RECEIVED
JUN 05 2015
DIVISION OF WATER QUALITY

ATTACHMENT E – NOTICE OF INTENT

ORDER WQ 2014-0174-DWQ
GENERAL PERMIT NO. CAG990002

STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR DISCHARGES FROM UTILITY VAULTS AND UNDERGROUND STRUCTURES TO WATERS OF THE UNITED STATES

I. NOTICE OF INTENT STATUS *(See Instructions)*

MARK ONLY ONE ITEM	1.☐ New Discharger 2.☒ Existing Discharger WDID# 5000000085 3.☐ Change of Information: WDID # _____ 4.☐ Change of ownership or responsibility: WDID# _____

II. OWNER/OPERATOR (If additional owners/operators are involved, provide the information in a supplemental page.)

A. Name AT&T Corp			Owner/Operator Type (Check One) 1.☐ City 2.☐ County 3.☐ State 4.☐ Gov. Combo 5.☒ Private
B. Mailing Address 308 S. Akard St.			
C. City Dallas	D. County Dallas	E. State TX	F. Zip Code 75202
G. Contact Person Chantel McMorris	H. Title Manager EH&S Environmental Svcs	I. Phone (214) 464-5685	
J. Email Address am295w@att.com			

☐ **Additional Owners** _____

III. BILLING ADDRESS (Enter information only if different from II. above)

Send to: ☐ **Owner/Operator** ☐ **Other**	A. Name	B. Title	
	C. Mailing Address		
D. City	E. County	F. State	G. Zip Code

IV. RECEIVING WATER INFORMATION

A. Attach a project map(s) that shows (1) the service area within the a specific Regional Water Board boundary and maps of(2) the corresponding major surface water(s) bodies and watersheds to which utility vault or underground structure water may be discharged. Map features must also include ASBS boundaries, MS4 discharge points to the ASBS, and major roadways.

B. Regional Water Quality Control Board(s) where discharge sites are located
List the Water Board Regions where discharge of wastewater is proposed, i.e. Region(s) 1, 2, 3, 4, 5, 6, 7, 8, or 9:

V. LAND DISPOSAL/RECLAMATION

The State Water Resources Control Board's water rights authority encourages the disposal of wastewater on land or re-use of wastewater where practical. You must evaluate and rule out this alternative prior to any discharge to surface water under this Order.

Is land disposal/reclamation feasible for all sites? ☐ **Yes** ☒ **No**

Is land disposal/reclamation applicable to a portion of the total number of sites? ☐ **Yes** ☒ **No**

If **Yes** to one or both questions, you should contact the Regional Water Board. This Order does not apply if there is no discharge to surface waters. If **No** to either or both questions, explain:

Majority of manholes are in the urban areas where discharge to land or re-use is not feasible.

VI. VERIFICATION

Have you contacted the appropriate Regional Water Board or verified in accordance with the appropriate Basin Plan that the proposed discharge will not violate prohibitions or orders of that Regional Water Board? ☒ **Yes** ☐ **No**

VII. TYPE OF UTILITY VAULT OR UNDERGROUND STRUCTURE (Check All That Apply)

☐ **Electric** ☐ **Natural Gas** ☒ **Telecommunications** ☐ **Other:** _____

VIII. POLLUTION PREVENTION PLAN CONTACT INFORMATION

Each Discharger is required to provide a copy of their PLAN with their completed NOI. The PLAN requirements are provided in Section VII.C.3 of the Order. In the space below, provide the contact information for the person responsible for the development of the PLAN.

A. Company Name AT&T Corp		B. Contact Person Chantel McMorris	
C. Street Address Where PLAN is Located 308 S. Akard St.		D. Title of Contact Person Manager EH&S Environmental Svcs	
E. City Dallas	F. County Dallas	G. State TX	H. Zip Code 75202
I. Phone (214) 464-5685	J. Email Address am295w@att.com		

IX. DESCRIPTION OF DISCHARGE(S)

Describe the discharge(s) proposed. List any potential pollutants in the discharge. Attach additional sheets if needed.

Discharge will be from vaults which pass the manhole bailer test and other requirements outlined in the PLAN. Water will be pumped to the street gutter. Water may contain minor amounts of total suspended and total dissolved solids and minor concentrations of petroleum hydrocarbons from road run-off.

X. REMINDERS

A. Have you included service territory/watershed map(s) with this submittal? ☒ Yes ☐ No
Separate maps must be submitted for each Regional Water Board where a proposed discharge will occur.

B. Have you included payment of the filing fee (for first-time enrollees only) with this submittal? ☐ Yes ☐ No ☒ N/A

C. Have you included your PLAN? ☒ Yes ☐ No

XI. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment."

A. Printed Name: Chantel McMorris

B. Signature: Chantel McMorris

C. Date: 5/20/15

D. Title: Manager, EH&S Environmental Services

PLEASE SUBMIT THE NOI, FIRST ANNUAL FEE, PLAN, AND MAP
TO THE FOLLOWING ADDRESS:

UTILITY VAULTS NOI
NPDES UNIT
DIVISION OF WATER QUALITY
STATE WATER RESOURCES CONTROL BOARD
P.O. BOX 100
SACRAMENTO, CA 95812-0100

STATE USE ONLY

WDID:	**Regional Board Office**	**Date NOI Received:**	**Date NOI Processed:**
Case Handler's Initial:	**Fee Amount Received:** $	**Check #:**	

AT&T CORP
POLLUTION PREVENTION PLAN
FOR
WATER DISCHARGES
FROM
UNDERGROUND STRUCTURES

Prepared for:
AT&T Environment, Health & Safety
308 South Akard Street
Dallas, TX 75202

April 14, 2015

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1.0 Introduction

1.1 Overview

The California State Water Resources Control Board (State Board) has authority under the Federal Clean Water Act of 1972, to issue statewide General National Pollutant Discharge Elimination System (NPDES) Permits to regulate the discharge of pollutants into United States waters.

For AT&T Corp. (AT&T), discharges are a routine activity of telecommunications network operations and maintenance. AT&T may occasionally remove water from manholes, utility vaults and other underground structures as a result of storm water inflow from the surface, subterranean seepage, and/or irrigation runoff.

To facilitate regulation of discharges from the de-watering of the utility vaults and similar underground structures, the State Board has developed a NPDES Permit for Discharges from Utility Vaults and Underground Structures to Surface Waters (General Permit CAG990002). The State Board allows utilities to apply for coverage under the General Permit with each Regional Water Quality Control Board (Regional Board) in which they have discharges to surface waters.

The Permit requires utilities to develop and implement a Pollution Prevention Plan (Plan) which includes Pollution Prevention Practices (PPP) designed to prevent or control the discharge of pollutants. The General Permit also requires utilities to develop and implement an annual monitoring program to analyze discharges from a representative number of utility vaults and to submit this report to the appropriate Regional Board.

This Plan explains AT&T's operational procedures for discharging water from manholes, utility vaults and other underground structures to comply with water quality standards and the provisions of the General Permit.

1.2 Purpose of the Plan

This Plan has been prepared in accordance with the NPDES Permit for Discharges by Utility Companies to Surface Waters (NPDES No. CAG990002 and Order No. 2014-0174-DWQ) and applies to short-term intermittent discharges to surface waters by AT&T. The purpose of this Plan is to describe:

- The type and duration of discharges that occur;
- The operating procedures of PPP developed to insure that pollutant concentrations in the discharge do not violate water quality objectives for the receiving waters, including prohibitions to discharge; and
- The commitment of AT&T to continued evaluation of measures to reduce pollutants in discharges and to prevent, to the extent practicable, cross-media pollution.

1.3 Updating of the Plan

AT&T must amend the Plan whenever there is a change in construction, operation, or maintenance, or to ensure compliance with water quality standards. In addition, the Plan must be amended if it violates any condition of the Permit or has not achieved the general objective of controlling pollutants in discharges to surface waters.

1.4 Pollution Prevention Team

The Pollution Prevention Team (PPT) is headed by AT&T Environment, Health & Safety Manager Mr. Jay Maille and includes all AT&T service technicians working with underground structures. Members of the PPT are responsible for developing the Plan and assisting in its implementation, compliance, and revision. AT&T field technicians are trained by other PPT members in the policies and produces of this Plan. Before working in underground structures, field technicians are properly trained to understand the importance of maintaining overall environmental stewardship of their workplace. The team also consists of the following members:

Name	Title	Responsibilities	Contact Information

1.5 Employee Training

The training of AT&T service technicians in the PPP for any required servicing of the manhole is one of the most effective ways of preventing pollutants in discharged water. Before working on underground structures, AT&T service technicians are properly trained to understand the importance of maintaining high-quality water in the State of California and to comply with the NPDES Permit and the PPP.

AT&T will ensure that all employees involved with procedures of the General Permit are trained in all aspects of the permit. Training will occur on an annual basis and within 30 days of hire for new employees. Training will be conducted by a member of the PPT. The areas of training will include:

- Evaluation of discharge water within the vaults and underground structures
- Good housekeeping practices
- Preventative Maintenance
- Runoff controls
- Spill prevention and response
- Recordkeeping

Records of employee training within each Regional Water Board will be maintained electronically and available for inspection by SWRCB and Regional Water Board Personnel.

2.0 Types of Discharges and Potential Pollutant Sources

AT&T discharges covered by this Plan all originate as water accumulated in underground structures. These discharges can be divided into two types, manual or automatic, according to how the water is discharged. The following describes the two types of discharges, as well as potential pollutant sources associated with each type of discharge. Essential features of the drainage systems in each of the nine Regional Water Quality Boards are depicted in Figures 1 through 9.

2.1 Manual Discharges

Manual discharges originate in potentially wet structures including manholes, vaults, and similar underground structures that contain signal repeating equipment, communication cables, cable connections and/or other telecommunication equipment. These spaces are subject to intrusion of infiltrated groundwater and surface runoff from above, as well as potentially from leaks in other underground utility service lines (e.g., storm drains and sanitary drain lines).

Normal company operations in a wet underground structure do not directly contribute to the generation of contaminants in water. Since these structures are not constructed to be water tight, occasionally foreign liquids are collected in the structure typically as result of rising of water tables, surface runoff and/or broken public sewage piping. Water that is trapped in the wet structure may have occasional traces of sewage, oil, grease, petroleum, organic matter, mud, silt, pesticides, and other pollutants (potentially metals) in small amounts resulting from surface runoff or auto exhaust.

2.2 Automatic Discharges

Automatic discharges occur from dry structures referred to as controlled environmental vaults (CEVs). These structures typically contain switchgear, computers and electronics which are sensitive to heat and moisture.

Unlike wet structures, the construction of CEVs is designed to preclude water intrusion. The vaults are equipped with air conditioners to control equipment temperature and humidity. In addition, CEVs located below ground have automatic sump pumps. Air conditioning water condensate that accumulates in the sump is automatically discharged when a pre-set level is reached. The condensate water discharged never comes in contact with any of the equipment inside the CEVs. Water discharged from dry structures is in smaller quantities than discharges from wet structures.

Heat and moisture alarms are remotely monitored at AT&T's Network Operating Centers (NOCs). In the event of an alarm, a technician is dispatched to investigate and perform any necessary repairs.

3.0 Discharge Schedule

3.1 Unscheduled Discharges

Unscheduled manual and automatic discharges can be controlled utilizing the methods described under Sections 4.3 and 4.5 of this Plan.

The majority of manual water discharges from wet structures are unscheduled because the water that has accumulated in the underground structure remains there until field technicians enter to do repair or maintenance work. Before work can proceed the field technicians must remove the water. Because of the critical nature of telecommunications network, service needs to be restored promptly.

Prior to discharging manhole water, field technicians must use on-site water testing procedures to determine if the water can be discharged. Only water that has passed the on-site water testing will be discharged. Procedural controls to test and observe the water will be completed prior to and during dewatering activities.

The quantity of water discharged is dependent on the size of the structure and the depth of the water collected in the structure. Typically, manhole water discharge events range from 20 gallons to 2,000 gallons. The discharge is a short term event, lasting approximately 30-90 minutes. Unscheduled discharges from dry structures (CEVs) are smaller in volume than wet structure discharges. Dry structure discharges are intermittent and result from minor groundwater infiltration, landscaping and air conditioning condensate.

The water from dry and wet structures is discharged to an area where it may flow to a storm drain system or catch basin. It is possible that the discharge will reach a natural conveyance or water body.

3.2 Scheduled and Reservoir Discharges

AT&T does not practice scheduled discharges. However, such discharges would be controlled utilizing the same methods described under Sections 4.3 and 4.5 of this Plan.

3.3 Emergency Discharges

Emergency discharges from wet or dry structures can be controlled by the same methods described under Sections 4.3 and 4.5 of this Plan.

In emergency situations involving an imminent threat to human life, serious property damage and/or in cases of natural disaster or catastrophic events, field supervisors have the authority to take whatever action is necessary to mitigate the immediate threat including discharge of untested water.

3.4 Spills and Leaks

During the years prior to the new permit and revision of the Plan, there were no spills or leaks of hazardous pollutants from an underground structure or during the decontamination / dewatering of an underground structure maintained by AT&T.

AT&T field technicians are properly trained and equipped with materials needed to immediately deal with a spill or leak of hazardous pollutants. If the leak or spill is of significant size, AT&T would engage one of our emergency response vendors.

AT&T field technicians must call their supervisor and/or the EHS Hotline at (800) 566-9347 to report a spill or leak of hazardous pollutants. Additionally, spills shall be reported to the appropriate local agency, such as the fire department, to assist in cleanup at their discretion. A spill containing oil of reportable quantity must be reported to the National Response Center at (800) 424-8802 within 24 hours.

The Plan will be updated to include a record of any spills or leaks of hazardous pollutants.

4.0 Pollution Prevention Practices (PPP)

4.1 Overview

The operating procedures used for on-site testing of water in underground structures must be simple and concise to permit workers to quickly determine if the water can be pumped from the structure so work can resume. The critical nature of telephone communication emergencies requires field technicians to work within tight deadlines. Screening procedures must be compatible with these business needs.

The field technicians are instructed to contact their supervisor and/or EHS organization for immediate assistance when water fails screening. Depending on the nature of the issue, there are several prearranged licensed contractors available to handle the situation as appropriate. Only water that has passed the screening will be discharged.

It is the responsibility of the field technician to ensure strict adherence to these procedures. This will aid in AT&T's compliance with the provisions of the General Permit.

4.2 When to Apply

The PPP is to be used for the short-term, intermittent discharge of water from manholes, vaults, and other underground structures which must be drained to allow for repair and maintenance work to proceed. Structures will be dewatered only to the point required to allow for safe access to equipment.

Also, the PPP addresses the control of pollutants discharged from automatically pumped sumps in vaults and other sub surface structures that are to be kept free of moisture and water.

4.3 Procedures of Water Discharge from Wet Structures

This section describes the method for the testing of water prior to discharging the water from a manhole. The purpose of these procedures is to assist the field technician in identifying the quality of the water to be pumped from the underground structure, as well as in identification of any material that may disallow such discharge of the water.

The *manhole water test bailer kit* is designed to allow the field technician to obtain samples and assess the quality of the water in a structure. All observations using the manhole water bailer test kit must be performed outside the manhole.

Testing procedures discussed in this Plan are graphically summarized in the "Utility Manhole & Vault De-Watering Decision Guide". These flowcharts (Appendix A) are a companion document to this Plan and should be read in conjunction to reading this text.

Section II (E) of the General Permit requires Utilities to comply with specific MS4 notification requirements. AT&T in commitment to these MS4 notification requirements and will advise MS4s of potential discharges and the screening procedures outlined in this Plan. On a case-by-case basis, AT&T Environmental Managers will advise AT&T field supervisors on specific MS4 jurisdictional discharge requirements.

4.3.1 Testing Procedures

Prior to beginning work operations in a vault or manhole, the field technician must use applicable worksite procedures to assure the general work area is safe, clearly marked, and that all appropriate personal safety equipment is employed. In addition, established procedures must be followed to assure the confined-space atmosphere is tested prior to entry to perform any work. After this is completed, the following procedures detail the steps that are taken to ensure compliance with the General Permit.

1. Lower the clean water bailer into the deepest part of the manhole to obtain a sample. Slowly raise the water bailer to keep from agitating or spilling any sample.

2. Bring the filled bailer out of the manhole for inspection. Observe the appearance and smell of the water in the bailer. Look carefully for any layered separations of the sample. *A distinct bottom layer may be indicative of dry cleaning fluids or other solvents*. After observational analysis, return the sample to the manhole and refer to Flow Chart #1 to determine the course of action to be taken.

3. Lower the bailer again into the manhole and obtain a surface sample. Slowly raise the water bailer to keep from agitating or spilling any contents. *A distinct top layer may indicate gasoline, oil, or other lighter than water solvents, or possible other organic materials.* After observational analysis, test and verify that the water is within the pH range of 6.0 – 9.0 s.u. then return the sample to the manhole and refer to Flow Chart #1 to determine the course of action.

4. If the manhole water is clear, but has a strong chemical odor, a company approved contractor must be used to evacuate the manhole or vault.

5. If the manhole water has free-phase floating hydrocarbon or chemical solvent in any amount greater than a slight surface sheen, the company approved contractor must be used to evacuate the manhole or vault.

6. If the manhole water is clear after the previous tests, with no odors, layers, or solids, and the pH is tested and verified to be between 6.0 – 9.0 s.u., the water may be safely discharged. Pumping should be performed from the top down to minimize the disturbance of any accumulated sediments at the bottom of the structure. Every effort should be made to keep the pump inlet nozzle greater than 3 inches above any sediment at the bottom of the structure. Whenever possible the water shall be discharged directly to a storm sewer or catch basin, rather than into the street or along the curb. Try to minimize the path of travel to the proper discharge point. Do not pump the manhole water directly into any stream, pond, wetland, swamp or beach.

7. If the manhole sample is not clear (transparent) and is instead cloudy, milky and/or dark in color, the sample should be set aside for five minutes to allow settling of any particulate matter to occur. Refer to Flow Chart #1B and to Section 4.3.2 of this Plan. If the sample remains cloudy or opaque after five minutes, a company approved contractor must be used to evacuate the manhole or vault.

8. The field technician will log observations and test results in a company provided field log.

4.3.2 Engineering Controls

These additional engineering controls shall be applied as follows:

1. <u>Slight Surface Sheen or Floating Solids Present</u> – If a slight surface sheen or any floating solids are encountered in a manhole (See Flow Chart #1A), remove any floating solids using a scoop or net and apply an absorbent pillow to the water surface to remove any sheen, if necessary. After completing solids and sheen removal, and if pH is tested and verified between the range of 6.0 – 9.0 s.u., discharge is allowed but pumping should be performed from the top down to minimize the disturbance of any accumulated sediments at the bottom of the structure. Every effort should be made to keep the pump inlet nozzle greater than 3 inches above any sediment at the bottom of the structure. Whenever possible the water shall be discharged directly to a storm sewer or catch basin, rather than into the street or along the curb. Try to minimize the path of travel to the proper discharge point. Do not pump the manhole water directly into any stream, pond, wetland, swamp or beach. The manhole effluent will be limited to the minimum amount required to access the structure and equipment safely.

2. Bottom Layer Present – Mud and/or Organic Debris - If a bottom layer is encountered and identified as mud or sediments by using Flow Chart #1A, and if pH is tested and verified between the range of 6.0 – 9.0 s.u., discharge is allowed but pumping should be performed from the top down to minimize the disturbance of any accumulated sediments at the bottom of the structure. Every effort should be made to keep the pump inlet nozzle greater than 3 inches above any sediment at the bottom of the structure. Whenever possible the water shall be discharged directly to a storm sewer or catch basin, rather than into the street or along the curb. Try to minimize the path of travel to the proper discharge point. Do not pump the manhole water directly into any stream, pond, wetland, swamp or beach. The manhole effluent will be limited to the minimum amount required to access the structure and equipment safely.

3. Initially Cloudy Water – Water Becomes Clear with Time – If the bailer sample is not clear and appears cloudy, milky and/or dark in color, the sample should be set aside for five minutes to allow settling of any particulate matter to occur (Refer to Flow Chart #1B). If the particulate matter settles and the sample clears, and after a pH test verifies a range within 6.0 – 9.0 s.u., discharge is allowed but pumping should be performed from the top down to minimize the disturbance of any accumulated sediments at the bottom of the structure. Every effort should be made to keep the pump inlet nozzle greater than 3 inches above any sediment at the bottom of the structure. Whenever possible the water shall be discharged directly to a storm sewer or catch basin, rather than into the street or along the curb. Try to minimize the path of travel to the proper discharge point. Do not pump the manhole water directly into any stream, pond, wetland, swamp or beach. The manhole effluent will be limited to the minimum amount required to access the structure and equipment safely.

4. Periodically the field technician shall inspect the effluent during discharge to ensure the quality of the water being released remains consistent with the sampling observations. If at any time the discharge water quality changes, immediately stop pumping and re-evaluate by testing again.

5. The field technician will log observations and test results in a company provided field log.

4.4 Manhole Water Disposal

4.4.1 Water Passes the Testing Procedures

After passing all aspects of the screening process, the water may be discharged. Whenever possible, the water should be pumped to a storm drain system or catch basin. AT&T field technicians shall never discharge directly into a stream, pond, wetland, swamp, or beach. Engineering controls may be required prior to and/or during dewatering activities. Refer to Flow Chart #1A, Flow Chart #1B, and Section 4.3.2.

4.4.2 Water Fails the Testing Procedures

If manhole water is determined to be of a quality that cannot be discharged (e.g., oily sludge, gasoline or other hydrocarbons greater than a simple sheen, milky or cloudy liquid, strong chemical odor, etc.) a company approved contractor must be obtained to evacuate the structure and to clean it prior to entry and commencing work. In these cases, notify your Supervisor and contact EHS at 800 KNOW EHS (800.566.9347) to obtain a qualified contractor.

If raw sewage is determined to be the material or waste in the manhole, a local septic tank pumping and cleaning company may be used to evacuate and clean the manhole. If the source of sewage is found to be a break in a local sanitary waste line, inform your Supervisor and Environmental Management for reporting to the local agency for repair.

4.5 Procedures of Water Discharge from Dry Vaults and Structures

These procedures apply to any underground structure with an automatic or manually activated sump pump that discharges water to storm drains or surfaces.

To prevent pollution in discharges from dry structures (CEVs and structures), it is essential that the structures are kept clean and that inspections are made. The following are guidelines for maintaining CEVs and other dry structures:

- Do not dispose of any material (e.g., oil, trash, etc.) except condensate water in the sump.
- Keep the vault clean by removing any trash or debris.
- Do not store any chemicals in the vault.
- Immediately clean up any substances spilled on the vault floor to prevent sump contamination.
- Inspect the sump area for debris or signs of staining.

4.6 Inspections and Maintenance Activities

When working on underground structures, AT&T field technicians must inspect integrity of the structure to assure that it is functioning properly. Inspection records include the date and time the inspection was performed, the name of the inspector, the items inspected, and any corrective action required.

4.7 Sediment and Erosion Control

Pumping should be performed from the top to the bottom to minimize disturbance of sediments. Every effort should be made to keep the pump inlet nozzle greater than three inches above the surface of any sediment that might have collected in the manhole. The manhole effluent will be limited to the minimum amount required to safely access the manhole equipment. The manhole should not be completely dewatered.

If sediment must be removed from the manhole, the sediment will be assumed to be hazardous. The AT&T field technician will contact his or her supervisor and/or the EHS staff who will assist in the proper classification of the material and coordinate appropriate transportation and disposal.

When discharging water from underground structures to a storm drain system or catch basin, AT&T field technicians should always make certain that the area is clean. Trash and debris in the vicinity shall be picked up and properly disposed of. If any sediment exists around the storm drains, AT&T field technicians shall sweep the area to ensure that excessive sediment does not enter the storm drain system.

If there is no storm drain in close proximately, AT&T service technicians may discharge water from underground structures to the surrounding area. If discharging to unpaved surfaces with significant slopes, fiber rolls or other appropriate devices will be used to minimize erosion.

4.8 Vector Control

Stagnant water is an attractant for mosquitoes whose larvae develop in such conditions. Water that has been allowed to stand can serve as a vector to breeding mosquitoes. Water that has been allowed to stand for as little as four days can be attractive to mosquitoes. AT&T undertakes efforts to ensure their underground structures remain water tight and openings to the outside environmental are plugged. AT&T does not use chemical additives to control mosquitoes.

4.9 Comprehensive Site Compliance Evaluation

A comprehensive site compliance evaluation (CSCE) will be conducted by AT&T service technicians upon each discharge event. The CSCE will include the scope of the evaluation, the personnel making the evaluation, the date(s) of the evaluation, major observations relating the implementation of the Plan, actions taken to revise the Plan, and incidents of noncompliance or a certification of compliance the Plan and the NPDES Permit. The CSCE shall be signed in accordance with the signatory requirements of the NPDES Permit and retained for 3 years by AT&T Environment, Health & Safety Management headquarters.

5.0 Certification and Signature

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By: Chantel McMorris

Title: EH&S Water Manager

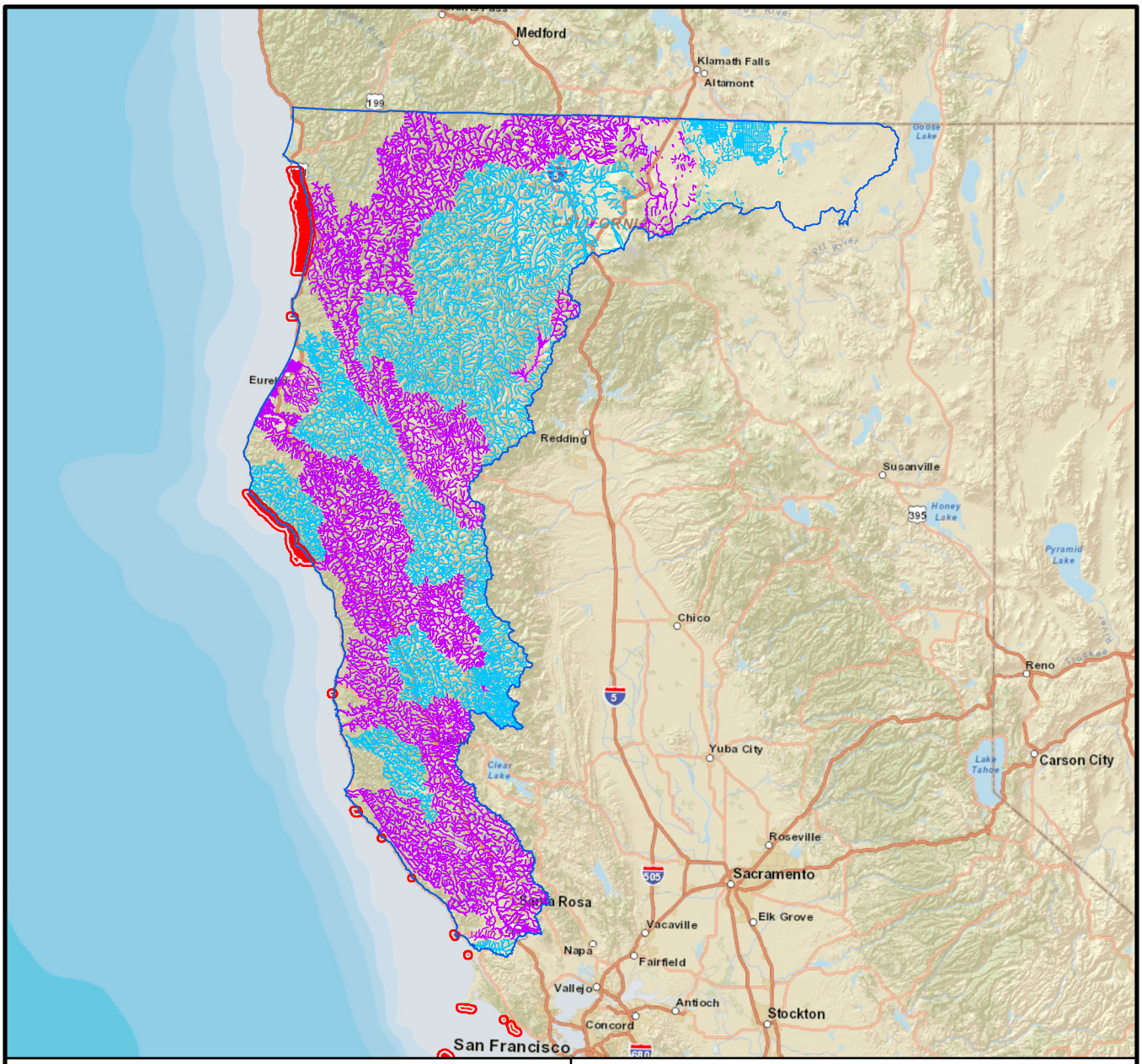
Date: 6-1-15

6.0 Contact Information

Plan kept at address: 308 South Akard Street
Dallas, Texas 75202

Primary Contact Name: Chantel McMorris
Primary Contact Phone: (214) 464-5685

FIGURES



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

1 in = 200 miles

0 50 100 Miles

Figure Group 1a. North Coast Region 1 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

1 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

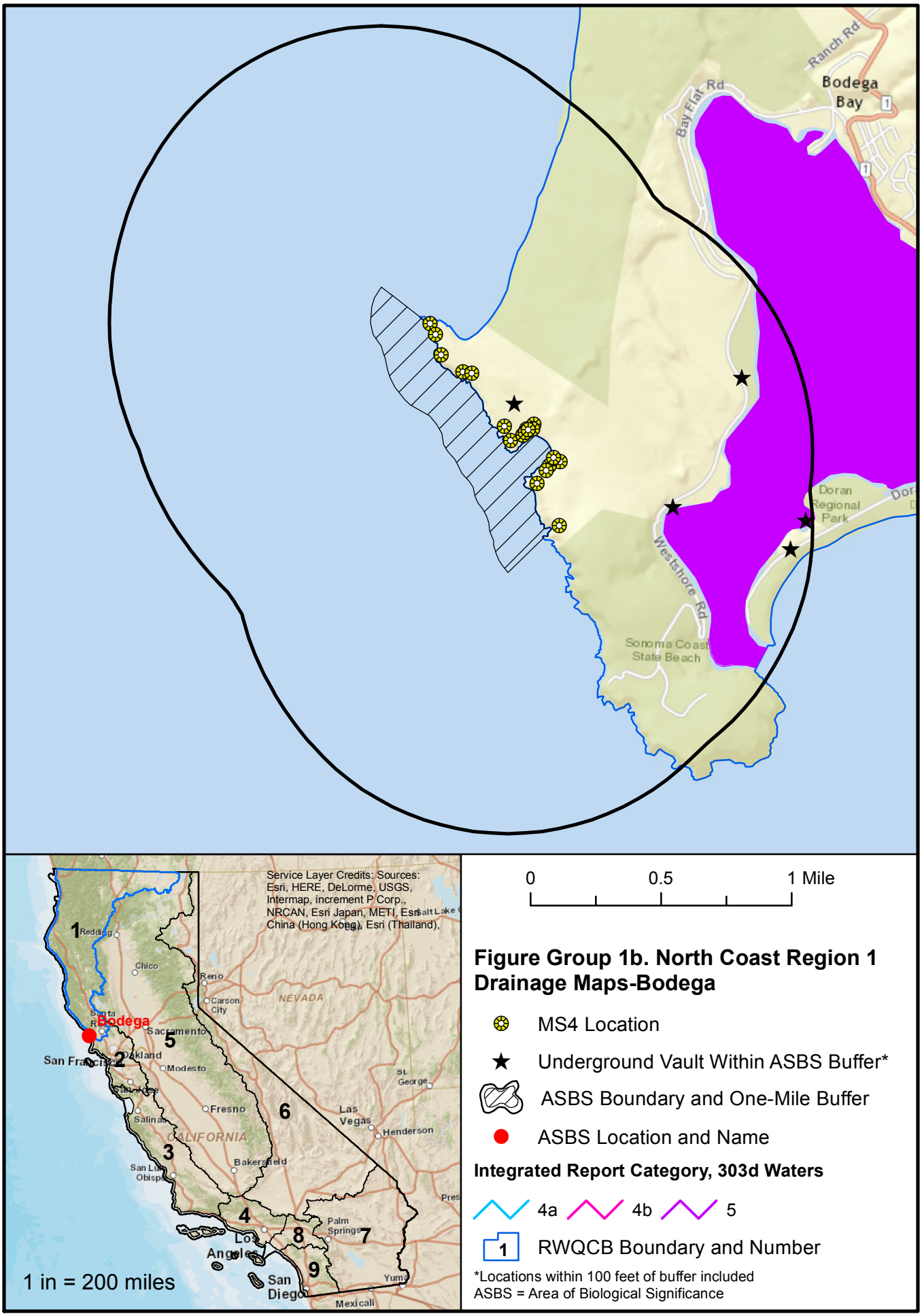


Figure Group 1b. North Coast Region 1 Drainage Maps-Bodega

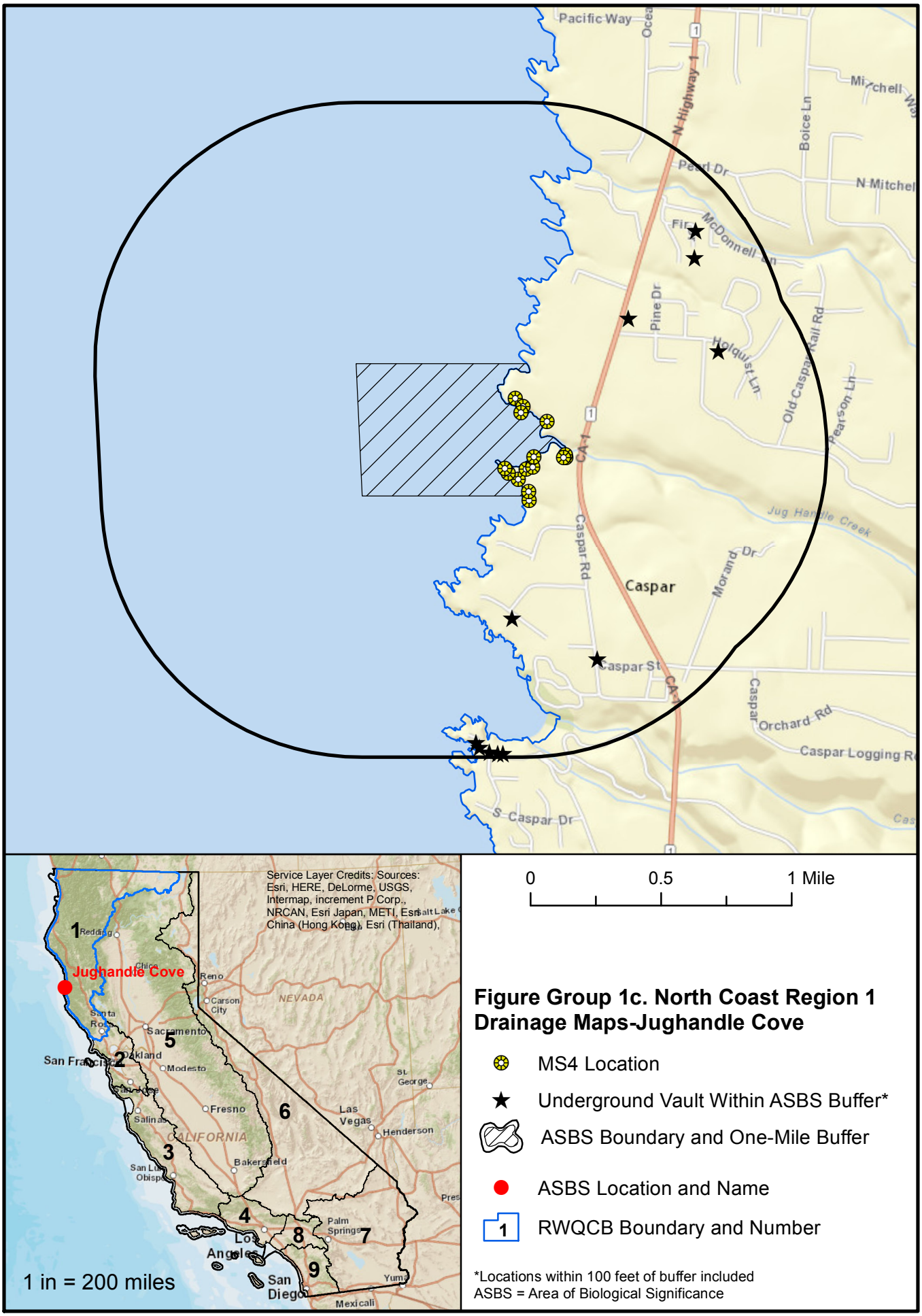


Figure Group 1c. North Coast Region 1 Drainage Maps-Jughandle Cove

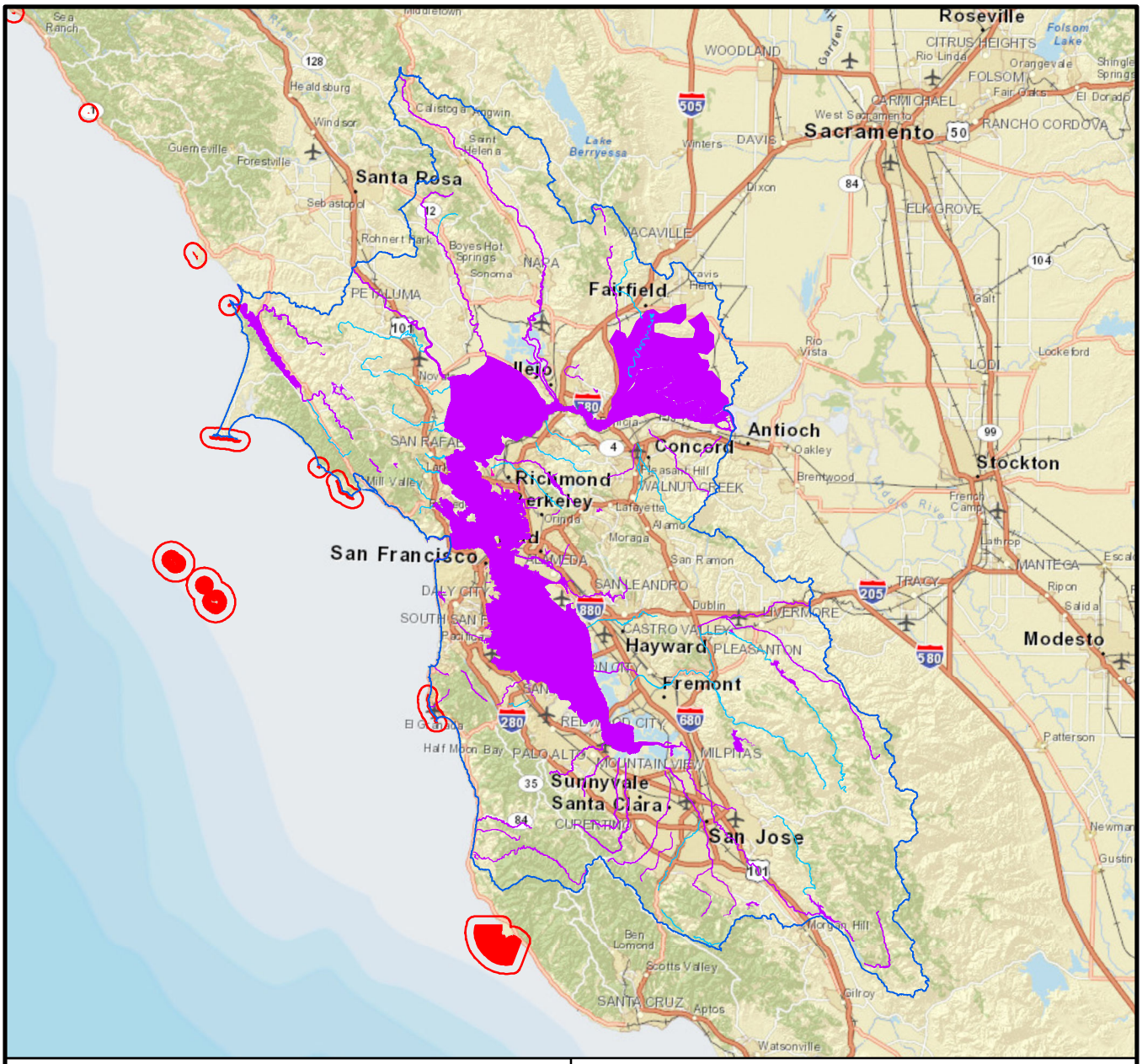
- MS4 Location
- Underground Vault Within ASBS Buffer*
- ASBS Boundary and One-Mile Buffer
- ASBS Location and Name
- RWQCB Boundary and Number

*Locations within 100 feet of buffer included
ASBS = Area of Biological Significance

Figure Group 1d. North Coast Region 1 Drainage Maps-Trinidad Head

- MS4 Location
- Underground Vault Within ASBS Buffer*
- ASBS Boundary and One-Mile Buffer
- ASBS Location and Name
- RWQCB Boundary and Number

*Locations within 100 feet of buffer included
ASBS = Area of Biological Significance



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

1 in = 200 miles

0 20 40 Miles

Figure Group 2a. San Francisco Bay Region 2 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

2 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

Figure Group 2b. San Francisco Bay Region 2 Drainage Maps-Duxbury Reef

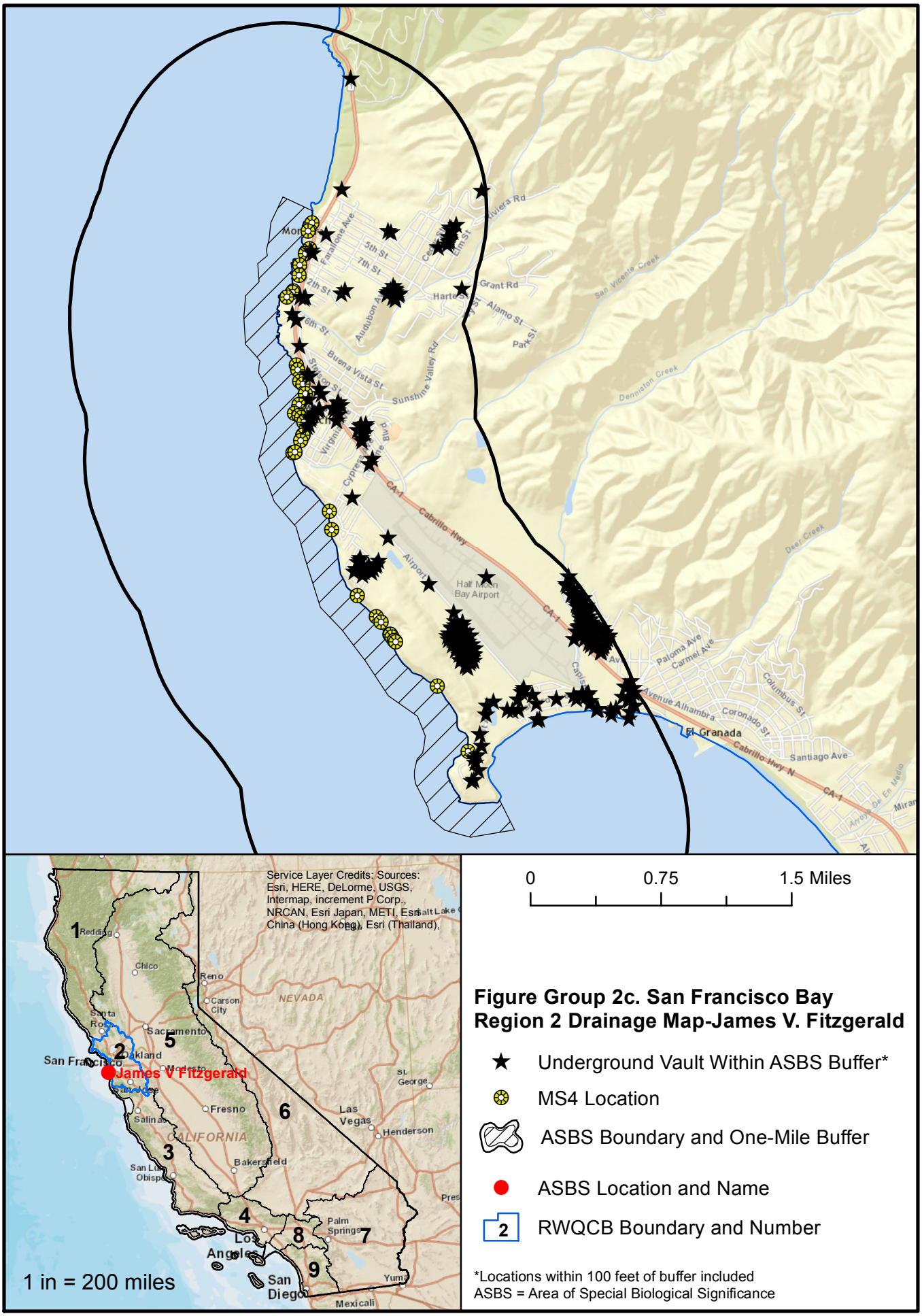


Figure Group 2c. San Francisco Bay Region 2 Drainage Map-James V. Fitzgerald

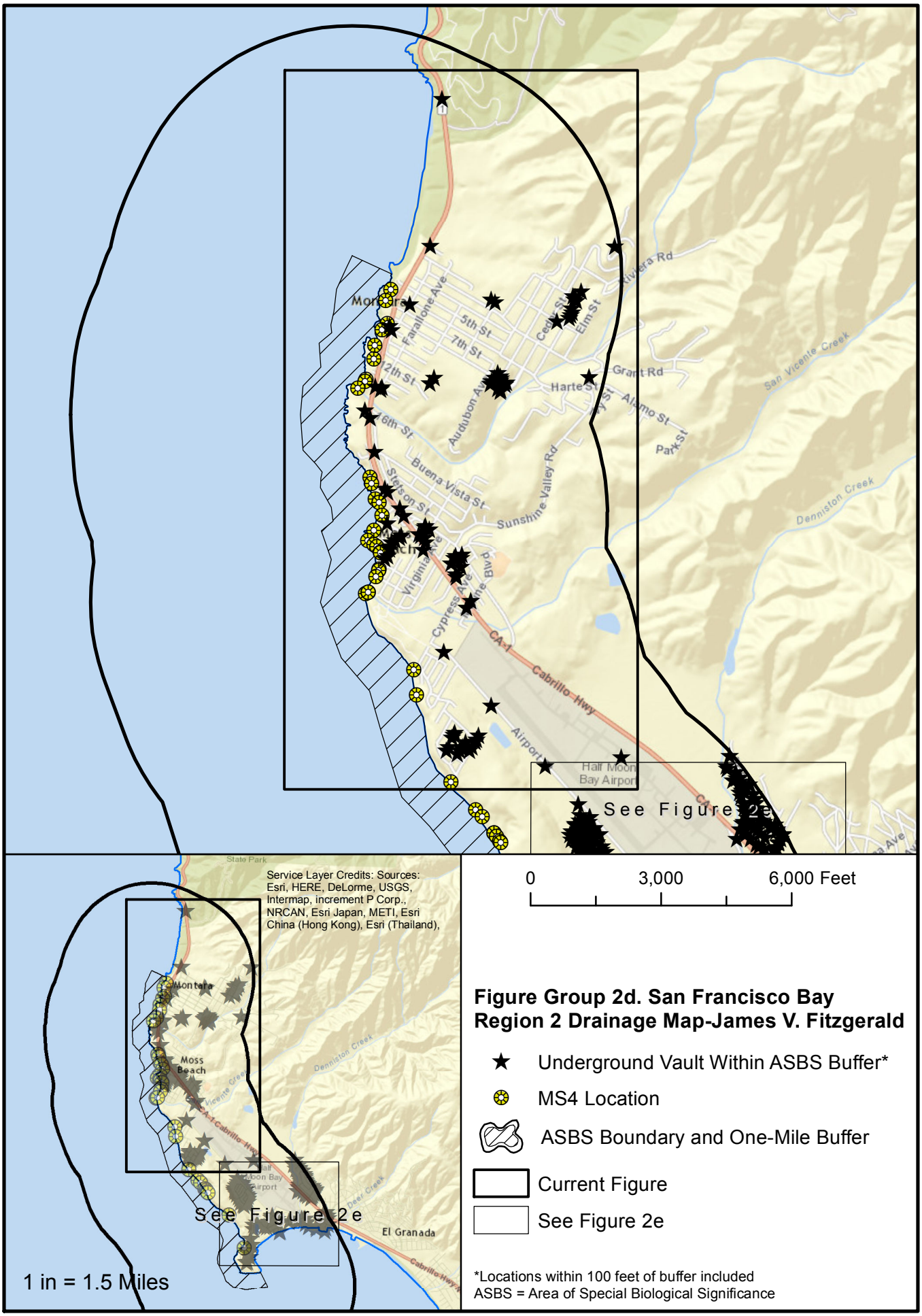


Figure Group 2d. San Francisco Bay Region 2 Drainage Map-James V. Fitzgerald

★ Underground Vault Within ASBS Buffer*

MS4 Location

ASBS Boundary and One-Mile Buffer

Current Figure

See Figure 2e

*Locations within 100 feet of buffer included
ASBS = Area of Special Biological Significance

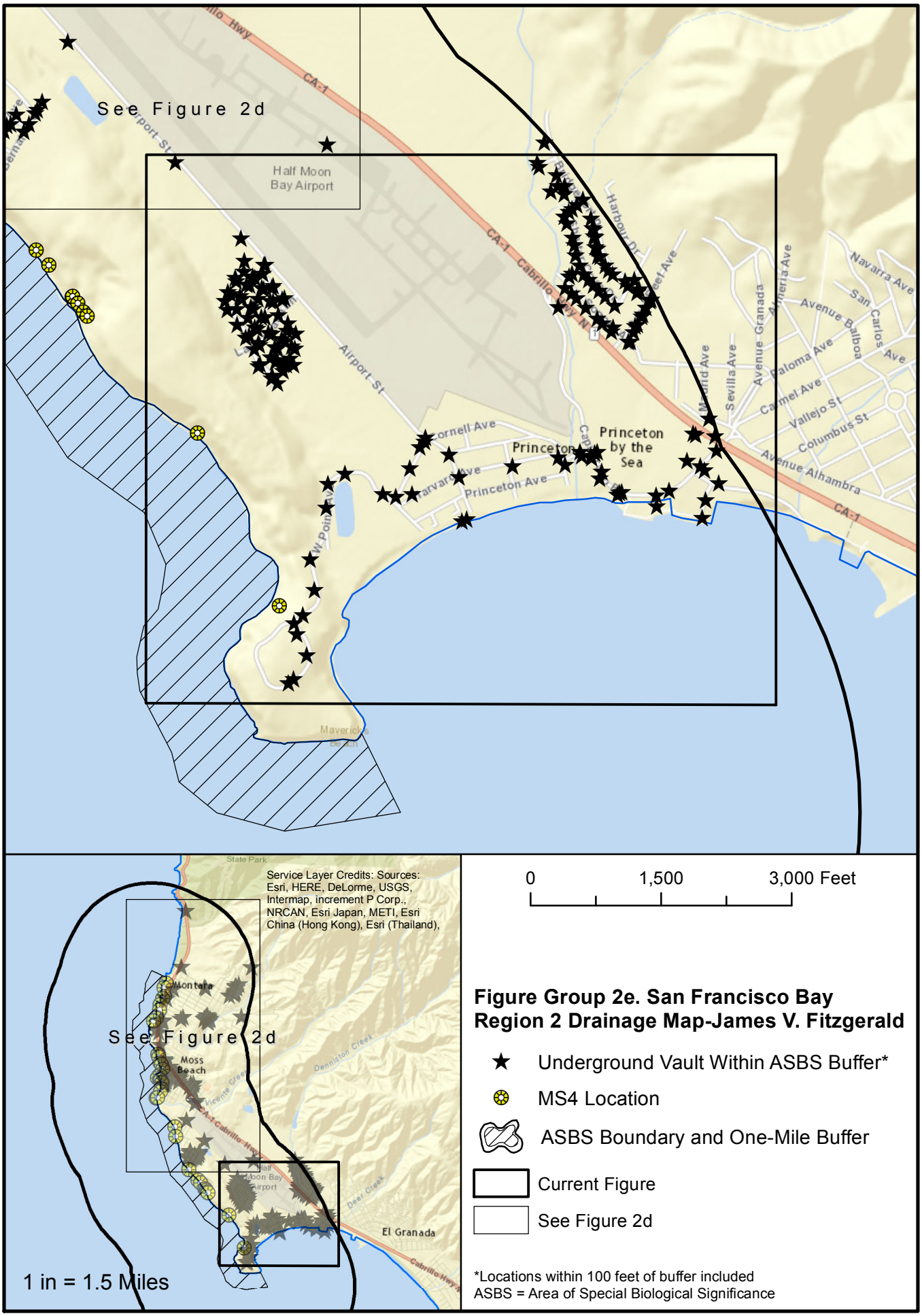
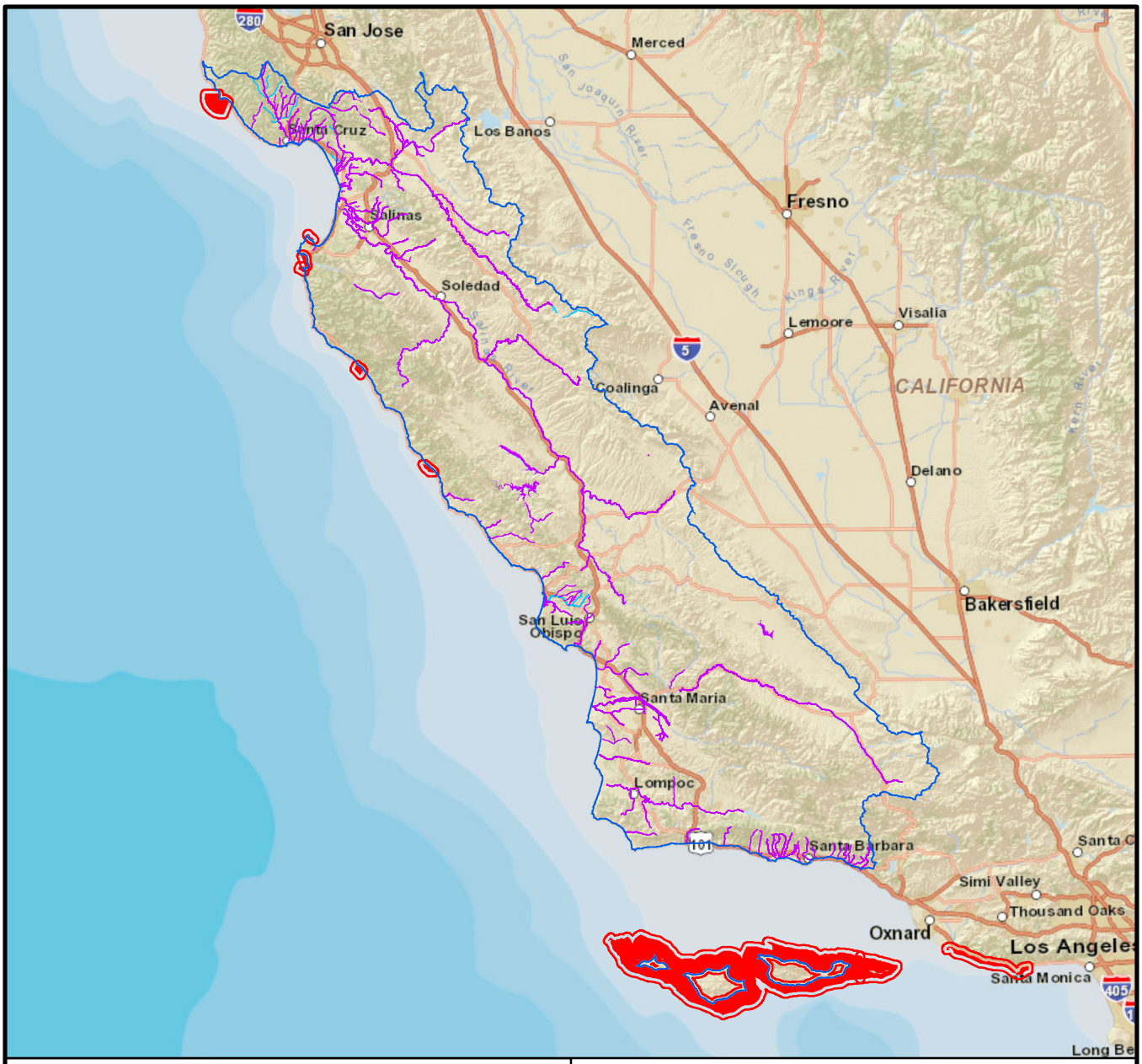


Figure Group 2e. San Francisco Bay Region 2 Drainage Map-James V. Fitzgerald

Figure Group 2f. San Francisco Bay Region 2 Drainage Maps-Point Reyes



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

1 in = 200 miles

0 40 80 Miles

Figure Group 3a. Central Coast Region 3 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

3 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

Figure Group 3b. Central Coast Region 3 Drainage Maps-Ano Nuevo

- MS4 Location
- Underground Vault Within ASBS Buffer*
- ASBS Boundary and One-Mile Buffer
- ASBS Location and Name
- 3 RWQCB Boundary and Number

*Locations within 100 feet of buffer included
ASBS = Area of Biological Significance

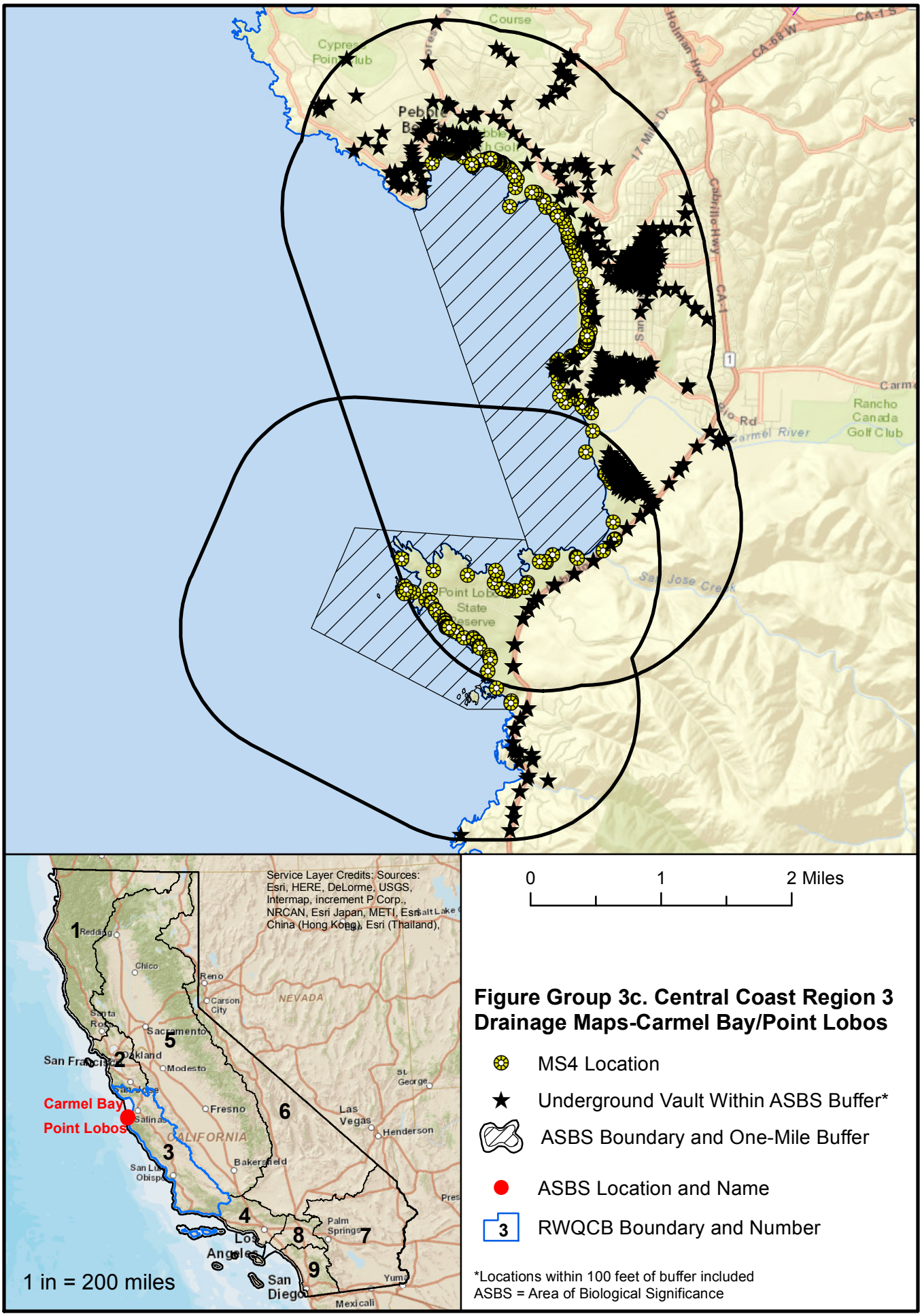


Figure Group 3c. Central Coast Region 3 Drainage Maps-Carmel Bay/Point Lobos

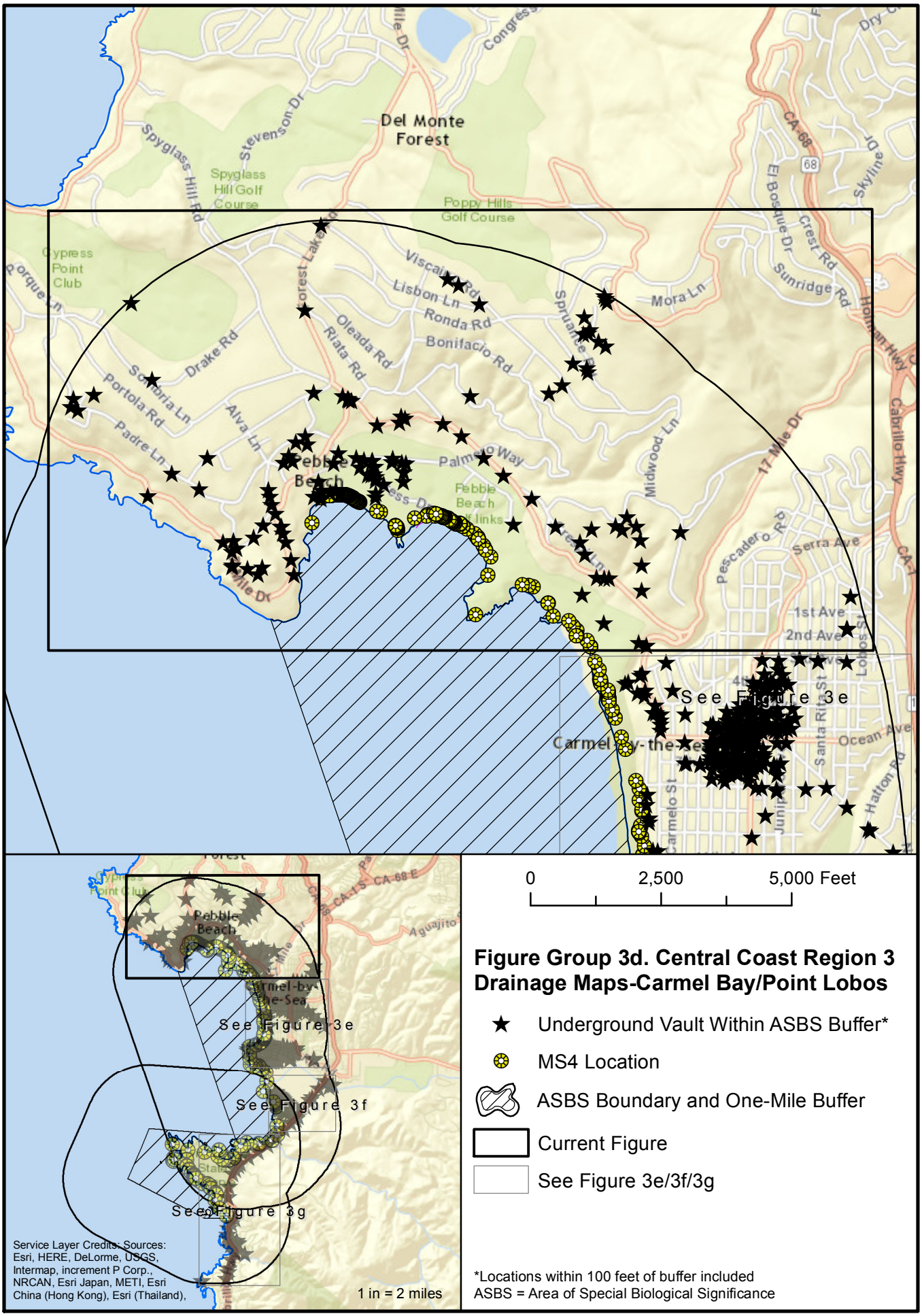


Figure Group 3d. Central Coast Region 3 Drainage Maps-Carmel Bay/Point Lobos

★ Underground Vault Within ASBS Buffer*

MS4 Location

ASBS Boundary and One-Mile Buffer

Current Figure

See Figure 3e/3f/3g

*Locations within 100 feet of buffer included
ASBS = Area of Special Biological Significance

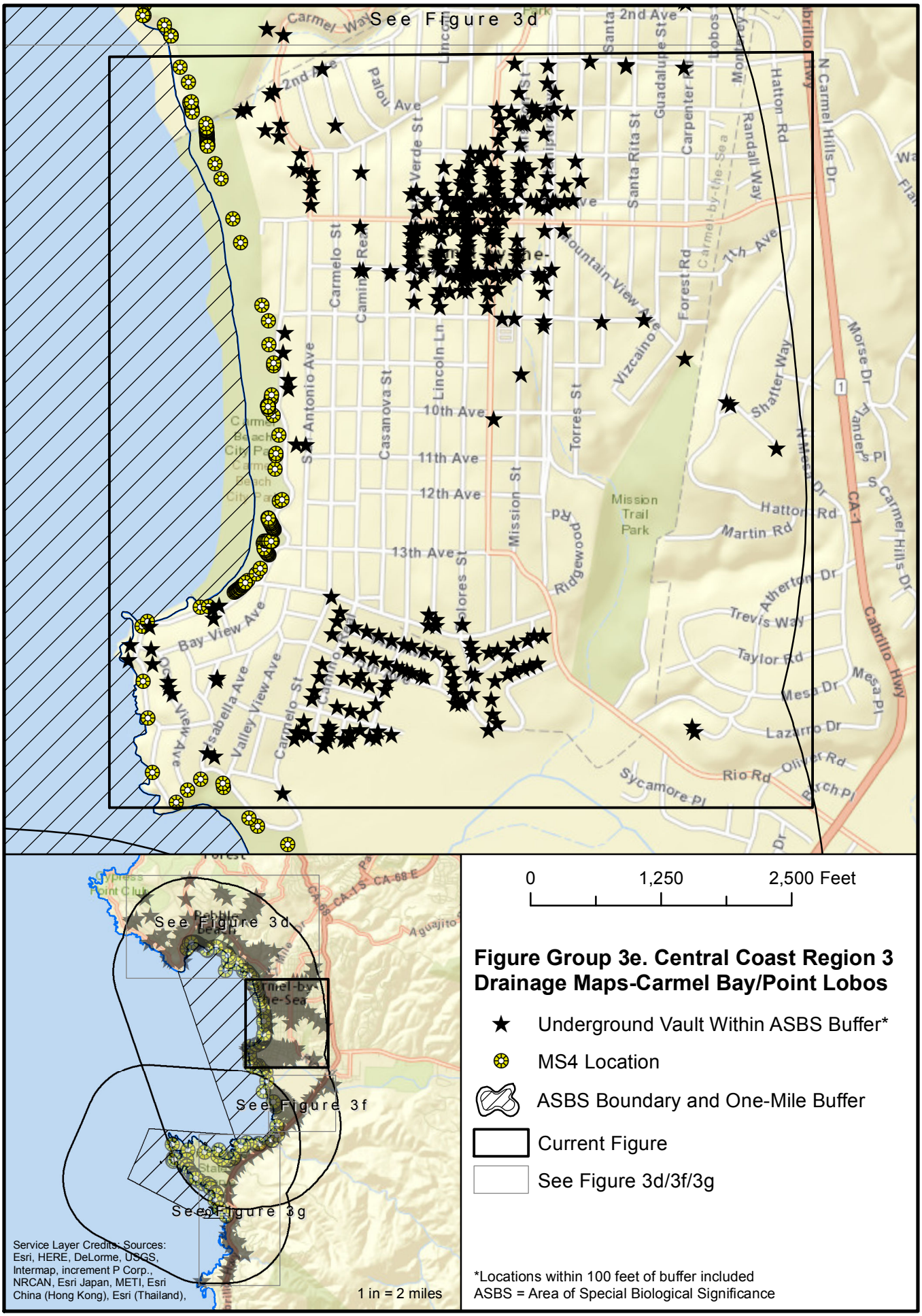


Figure Group 3e. Central Coast Region 3 Drainage Maps-Carmel Bay/Point Lobos

★ Underground Vault Within ASBS Buffer*

MS4 Location

ASBS Boundary and One-Mile Buffer

Current Figure

See Figure 3d/3f/3g

*Locations within 100 feet of buffer included
ASBS = Area of Special Biological Significance

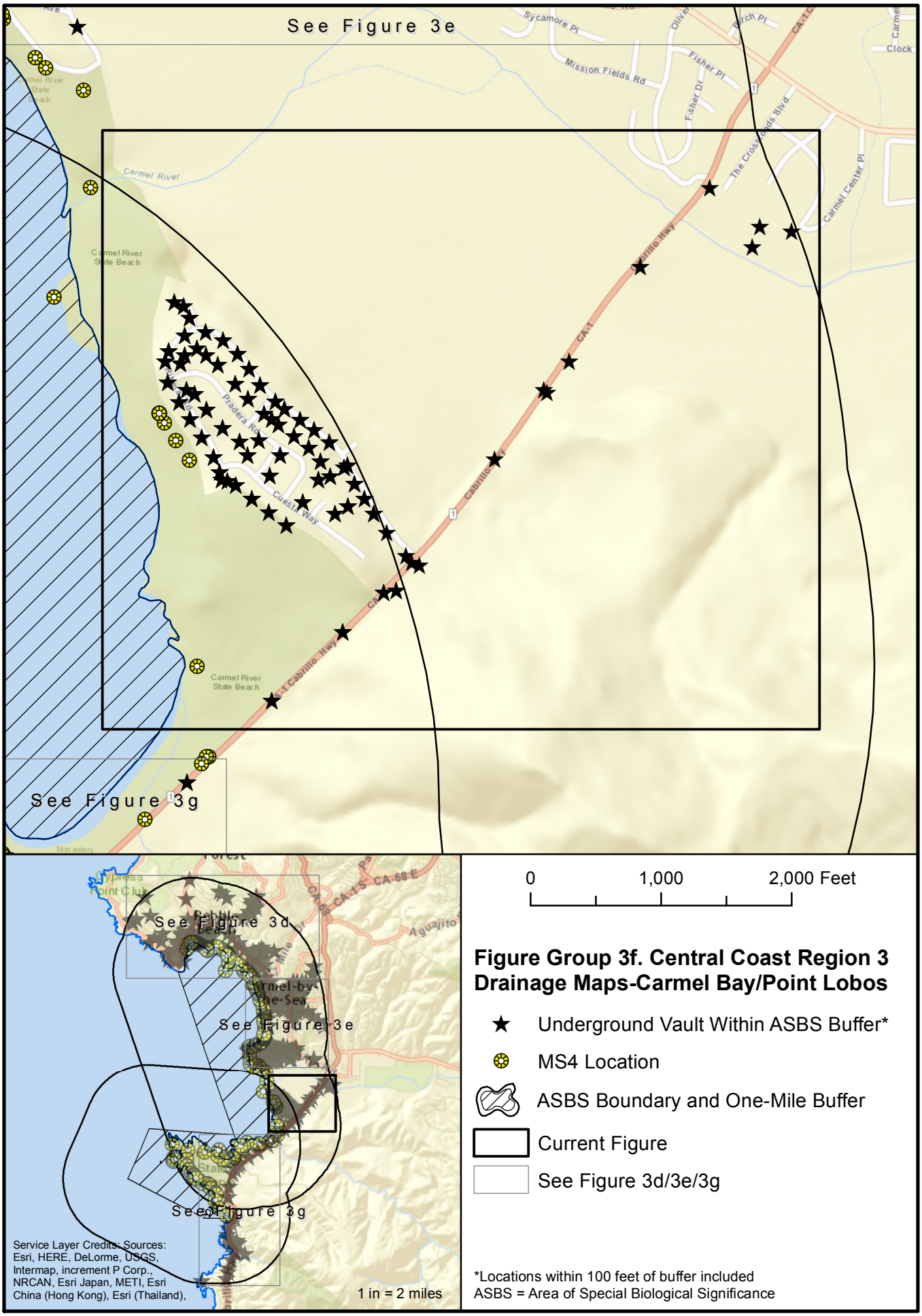


Figure Group 3f. Central Coast Region 3 Drainage Maps-Carmel Bay/Point Lobos

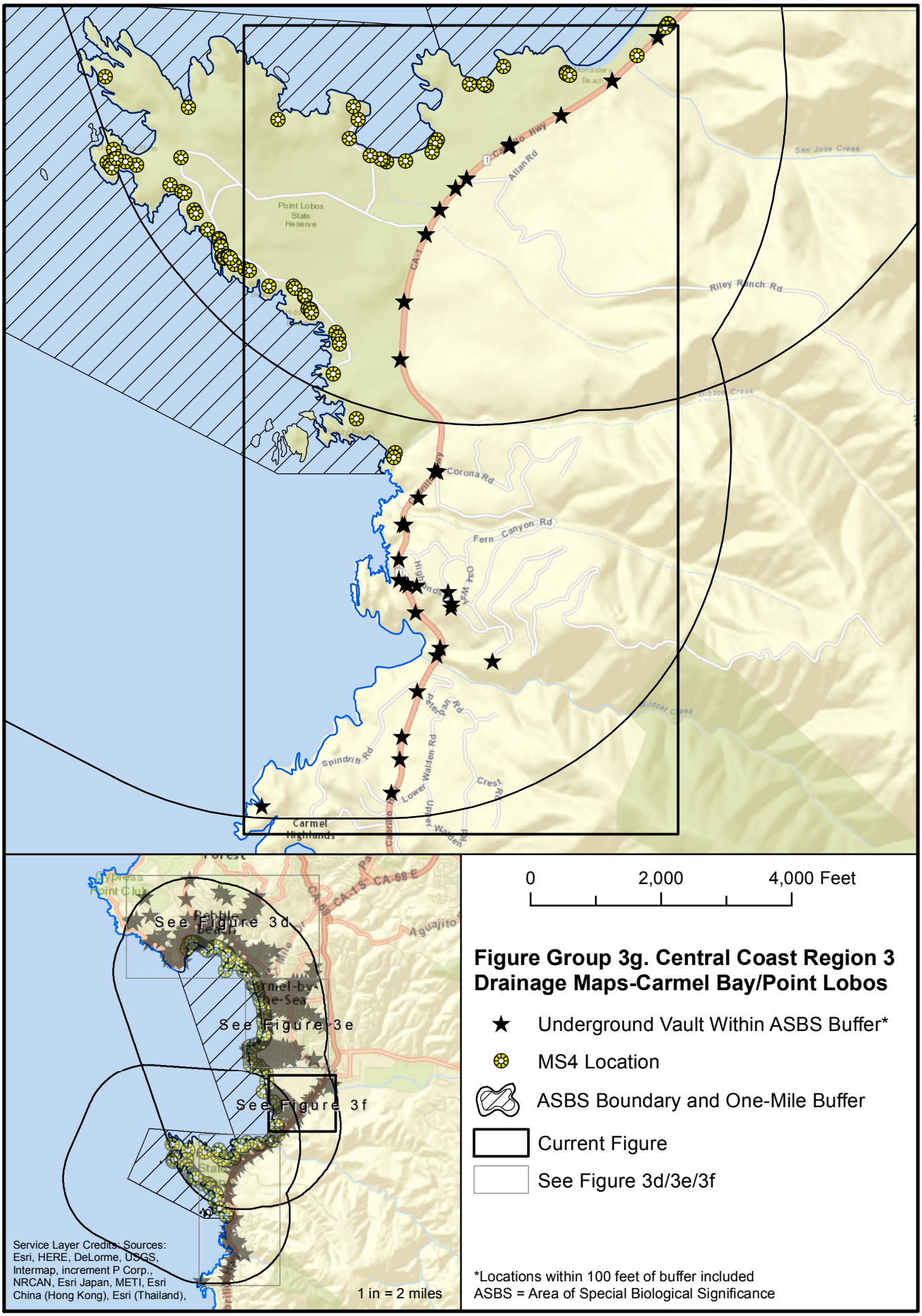


Figure Group 3g. Central Coast Region 3 Drainage Maps-Carmel Bay/Point Lobos

Figure Group 3h. Central Coast Region 3 Drainage Maps-Julia Pfeiffer Burns

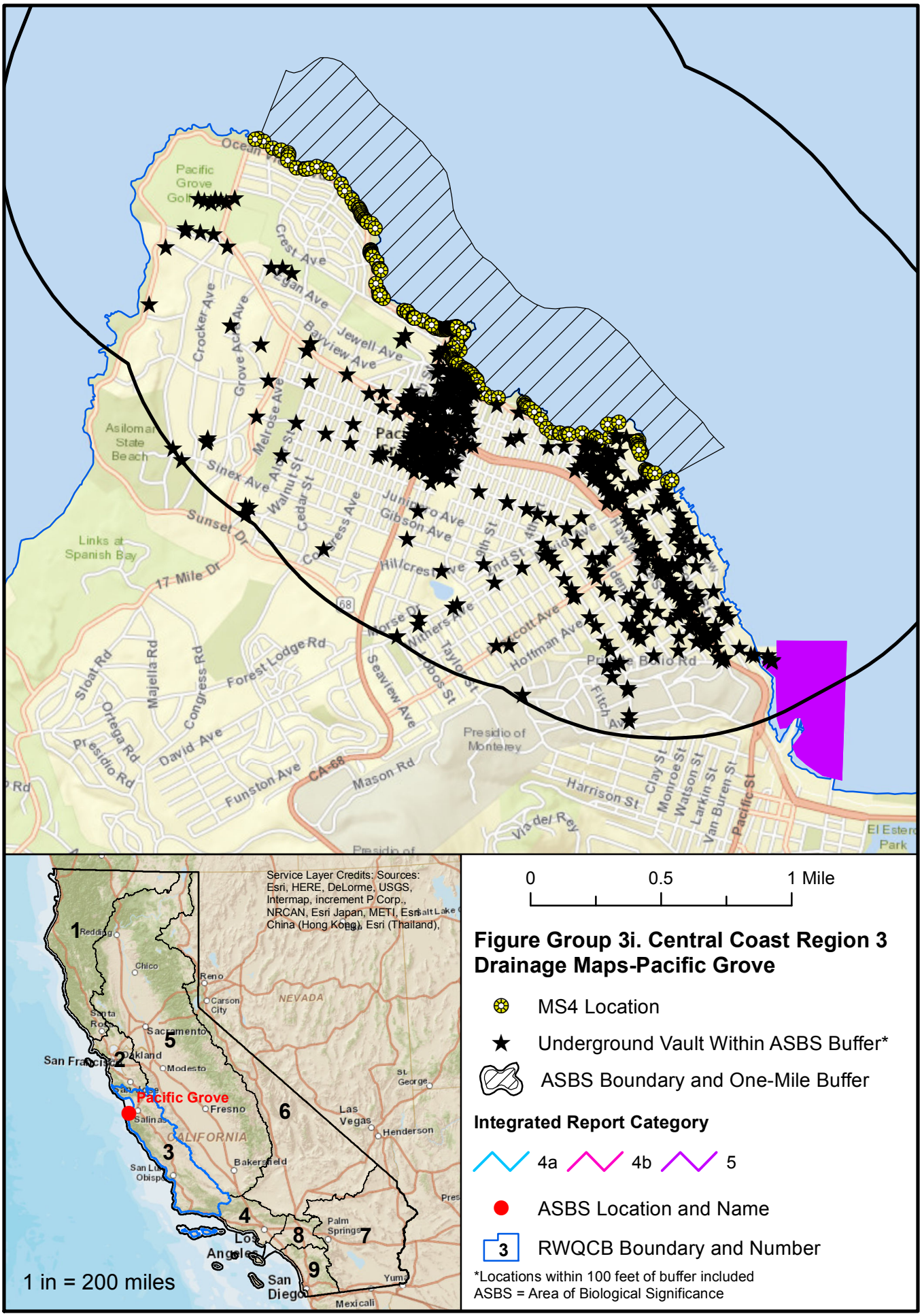


Figure Group 3i. Central Coast Region 3 Drainage Maps-Pacific Grove

MS4 Location

Underground Vault Within ASBS Buffer*

ASBS Boundary and One-Mile Buffer

Integrated Report Category

4a 4b 5

ASBS Location and Name

3 RWQCB Boundary and Number

*Locations within 100 feet of buffer included
ASBS = Area of Biological Significance

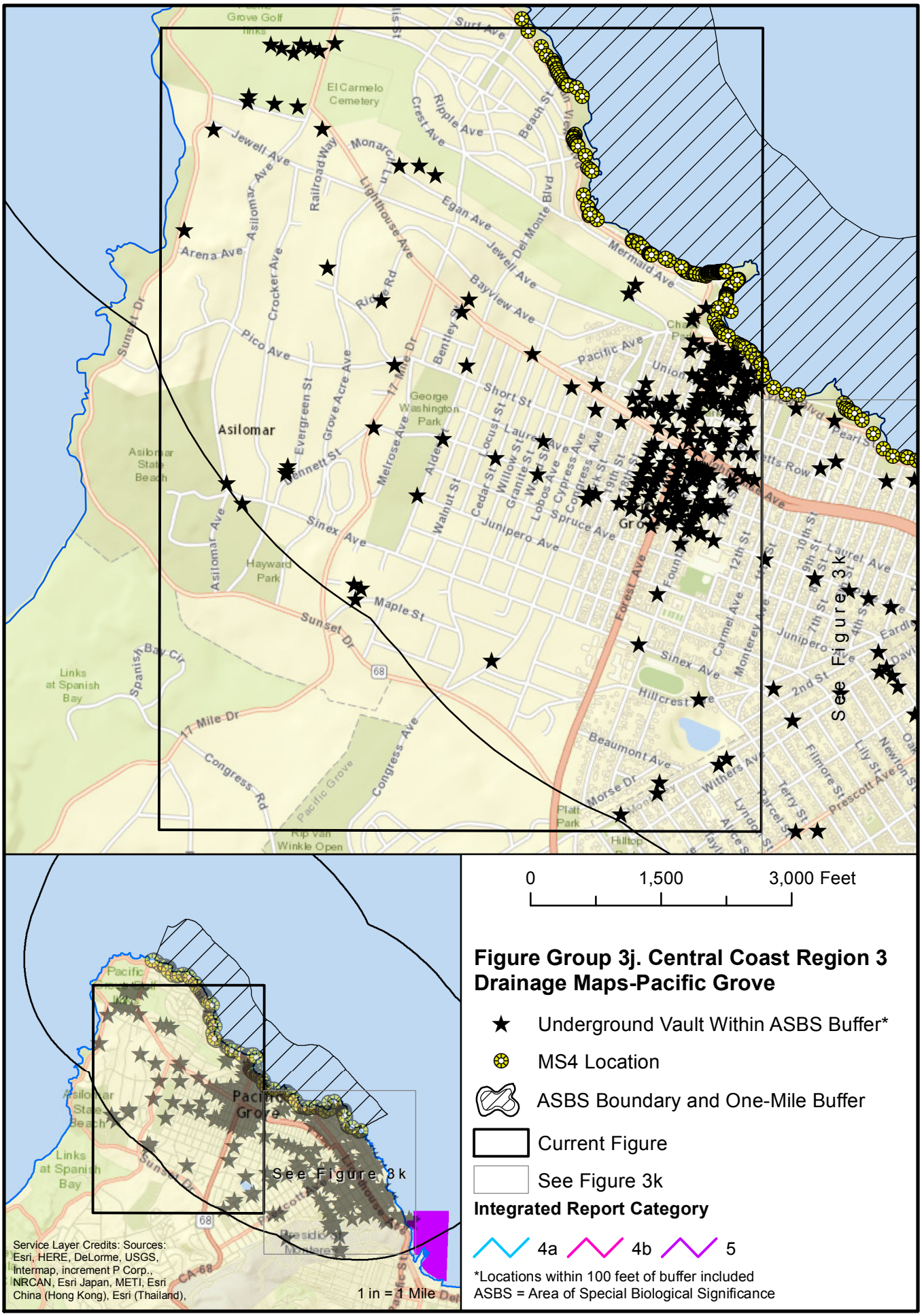


Figure Group 3j. Central Coast Region 3 Drainage Maps-Pacific Grove

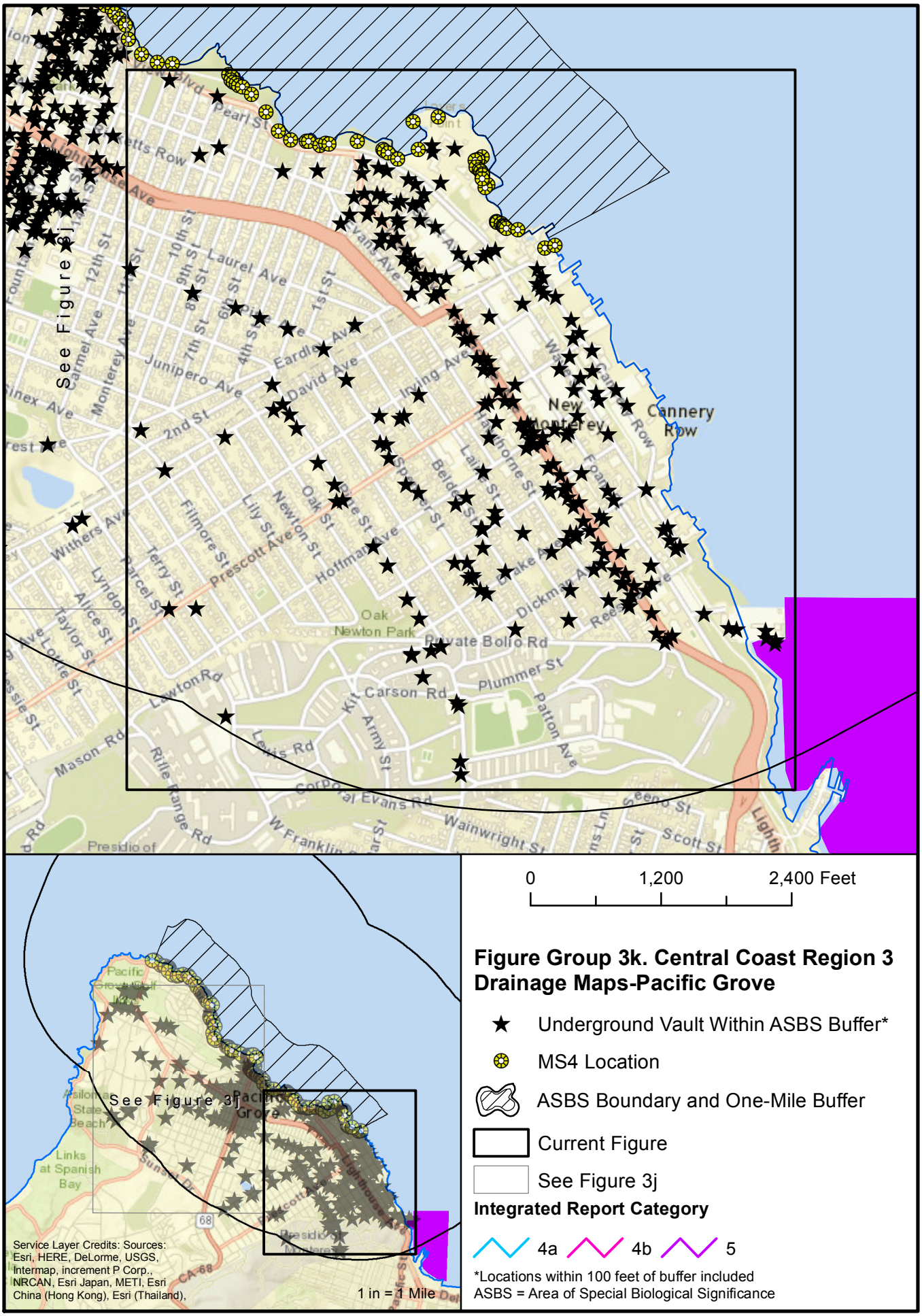
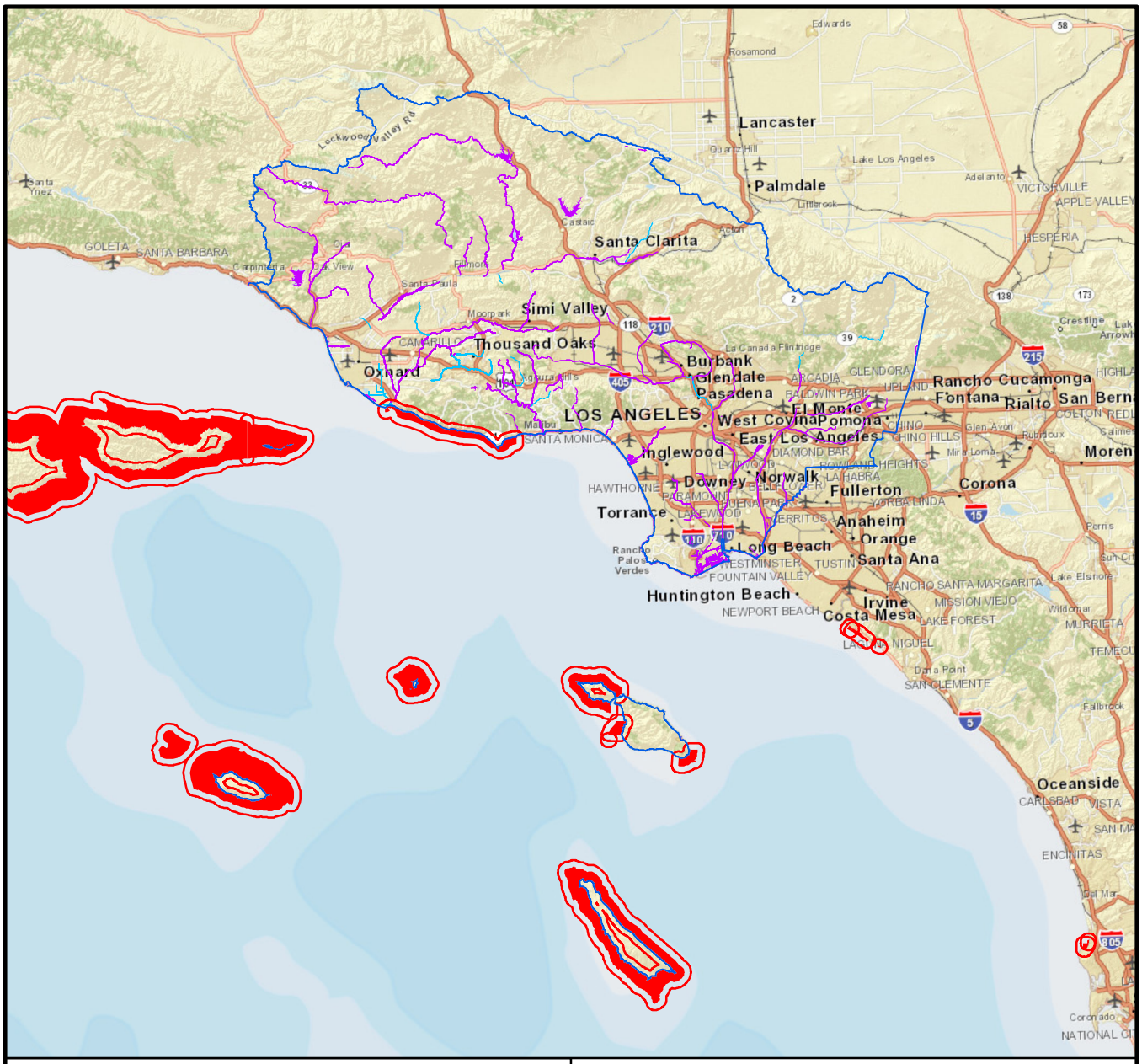


Figure Group 3k. Central Coast Region 3 Drainage Maps-Pacific Grove



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

1 in = 200 miles

0 25 50 Miles

Figure Group 4a. Los Angeles Region 4 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

4 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

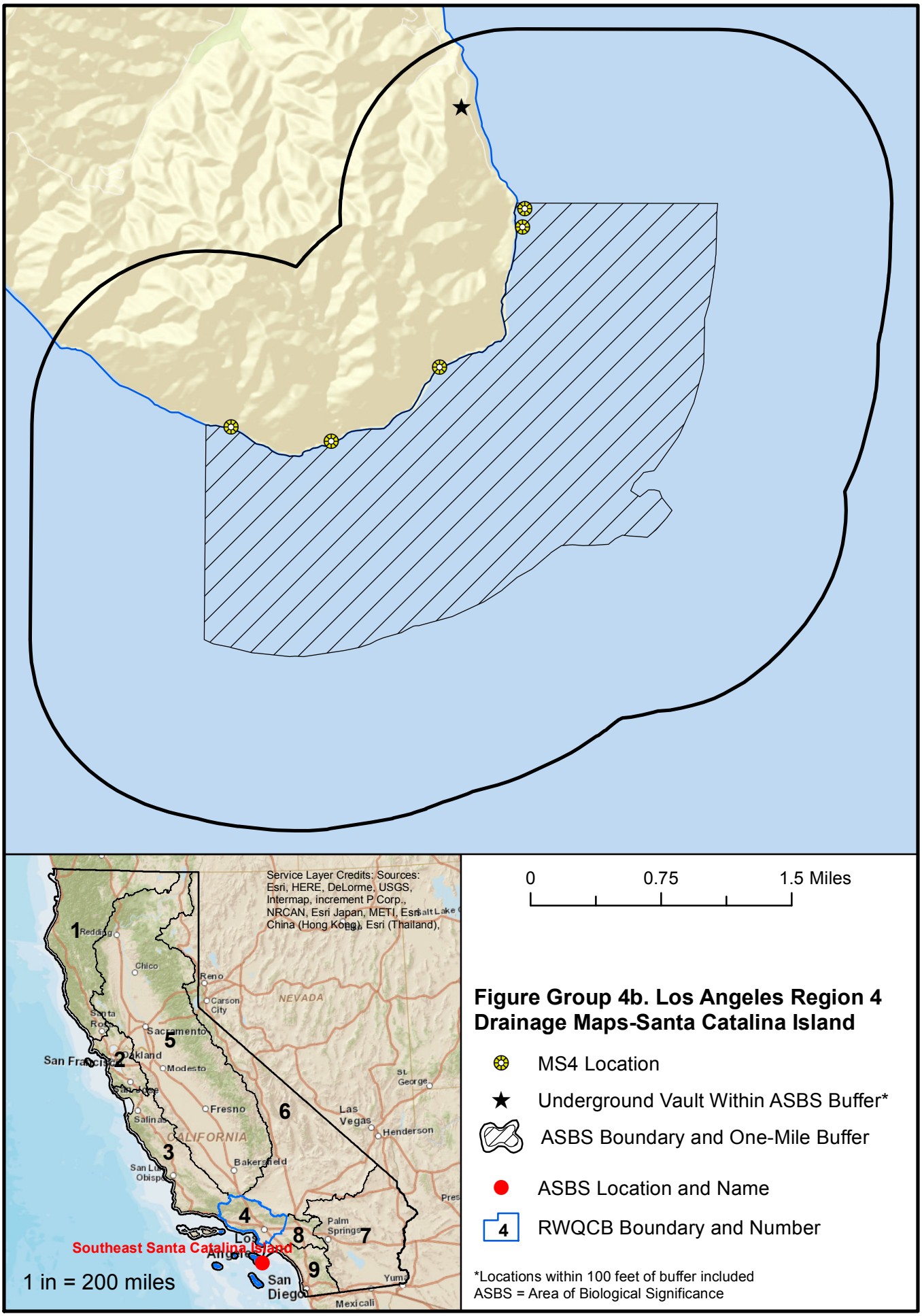
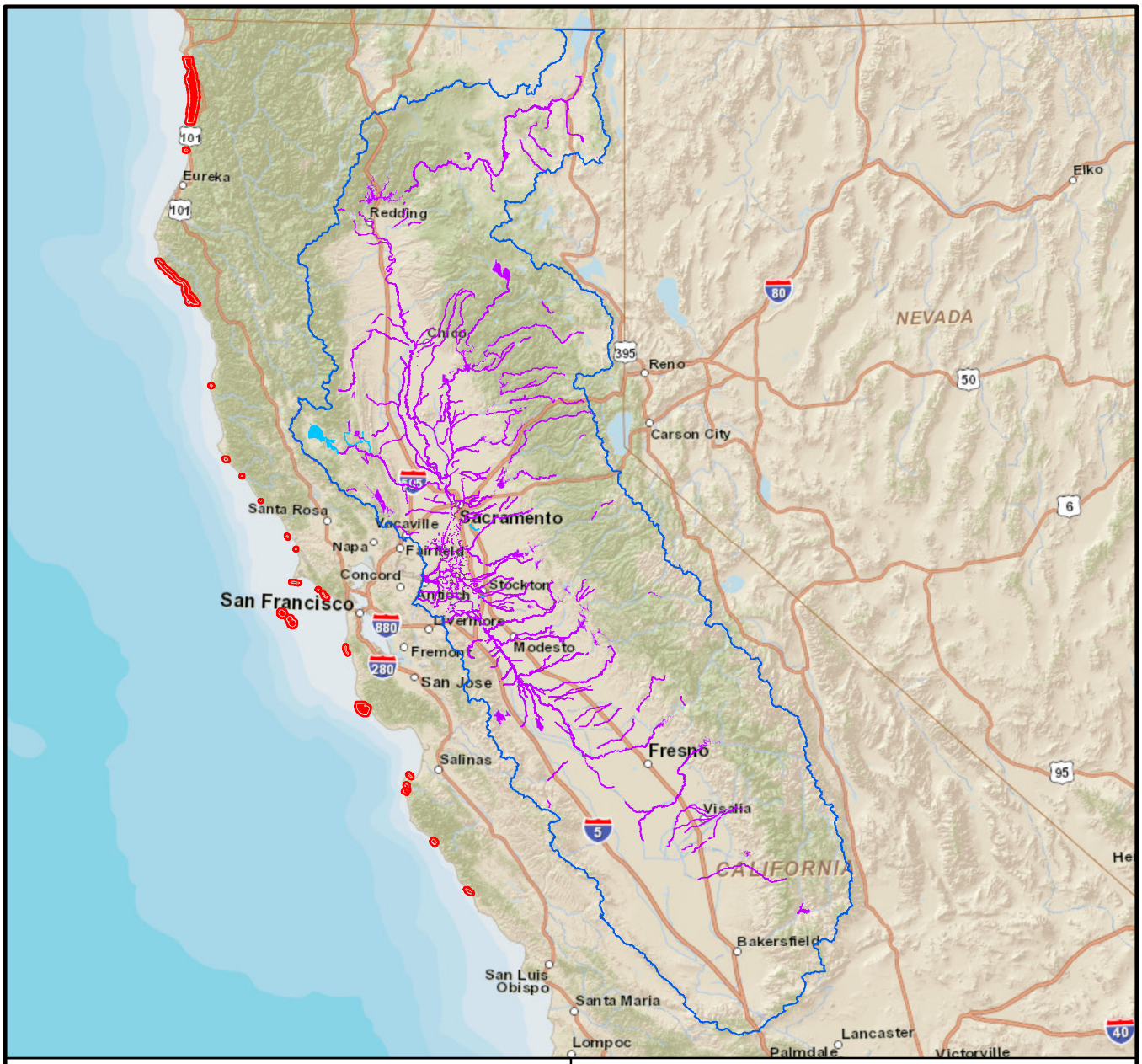


Figure Group 4b. Los Angeles Region 4 Drainage Maps-Santa Catalina Island



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

1 in = 200 miles

0 80 160 Miles

Figure Group 5. Central Valley Region 5 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

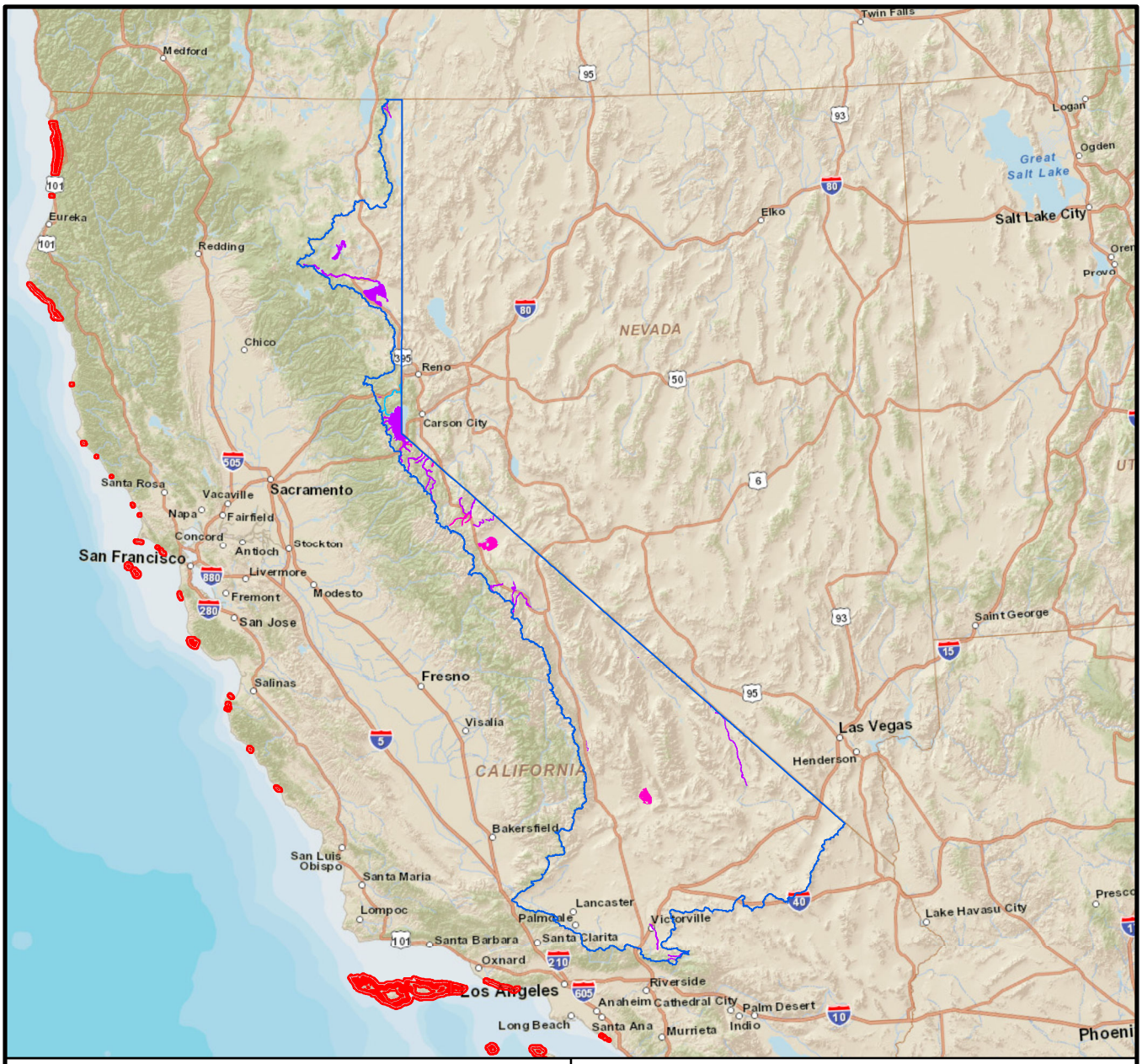
ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

5 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance



1 in = 200 miles

Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

0 100 200 Miles

Figure Group 6. Lahontan Region 6 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

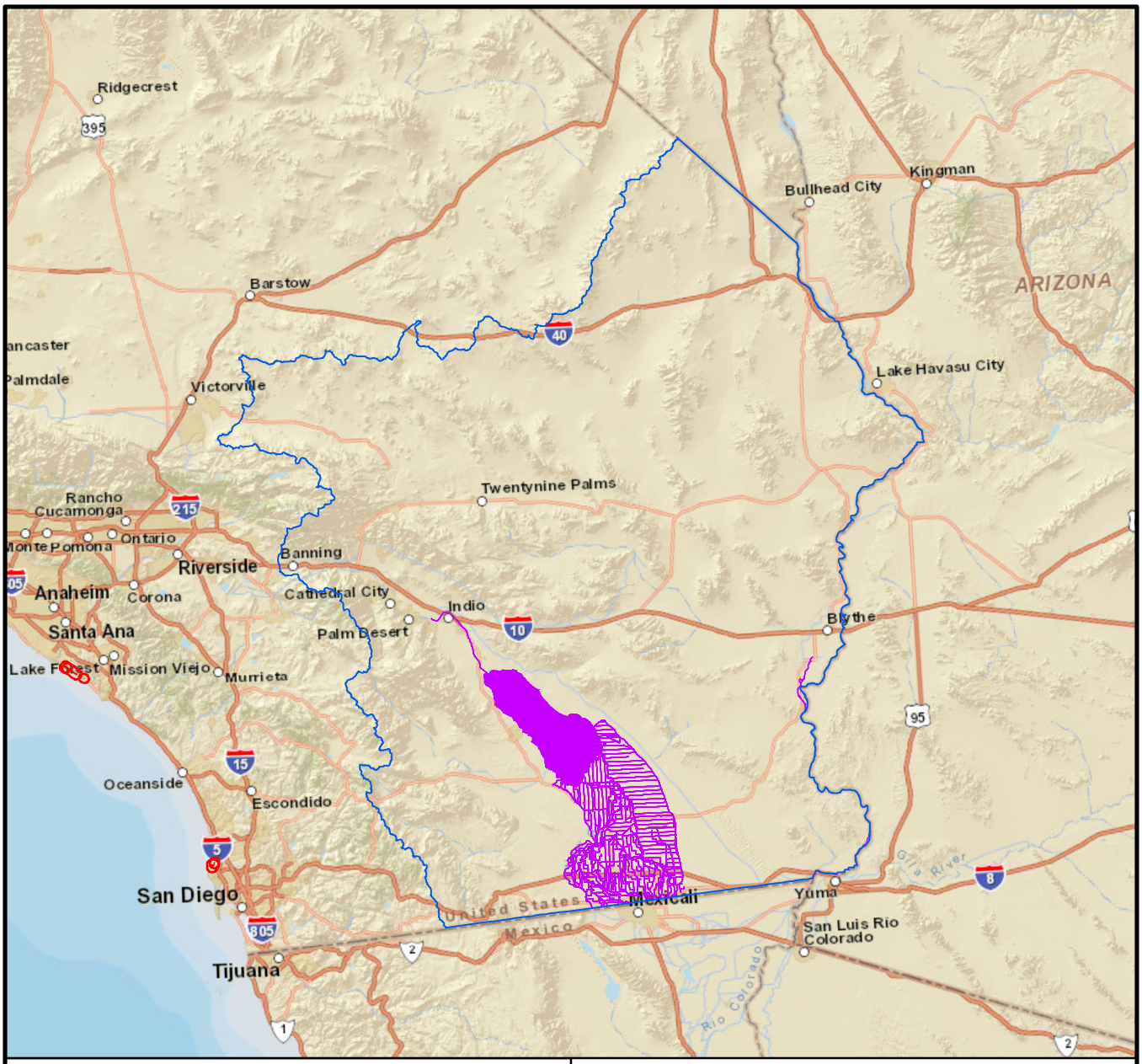
ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

6 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

1 in = 200 miles

0 40 80 Miles

Figure Group 7. Colorado River Region 7 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

7 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

1 in = 200 miles

Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

0 15 30 Miles

Figure Group 8a. Santa Ana Region 8 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

8 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

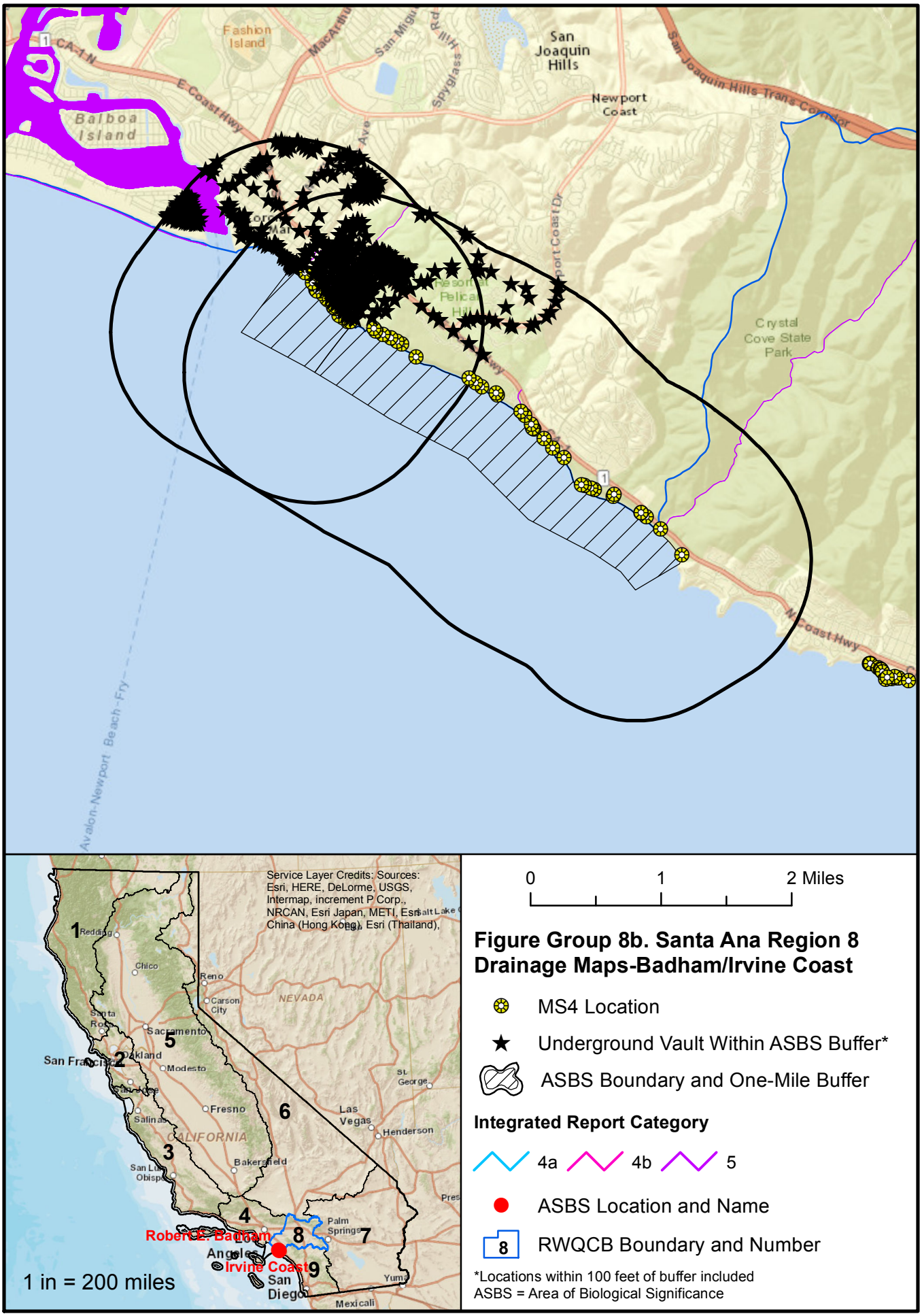


Figure Group 8b. Santa Ana Region 8 Drainage Maps-Badham/Irvine Coast

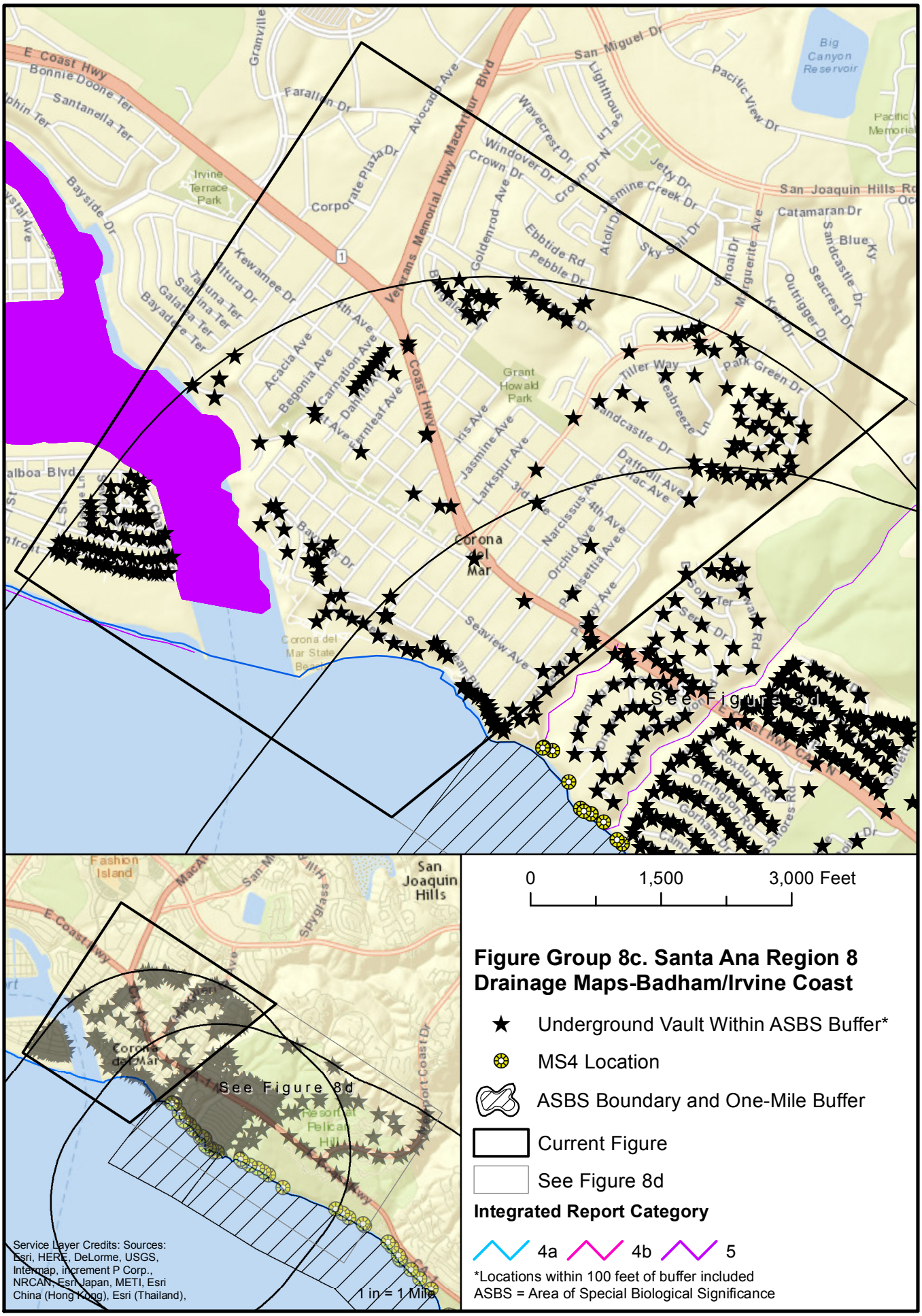


Figure Group 8c. Santa Ana Region 8 Drainage Maps-Badham/Irvine Coast

★ Underground Vault Within ASBS Buffer*

MS4 Location

ASBS Boundary and One-Mile Buffer

Current Figure

See Figure 8d

Integrated Report Category

4a 4b 5

*Locations within 100 feet of buffer included
ASBS = Area of Special Biological Significance

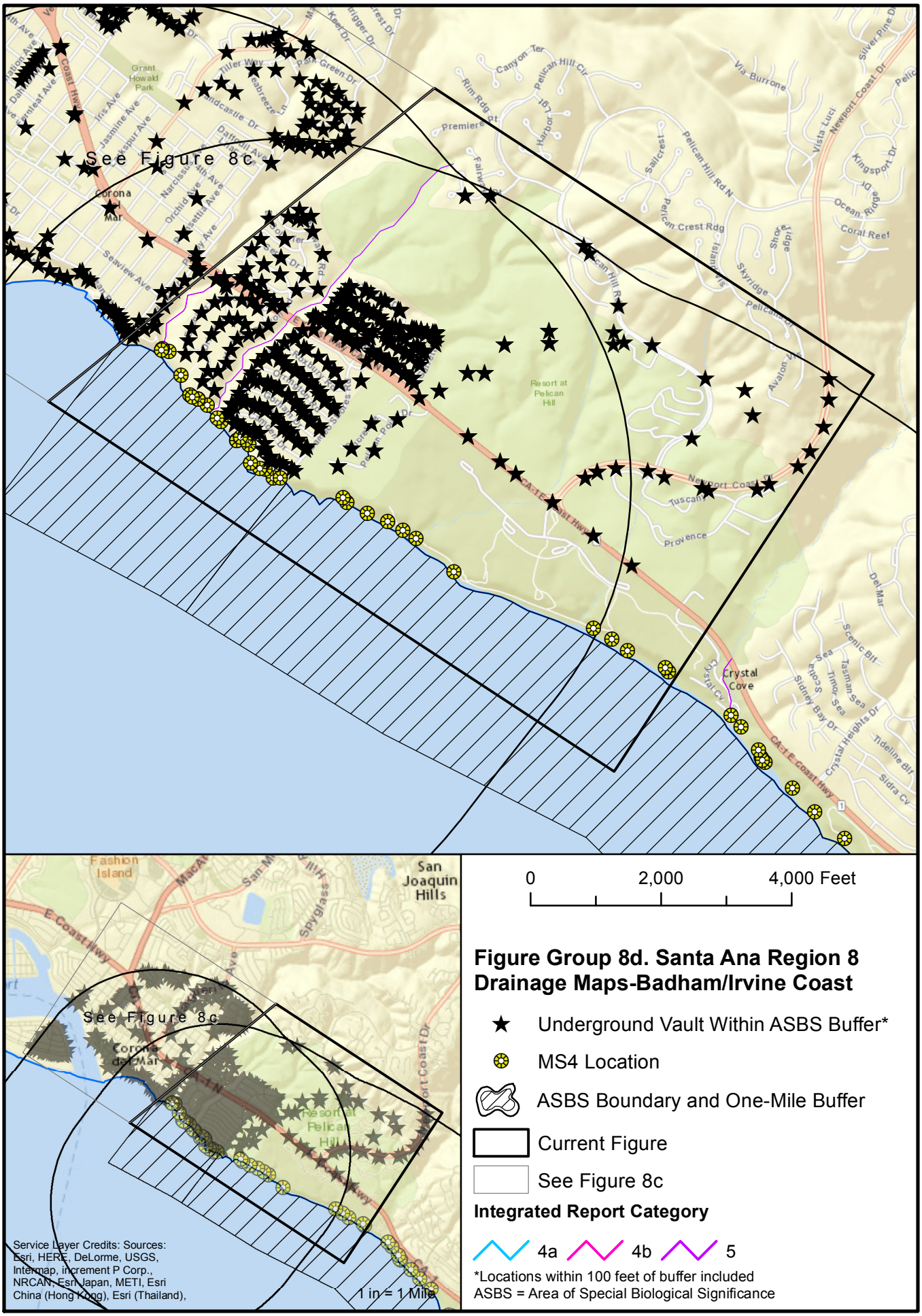
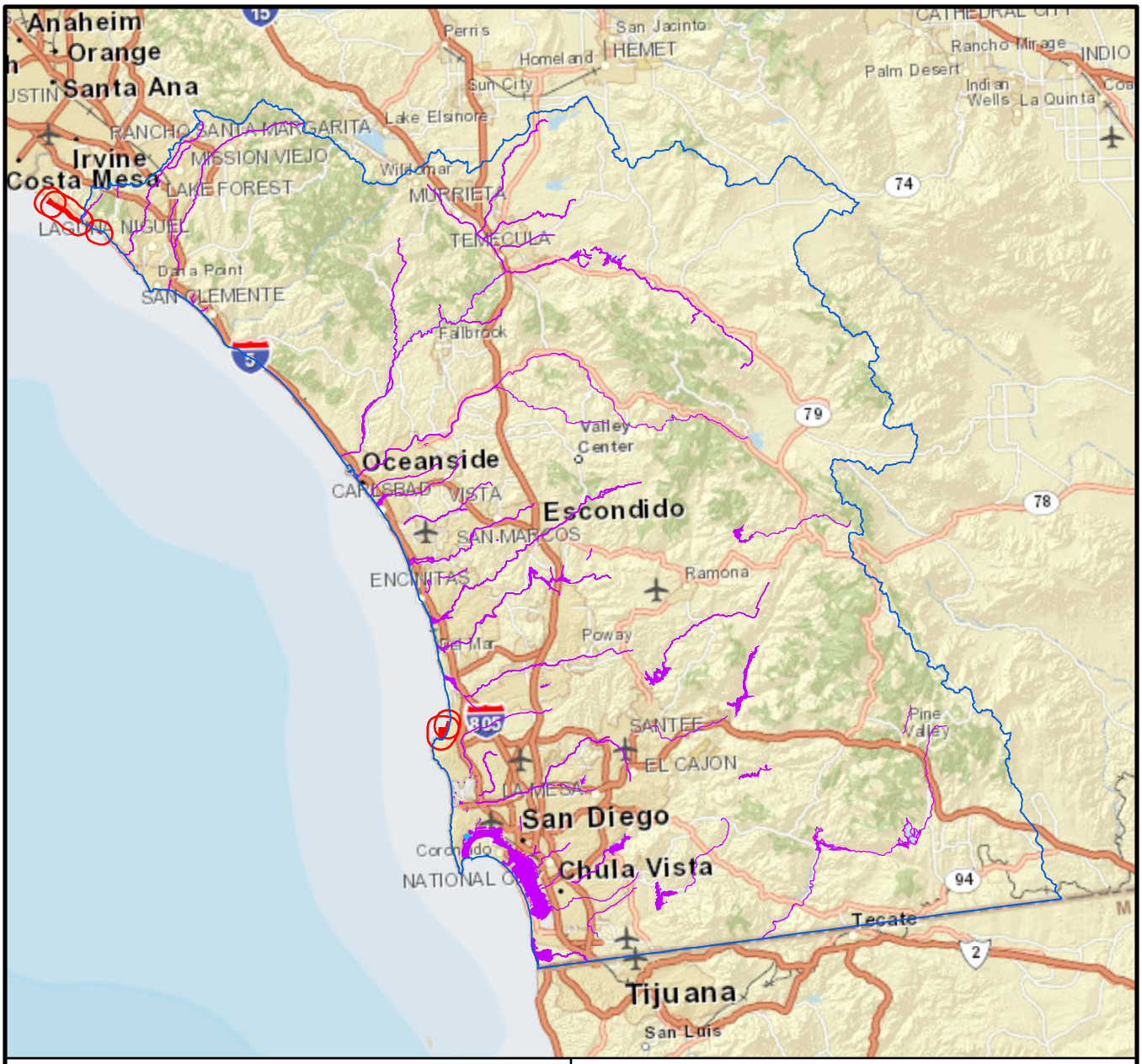


Figure Group 8d. Santa Ana Region 8 Drainage Maps-Badham/Irvine Coast



Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand),

0 15 30 Miles

Figure Group 9a. San Diego Region 9 Drainage Maps-Overview

Underground Vault Locations Distributed Regionally

ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

9 RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

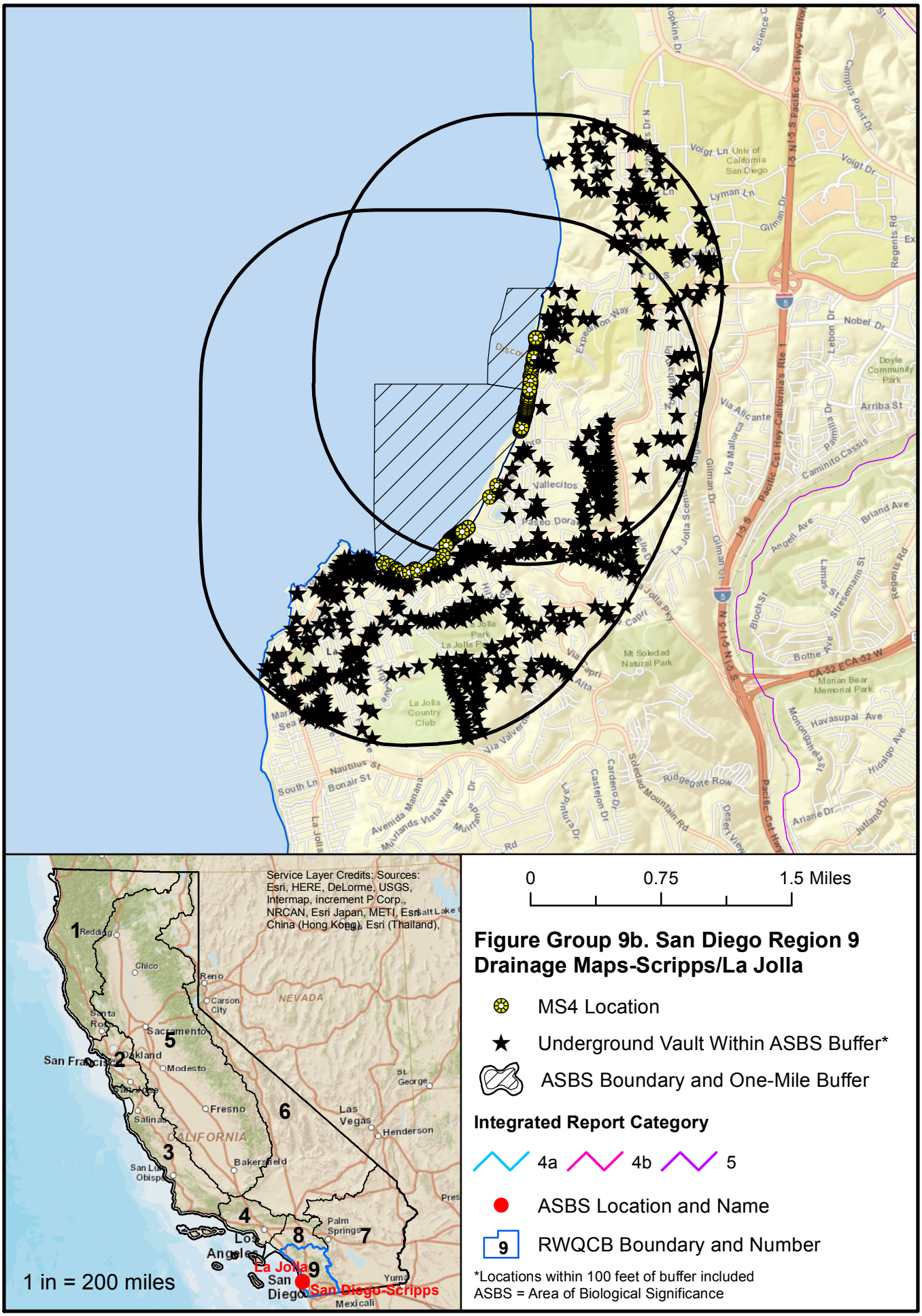


Figure Group 9b. San Diego Region 9 Drainage Maps-Scripps/La Jolla

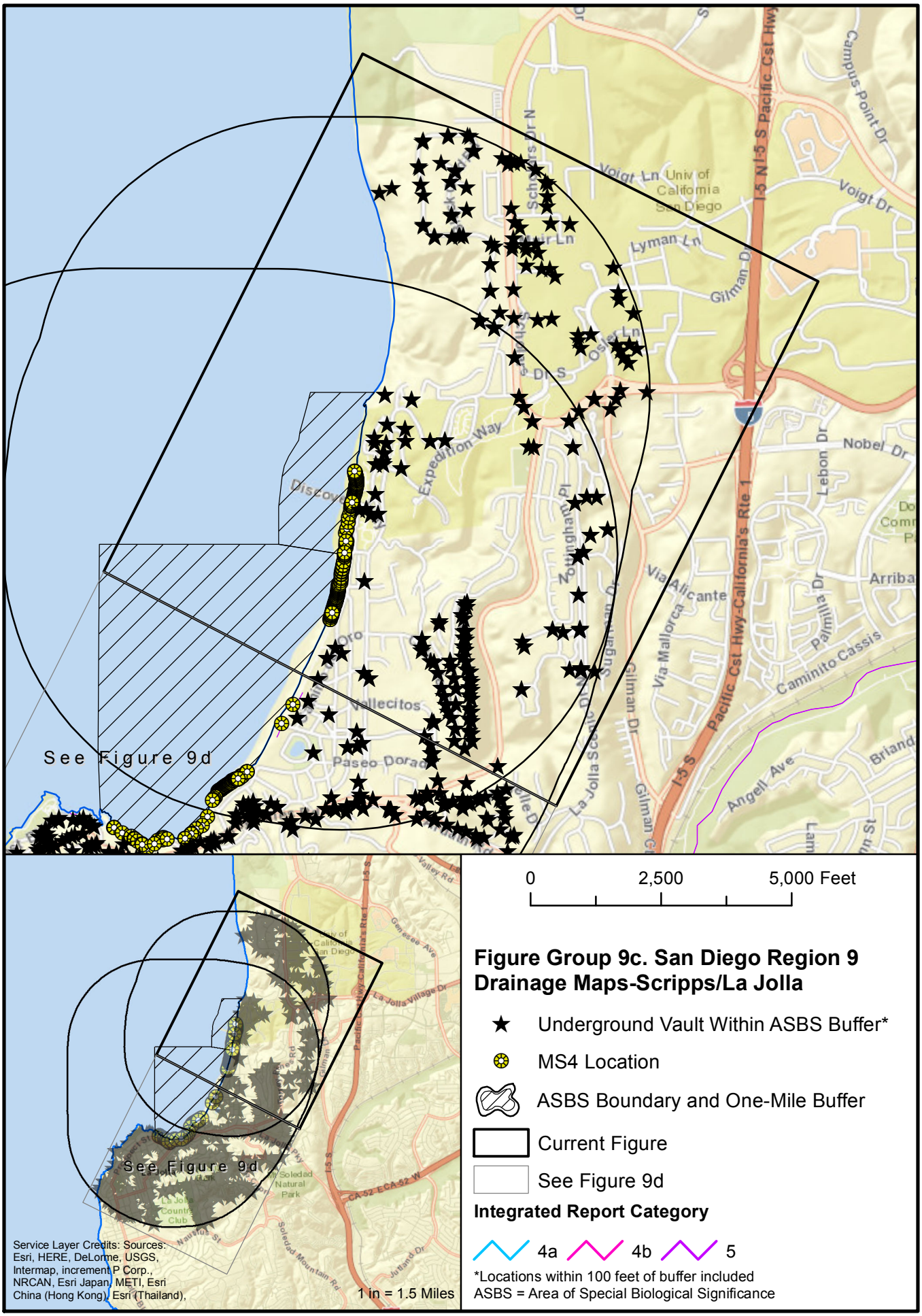


Figure Group 9c. San Diego Region 9 Drainage Maps-Scripps/La Jolla

★ Underground Vault Within ASBS Buffer*

MS4 Location

ASBS Boundary and One-Mile Buffer

Current Figure

See Figure 9d

Integrated Report Category

4a 4b 5

*Locations within 100 feet of buffer included

ASBS = Area of Special Biological Significance

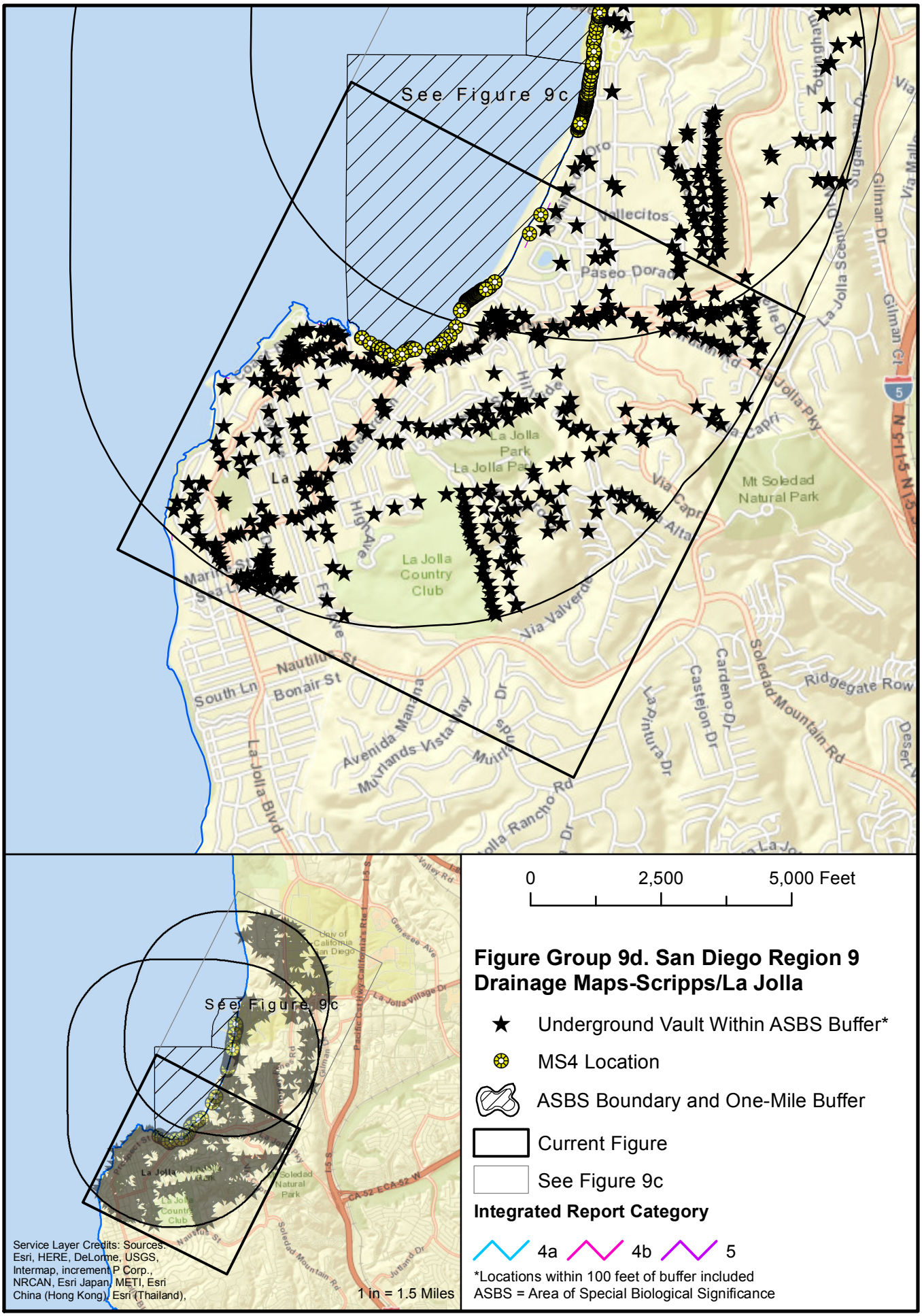


Figure Group 9d. San Diego Region 9 Drainage Maps-Scripps/La Jolla

★ Underground Vault Within ASBS Buffer*

MS4 Location

ASBS Boundary and One-Mile Buffer

Current Figure

See Figure 9c

Integrated Report Category

4a 4b 5

*Locations within 100 feet of buffer included

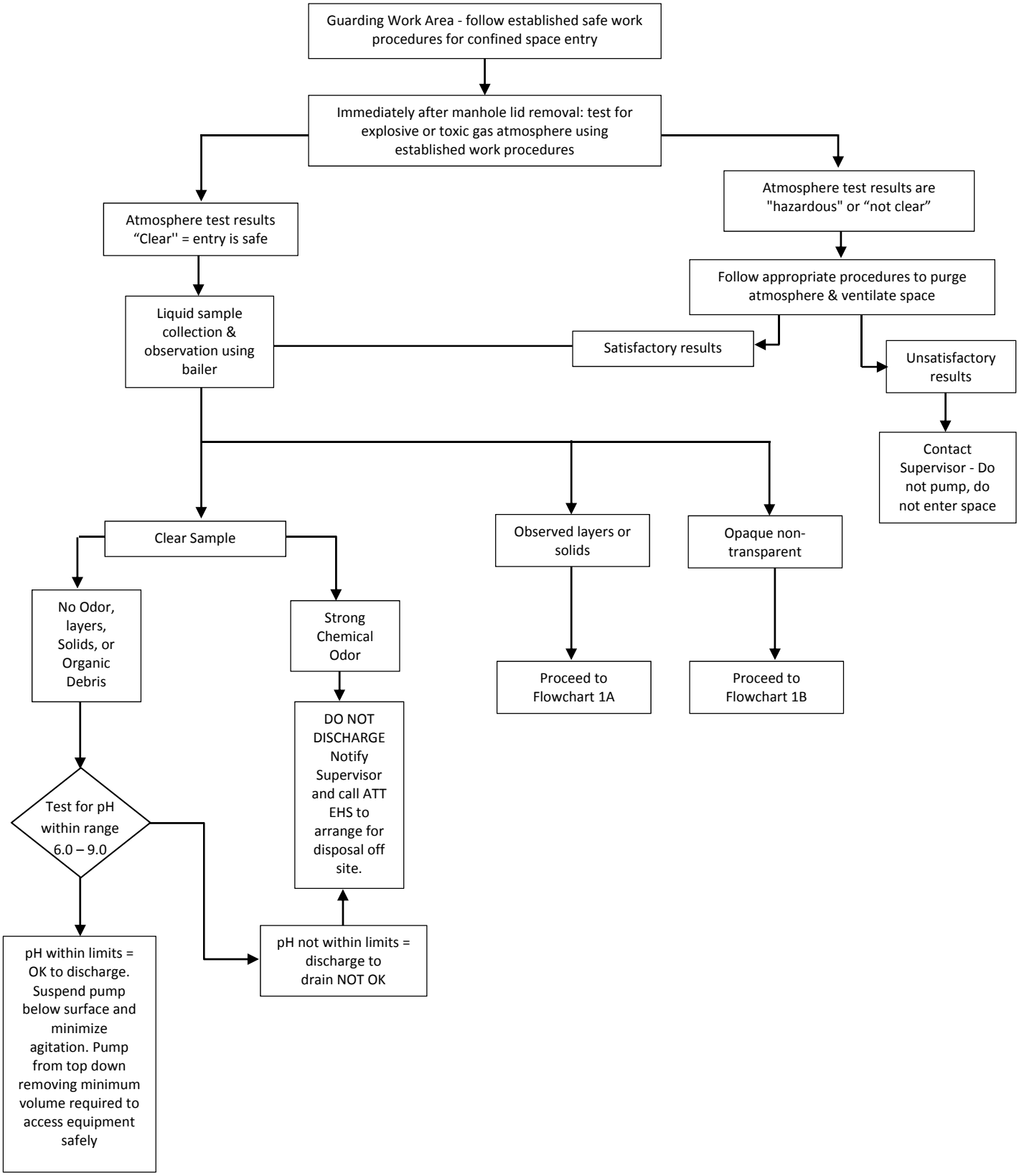
ASBS = Area of Special Biological Significance

APPENDIX A

Flow Charts

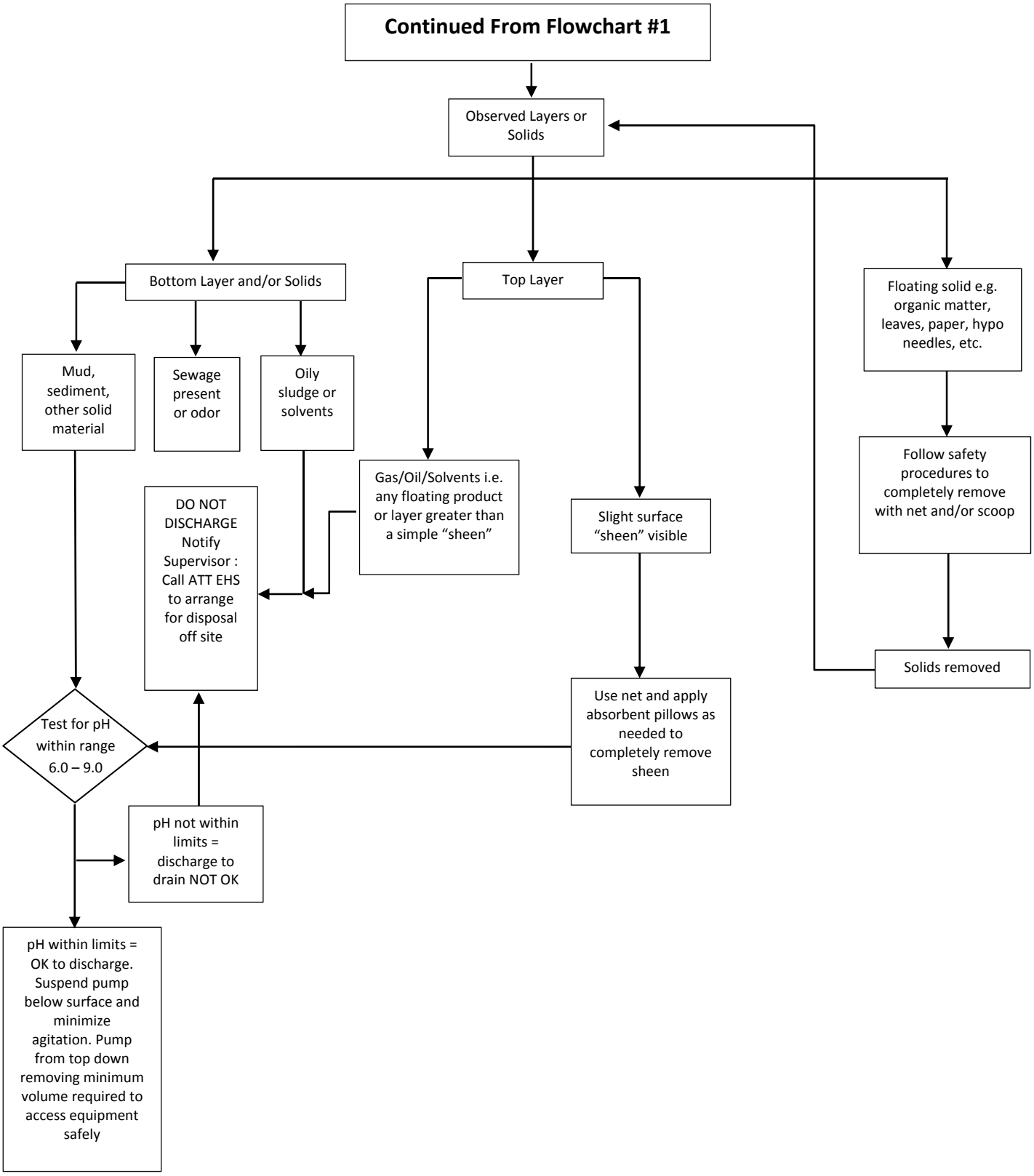
Utility Manhole & Vault De-Watering Decision Guide

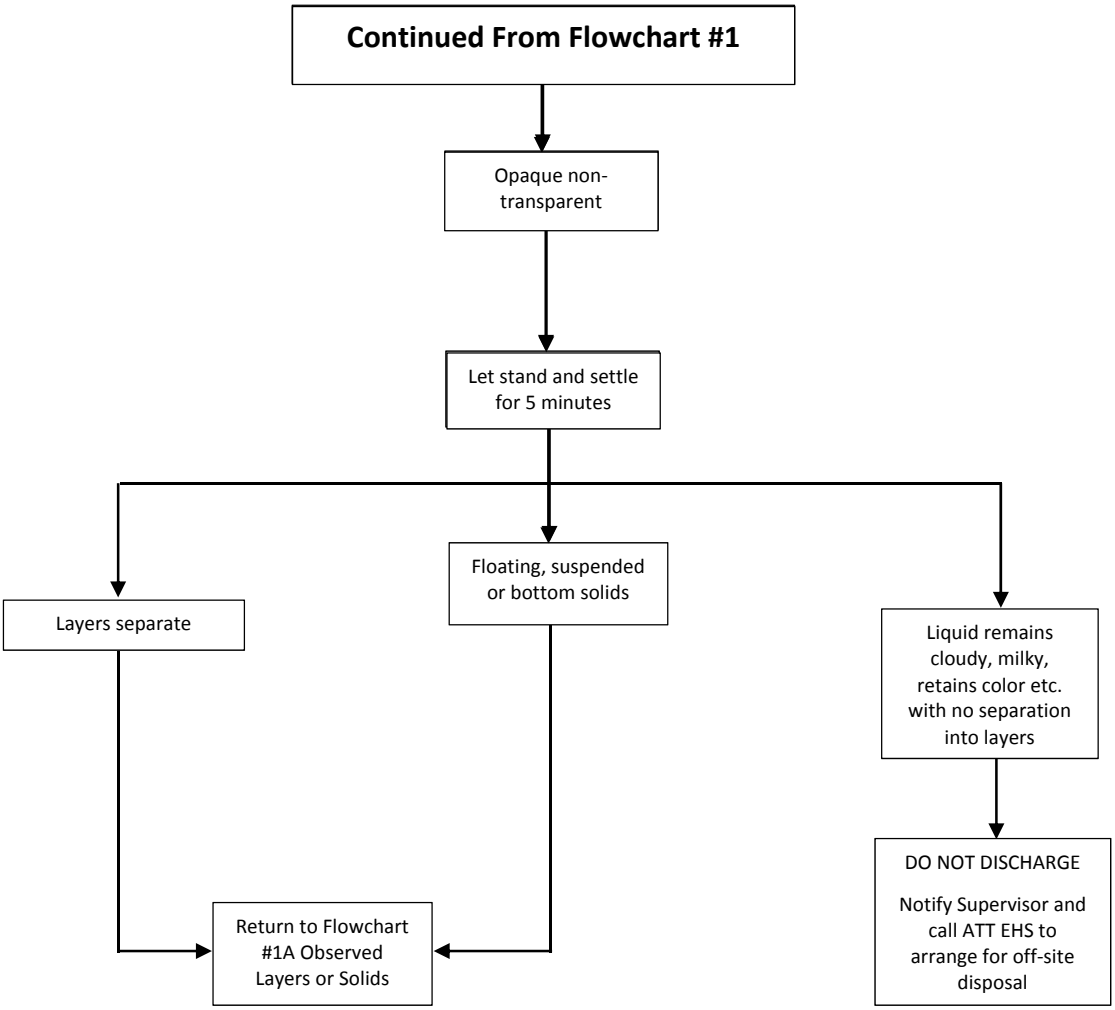
Flow Chart #1



Utility Manhole & Vault De-Watering Decision Guide

Flow Chart #1A



Utility Manhole & Vault De-Watering Decision Guide

Flow Chart #1B