

Transmittal



Stantec

Stantec Consulting Services Inc.
3875 Atherton Road
Rocklin CA 95765
Tel: (916) 773-8100
Fax: (916) 773-8448

To:	Philip Isorena	From:	Davina Gonzalez
Company:	NPDES Wastewater Unit Division of Water Quality State Water Resources Control Board	<input type="checkbox"/>	For Your Information
		<input checked="" type="checkbox"/>	For Your Approval
		<input type="checkbox"/>	For Your Review
		<input type="checkbox"/>	As Requested
Address:	1001 I Street, 15 th Floor Sacramento, CA 95814		
Phone:			
Date:	October 12, 2011		
File:	184010213		
Delivery:	Regular Mail		

**Reference: Utility Vault General Permit Application
Surewest Telephone**

Enclosed are items required to obtain a Waste Discharge Identification (WDID) number for Surewest Telephone. Included in the application is a signed Notice of Intent, Draft Pollution Prevention Plan, and check in the amount of \$1452 made payable to the State Water Resources Control Board.

Thank you for your assistance with this request.

STANTEC CONSULTING SERVICES INC.

Davina R. Gonzalez, PE
Environmental Engineer
Tel: (916) 773-8100
Fax: (916) 773-8448
davina.gonzalez@stantec.com

One Team. Infinite Solutions.



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**SureWest Telephone
Pollution Prevention Plan (PPP)**

For General Permit on Discharges
from Utility Vaults and Underground
Structures to Surface Waters

Waste Discharge Identification No:

Pending

Prepared for:

SureWest
8150 Industrial Ave
Roseville, CA 95678
(916) 786-4325

Prepared by:

Stantec Consulting Services Inc.
3875 Atherton Road
Rocklin, CA 95765
916-773-8100

September 2011

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SUREWEST TELEPHONE
POLLUTION PREVENTION PLAN

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- Appendix B Decision Flowchart
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1.0 Introduction

1.1 BACKGROUND

SureWest Telephone is a communications company servicing residents in the Sacramento area. Typical underground activities primarily involve utility installation and maintenance.

This Pollution Prevention Plan has been prepared to comply with California's General Permit for Discharges from Utility Vaults and Underground Structures to Surface Waters (General Permit), State Water Resources Control Board (SWRCB) Order No. 2006-0008-DWQ. Utility companies operate and maintain numerous vaults and underground structures within their service territories. For safety reasons, utility companies must de-water vaults and underground structures prior to performing any repair, maintenance, and/or installation of equipment. Volume of discharges can vary from a few gallons to a few thousand gallons depending on the configuration and individual situation at each vault or structure. These intermittent discharges are routed to Waters of the United States or indirectly via local storm drainage systems.

The General Permit requires dischargers to establish Pollution Prevention Plans (Plan) for discharges from utility vaults and underground structures. The major objectives of the Plan are as follows:

1. Identify specific individuals within the utility's organization who are responsible for maintenance, implementation, and revision of the Plan
2. Evaluate potential pollutant sources at the site
3. Select and implement appropriate measures designed to prevent or control the discharge of pollutants

Additional Plan objectives include:

- Inventory of exposed materials
- Identify significant spills or leaks that occurred at areas exposed to precipitation or that otherwise enter the discharge stream from 3 years prior to the date of submission of the NOI to be covered under the General Permit

1.2 PERMIT APPLICATION DOCUMENTS

The permit application documents were submitted in September 2011 and are included in Appendix B.

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POLLUTION PREVENTION PLAN

1.3 PLAN AVAILABILITY

The Plan is available at the following location:

SureWest Telephone
8150 Industrial Blvd
Roseville, CA 95678
Office (916) 786-4325

The Plan is also available upon request by a State or Municipal inspector.

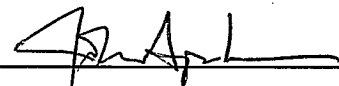
1.4 POLLUTION PREVENTION TEAM

The Pollution Prevention Team is responsible for developing the Plan and assisting the utility or plant manager in its implementation, maintenance, and revision. The team is identified in the table below.

Name	Title	Office Phone	Mobile Phone
Jeremy Sperling	Fleet Services Maintenance Manager	(916) 786-7325	(916) 532-4635
Mike Doyle	Safety Manager	(916) 786-4191	(916) 223-1585
Chris Wooden	Safety Coordinator	(916) 786-1268	(916) 879-2902

1.5 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. [40 CFR §122.22(d)].

Signed: 
Title: Director
Date: 9.30.11

2.0 Discharge Provisions

SureWest must dewater utility vaults to protect equipment and for safety reasons prior to performing maintenance, repair, and/or installation of equipment. Water is either manually pumped from the vaults or via automatic sump pumps located in the vault. Depending on the time of year, volume of discharge can vary from a few gallons to several hundred gallons.

2.1 SCHEDULED AND UNSCHEDULED DISCHARGES

SureWest does not have scheduled discharges. Sump pumps have sensors and switch on automatically when a level of water has been reached. Most discharges from underground vaults are unscheduled. The vaults are not air-tight and water accumulates in these vaults. Dewatering is necessary for maintenance or repair. Prior to discharge, field technicians shall use procedures outlined in this Plan to determine if the water can be discharged in compliance with the Plan.

3.0 Description of Potential Pollutant Sources

3.1 DRAINAGE MAP

A drainage map showing essential features of the drainage system for the service area is provided in Appendix A.

3.2 INVENTORY OF EXPOSED MATERIALS

The following is a list of materials that may potentially be exposed to precipitation at SureWest utility vault sites:

- Water based lubricant (non-toxic)
- Hydraulic pump fluid (oil)
- Sediment
- General litter
- Vehicle fluids (oil, grease, petroleum and coolants)

It should be noted that these materials are not permanently located in the vaults but rather are associated with the vehicles or equipment used to inspect/maintain the vaults. Good housekeeping and spill prevention practices are discussed in Sections 4.2 and 4.3.

3.3 SPILLS OR LEAKS

The only recorded spill in the last 3 years occurred when a hydraulic de-watering pump failed and approximately 2 quarts of oil leaked into a vault containing about 1,000 gallons of water. A contractor responded and pumped out the contaminated water for offsite disposal.

3.4 RISK IDENTIFICATION AND SUMMARY OF POTENTIAL POLLUTANT SOURCES

The equipment in the vaults does not contain potential contaminants. The risk of a hydraulic pump failing is small. External contaminants could be sediment and oil/gas from vehicles entering the vault via stormwater.

4.0 Pollution Prevention Practices

4.1 VAULT SAMPLING PRIOR TO DISCHARGE

The procedure to verify whether water is safe to discharge into the storm drain is described below and demonstrated in the Decision Flow Chart in Appendix B.

Petroleum sheen. Prior to sampling water in vault, verify presence of petroleum sheen. If present, contact local contractor to vacuum pump and properly dispose water.

Sample collection. Using a clear water bailer, lower into the vault and draw a sample, being careful not to agitate the water.

Sample appearance. Check appearance of water for clarity, whether clear, contains solids, or non-transparent/opaque. If water bailer is clear with no odors, layers, solids, vault may be pumped to ground or storm drain.

Layers and/or solids. Verify whether the water bailer contains layers or sludge/solids at the bottom. If layers exist with no solids, and contains a bottom liquid layer, return the water back into the vault and check for presence of odors. If the layer has a solvent or chemical odor, contact local vacuum truck company to pump and dispose of properly.

If the bottom of the water bailer contains more than 1/8 inch of solids in the bottom, further testing shall be conducted to determine whether the solids are mud or oil/petroleum sludge.

- Carefully pour water back into the vault, leaving as much of the solids as possible.
- Replace the water poured out with clean water.
- Gently shake the contents and observe the water. If solids are mud, they will readily mix with water and the sludge at bottom will appear lighter. Oil/petroleum sludge will not mix with water and the appearance of the sludge at the bottom will not change.

If solids are determined to be mud/sediment, water shall be filtered through a filter bag while pumped from vault and discharged to the storm drain.

If solids are determined to be oil/sludge, contact vacuum truck company to pump and dispose at an approved hazardous waste facility.

Top layer with chemical odor. If the sample contains a chemical odor, contact a vacuum truck to pump and dispose at a hazardous waste facility.

Non-transparent/opaque sample. If the sample is not clear and is opaque or cloudy when held up to sunlight, the sample shall be set aside for 10 minutes to allow particles in the water to settle out and bubbles to escape. If the water is clear or beginning to clear after 10 minutes, water can be pumped to storm drain. If water remains opaque, laboratory testing must be

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POLLUTION PREVENTION PLAN

Pollution Prevention Practices

September 2011

performed to determine proper way to handle the water collected in vault. Laboratory samples shall be collected in accordance with EPA protocols, sent to a certified laboratory, and analyzed for the following:

- Oil and Grease using EPA Method 1664
- Total Petroleum Hydrocarbons as gasoline, diesel fuel, and motor oil using EPA Method 8015
- pH using EPA Method 150.1

Biohazards. Field crew shall be cautious for presence of biohazards in the vault in the form of hypodermic needles and razor blades. Special care shall be taken in handling/disposing of these items to avoid punctures or cuts by these objects.

4.2 GOOD HOUSEKEEPING & PREVENTATIVE MAINTENANCE

SureWest inspects vaults during maintenance for defects such as deposits, leaks, or cracks in addition to odors and presence of water. Equipment is inspected to prevent malfunction. Vehicles are regularly checked prior to use for leaking fluids (oil, grease, petroleum and coolants). Confined space procedures shall be performed for worker safety.

4.3 SPILL PREVENTION AND RESPONSE PROCEDURES

Spill prevention shall be incorporated into all activities. Equipment and materials for cleanup of spills shall be available on site. Leaks and spills shall be cleaned up immediately. Small spills can be cleaned with a rag or absorbent material such as kitty litter or spill specific product. Minor spills that can be controlled by the first responder at the discovery of the spill can be cleaned with absorbent materials.

Contaminated water shall not be discharged but vacuum pumped by a hazardous waste contractor. For significant or hazardous spills that cannot be controlled by personnel in the immediate vicinity, the contractor shall notify the local emergency response and the California Emergency Management Agency at 916-845-8768. For spills of federal reportable quantities, in conformance with the requirements in 40 CFR parts 110, 119, and 302, the contractor should notify the National Response Center at 800-424-8802. In the event of a significant spill, notification should first be made by telephone and followed up with a written report.

4.4 INSPECTIONS

SureWest field technicians shall inspect vaults and equipment for defects and to ensure proper working order.

Prior to disposal of water from a utility vault, field technicians shall visually inspect water in vault to determine presence of contamination (oil sheen, solids, odor). Only water that has passed

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**SUREWEST TELEPHONE
POLLUTION PREVENTION PLAN**
Pollution Prevention Practices
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inspection shall be discharged to ground or storm drain. If water fails screening, licensed contractors shall be contacted to arrange pumping and proper disposal of contaminated water.

4.5 EMPLOYEE TRAINING

Employees are trained annually in confined space and utility vault discharge procedures and at regular intervals on field safety.

4.6 RECORD KEEPING AND INTERNAL REPORTING PROCEDURES

Records including discharge logs are kept for a minimum of 3 years. Discharge logs are kept by field crew but can be made available at the SureWest main office. A copy is included in Appendix C.

4.7 SEDIMENT AND EROSION CONTROL

Pollution prevention practices for sediment and erosion control involve inspection of presence of sediment in the vault through testing procedures identified in Section 4.1. If solids are determined to be sediment and not oil/gas, water is pumped first from the top of the vault to minimize sediment suspension, and then filtered through a filter bag or "rock sock" prior to discharge to storm drain. Sediment that is removed from liquid waste shall be disposed in methods approved by the Regional Water Quality Control Board and that will not contribute to degradation of water quality.

4.8 MANAGEMENT OF RUNOFF

Where possible and where direct discharge to storm drain is not available, stormwater that has passed the visual inspection shall be discharged to ground where it can evaporate and/or infiltrate.

4.9 COMPREHENSIVE SITE COMPLIANCE EVALUATION

Site compliance evaluations shall be performed for each discharge event and shall include visual inspection of the site for presence of pollutants, an evaluation of effectiveness of pollution prevention measures in place, and inspection of structural integrity of vaults and equipment. See Appendix C for site compliance evaluation form.

Based on the results of the evaluation, SureWest shall revise the Plan within 2 weeks for any additional control measures needed and update list of potential pollutants. Revisions shall be implemented immediately.

Reports shall record compliance with Plan, General Permit, and identify any incidents of non-compliance and shall be retained for 3 years.

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POLLUTION PREVENTION PLAN

Appendix A
Submitted Permit Application
Documents

ATTACHMENT B – NOTICE OF INTENT FORM

**NOTICE OF INTENT (NOI)
 WATER QUALITY ORDER NO. 2006-0008-DWQ
 STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 PERMIT FOR DISCHARGES FROM UTILITY VAULTS AND UNDERGROUND STRUCTURES TO
 SURFACE WATERS OF THE UNITED STATES
 GENERAL PERMIT NO. CAG990002**

I. NOTICE OF INTENT STATUS (See Instructions)

MARK ONLY ONE ITEM	1. <input checked="" type="checkbox"/> New Discharger	2. <input type="checkbox"/> Change of Information – WDID #
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II. OWNER/OPERATOR (If additional owners/operators are involved, provide the information in a supplemental page.)

A. Name <i>SureWest Telephone</i>		Owner/Operator Type (Check One)		
B. Mailing Address <i>8150 Industrial Avenue</i>		1. <input type="checkbox"/> City	2. <input type="checkbox"/> County	3. <input type="checkbox"/> State
C. City <i>Roseville</i>	D. County <i>Placer</i>	E. State <i>CA</i>		F. Zip Code <i>95678</i>
G. Contact Person <i>Jeremy Sperling</i>	H. Title <i>Fleet Services Maintenance Manager</i>	I. Phone <i>916-786-4325</i>		

ADDITIONAL OWNERS

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

Send to: <input checked="" type="checkbox"/> Owner/Operator <input type="checkbox"/> Other	A. Name	B. Title		
	C. Mailing Address			
D. City	E. County	F. State	G. Zip Code	

IV. RECEIVING WATER INFORMATION

A. Receiving water(s): <i>Pleasant Grove Creek, Dry Creek</i>	B. Describe the types of receiving waters affected:
C. Regional Water Quality Control Board(s) where discharge sites are located List all regions where discharge of wastewater is proposed, i.e. Region(s) 1, 2, 3, 4, 5, 6, 7, 8, and/or 9: <i>Region 5</i>	

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? Yes No

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

VI. VERIFICATION

Have you contacted the appropriate Regional Water Board or verified in the appropriate Basin Plan that the proposed discharge will not violate prohibitions or orders of that Regional Water Board? <input type="checkbox"/> Yes <input type="checkbox"/> No
--

VII. TYPE (Check All That Apply)

<input type="checkbox"/> Electric	<input type="checkbox"/> Natural Gas	<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Other:
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VIII. POLLUTION PREVENTION PRACTICES PLAN INFORMATION

A. Company Name <i>Surewest Telephone</i>		B. Contact Person <i>Jeremy Sperling</i>		
C. Street Address Where PLAN is Located <i>8150 Industrial Avenue</i>		D. Title of Contact Person <i>Fleet Services Maintenance Manager</i>		
E. City <i>Roseville</i>	F. County <i>Placer</i>	G. State <i>CA</i>	H. Zip Code <i>95678</i>	I. Phone <i>(916) 786-4325</i>

IX. DESCRIPTION OF DISCHARGE

Describe the discharge(s) proposed. List any potential pollutants in the discharge. Attach additional sheets if needed.
Water within vaults and underground structures that has passed visual inspection procedures will be discharged to land or storm drain where applicable. potential pollutants include sediment, oil or gas from vehicles, and hydraulic fluid from pump equipment.

X. VICINITY MAP AND FEE

A. Have you included vicinity map(s) with this submittal? Separate vicinity maps must be submitted for each Region where a proposed discharge will occur.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B. Have you included payment of the filing fee (for first-time enrollees only) with this submittal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
C. Have you included your PLAN?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

XI. CERTIFICATION

"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 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 directly responsible for gathering the information, the information submitted is true, accurate, and complete to the best of my knowledge and belief. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. In addition, I certify that the provisions of the permit, including the criteria for eligibility and the development and implementation of Pollution Prevention Practices, if required, will be complied with."

A. Printed Name: <i>John Apostolos</i>	
B. Signature: <i>[Signature]</i>	C. Date: <i>9.30.11</i>
D. Title: <i>Director</i>	

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

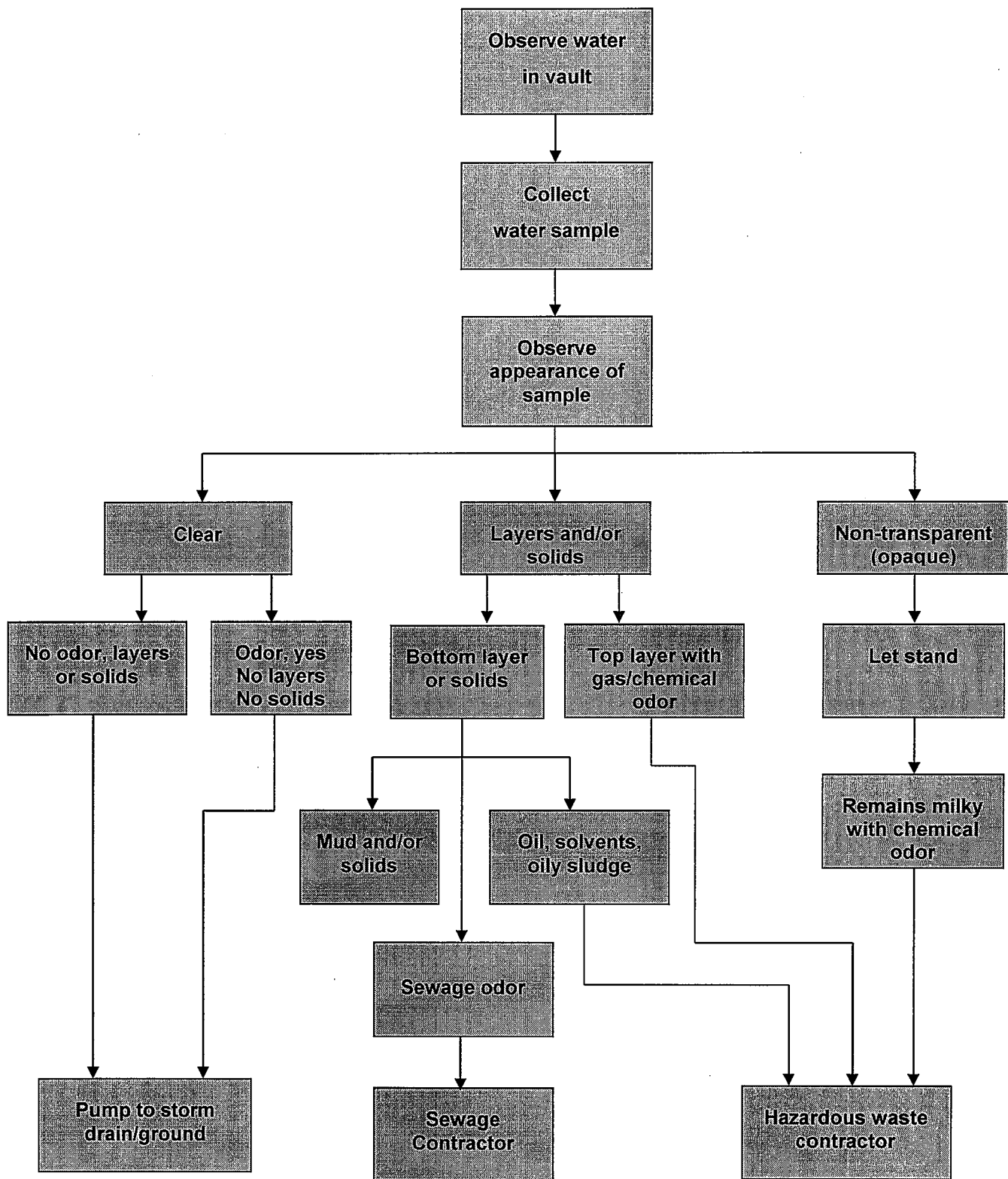
**UTILITIES NOI
 NPDES UNIT
 DIVISION OF WATER QUALITY
 STATE WATER RESOURCES CONTROL BOARD
 P.O. BOX 100
 SACRAMENTO, CA 95812-0100**

STATE USE ONLY

WDID:	Regional Board Office	Date NOI Received:	Date NOI Processed:
		Fee Amount Received: \$	Check #:

Appendix B
Decision Flow Chart

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 Decision Flow Chart



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Appendix C

Discharge Log

**SureWest
Visual Inspection / Discharge Log
Comprehensive Site Evaluation Report**

Date and Time of Inspection:	Report Date:
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Site Information

Site Name/Vault Number:	
Maintenance activities:	Weather conditions:

Observations

Observations: If yes identify location

Hazardous Spill	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Odors	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Layers Present	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Non-Transparent/Opaque	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sheen	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Discolorations	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sediment	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Disposal Method

Passed screening test? Yes <input type="checkbox"/> No <input type="checkbox"/>	For cloudy sample, attach test results (Oil/grease, Petroleum Hydrocarbon, and pH)
If yes, discharge to ground or storm drain:	If no, contact Vacuum truck company:
Estimated discharge volume	Company contacted:
_____	_____
(gallons)	(name/phone)

Site Inspections

Equipment or BMPs Evaluated	Deficiencies Noted

Corrective Actions Identified (note if PPP PLAN change is needed)

Inspector Information

Inspector Name:	Inspector Title:
Signature:	Date:

RECEIPT

RECEIVED FROM

Matthew-Dave

ADDRESS

FOR *Sure West*

ACCOUNT			
AMT OF ACCOUNT			
AMT PAID			
BALANCE DUE			

- CASH
- CHECK
- MONEY ORDER

BY

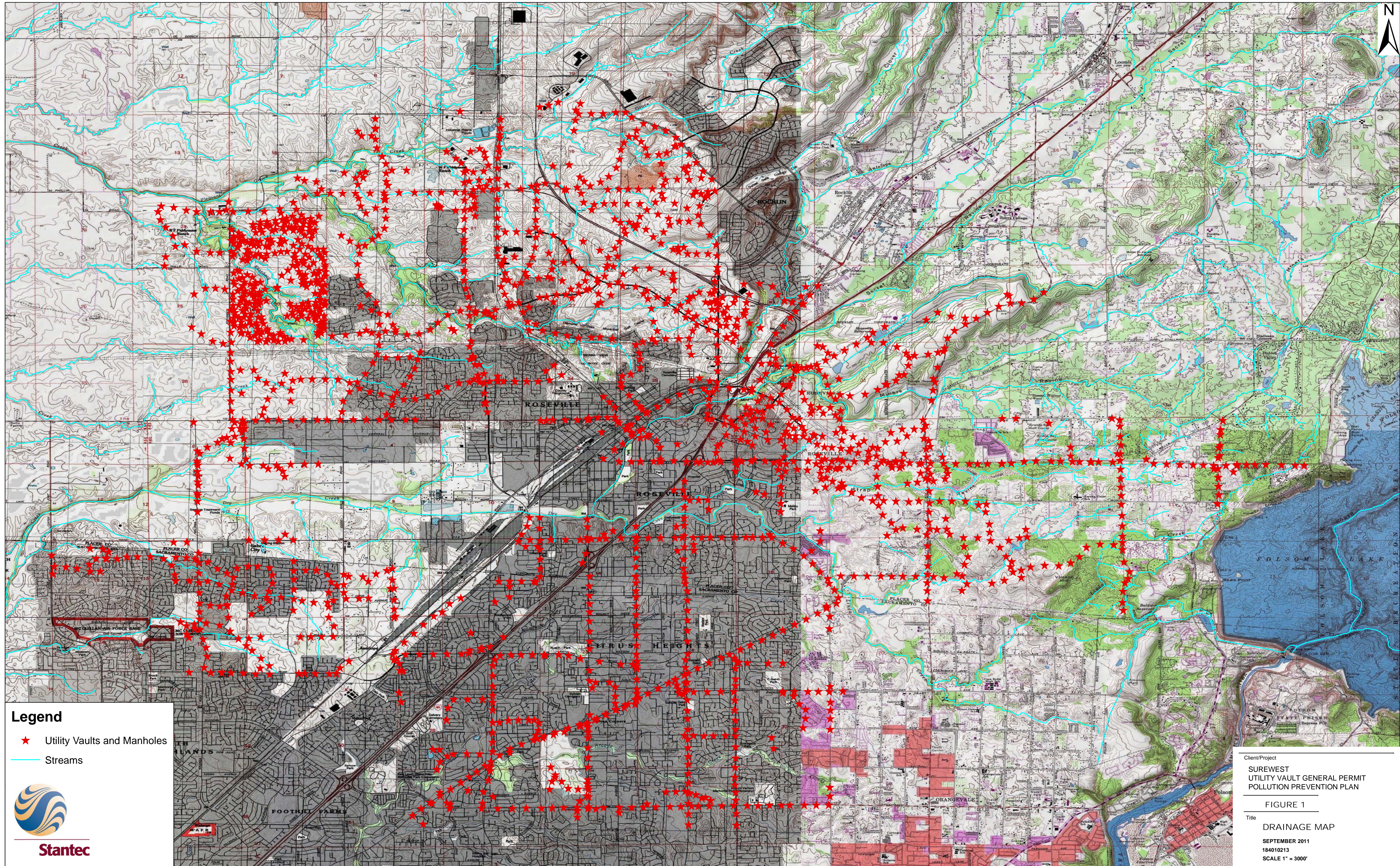
[Signature]

0000032609

\$ 1152.00

NO. 243083

DATE 10/17/11



- Legend**
- ★ Utility Vaults and Manholes
 - Streams



Client/Project
SUREWEST
UTILITY VAULT GENERAL PERMIT
POLLUTION PREVENTION PLAN

FIGURE 1

Title
DRAINAGE MAP

SEPTEMBER 2011
184010213
SCALE 1" = 3000'