Pollution Prevention Plan:
Discharges from Utility Vaults and Underground Structures to Surface Waters

Submitted to:
Utility Vaults NOI - NPDES Unit
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Submitted by:
CITY OF BURBANK
BURBANK WATER AND POWER
164 West Magnolia Boulevard
Burbank, CA 91502

Prepared by:
NATURAL RESOURCE GROUP, LLC
3763 Howard Hughes Parkway Suite 310
Las Vegas, NV 89169
November 2015
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1.0 Introduction

1.1 General Overview
Burbank Water & Power (BWP) has electric utility vaults and secondary containment throughout the city of Burbank. These utility vaults and secondary containment may need to be dewatered whenever scheduled or emergency activities are required. This Pollution Prevention Plan (PLAN) was written following the requirements of the General Permit No. CAG 990002 and details the best management practices (BMP) used in the event of a discharge. This PLAN covers the underground utility vaults maintained by BWP throughout the city of Burbank and on the Burbank Water and Power Campus.

While the city of Burbank is regulated by the Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Order No. R4-212-0175, the order allows non-storm water discharges that are authorized by a permit.

1.2 Applicability
General Permit No. CAG 990002 (General Permit) regulates the discharge from dewatering activities of utility vaults and other underground structures. Discharges are permitted provided that the water does not contain pollutant concentrations that have a reasonable potential to cause or contribute to any of the following:

- Excursions of applicable federal water quality criterion pursuant to the Clean Water Act (CWA) section 303;
- Excursions of applicable water quality objectives adopted by the Regional or State Water Board; or,
- Cause acute or chronic toxicity in the receiving water.

1.3 Owner & Operator Information
Burbank Water and Power owns and operates all of the vaults covered under this general permit.

CITY OF BURBANK
BURBANK WATER AND POWER
164 West Magnolia Boulevard
Burbank, CA 91502
2.0 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.

Name  Signature  Date
3.0 PLAN Administration

3.1 Regional Water Board Liaison (VII.A.2.a)
Claudia Fierro is the designated Regional Water Board Liaison as required by the General Permit, Section VII.A.2.a.

Claudia Fierro
Environmental and Safety Manager
Burbank Water & Power
164 West Magnolia Boulevard
Burbank, California 91502
(818) 238-3510
cfierro@burbankca.gov

3.2 Pollution Prevention Team (VII.C.3.c.i.a)
The following people are designated members of the Pollution Prevention Team:

Claudia Fierro
Environmental and Safety Manager
Burbank Water & Power
164 West Magnolia Boulevard
Burbank, California 91502
(818) 238-3510
cfierro@burbankca.gov

Bradley A. Recker
Manager Electrical Distribution
Burbank Water & Power
164 West Magnolia Boulevard
Burbank, California 91502
(818) 238-3591
brecker@burbankca.gov

Mike Kelley
Manager Electrical Equipment
Burbank Water & Power
164 West Magnolia Boulevard
Burbank, California 91502
(818) 238-3588
mkelley@burbankca.gov

3.3 Employee Training (VII.C.3.c.i.b)
Employees who dewater vaults during normal operations or emergency situations are trained annually. Training will occur more frequently in the event that dewatering procedures change or new employees require training. Only trained employees complete vault dewatering activities.

The training covers, at a minimum, the following topics:
- Dewatering Procedures/Checklist
- Best Management Practices
- Spill Response
- Good Housekeeping
• Pollution Control Procedures
• Materials Management
• Vault Dewatering Pollution Prevention PLAN

The pollution prevention team reviews the training material annually and updates the material as necessary. The Environmental and Safety Manager is responsible for coordinating the annual training, while the Manager of Electrical Distribution and Electrical Equipment are responsible for identifying which employees’ may be required to complete vault dewatering activities in the next year (for purposes of this PLAN, a year is considered May 1st through April 30th).

Documentation of all employees’ who complete training each year is kept in the Environmental and Safety Manager’s office for a minimum of five years. Blank training documentation forms are in Appendix C of this PLAN.
4.0 Identification of Potential Pollutant Source

4.1 Description of Potential Pollutant Sources (VII.C.3.c.ii.a)
Electrical vaults, man holes, and pull boxes are concrete-walled, subterranean structures that range in size. All electrical subterranean structures contain sealed cable, while electrical vaults and manholes may also contain oil filled equipment. These are the only materials kept within the vaults. Oil filled transformers and switches are the only potential source of contamination within the vaults. BWP currently maintains approximately 800 manholes, 30 vaults, and 300 pull boxes in electrical service. Approximately 20 structures contain oil filled equipment.

Because vaults are commonly found in streets or parkways, storm water from the surface leaks through the joints of the cover, filling the vault. Any potential pollutants from outside the vaults come from vehicular activity and other activity in the immediate surrounding area. There are not currently any structural runoff controls beyond the vault cover.

Additionally, subsurface secondary containment structures are concrete-walled, subterranean structures that range in size. The secondary containment on campus does not have any covers, but it does have concrete walls that rise above the surface. For this reason, runoff from the ground is not expected to enter the subsurface secondary containment. Oil filled transformers within the secondary containment are the only potential source of contamination.

Personnel do not bring materials into the vault during scheduled or emergency activities, so there are no additional potential pollutant sources.
4.2 Drainage Map (VII.C.3.c.ii.b)
4.3 Potential Pollution Source Assessment (VII.C.3.c.ii.c)

Most vaults only contain sealed electrical cable so do not have potential pollution sources from within the vault. Approximately twenty vaults contain oil filled equipment, which makes oil a potential pollutant source within these vaults. For this reason, discharge samples are analyzed for oil and grease.

Because the vaults are not completely sealed, runoff from the street may bring motor oil, gasoline, and diesel residue into the vault. Additionally, sediment and trash may enter the vault in runoff from the street. For this reason, discharge samples are analyzed for oil and grease, Total Petroleum Hydrocarbons (TPH) – Gasoline Range Organics, and TPH – Diesel Range Organics, and Total Suspended Solids.

Most sub-surface secondary containment surrounds oil-filled electrical equipment, which makes oil a potential pollutant source. For this reason, in addition to the reasons described above, discharge samples are analyzed for oil and grease.

Additionally, as required by Table 3 of Section VII.C.3.d of the General Permit, discharge samples are analyzed for pH.
5.0 Procedures for Discharges (VII.C.3.c.iii)

5.1 Scheduled & Emergency Discharges
Discharges only occur when scheduled activities or emergency work is required in the vault. When work is scheduled, personnel either pump the vault the day of the scheduled work or check the vault within a week prior to the scheduled work. In either scenario, personnel come to the site prepared to dewater the vault to the storm drain. First, personnel complete the applicable good housekeeping tasks detailed in section 6.1 of this PLAN. After evaluating the water using the Sensory Checklist Method (SCM) checklist as detailed in section 5.2 of this PLAN, personnel decide if the water may be discharged to the storm drain or if it must be pumped to containment. If necessary, personnel call for containment and do not discharge to the storm drain.

In the event of emergency work, personnel follow the same procedures. Personnel come to the site prepared to discharge water to the storm drain. If the emergency calls for quick action, personnel may omit completing the good housekeeping tasks detailed in section 5.2 of this PLAN until the emergency situation is over. After evaluating the water using the SCM checklist, personnel decide if the water may be discharged to the storm drain or if it must be pumped to containment. If necessary, personnel call for containment and do not discharge to the storm drain.

There are currently no electrical vaults with automatic discharge pumps.

5.2 Sensory Checklist Method
The sensory checklist method (SCM) is the method personnel use to determine if water contained in a vault may be discharged to the storm drain. It is also used to document the discharge process and allows personnel to recommend new procedures and/or Best Management Practices (BMPs). The SCM requires that personnel complete a checklist using their sight and smell to identify potential contamination in the water. First, personnel evaluate the water for any discoloration or unusual odor. If the water is clear and free of odor, personnel evaluate for the presence of any oil, tar, and/or soil particles. If necessary and available, personnel may use a filter sock to remove particles from the water during discharge. If the water is free of particles or the particles can be removed with a filter sock, personnel evaluate for a clear path to the storm drain. If necessary, personnel remove garbage in the path to the storm drain.

If there is not a possible clear path or pollutants are identified, the water may not be discharged to the storm drain and must be pumped to containment. Personnel pump to containment in one of two ways:
- The water may be pumped to 55 gallon drums available from the BWP campus. The drums are then tested as necessary and are properly disposed of as waste; or,
- The water may be pumped to containment for the duration of the work activity and then returned to the vault after the work activity is complete.

All SCM checklists document the date and time, the condition of the water, approximate gallons discharged, location of the discharge, the discharge duration, and the personnel completing the inspection and discharge.

5.3 Discharge Documentation
After the discharge event is concluded and the SCM checklist is complete, personnel submit the completed SCM checklist to any member of the pollution prevention team who will then submit it to the Environmental and Safety Manager. The Environmental and Safety Manager reviews the checklist for completeness and evaluates any recommended changes to the discharge procedures. If the measures are deemed inappropriate, the Environmental and Safety Manager documents on the SCM checklist the basis for this conclusion. If the recommended changes are deemed appropriate, the Environmental and Safety Manager amends the SCM checklist and PLAN. This process occurs within two weeks of the discharge event.

A copy of the SCM Checklist is included in Appendix B.

5.4 Spill Prevention and Response Procedures
The only equipment that could cause a potential spill of pollutants in the electric utility vaults is the oil filled equipment. In the event that activities requiring additional oil or creating a potential oil spill scenario is necessary to this equipment, personnel shall first discharge any storm water in the vault according to the procedures in section 5.1
and 5.2 of this PLAN. If a minor oil spill occurs during work, the oil is immediately cleaned up with towels and/or rags kept on crew trucks. Clean up materials shall be disposed of properly.

If necessary, personnel may call in requesting appropriate spill kits and clean up materials. For oil spills larger than 42 gallons or any spill that cannot be contained within the vault, personnel shall report the spill to a pollution prevention team member, who calls the appropriate spill cleanup contractor:

Emergency Response Contractor:
Industrial Waste Utilization
Phone: 909-984-9984

All BWP personnel who enter a vault are properly trained in work procedures, confined space entry, oil-handling protocol, and spill response and clean up disposal. Clean up only occurs when it can be safely done.
6.0 Pollution Control Measures and BMP

The following best management practices (BMP) are intended to reduce the potential of pollutants in the water contained in the vaults and to reduce the potential of pollutants being discharged into storm drains during dewatering events.

6.1 Good Housekeeping (VII.C.3.c.iv.a)

Good housekeeping practices are intended to prevent or minimize the contamination of storm water. When at the site of a vault or underground structure, personnel complete the following tasks:

- Remove trash and other debris from the area surrounding the vault and the drainage path from the vault to the nearest storm drain;
- Refrain from storing liquids in vaults when possible;
- Use absorbent material to clean up any observed oil; and,
- Remove all unnecessary equipment after completing work.

6.2 Discharge Procedures (VII.C.3.c.iv.b)

Personnel complete the good housekeeping procedures detailed in section 6.1 of this PLAN prior to any non-emergency discharges. Personnel sweep the area surrounding the vault as necessary, ensuring there is a clear and clean discharge path from the discharge point to the storm drain. This step ensures that no pollutants from the street mix with the discharge and enter the MS4. Personnel then follow the discharge evaluation procedure as detailed in section 5.2 of this PLAN.

Erosion is not a concern in the concrete vaults, so the use of straw wattles (as detailed in section VIII.C.3.c.iv.b of the General Permit) is not a part of the discharge procedures.

6.3 Pollution Control and Waste Disposal Procedures (VII.C.3.c.iv.c)

As detailed in section 5.2 of this PLAN, water deemed polluted by using the SCM checklist is pumped to containment and properly disposed of as waste or is pumped to containment and returned to the vault after work is complete.
7.0 Annual PLAN Evaluation and Revision

7.1 PLAN Evaluation (VII.C.3.d.i)
This PLAN is evaluated annually by the Pollution Prevention Team. The team evaluates the PLAN’s effectiveness in reducing pollutant loadings in discharges and evaluates the implementation of the PLAN in accordance with the regulation. The team evaluates the need for any additional equipment in the implementation of the PLAN.

If any of the samples taken from discharge events during the previous year (for purposes of this PLAN, a year is considered May 1st through April 30th) exceed the Numeric Action Levels (NALs) as detailed in section VII.C.3.d.i.b of the General Permit and below in section 8.4 of this PLAN, the team also evaluates the sources of the pollutant(s) and the BMPs in the PLAN intended to reduce the pollutant(s). The team may revise the BMPs as necessary to prevent future NAL exceedances.

If a NAL exceedance is caused by a source out of BWP’s control, a revision to the PLAN and BMPs will not be effective in reducing potential future exceedances. In these instances the PLAN is not revised, and the situation is documented in the Annual Report.

7.2 PLAN Revision (VII.C.3.d.ii)
In the event the team determines BMPs need to be revised or added, this PLAN and the employee training are revised to reflect the new BMPs. The team also documents the progress of the implementation of the BMPs using the form provided in Appendix D. The implementation progress is also documented in the Annual Report as detailed in section 9 of this PLAN.
8.0 Annual Routine Pollutant Monitoring

8.1 Monitoring Locations and Sample Types (Attachment C, II & IV)
Annually, five samples are taken from the vault dewatering discharge point (end of the discharge hose). For purposes of this PLAN, a year is considered May 1st through April 30th. The five samples taken represent a cross section of typical vault discharges and the reasons for the vault sampling selections are detailed in the Annual Report. When less than five vaults are dewatered in a year, all of the discharge events during that year are sampled and an explanation is provided in the Annual Report. When more than five samples are taken in a year, all sample results are reported in the Annual Report.

All annual samples are analyzed for the following constituents:
- Total Petroleum Hydrocarbons – Diesel Range Organics
- Total Petroleum Hydrocarbons – Gasoline Range Organics
- Oil and Grease
- pH
- Total Suspended Solids

8.2 Sampling Test Procedures (Attachment C, I & IV)
Sampling is conducted according to U.S. Environmental Protection Agency (U.S. EPA) test procedures approved under 40 C.F.R. part 136, Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act. All samples are analyzed by a laboratory certified to perform such analyses by the California Department of Public Health, in accordance with the provision of California Water Code section 13176, and include quality assurance/quality control data with their reports.

8.3 Sampling Documentation
The SCM checklist is completed prior to and during any discharge events as detailed in section 5.2 and 5.3 of this PLAN.

8.4 Numeric Action Levels
Once the sample lab results are received, all sample results are compared to the Numeric Action Levels (NALs) for Pollutants of Concern in Table 3 of the General Permit. If any of the sample results exceed the Maximum Daily levels or are below the Minimum Daily levels, then the Pollution Prevention Team will review all documentation related to the discharge incident, the procedures outlined in this PLAN, and the BMPs outlined in this plan during the annual PLAN evaluation. The team will adjust the PLAN as necessary to minimize the potential for future exceedances.
9.0 Annual Report (Attachment C, VI.B)
The pollution prevention team submits the Annual Report by June 1st each year covering the previous May 1st to April 30th. The Annual Report contains the following information:

- Cover letter containing the following information
  - Violations of the regulation;
  - Exceedances of the NALs;
  - Corrective actions taken or planned; and,
  - Time schedule for corrective actions.

- Executive summary detailing the compliance and/or violations of the General Permit and an evaluation of this PLAN;

- Summary of the sampling data;

- Summary of the field observations recorded on the SCM checklist;

- Map showing the location of each sampled discharge location;

- List of all sampled discharge locations with location identification information such as an address or latitude and longitude;

- Description of the sample collection, sample analysis, and quality control procedures;

- Sampling results in a tabulated format detailing the following:
  - Discharge location;
  - Collection date;
  - Name of the constituent and concentration detected; and,
  - Minimum detection levels.

- Estimate of annual volume discharged and description of method and assumptions used to estimate annual volume; and,

- Certification and signature by the chief executive officer or a duly authorized representative as detailed in Attachment B, V.B of the regulation.
Attachment A

Notice of Intent
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)

<table>
<thead>
<tr>
<th>MARK ONLY ONE ITEM</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. ☐ New Discharger</td>
<td>2. ☐ Existing Discharger</td>
</tr>
<tr>
<td>3. ☐ Change of Information: WDID #</td>
<td>4. ☐ Change of ownership or responsibility: WDID#</td>
</tr>
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II. OWNER/OPERATOR (If additional owners/operators are involved, provide the information in a supplemental page.)

<table>
<thead>
<tr>
<th>A. Name</th>
<th>Owner/Operator Type (Check One)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Burbank Water and Power</td>
<td></td>
</tr>
<tr>
<td>B. Mailing Address</td>
<td></td>
</tr>
<tr>
<td>194 W Magnolia Blvd</td>
<td></td>
</tr>
<tr>
<td>C. City</td>
<td>D. County</td>
</tr>
<tr>
<td>Burbank</td>
<td>Los Angeles</td>
</tr>
<tr>
<td>E. State</td>
<td>F. Zip Code</td>
</tr>
<tr>
<td>CA</td>
<td>91502</td>
</tr>
<tr>
<td>G. Contact Person</td>
<td>H. Title</td>
</tr>
<tr>
<td>Claudia Fierro</td>
<td>Environmental and Safety Manager</td>
</tr>
<tr>
<td>I. Phone</td>
<td>J. Email Address</td>
</tr>
<tr>
<td>(818) 238-2360</td>
<td><a href="mailto:CFierro@burbankca.gov">CFierro@burbankca.gov</a></td>
</tr>
</tbody>
</table>

☐ Additional Owners

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

<table>
<thead>
<tr>
<th>Send to:</th>
<th>A. Name</th>
<th>B. Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ Owner/Operator</td>
<td></td>
<td></td>
</tr>
<tr>
<td>☐ Other</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C. Mailing Address</td>
<td></td>
<td></td>
</tr>
<tr>
<td>D. City</td>
<td>E. County</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>F. State</td>
<td>G. Zip Code</td>
<td></td>
</tr>
</tbody>
</table>

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.

See attached maps

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:

Region 4
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 [X] 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? [X] Yes [ ] No

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

[X] 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
   Burbank Water and Power

B. Contact Person
   Claudia Fierro

C. Street Address Where PLAN is Located
   164 W Magnolia Blvd

D. Title of Contact Person
   Environmental and Safety Manager

E. City
   Burbank

F. County
   Los Angeles

G. State
   CA

H. Zip Code
   91502

I. Phone
   818-238-3510

J. Email Address
   CFierro@burbankca.gov
IX. DESCRIPTION OF DISCHARGE(S)

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

Discharges from electric utility vaults, manholes, and underground structures are sometimes required during routine and emergency maintenance activities.

The following potential pollutants may be in the discharge:
- Total Petroleum Hydrocarbons – Diesel Range Organics
- Total Petroleum Hydrocarbons – Gasoline Range Organics
- Oil and Grease
- pH
- Total Suspended Solids

X. REMINDERS

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

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: Ronald E. Davis
B. Signature: [Signature]
C. Date: 1/23/14
D. Title: General Manager, Burbank Water and Power

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

<table>
<thead>
<tr>
<th>WDID:</th>
<th>Regional Board Office</th>
<th>Date NOI Received:</th>
<th>Date NOI Processed:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case Handler's Initial:</td>
<td>Fee Amount Received:</td>
<td>Check #:</td>
<td>$</td>
</tr>
</tbody>
</table>
Attachment B

Sensory Method Checklist
Sensory Checklist Method (SCM)

This entire checklist must be completed for every potential discharge to the street/storm drain. The Post Discharge Inspections portion of this checklist shall be completed for annual site evaluations of automatically discharged vaults.
Write in or circle all answers as indicated.

**Discharge Evaluation**

<table>
<thead>
<tr>
<th>Date</th>
<th>Facility ID</th>
<th>Vault Dimensions</th>
</tr>
</thead>
</table>

**Check #1** Is the vault water cloudy, discolored, and/or has an unusual odor?

- YES
- NO

**Check #2** Are there any oil, tar and/or soil particles?

- YES
- NO

**Check #3** Is there a clear path to the storm water drain?

- YES
- NO

**Discharge Instructions**

While monitoring the discharge, begin pumping the vault water to the street / storm drain system. Fill in only the information directly below (date, amount and destination). If any of the above conditions appear during discharge, immediately stop pumping. Return to CHECK #1 to reassess the situation. If it is determined that containment is necessary, stop discharge and record the condition that prompted the stop, the new condition of the vault water itself, and the method used to discharge to containment.

<table>
<thead>
<tr>
<th>Duration Discharge</th>
<th>Estimated Amount (gal)</th>
<th>Discharge Destination</th>
</tr>
</thead>
</table>

If necessary, describe discharge conditions necessitating stopping the discharge and instead pumping to containment:

---

**Post Discharge Inspections**

**Comprehensive Site Compliance Evaluation**

Evaluate measures to reduce pollutants in future discharges. Evaluate additional or modified procedures to reduce pollutant levels in discharges.

---

The information provided is true and correct to the best of my knowledge.

Name: ___________________________  Print: ___________________________  Sign: ___________________________
## SCM Checklist Instructions

### Discharge Evaluation
The Discharge Evaluation walks personnel step by step through the discharge evaluation process. Complete the Discharge Evaluation portion of the checklist prior to, during, and after the discharge. This form should be returned to the environmental manager after it is completed. The environmental manager shall review the form, take any required actions, and sign the form.

### Post Discharge Inspections
Post discharge inspections are to be completed after the pumping has ceased or during the annual inspection for automatically dewatered vaults.

### Comprehensive Site Evaluation
Personnel completing the comprehensive site evaluation should record any recommended improvements to the discharge evaluation and procedures.

Upon receiving this form, the environmental manager shall review and evaluate all recommended improvements to the discharge evaluation and procedures. If the recommendations are to be adopted, the environmental manager should amend the Pollution Prevention Plan and this SCM checklist within two weeks. A written statement documenting that the changes were made should be recorded below.

If the environmental manager evaluates the recommendations and decides against incorporating them into the plan, the environmental manager shall document the reasons for the decision below.

### Documentation of Environmental Manager’s Review

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Attachment C

Blank Training Records
Vault Dewatering Training Records

Complete this sheet after training is complete.

<table>
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<tr>
<th>Employee’s Name (Print)</th>
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Attachment D

PLAN Revision and Implementation
Vault Dewatering Annual PLAN Review and Revision

Use one copy of this page for each PLAN revision and implementation. Document the initial revision and update this page with the status of implementation.

Personnel Participating in Review: Date: ____________

Revision and Reason for Revision:

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Date: ____________ Personnel Updating: ____________

Update on Implementation of Revision:

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Attachment E

Vault Dewatering General Permit