

RECEIVED

JUN 30 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. <input type="checkbox"/> New Discharger	2. <input checked="" type="checkbox"/> Existing Discharger	WDID# 4000000010
	3. <input type="checkbox"/> Change of Information: WDID # _____		
	4. <input type="checkbox"/> Change of ownership or responsibility: WDID# _____		

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

A. Name Veolia Energy Los Angeles, Inc		Owner/Operator Type (Check One)	
		1. <input type="checkbox"/> City	2. <input type="checkbox"/> County
		3. <input type="checkbox"/> State	4. <input type="checkbox"/> Gov. Combo
		5. <input checked="" type="checkbox"/> Private	
B. Mailing Address 2052 Century Park East			
C. City Los Angeles	D. County Los Angeles	E. State CA	F. Zip Code 90067
G. Contact Person Tina Heath	H. Title EHS Corporate Director	I. Phone 909-614-2701	
J. Email Address tina.heath@veolia.com			

Additional Owners _____

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

Send to: <input type="checkbox"/> Owner/Operator <input checked="" type="checkbox"/> Other	A. Name Veolia North America	B. Title Accounts Payable	
	C. Mailing Address 125 S 84th, Suite 175		
D. City Milwaukee	E. County Milwaukee	F. State WI	G. Zip Code 53214

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: Four

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:

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: District Heating and Cooling

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 Veolia Energy Los Angeles, Inc		B. Contact Person Carlos Del-Cid	
C. Street Address Where PLAN is Located 715 West Third Street		D. Title of Contact Person Director of Operations	
E. City Los Angeles	F. County Los Angeles	G. State CA	H. Zip Code 90071
I. Phone 213-617-2509		J. Email Address carlos.del-cid@veolia.com	

IX. DESCRIPTION OF DISCHARGE(S)

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

Water from rainfall, landscape runoff, and distribution pipeline leaks.
Under normal operations, the materials in the vaults are not likely to contaminate the water. In most cases, this water is clean, but may contain traces of petroleum products (residue left on the roads: oil, grease, gasoline, etc.), organic matter, mud and pesticides and other pollutants.

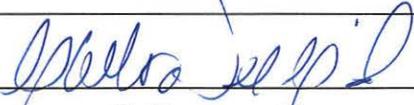
X. REMINDERS

- 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: Carlos Del-Cid

B. Signature: 

C. Date: 6-29-15

D. Title: Director of Operations

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 #:	

**Statewide General National Pollutant
Discharge Elimination System Permit of
Discharges by Utilities & Companies to Surface
Waters**

2015 Pollution Prevention Plan

For

Veolia Energy Los Angeles, Century City



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I. PLAN Administration

a) Company Introduction

Veolia Energy Los Angeles, Inc (“Veolia”) is a company that specializes in reliable, low cost thermal energy via district energy. District energy is the production and distribution of thermal energy, produced at a central plant and distributed to the community through an underground piping network.

District heating and cooling allows buildings to forego the installation of on-site boilers and chillers, so our customers receive consistent heating and cooling within their property line, the benefit of redundancy within both chilled water and hot water capacity, and the economy of scale. In addition, our district energy plants and networks are designed to stringent environmental standards.

b) Overview and Purpose

Veolia has vaults throughout the closed loop distribution system. Veolia may occasionally remove water from the vaults as a result of stormwater drainage, subterranean seepage, irrigation runoff, and/or distribution line leakage. Thus, due to the normal course of maintenance and vault care, the vault must be dewatered. This results in short term and intermittent discharges to surface waters of the State of California.

The California State Water Resources Control Board has the 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 the United States water.

In order to regulate surface waters discharges associated with the de-watering of utility vaults and underground structures, the California State Water Resources Control Board issues General NPDES Permits for Discharges from Utility Vaults and Underground Structures to Surface Waters, Order No. 2014-0174-DWQ, NPDES CAG990002, (“PERMIT”). The State Board allows utilities and other companies to apply for coverage under the General Permit within their region.

The PERMIT requires utilities and other companies to develop and implement a Pollution Prevention Plan (“PLAN”), which include Pollution Prevention Practices (“PPP”), designed to prevent or control the discharge of pollutants. In addition, the PERMIT requires the utilities and other companies to develop and implement a monitoring and reporting program.

The purpose of this PLAN is to assist the Veolia staff in complying with the water quality standards, PPP, and the provisions of the general permit when discharging water from the vaults.

c) Pollution Prevention Team

- Team Head: Carlos Del Cid, Director of Operations
- Email: carlos.del-cid@veolia.com
- Phone: 909-612-2743

- Team assistant: Graham Rowe, Operator
- Email: graham.rowe@veolia.com
- Phone: 323-879-0110

- PLAN Originator: Tina Heath, EHS Corporate Director
- Email: tina.heath@veolia.com
- Phone: 909-614-2701

The Veolia Team also includes all of the Veolia personnel working on the dewatering of the vaults. Members of the team are responsible for developing, maintaining, revising, and implementing this PLAN.

d) Employee Training

Veolia's personnel are fully trained before performing work in vaults. Their training includes, but not limited to:

- Vault pumpout procedures and logs, BMS-03-EP-0100-CA
- Basic operating procedures
- Safety procedures and issues
- Proper traffic safety procedures
- Good housekeeping practices
- Spill management procedures
- Confined space entry and confined space non-entry rescue

These training courses are conducted via various means: PowerPoint, webinar, in-person face-to-face, and videos and is coordinated/overseen by head of the Pollution Prevention Team. The employees are trained on the specifics of the PLAN including the procedure to fill out the pumpout logs. Records of the employee training will be maintained at the Veolia Los Angeles Office.

e) Annual PLAN Revision, Evaluation, and Report

Veolia shall amend the PLAN whenever there is a change in construction, operation, or maintenance, when such amendment is necessary to ensure compliance with the California State Water Resources Control Board issues General NPDES Permits for Discharges from Utility Vaults and Underground Structures to Surface Waters, Order No. 2014-0174-DWQ, NPDES CAG990002 and receiving water limits. The PLAN shall also be amended if it is in violation of any conditions of this General Permit or has not achieved the general objective of controlling pollutants in discharges to surface waters. The Discharger shall submit the amended PLAN to the Regional Water Board.

Veolia shall conduct an overall evaluation of the effectiveness the PLAN in controlling the discharge of pollutants during a discharge event and revise or replace the PLAN as necessary to address procedures and PPP. During this evaluation period, Veolia will analyze the yearly representative vault water discharge for the parameters listed within PERMIT, Attachment C, Table C-1.

Veolia shall submit an Annual Report (for the period from May 1 through April 30) no later than June 1st of each year during the term of this PERMIT.

II. Potential Pollutant Sources

a) Vicinity and Drainage Maps

The vaults covered within this PLAN are located in the Downtown Los Angeles Area. Vicinity and Drainage maps and an example vault diagram can be found within Appendix A. The corresponding City of Los Angeles stormwater drain runoffs travel to the ocean.

Under normal operations, the materials in the vaults are not likely to contaminate the water. However, because the vaults are not watertight, they can collect from rainfall and landscape runoff. In most cases, this water is clean, but may contain traces of petroleum products (residue left on the roads: oil, grease, gasoline, etc.), organic matter, mud and pesticides and other pollutants.

b) Inventory of Exposed Materials

Most vault water is found to be free of substantial pollutants and is not treated prior to discharge. If significant or hazardous contaminants are detected during the on-site water testing as described in Veolia Procedure Vault Pumping Procedure, BMS-03-EP-0100-CA, prior to dewatering, licensed contractors will transport and properly dispose of the contaminated water.

c) Spills and Leaks

Veolia has had rare treated process water leaks in association with the dewatering of the vaults within the past three years. However, the discharged water testing has been performed by third party laboratories and no hazardous pollutants were found. The PLAN will include a record of any spills or leaks of hazardous pollutants on the appropriate logs.

III. Discharge Provisions and Procedures

Veolia must dewater the subsurface vaults to protect equipment or for safety reasons prior to performing repair and maintenance of the equipment located within the various vaults. The water is manually pumped from the vault. The volume of discharge from each vault varies and may range from a few hundred gallons to a few thousand gallons depending on the size of the vault, the weather and/or the maintenance activity.

a) Pumpout Procedures

Veolia uses the company's Procedure Vault Pumping Procedure, BMS-03-EP-0100-CA, attached in Appendix B of the PLAN, to pumpout the vaults. Prior to discharging waters, Veolia personnel will use

the Veolia Pump Out Checklist, to determine if the water can be discharged in compliance with the NPDES PERMIT and this PLAN. Only waters which pass this test will be discharged.

b) Scheduled Discharges

Veolia does not regularly schedule discharges from the underground vaults. If a scheduled discharge were to occur, the practices as outlined within unscheduled discharges would be implemented.

c) Unscheduled Discharges

The majority of the discharges from the underground vaults are unscheduled. Water accumulates in these structures overtime and is dewatered as necessary for maintenance or repair. The frequency of discharge is dependent on the rate and frequency that the water is entering the vault. These vaults need to be dewatered before field work can occur.

Unscheduled discharges would be controlled utilizing the practices described in this PLAN and Veolia Procedure Vault Pumping Procedure, BMS-03-EP-0100-CA

d) Emergency Discharges

In emergency situations involving an immediate threat to human life, serious property damage and/or catastrophic events, Veolia's Management shall take the required action to enter the vault and discharge the untested water. If an emergency discharge were to occur, the practices as outlined within unscheduled discharges would be implemented and the event documented.

e) Reservoir Discharges/ Automatic Discharges

Veolia does not discharge into reservoirs. Veolia only has one vault that is fitted with automatic sump pumps. This vault, #9, is located in the basement of a building and does collect landscape runoff on occasion. Even though the vault is controlled by the building property owners, Veolia regularly inspects the vault, coordinates any maintenance, and discuss pumping activity with the owners.

IV. Risk Identification and Pollution Assessment

Since the vaults are not air-tight, contaminants can enter from outside sources. External contaminants can include traces of petroleum products (oil, gasoline), oil and grease, organic matter, mud, silt, pesticides, and other pollutants. These contaminants are from residue matter left on the streets and within ground/landscaping. Typically, discharge waters are free from significant contaminants. Accidental spills or leaks by outside parties (illegal dumping, traffic accidents) are possible, though unlikely and their risk is low since the vault lids are secured.

The distribution piping contained within vaults contains insulation material around the pipe and may contribute very small amounts of particulates matter to the discharged water. As the piping is routinely maintained and monitored, the risk of contaminating the discharge water is small.

a) Past Sampling Data and Pollution Assessment

The discharged waters have been tested by third party laboratories. The past data water testing results confirm that the pollution concern is extremely low.

b) Vector Control

Vector control is required for stagnant, room temperature standing water to discourage the breeding of insects, such as mosquitoes. Since Veolia operates a district heating plant, the high temperature water loops piping heats the vaults in excess of 100° F. This temperature is too hot for insect breeding. Thus, Veolia does not need to administer chemical pesticides in the vaults.

c) Future Pollution Assessment and Sampling

Veolia personnel will sample the vault discharge water in accordance to Attachment G of the PERMIT, Discharge Characterization Study 1. In addition, Veolia will sample the discharge water for the constituents listed within PERMIT, Table 3 to help gauge the effectiveness of the existing PLAN annually.

V. Pollution Control Measures and Prevention Practices

a) Good Housekeeping and Preventive Maintenance

Veolia has policies in place which address housekeeping, inspections and preventative maintenance. The vaults and other sub-surface structures are kept clean and free from known contaminants. The sites are periodically checked during maintenance for any defects (deposits, leaks, cracks, etc.).

The Veolia personnel is required to prepare the site in accordance with standard Veolia policy and practices, including work zone safety. Prior to discharging, the personnel is required to set up all safety equipment and don all necessary personal protective equipment including, but not limited to, safety glasses, safety shoes, gloves, high visibility traffic warning vest, etc. These procedures are covered within Veolia Internal Procedure regarding work zone safety, BMS-01-SP-023.

Prior to entrance into the vault by the workers, the atmosphere must be tested, the vault must be purged, continuous ventilation must be provided, and the atmosphere must be continuously monitored as long as the workers remains in the vault. These procedures are covered in the Veolia Internal Procedure Permit required Confined Space, BMS-01-SP-002.

b) Pollution Control, Spill Prevention and Response Procedures

Veolia's management has established a strict environmental policy that promotes increase awareness, motivation and involvement of the people in the organization. To aid in the pollution control, hazardous materials are not stored within Veolia's vaults and the lids to all vaults are secured into place and the vaults are not accessible to the general public.

Prior to any manual discharge, the waters are inspected prior to discharge to determine if they contain contaminants. Contaminated water will not be discharged. If an unexpected spill were to enter into a

vault or structure, the appropriate agencies would be immediately notified and the release would be addressed either by a qualified contractor or Veolia personnel according to the Veolia Internal Environmental Reporting Procedure, BMS-01-EP-014.

Any hazardous materials and/or waste would be contained and transported to an appropriate disposal facility by qualified personnel. Spill response equipment and supplies are available at Veolia Energy Bunker Hill Facility.

c) Sediment and Erosion Control

The vaults that Veolia manages under this PLAN are not in high risk areas for significant soil erosion. The personnel will follow the Veolia Vault Pump out Procedure No. BMS-03-EP-0100: Sections 7.2 to minimize the risk of sediment entering discharge water.

d) Management Runoff

Not applicable. No water runs off. It is trapped in the substructure which serves as a containment.

e) Inspections

Veolia personnel must inspect the integrity of vaults and structures to ensure they are in good working order and functioning properly. Any damage is documented and repaired as soon as possible. Prior to manually pumping out a vault or subsurface structure, the personnel, or subcontractor, will conduct a visual inspection of the water in the vault to determine the presence of any obvious signs of contamination (e.g., a sheen on top of the water, cloudiness, presence of physical objects, etc.). These procedures and required records are noted in Veolia Procedure No. BMS-03-EP-0100-CA: Section 7.0 and Procedure's Pump out Checklist-Exhibit A. Copies of these documents can be found within Appendix B of the PLAN.

Veolia personnel are instructed to contact their supervisor if the water fails preliminary screening. Only water that has passed the screening process will be discharged. If the water fails screening, prearranged licensed contractors are available to pump out, transport, and properly dispose of the contaminated water. It is the operation's and maintenance's responsibility to strictly adhere to the approved inspection procedures for dewatering of vaults and structures.

f) Waste Disposal

Veolia has internal policies in place which addresses the proper handling of the hazardous waste management, BMS-01-EP-009. Although Veolia does not store any hazardous materials nor expect the need to dispose of hazardous waste during the pumpouts of the vaults, the personnel will inspect the water prior to discharge to determine if they contain contaminants.

VI. Record Keeping and Internal Reporting Procedures

Federal regulation requires that any oil spill into a water body be reported to the National Response Center at 1-800-424-8802 (24 hours). In addition, Veolia shall report spills to the appropriate local agency, such as the fire department at phone number 911 and the California Office of Emergency

Services located at phone number 1-800-852-7550. These actions are outline within the Veolia spill notification guidelines template and Veolia Internal Environmental Reporting Procedure, BMS-01-EP-014.

During such an incident, Veolia will provide a description of incidents (such as spills or other discharges), along with other information describing the quality and quantity of discharges. The Company will then document the date and time of incident, weather conditions, duration and cause of spill/leak/discharge, response procedures, resulting environmental problems and persons notified.

Veolia will maintain the PLAN records for five years at the facility and at the Los Angeles Office.

VII. 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 the 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.

X



Carlos Del Cid
Director of Operations

Date: June 29, 2015

APPENDIX A - Vicinity and Drainage Maps

Table 1
Century City Vault Locations (Updated June 2015)

Vault #	Vault Address	Vault Size (ft)
1	Located behind 2052 Century Park E	10x12x12 (6 ft below grade to top of vault)
2	Located 100 feet west of 2052 Century Park E	16x18x18 (6 ft below grade to top of vault)
3	Located about 500 feet east of intersection of W. Olympic Blvd and Century Park E.	8x10x12 (5 ft below grade to top of vault)
4	Located on the Southwest corner of Olympic Blvd and Century Park E.	16x16x20 (18 ft below grade to top of vault)
6	Located in front of 2052 Century Park E.	8x10x10 (6 ft below grade to top of vault)
7	Located on the Southwest corner of Century Park E. and Constellation Blvd.	18x18x20 (6 ft below grade to top of vault)
7A	Located on the Southwest corner of Century Park E. and Constellation Blvd.	8x10x10 (4 ft below grade to top of vault)
7B	Located East side of Century Park East, South of Santa Monica Blvd.	10x15x10 (2 ft below grade to top of vault)
8	Located on the West side of Constellation Blvd 460 ft south of Century Pak E. and 420 ft north of Avenue of the Stars	8x10x10 (6 ft below grade to top of vault)
8A	Located on the Northwest corner of Avenue of the Stars and Constellation Blvd.	10x10x12 (0 ft below grade to top of vault)
8B	Located on the Northwest corner of Avenue of the Stars and Constellation Blvd.	10x10x12 (0 ft below grade to top of vault)
9	Located on the Southwest corner of Avenue of the Stars and Constellation Blvd. (1999 Ave of the Stars Buidling Property owners)	10x14x10 (6 ft below grade to top of vault)
10	Located on the Southeast corner of Avenue of the Stars and Constellation Blvd.	8x8x10 (6 ft below grade to top of vault)

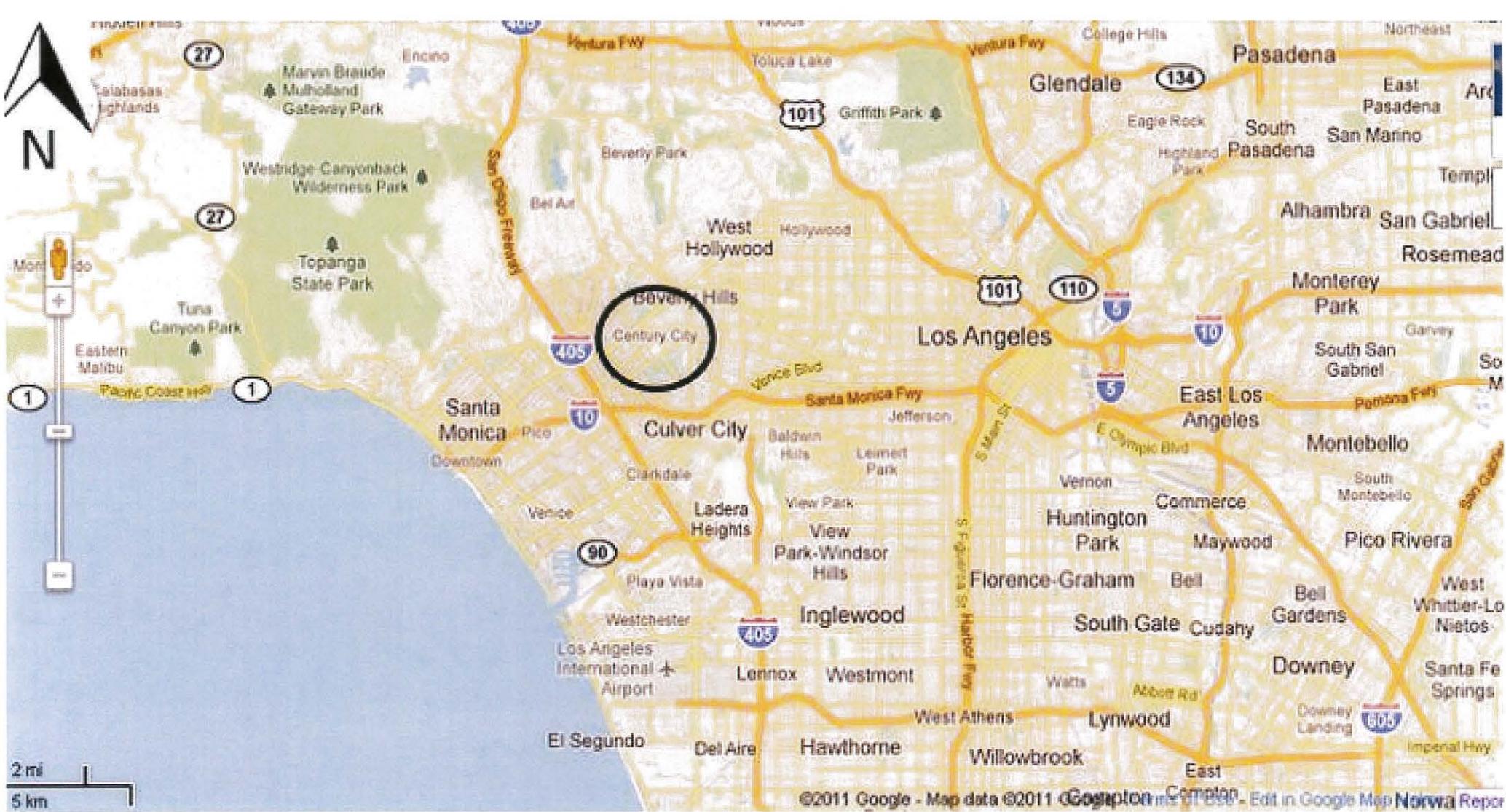


Figure 1.1

Century City

Vault Locations

Veolia Energy

Site Vicinity Map

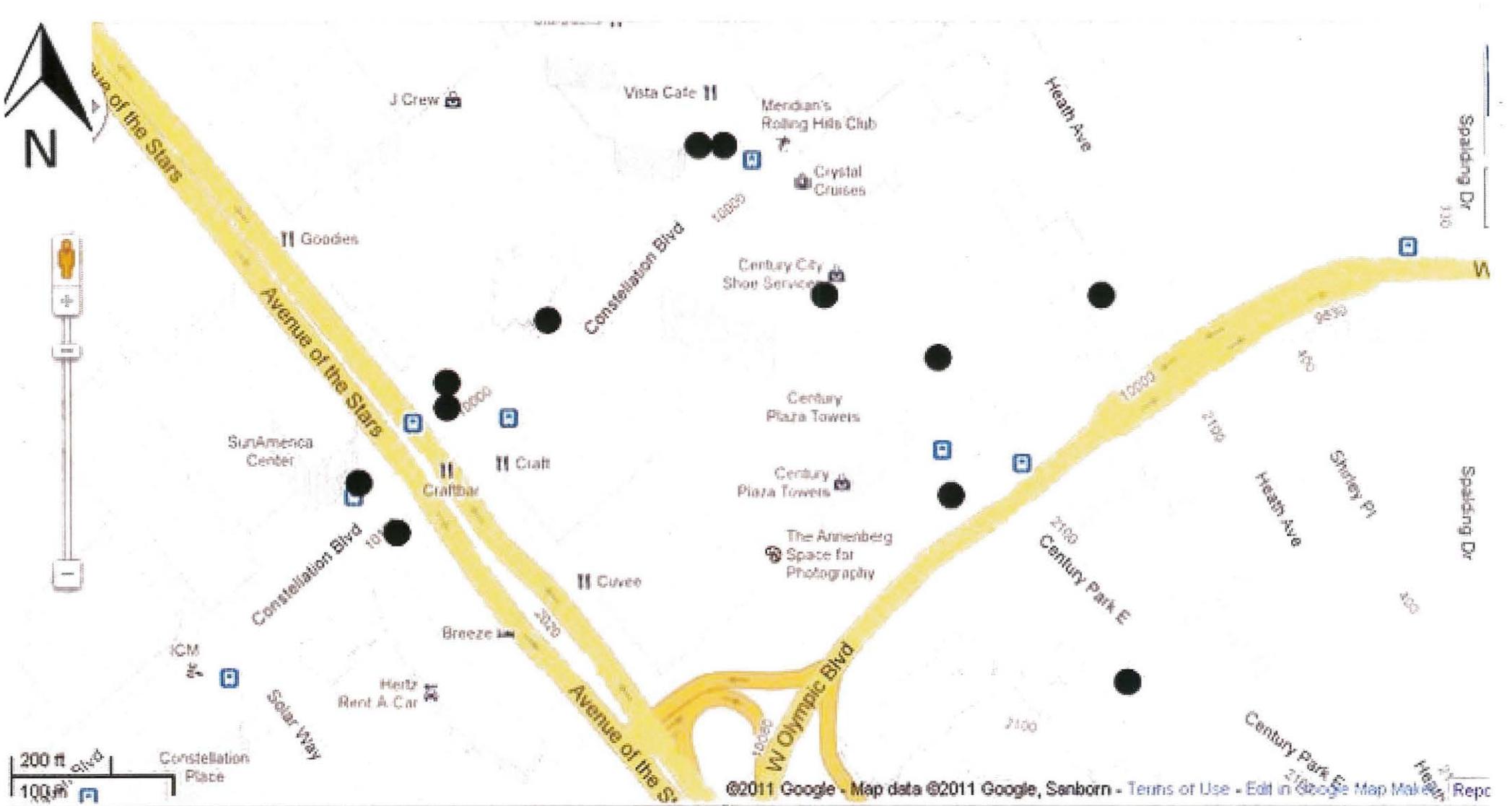


Figure 1.2

Veolia Energy

● = Century City Vault Locations

Site Vicinity Map

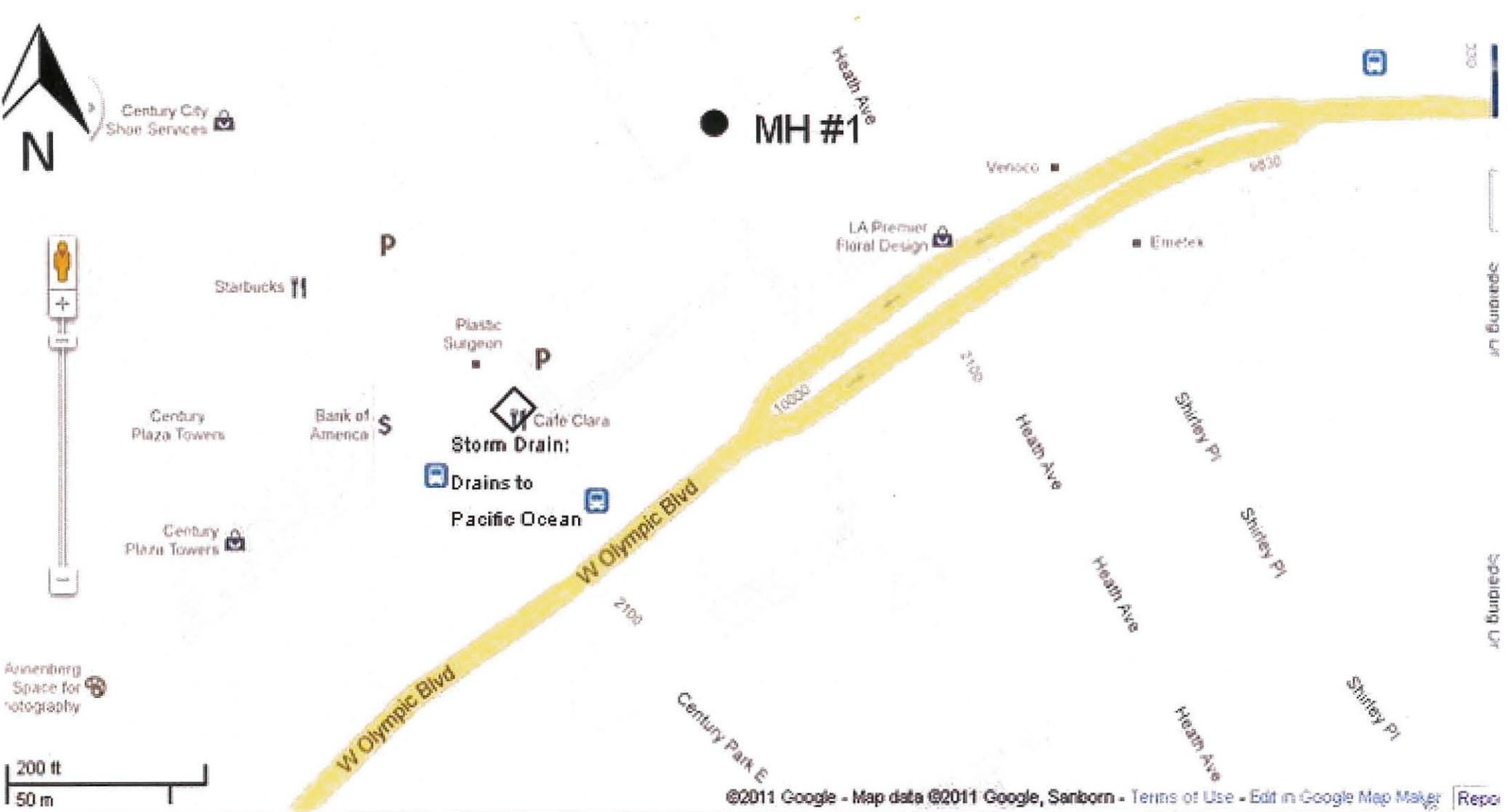


Figure 1.3

Veolia Energy

● = Century City Vault Location

Site Vicinity Map



Figure 1.4

● = Century City Vault Location

Veolia Energy

Site Vicinity Map

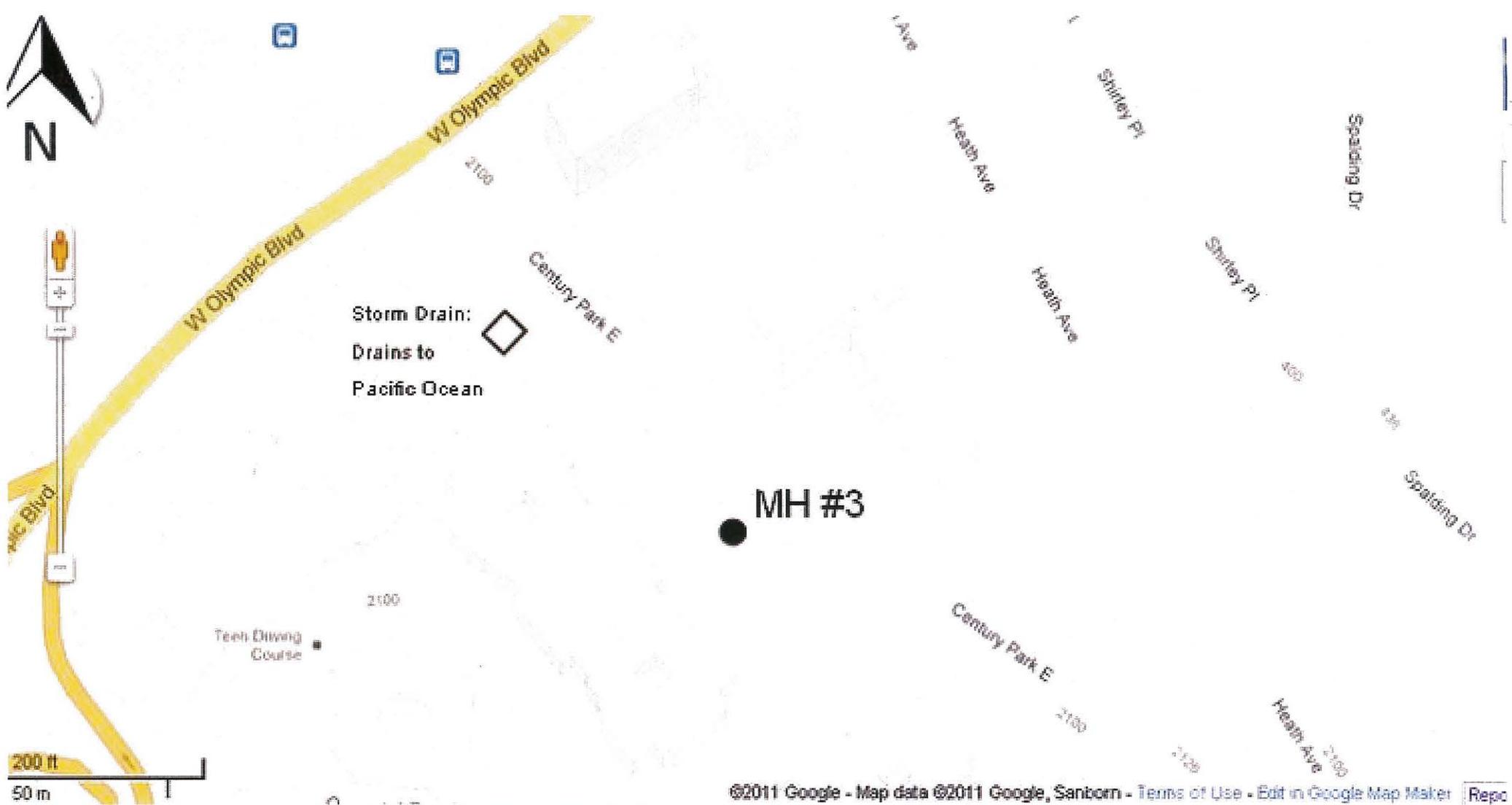


Figure 1.5

Veolia Energy

● = Century City Vault Location

Site Vicinity Map

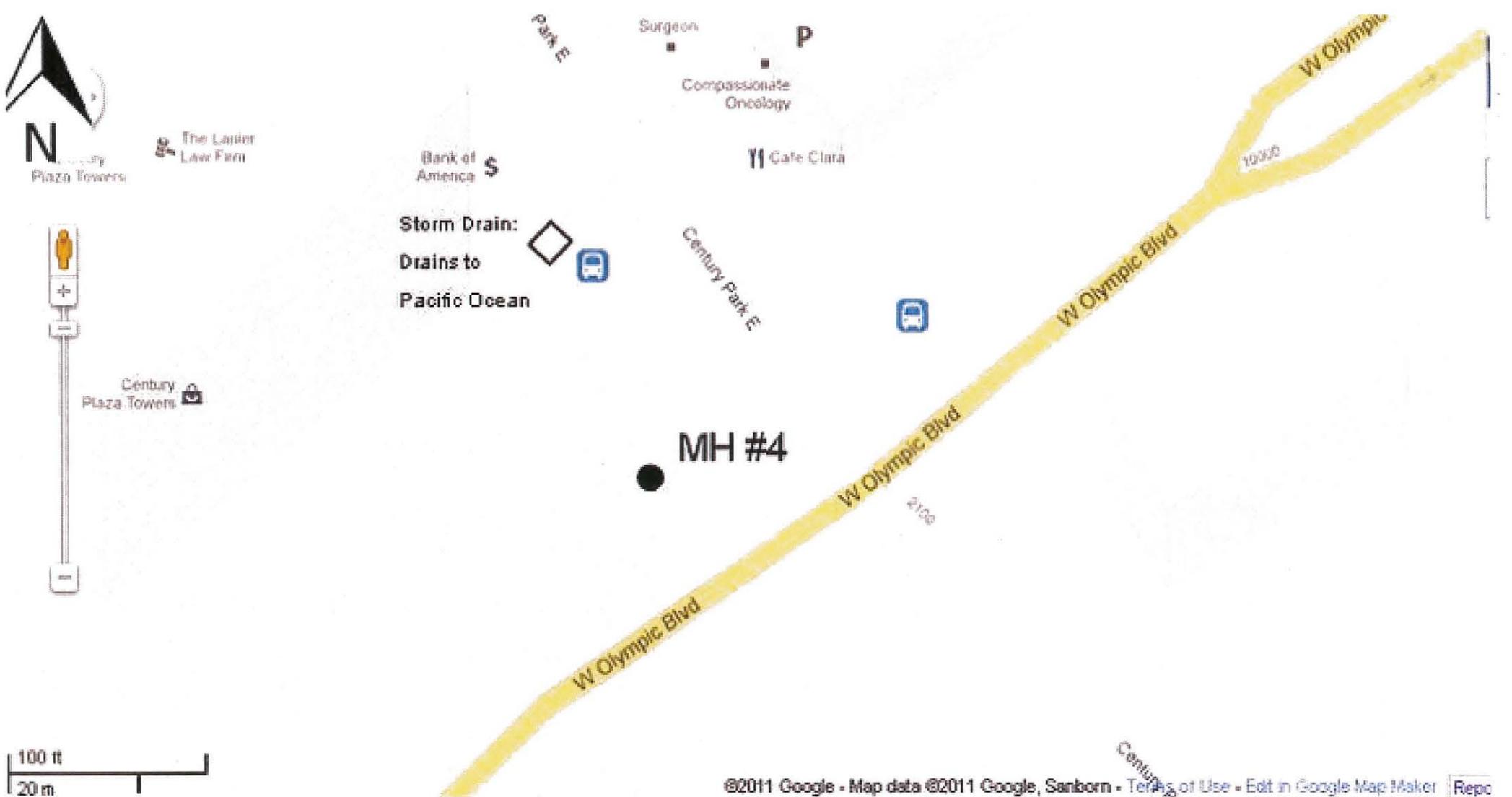


Figure 1.6

Veolia Energy

● = Century City Vault Location

Site Vicinity Map



Figure 1.7

Veolia Energy

● = Century City Vault Location

Site Vicinity Map

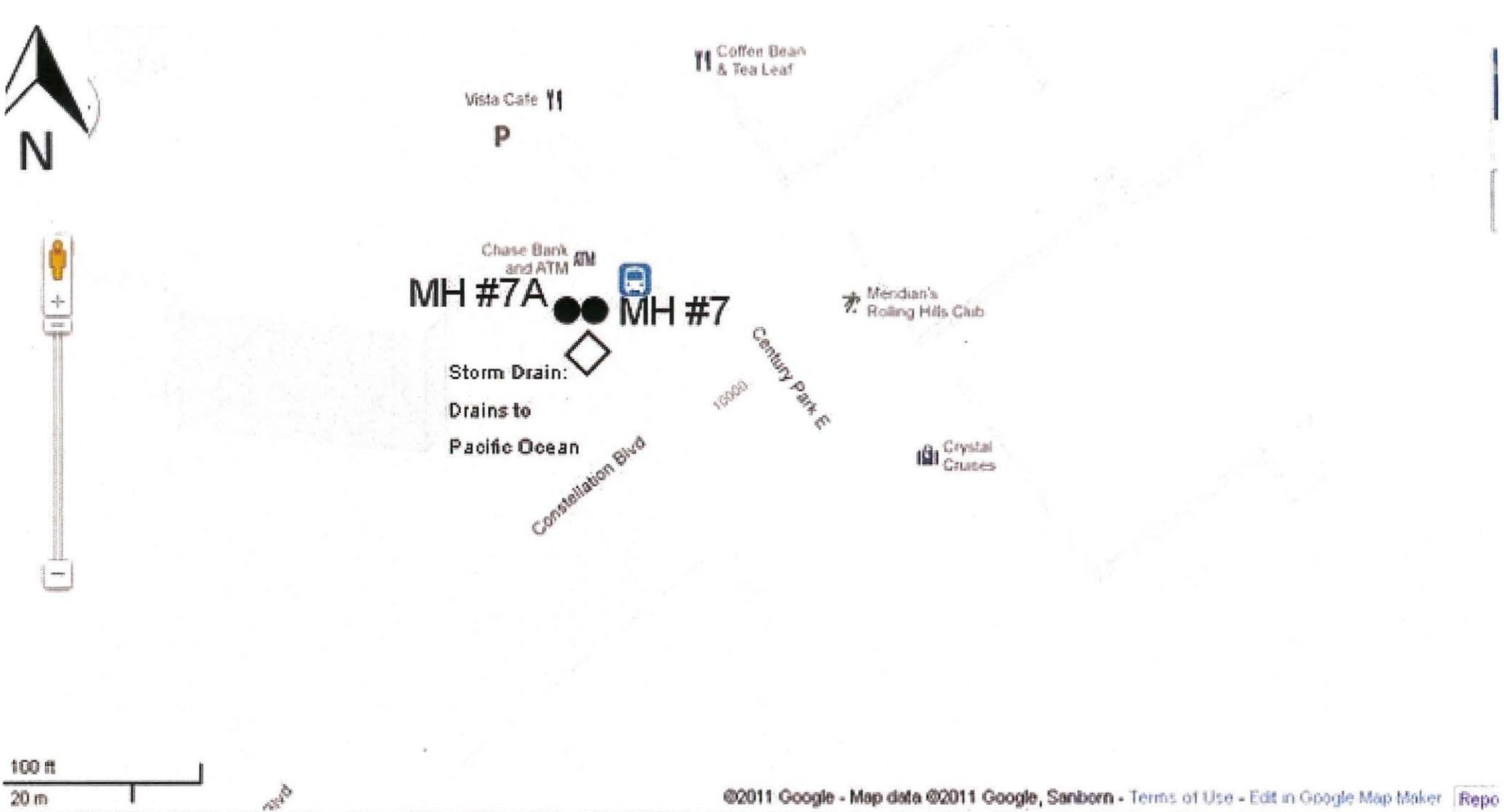


Figure 1.8

● = Century City Vault Locations

Veolia Energy

Site Vicinity Map

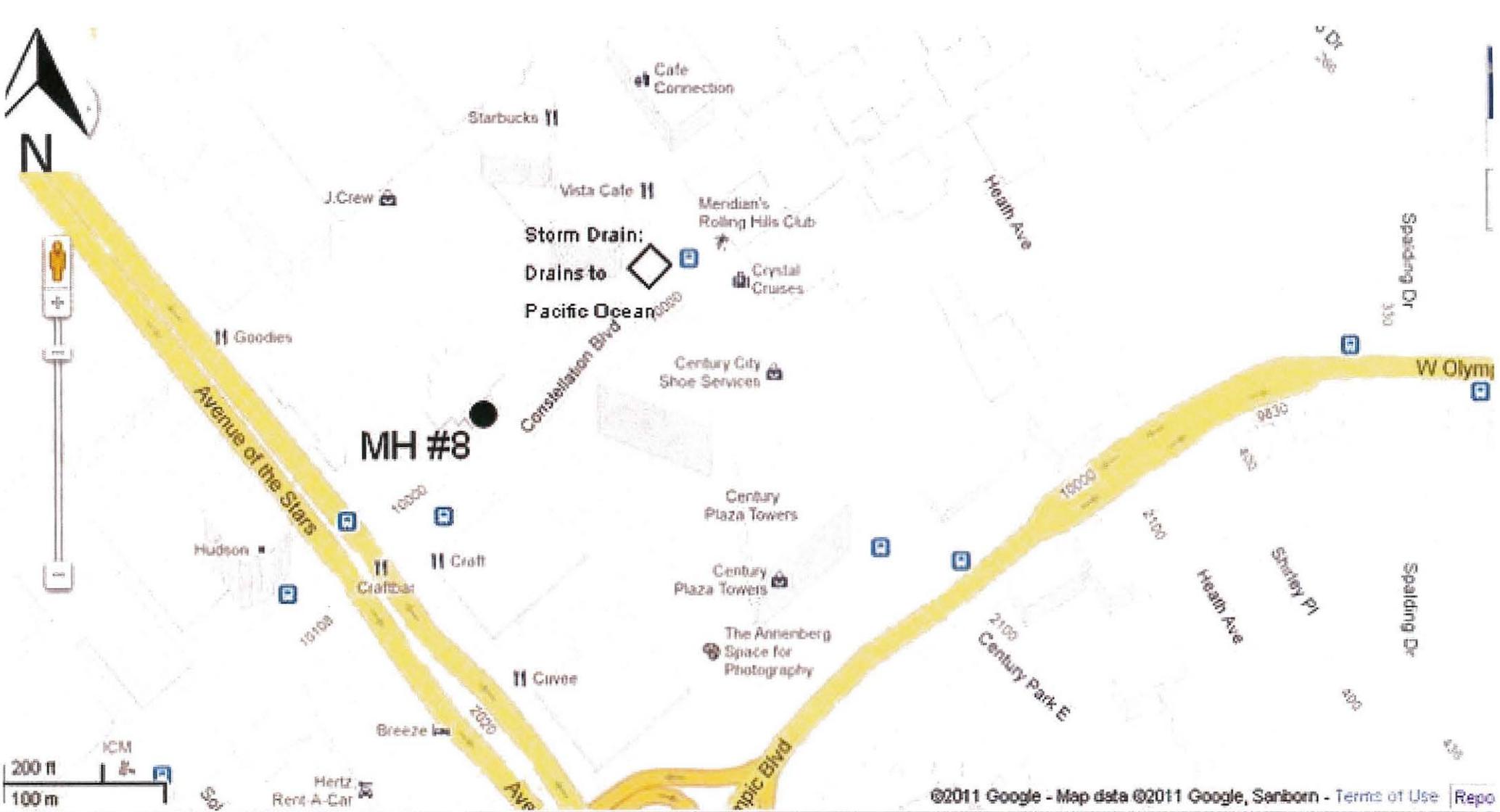


Figure 1.9

● = Century City Vault Location

Veolia Energy

Site Vicinity Map

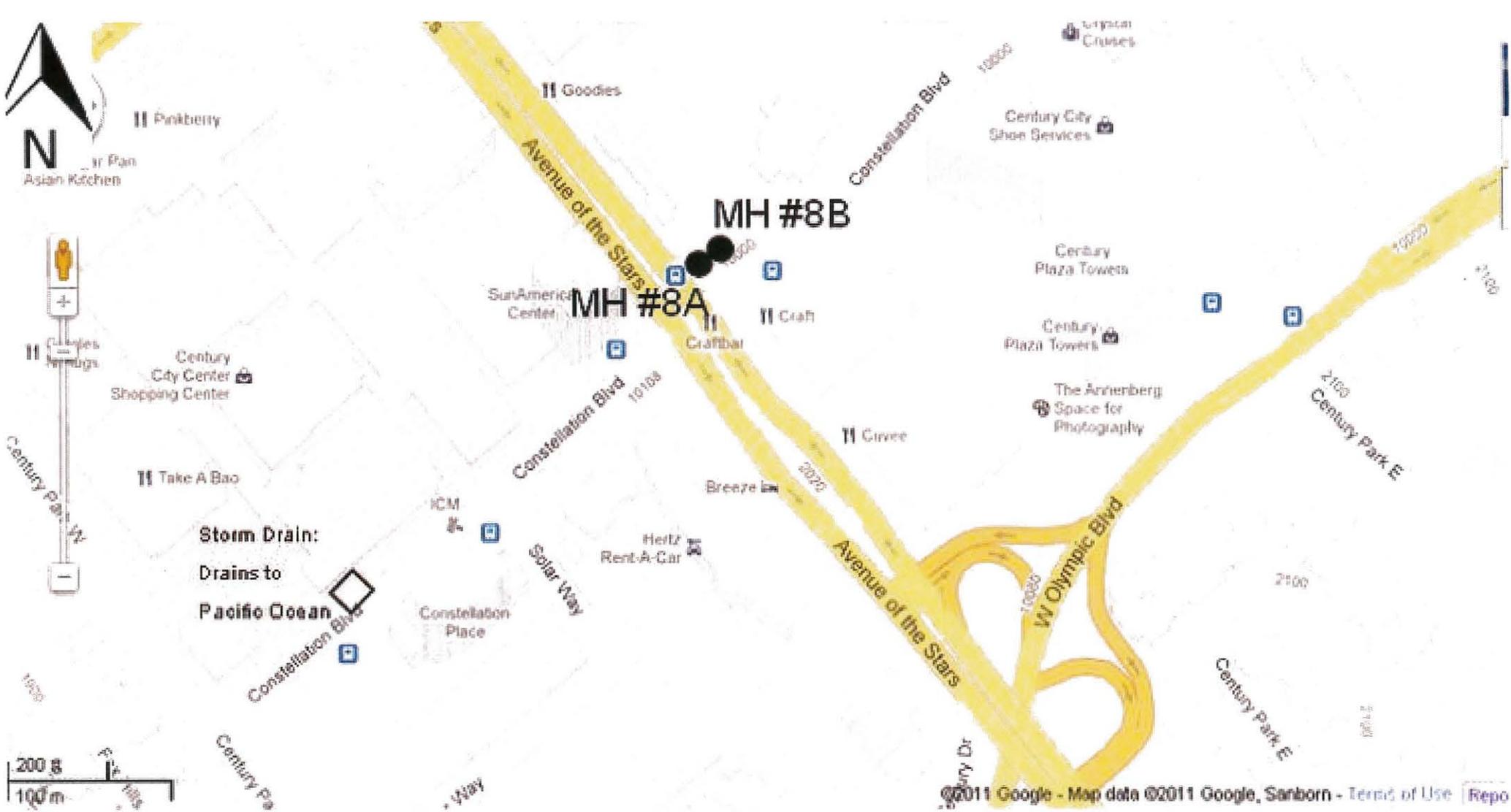


Figure 1.10

Veolia Energy

● = Century City Vault Location

Site Vicinity Map

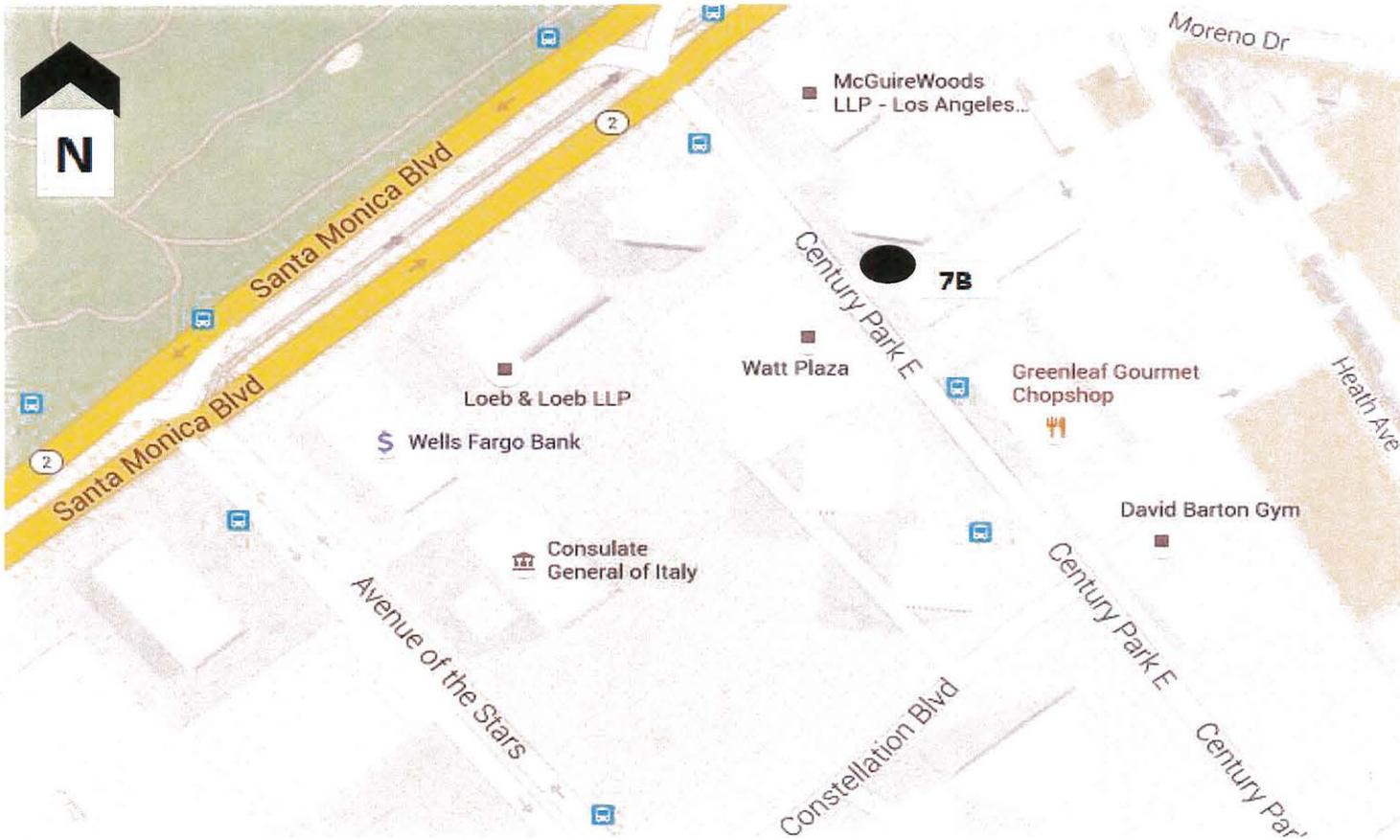


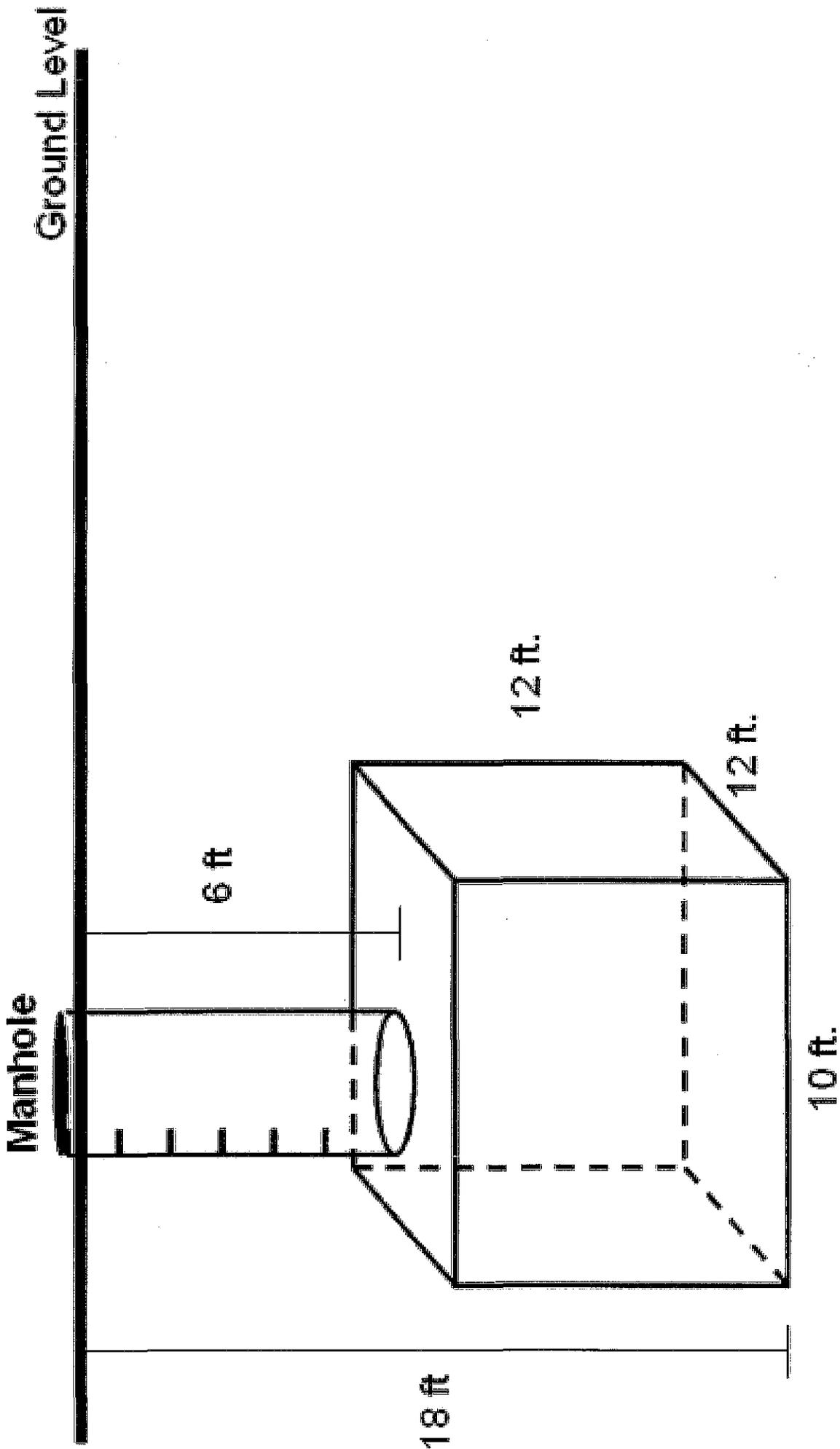
Figure 1.13

Veolia Energy

● = Century City
Vault Location

Site Vicinity Map
| ——— | = 200 ft

Example Diagram of a Vault



APPENDIX B - Vault Pumping Procedure: BMS-03-EP-0100-CA and Exhibit A: Pump out Checklist



Regional Environmental Program

SUBJECT: Vault Pumping Practices

PROCEDURE NO.
BMS-03-EP-0100- CA

PAGE
1 of 5

PREPARED BY
Michael Stoppa

APPROVED BY
ORIGINATION DATE
September 2011

REVISION DATE
June 2015
REV. #
03

DATE	REVIEWED BY:	REVISIONS MADE:	COMMENTS / REVISIONS	REVISIONS APPROVED BY:
09/2012	Michael Stoppa	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Annual review	MDS
06/2015	Tina Heath	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Slight modifications to cover the Los Angeles Sites procedures under the California State Water Resources Control Board, Order #2014-0174-DWQ, NPDES CAG990002	TBH
		<input type="checkbox"/> YES <input type="checkbox"/> NO		
		<input type="checkbox"/> YES <input type="checkbox"/> NO		
		<input type="checkbox"/> YES <input type="checkbox"/> NO		
		<input type="checkbox"/> YES <input type="checkbox"/> NO		
		<input type="checkbox"/> YES <input type="checkbox"/> NO		

All Revisions must be approved by; Corporate Safety Manager, Regional Environmental, Health, and Safety Manager; and the facility General Manager

1.0 Purpose

- 1.1 The purpose of this procedure is to provide an effective means of identifying the appropriate and in some cases regulatory requirements necessary for distribution personnel to use in the event a vault in a public area becomes flooded with any material either liquid or solid. This Vault Pumping Program also establishes administrative and PPE practices and requirements for employees subject to its implementation.

2.0 Scope

- 2.1 This procedure applies to all employees working in or at a location owned, operated or managed by VEnNA that requires that they perform vault pumping or cleaning due to foreign material entering our vault system or that of our customer should we be liable for maintenance of those vaults.

3.0 References

- 3.1 VEnNA Personal Protective Equipment program
- 3.2 VEnNA Confined space entry program
- 3.3 VEnNA Energy Control (Lock out / Tag Out) Program
- 3.4 VEnNA Welding, Cutting and Hot Work
- 3.5 VEnNA Work Zone Safety Policy
- 3.6 Site specific NPDES or other applicable permitting requirements

4.0 Responsibilities

- 4.1 **Plant Manager** shall ensure uniform implementation and compliance with this program by all employees and assume the responsibilities of managers and supervisors if the facility does not support such positions.
- 4.2 **Human Resources representative** maintains all employee medical and personnel records.
- 4.3 **Department Managers** shall ensure that personnel under their direction receive training and that they maintain compliance with this program at all times.
- 4.4 **Site Safety Managers** shall ensure the training of facility supervision to this program is completed and documented, to a level that will ensure understanding.
- 4.5 **Shift and/or Distribution Supervisors** shall ensure the training of facility supervision to this program is completed and documented, to a level that will ensure understanding.
- 4.6 **Department Supervisors** shall be responsible for ensuring that only trained employees assume active roles and perform related work(s) in accordance with this program.

- 4.7 **Employees** must ensure that they understand and comprehend this program and maintain full compliance with this program and its contents. Only trained employees shall assume active roles and perform work in accordance with this program.

5.0 Definitions

- 5.1 **Contractor** – For the purposes of this procedure any contractor brought on site to work within the scope of this procedure shall adhere to all specific requirements of Veolia Energy NA in regards to vault maintenance and vault pumping.
- 5.2 **Distribution System** – For the purposes of this procedure any reference to a distributions system shall include public thoroughfare manholes, piping above and below ground, manholes on or in private property managed by Veolia Energy personnel.
- 5.3 **Qualified Employee** - A Veolia Energy employee that has been trained in the specific practices and procedures of a particular task and/or job. This training can be but is not limited to classroom, computer based, lecture, text book, video based, interactive, Power Point and discussion groups.

6.0 General Information

- 6.1 Each site shall verify whether there are any federal, state or local regulations that require a stormwater run-off permit and whether their site maintains a current site specific stormwater permit, NPDES permit or other regulated program as appropriate.
- 6.2 If a specific stormwater, NPDES permit or other applicable permit exists for the site, then the site shall;
- 6.2.1 Review the requirements established in that permit
 - 6.2.2 Ensure adherence to those specific and general permit effluent or release requirements at all times.

NOTE: Nothing within this document authorizes or directs any site to knowingly violate or disregard any federal, state or local permit or permitting program in order to comply with this procedure.

- 6.3 Due to rain fall, snow melt, landscape runoff and other localized spills, vaults can and do flood and/or fill with water, hazardous materials, sediment or other foreign material. As such, employees are required to adhere to strict guidelines and regulations established for the removal and disposal of that material contained below in section 7.0.
- 6.4 Employees working in or on our distribution team shall adhere to the following VEnNA internal safety programs at all time:
- 6.4.1 Confined Space Entry
 - 6.4.2 Energy Control (Lock out / Tag Out)
 - 6.4.3 Welding, Cutting and Hot Work

- 6.4.4 Personal Protective Equipment
- 6.4.5 Work Zone Safety

6.5 Employees working on or in our distribution system shall be vigilant to the environment around them at all times.

7.0 Procedures

7.1 Vault Inspection & Monitoring

7.1.1 Vaults shall be inspected on a regular scheduled basis as established by the facility maintenance program.

7.1.2 A vault inspection shall be initiated anytime a site is notified by any reputable party that a spill of any material has occurred within the general area of the vault, where topographical layout would indicate a likely or possible migration to our vault.

7.2 Vault Pumping

7.2.1 At a minimum, the following practices shall be observed by all distribution personnel without exception:

7.2.1.1 Visually inspect stormwater, ground water or any other material that has migrated into a vault.

7.2.1.2 If the material is clear and appears to be uncontaminated and non-hazardous, then it can be pumped from the manhole into the nearest storm sewer catch basin, using the following parameters.

7.2.1.2.1 A drain hose must be fitted to the pump and run the entire length terminating directly into the catch basin.

7.2.1.2.2 A sock shall be attached to the end of the drain line with the capacity to catch any solid materials or foreign bodies and prevent them from entering the storm sewer:

7.2.1.3 If the material is found to be unnaturally discolored or have excess turbidity or the presence of known hazardous materials (i.e. diesel fuel, gasoline, oil or other spilled material) then it shall NOT be pumped into any storm drain or sewer. It shall be

7.2.1.3.1 Pumped to a holding tank of a reputable contractor

7.2.1.3.2 Properly disposed of according to state and federal requirements

7.2.1.4 If a manhole / vault requires the removal of any solid material such as sediment, metal, wood or other foreign object, it shall be removed in accordance with state and federal regulations (OSHA, EPA, DNR, etc.) and disposed of in accordance with the same. All precautions shall be made prior to the removal of any foreign object.

NOTE: Under no circumstances shall foreign objects from our manhole / vaults be discarded into or upon a public way.

7.2.1.5 An ongoing working log shall be maintained at the site for each manhole / vault that requires evacuation of stormwater, ground water, or other spilled foreign material. (An example is contained in **Exhibit A** attached to this document)

7.2.1.5.1 The log shall contain start time, stop time, duration, and pumping rate.

8.0 Training

- 8.1 Employees covered by this program will participate in an initial and periodic training program geared towards educating the employees in the hazards of working to extract liquids or other foreign materials from manholes / vaults.
- 8.2 All new or transferred employees who will be assigned to jobs where they may become a subject to this activity shall receive training within 30 days of their initial employment or reassignment.
- 8.3 The training program shall include at a minimum:
 - 8.3.1 A brief review of the requirements for manhole / vault entry.
 - 8.3.2 29 CFR 1910 general Duty Clause
 - 8.3.3 Monitoring equipment design and use
 - 8.3.4 Safety hazards associated with manhole and vault entry
 - 8.3.5 This written program and its requirements.

9.0 Documentation

- 9.1 Training - Attendance rosters of all training sessions shall include date, department, name/signature of employee, and instructor's name. The Safety Manager or designee for each site shall maintain all training records.
- 9.2 All records and test results pertaining to this program will be made available to the employees upon written request. Only information related to the individual employee shall be released to him or her or their designated representative. Such representation must be made in writing.
- 9.3 Program Evaluation - This program shall be evaluated periodically by VEnNA Environmental, Safety & Health Department. Changes shall be made as necessary to maintain program effectiveness
- 9.4 An ongoing working log
- 9.5 Site Specific NPDES or other applicable regulatory documentation requirements.



Vault Pumpout Procedure BMS-03-EP-101 - Exhibit A

VAULT # _____

DATE: _____ TIME: _____ VAULT SIZE: _____

ESTIMATED WATER DEPTH: _____ AMOUNT (GAL) _____

Discharge destination (alley, etc.) _____

Describe conditions: _____

Is vault water cloudy, discolored, and/or has odor? Yes ___ No ___ Any oil and/or tar? Yes ___ No ___

Are there solids being discharged into the storm sewer? Yes ___ No ___ Recent Rain: Yes ___ No ___

Name & Signature _____

DATE: _____ TIME: _____ VAULT SIZE: _____

ESTIMATED WATER DEPTH: _____ AMOUNT (GAL) _____

Discharge destination (alley, etc.) _____

Describe conditions: _____

Is vault water cloudy, discolored, and/or has odor? Yes ___ No ___ Any oil and/or tar? Yes ___ No ___

Are there solids being discharged into the storm sewer? Yes ___ No ___ Recent Rain: Yes ___ No ___

Name & Signature _____

DATE: _____ TIME: _____ VAULT SIZE: _____

ESTIMATED WATER DEPTH: _____ AMOUNT (GAL) _____

Discharge destination (alley, etc.) _____

Describe conditions: _____

Is vault water cloudy, discolored, and/or has odor? Yes ___ No ___ Any oil and/or tar? Yes ___ No ___

Are there solids being discharged into the storm sewer? Yes ___ No ___ Recent Rain: Yes ___ No ___

Name & Signature _____

DATE: _____ TIME: _____ VAULT SIZE: _____

ESTIMATED WATER DEPTH: _____ AMOUNT (GAL) _____

Discharge destination (alley, etc.) _____

Describe conditions: _____

Is vault water cloudy, discolored, and/or has odor? Yes ___ No ___ Any oil and/or tar? Yes ___ No ___

Are there solids being discharged into the storm sewer? Yes ___ No ___ Recent Rain: Yes ___ No ___

Name & Signature _____

DATE: _____ TIME: _____ VAULT SIZE: _____

ESTIMATED WATER DEPTH: _____ AMOUNT (GAL) _____

Discharge destination (alley, etc.) _____

Describe conditions: _____

Is vault water cloudy, discolored, and/or has odor? Yes ___ No ___ Any oil and/or tar? Yes ___ No ___

Are there solids being discharged into the storm sewer? Yes ___ No ___ Recent Rain: Yes ___ No ___

Name & Signature _____

ESTIMATED WATER DEPTH: _____ AMOUNT (GAL) _____

Discharge destination (alley, etc.) _____

Describe conditions: _____

Is vault water cloudy, discolored, and/or has odor? Yes ___ No ___ Any oil and/or tar? Yes ___ No ___

Are there solids being discharged into the storm sewer? Yes ___ No ___ Recent Rain: Yes ___ No ___

Name & Signature _____