

ATTACHMENT E – NOTICE OF INTENT
ORDER WQ 2014-0174-DWQ
GENERAL PERMIT NO. CAG990002

MAR 03 2016
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**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 checked="" type="checkbox"/> New Discharger	2. <input type="checkbox"/> Existing Discharger
	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 Sonic Telecom, LLC		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 2260 Apollo Way				
C. City Santa Rosa	D. County Sonoma	E. State CA	F. Zip Code 95407	
G. Contact Person Brian Botteri	H. Title Project Manager	I. Phone 707-522-1000		
J. Email Address Brian.Botteri@sonic.com				

Additional Owners _____

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

Send to: <input checked="" type="checkbox"/> Owner/Operator <input type="checkbox"/> Other	A. Name Jon Cromwell	B. Title Senior Project Manager		
	C. Mailing Address 2260 Apollo Way			
D. City Santa Rosa	E. County Sonoma	F. State CA	G. Zip Code 95407	

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:
1

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: _____

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 Sonic Telecom LLC		B. Contact Person Brian Botteri	
C. Street Address Where PLAN is Located 2260 Apollo Way		D. Title of Contact Person Project Manager / Engineer	
E. City Santa Rosa	F. County Sonoma	G. State CA	H. Zip Code 95407
I. Phone 707-522-1000		J. Email Address Brian.Botteri@Sonic.com	

IX. DESCRIPTION OF DISCHARGE(S)

Describe the discharge(s) proposed. List any potential pollutants in the discharge. Attach additional sheets if needed.
Our typical potential discharge is rainwater from a third party manhole. We are Sonic Telecom and we enter manholes. We must pump water out to enter said manhole safely. No known pollutants. We do not have any of our own structures that require any type of discharge.

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: Jonathan Cromwell

B. Signature: _____ C. Date: _____

D. Title: Sr. Project Manager. O.S.P

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 #:	

**INSTRUCTIONS FOR COMPLETING A 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**

These instructions are intended to help you, the Discharger, complete the NOI form for General Permit No. CAG990002. **Please print clearly or type when completing the NOI form and service territory/watershed map(s). Illegible applications will not be processed.** For any field, if more space is needed, submit a supplementary page or letter with the NOI.

Send the completed and signed form, filing fee, PLAN, supporting documentation, and map(s) to the State Water Resources Control Board (State Water Board). Submit one permit application to cover all discharges within the boundaries of a Regional Water Quality Control Board (Regional Water Board). If the proposed discharges occur in more than one Water Board Region, submit a permit application for each Regional Water Board where a discharge will occur. Only one annual fee is required.

If the requirements in this Order conflict with the requirements of the Homeland Security Act and any other federal law that pertains to security in the United States, the Homeland Security Act and any other federal law that pertains to security in the United States shall take precedence. However, the Discharger must provide justification, including appropriate statutory citations, to the Regional Water Board regarding redacted information within any submittal. Coverage under this General Permit may be unavailable if nonredacted information is insufficient to demonstrate eligibility and compliance.

Section I – Notice of Intent Status

Indicate whether this request is for first time coverage, re-enrollment, or a change of information for a utility already covered under this Order. For a change of information or ownership, please supply the eleven-digit Waste Discharge Identification (WDID) number for the utility.

Section II – Owner/Operator

- A. Name** – Enter the name of the owner/operator. Check the appropriate box for which type of agency best describes the owner/operator. "Gov. Combo." is an abbreviation for "Government Combination" for a joint powers agency created by two or more government agencies. Private businesses should check the "Private" box.
- B. Mailing Address** – Enter the street number and name where correspondence should be sent (P.O. Box is acceptable).
- C. City** – Enter the city that applies to the mailing address given.
- D. County** – Enter the county that applies to the mailing address given.
- E. State** – Enter the state that applies to the mailing address given.

- F. Zip Code** – Enter the zip code that applies to the mailing address given.
- G. Contact Person** – Enter the name (first and last) of the contact person.
- H. Title** – Enter the contact person’s title.
- I. Telephone** – Enter the daytime telephone number of the contact person.
- J. Email Address** – Enter the email address of the contact person.
- Additional Owners** - Please check this box if there is more than one owner/operator and provide the requested information.

Section III – Billing Address

- Send To:** - Check the appropriate box and enter the information **only** if it is different from section II. above.
- Name** – Enter the name (first and last) of the person who will be responsible for the billing.
- A. Title** – Enter the title of the person responsible for the billing.
- B. Mailing Address** – Enter the street number and name where the billing should be sent (P.O. Box is acceptable).
- C. City** – Enter the city that applies to the billing address.
- D. County** – Enter the county that applies to the billing address.
- E. State** – Enter the state that applies to the billing address.
- F. Zip Code** – Enter the zip code that applies to the billing address.

Section IV – Receiving Water Information

- A.** Attach a project map(s) that shows (1) the service area within the 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. Submit separate map(s) for each Regional Water Board where a discharge is proposed. If applying for coverage in the Central Valley Region, send two additional copies of the required map and if applying for coverage under Lahontan Region, send one additional copy of the required map.
- B.** List all Regional Water Board numbers where utility vault discharges are proposed. Regional Water Board boundaries are defined in section 13200 of the California Water Code. The boundaries can also be found on our website at http://www.waterboards.ca.gov/waterboards_map.shtml.

C. The numbers with corresponding Regional Water Board names are shown below:

Regional Water Board Number	Regional Water Board Name
1	North Coast
2	San Francisco Bay
3	Central Coast
4	Los Angeles
5	Central Valley (Includes Sacramento, Fresno, and Redding Offices)
6	Lahontan (Includes South Lake Tahoe and Victorville Offices)
7	Colorado River Basin
8	Santa Ana
9	San Diego

Section V – Land Disposal/Reclamation

Check “YES” if land disposal and/or reclamation is/are feasible. If you check “YES,” contact the appropriate Regional Water Board. Your discharge may not be covered under the NPDES Program. If you checked “NO,” explain in the space provided the reason why these alternatives are not feasible.

Section VI – Verification

Indicate by checking “YES” or “NO” whether verification has been done to determine if the discharge(s) are in compliance with prohibitions or orders of the Regional Water Board.

Section VII – Type

Check the appropriate box(s) to indicate the type of utility for which you are seeking coverage.

Section VIII – Pollution Prevention Plan (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. The following contact information must be provided for the person responsible for the development of the PLAN.

- A. Company Name** – Enter the legal name of the company applying for coverage.
- B. Contact Person** – List the company contact person responsible for preparation and implementation of the PLAN.
- C. Street Address Where the PLAN is Located** - Indicate the street number and name where you will keep the PLAN for reference and review by personnel.
- D. Title of Contact Person** – Enter the official company title of the contact person.
- E. City** – Enter the city where the PLAN will be kept.
- F. County** – Enter the county where the PLAN will be kept.

- G. State** – Enter the state where the PLAN will be kept.
- H. Zip Code** – Enter the city zip code where the PLAN will be kept.
- I. Telephone** – Enter the daytime telephone number of the contact person.
- J. Email Address** – Enter the email address of the contact person.

Section IX- Description of Discharge

Describe the types of operations that occur and potential pollutants that may be found in the discharge.

Section X – Reminders

- A.** If you have included service territory/watershed map(s) with your NOI submittal, check the “YES” box. If not included, check “NO.” **NOTE: Map(s) of the proposed service territory to be covered must be received before you can obtain coverage under this Order.** Submit separate service territory/watershed map(s) for each Regional Water Board where a discharge is proposed. If applying for coverage in the Central Valley Region, send two additional copies of the required map and if applying for coverage under Lahontan Region, send one additional copy of the required map.

The map showing the service area within a specific Regional Water Board boundary and, showing the corresponding major surface water bodies and watersheds to which vault water may be discharged. Map features must also include service territory boundaries, Regional Water Board boundary, ASBS boundaries, MS4 discharge points to the ASBS, and major roadways.

- B.** Check “YES” if you have included the annual fee with your submittal. Check “NO” if you have not included payment. **NOTE: Payment of this fee must be received before you can obtain coverage under this Order.** Existing dischargers will be invoiced on their existing schedule and do not need to submit a fee with the initial renewal application. You will be invoiced annually and payment is required to continue coverage.
- C.** Check “YES” if you have included the PLAN. Otherwise, check “NO.” **NOTE: You must submit the PLAN to the State Water Board and appropriate Regional Water Board(s) to obtain coverage under this Order.**

Section XI – Certification

All NOIs shall be signed and certified as follows:

For a corporation: By a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions which govern the operation of the regulated

facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

For a partnership or sole proprietorship: By a general partner or the proprietor, respectively.

For a municipality, State, federal, or other public agency: By either a principal executive officer or ranking elected official. For purposes of this provision, a principal executive officer of a federal agency includes: (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of U.S. EPA).

- A. Printed Name** – Print your name legibly. The person responsible (in accordance with the signatory requirements described above and in section V.B of the Standard Provisions (Attachment B)) must fill out this section.
- B. Signature** – Provide a signature of name printed above.
- C. Date** – Indicate the date signed.
- D. Title** – Include the professional title of the person signing the NOI.

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1.1 PLAN OVERVIEW

The state of California Water Resources Control Board (SWRBC) is the regulatory authority over the discharge of waters from utility vaults and underground structures to surface waters under order No. 2014-0174-DWQ and National Pollutant Discharge Elimination System (NPDES) CAG990002 (General Permit) , which is effective as of July 1, 2015. The SWRCB is responsible for these discharges under the Federal Clean Water Act of 1972. Under this general permit, a discharger must submit this enrollment for discharges to the SWRCB. This Pollution Prevention Plan (PPP) will cover all areas where Sonic Telecom (Sonic) discharges are a result of normal routine maintenance and operations with respect to utility vaults, manholes, and other underground structures. These discharges include inflow of seepage into these structures, storm water inflow, and condensate within the structure

1.2 Purpose of the Plan

The PPP is designed to cover intermittent discharges from the removal of water from utility vaults, manholes and other underground structures (henceforth referred to as “vaults”) through discharge to the receiving waters of the United States and the State of California and ensure that pollutant concentrations in the discharged water do not cause, have a reasonable potential to cause or contribute to, an excursion above Federal, SWRCB and Regional Water Board water quality objectives. No discharges will cause acute or chronic toxicity to the receiving waters.

1.3 Description of the Plan

The PPP will cover the procedures involved with the evaluation of the intermittent water discharges from utility vaults and underground structures that SONIC enters to allow for the discharge of the waters within the water quality objectives. This plan will describe and contain the following:

- Sonic Pollution Prevention Team
- Employee Training
- Potential Pollutant Sources
- Types and Schedules of Discharges
- Procedures for Discharge Water Evaluation
- Pollution Control Measures
- Monitoring and Reporting Program
- Comprehensive PPP revisions and Evaluation
- Certifications and Signatures

The PPP will be signed and certified by the Sonic person responsible for the implementation of the PPP.

2.1 PLAN ADMINISTRATION

The PPP will be administered by Sonic in all Water Board Regions where discharges from vaults may occur. The PPP will comply with the Best Available Technology/Best Control Technology (BAT/BCT) during its implementation. PPP administration will address the Pollution Prevention Team, Employee Training, and Plan Application

2.2 Pollution Prevention Team

The Pollution Prevention Team is overseen by Jon Cromwell, Senior Outside Plant Construction Project Manager for Sonic. The team also consists of the following members:

Name	Title	Responsibilities	Contact Information
Jeremy Arballo	Construction Super.	Field Implementation of PPP	(707) 292-4957

2.3 Employee Training

Sonic will ensure that all Sonic personnel (Sonic employees and specifically qualified Sonic vendors) employees involved with procedures of the general permit will be trained in all aspects of the permit. Training will be repeated on an annual basis. The areas of training include the following

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

Records of employee training within each Regional Water Board will be maintained at Sonic as well as maintained electronically with Sonic's Management Team and will be available for inspection by SWRCB and Regional Water Board personnel

2.4 Plan Application

Application of the PPP occurs during discharge events from vaults covered under the General Permit. These structures will require dewatering to allow for maintenance

work to proceed within wet structures.

3.1 POTENTIAL POLLUTANT SOURCES

The PPP describes the potential pollutant sources, activities, and materials that may add significant levels of pollutants to the discharges covered under this general permit. Pollutants include those contained within the discharges, spills, and leaks. A typical inventory of the potential pollutants includes the following:

- Oil and grease
- Petroleum fuels (diesel and gasoline)
- Organic matter
- Sewage
- Sediment

3.2 Description of Underground Structures

Structures Sonic enters covered under the general permit include manholes, underground utility vaults, and other underground structures. They are classified as wet structures. The primary purpose of the underground structures is to provide Sonic with access to fiber cable. In general, mechanical equipment is not located within the vault structures. At this time, Sonic does not believe that discharges will exceed a potential maximum discharge limit of 50,000 gallons for any single discharge. In the event that any single discharge exceeds 50,000 gallons, appropriate notifications will be made as outlined below in section 5.3

Wet Structures

Wet structures include underground vaults, manholes, and other underground structures that are not completely sealed from the inflow of subsurface or surface waters, including storm waters. These structures contain various types of networking equipment that does not normally contribute pollutants to water within structure.. water infiltrating into wet structures will require removal prior to the commencement of work within these structures by Sonic personnel. Typical pollutants that may accumulate in waters in wet structures are outlined above in section 3.0. Removal of water from wet structures will cover the majority of discharges under the general permit.

3.3 Drainage Maps

maps in appendix

3.4 Areas of Special Biological Significance (ASBSs)

maps in appendix

4.1 TYPES OF DISCHARGES

Two types of discharges from structures that Sonic enters are covered under the general permit. Manual discharges are performed from wet structures as required. Discharges can also be categorized as unscheduled and scheduled. The types of discharges are described below in the following sections.

4.2 Manual Discharges

Water discharges from wet structures are primarily manual discharges. Following infiltration of water into wet structures, Sonic personnel must first pump the water out of the vault or structure prior to safely entering the structure to perform network operations.

4.3 Unscheduled Discharges

Unscheduled discharges represent the majority of discharges from both wet and dry structures. The discharge from wet structures occurs when Sonic personnel are required to enter the vault or underground structure to perform network operations maintenance.

4.4 Scheduled Discharges

Any scheduled discharges from wet or dry structures will be undertaken using the same procedures as those for unscheduled discharge.

5.1 PROCEDURES FOR DISCHARGES

Under the general permit, inspection and evaluation of water contained in the vaults is required before a determination can be made for Sonic personnel to discharge these waters to the receiving waters of the United States and the State of California. All waters described that are contained in vaults that do not pass the inspection, evaluation, discharge procedures, and record keeping activities related to discharges under the general permit.

5.2 Inspection of Underground Structures

Prior to removing water from vault, qualified Sonic personnel will initially inspect the structure to determine if a discharge is required prior to performing work within the vault. The work team will ensure that the work area is clearly marked and protected according to all applicable standards, and that proper personal protective equipment (PPE) including confined-space protocols are in place. The initial inspection should determine if there are any major issues in the underground structure, such as chemical odors, the presence of free-floating product, the presence of a volume of water above the maximum allowable limit of 50,000 gallons, or lack of integrity of contained Sonic equipment that would not allow for the discharge of waters of the structure under the general permit.

5.3 Evaluation of Waters Contained in Underground Structures

The procedures contained within this section will be undertaken by trained Sonic personnel and vendors to evaluate the quality of the water contained in the vault and determine if it meets the requirements under the general permit for discharge. If the initial inspection has determined that there are no visible pollutants in the subsurface structure water, a clean bailer or similar sampling equipment will be lowered into the vault to obtain a representative sample of the vault water. The sampling equipment should be lowered to a point above any visible sediment present in the bottom of the vault, and care should be taken not to disturb either the sediment or the water contained within the bailer. Observations will be made on the water sample obtained by sampling equipment. If there are any free-phase floating hydrocarbons on the water, or chemical or sewage odors, the water cannot be discharged under the general permit, and the sample will be returned to the vault. If the water sample collected from the vault does not contain product and odors as noted above, test the water for acid/base risk, oxidizer risk, fluoride risk, petroleum product organic solvent risk, and iodine, bromine, chlorine risk, using an NPS Corp. Spilfyter® Chemical Classifier Strip or equivalent approved methodology. If the measured parameters of the sample area are outside acceptable ranges, the water cannot be discharged, and the sample should be returned to the vault.

If the water sample is clear (not cloudy) and passes the Spilfyter® test as outlined above, the water can be discharged under the general permit, providing that all floating debris is removed from the water prior to discharge. Best Management Practices (BMPs) as outline below in Section 5.3, will be employed at all times during the discharge operations. If the sample passes the Spilfyter® test, and does not contain any sediment layers, solids, or an oily sheen, but is otherwise cloudy or milky, let the sample stand for a period of at least 5 minutes. If the sample remains cloudy, then the vault water cannot be discharged under the general permit. If the material in the water sample settles into layers or if material has settled onto the bottom of the sample, the water can be discharged under the general permit. In the event that the vault water does not pass the evaluation and testing procedures and cannot be discharged to the receiving waters under the conditions of the general permit the water will be analytically tested, and subsequently containerized and disposed according to all applicable regulations Some Regional Water Boards or specific Municipal Separate Storm Sewer Systems (MS4s) may have discharge water disposal requirements that are more stringent than those outline in the general permit. In these cases, the more stringent procedures will be followed.

5.4 Water Discharge Procedures

Waters contained in vaults that pass inspection and evaluation procedures outlined above can be discharged to the receiving waters in accordance with conditions in the general permit. The water can be pumped directly into a storm sewer or catch basin or along a street if a storm sewer is not available in the immediate area. Temporary

berms, erosion control measures, or other BMPs will be used to channel the water into the appropriate receiving area whenever possible, and ensure that the discharge area around the storm drain is free from debris. Prior to pumping, the nozzle of the sump pump inlet should be lowered into the utility vault to a point above any accumulated bottom sediment where pumping activities will not disturb the sediment to a point where it will enter the discharge stream. Use of a filter sock attached to the discharge hose will further mitigate any particulate matter from entering the discharge stream. Any water and sediment remaining in the vault following pumping operations should be removed and disposed according to all applicable regulations. In addition to the above procedures, if the discharge is causing or contributing to vector problems, Sonic will coordinate with a vector control agency to address the vector issues. During discharge operations, Sonic personnel will monitor the amount of the discharge to ensure that the maximum allowable amount of 50,000 gallons is not discharged. In the event that the discharge exceeds 50,000 gallons, Sonic will contact the appropriate agency within 24 hours of discharge.

5.5 Record Keeping

All procedures related to the inspection, evaluation, and discharge of waters from vaults will be recorded on an Underground Structure Inspection Form. A copy of that form is included in Appendix C. Maintenance activities and inspections will be recorded, and the records will include the data and time the inspection was performed, the name of the inspector, and the items inspected. In the event that problems are noted during the inspections, details will be noted in the Comments Section of the Inspection Form. All records of discharges occurring under the general permit within each Regional Water Board will be maintained at the regional office, and will be available for inspection by SWRCB and regional water board personnel

6.1 POLLUTION CONTROL MEASURES

Sonic will maintain measures and controls to ensure that waters discharged from vaults are in compliance with the general permit. These measures include good housekeeping, preventive maintenance, and spill prevention and response procedures.

6.2 Good Housekeeping

Good housekeeping at all underground vaults and structures is critical to ensure that potential pollutants are kept to a minimum. Sonic will maintain the integrity of their equipment in each vault, and any wastes stored at each of the sites will be kept to a minimum or removed from the structure, Good housekeeping will aid in the minimization of the amount of water discharged under the general permit.

6.3 Preventive Maintenance

Sonic, in general does not have mechanical equipment in manholes and underground

structures, as they are primarily used for fiber cable.

6.4 Spill Prevention and Response

Sonic will utilize the discharge procedures, good housekeeping, and preventive maintenance outlined in the above sections to ensure that spills and other excursions of the general permit are non-existent to minimal in occurrence. The following measures for spill reporting will be utilized in the event of a release of pollutants to the waters of the United States and State of California:

- In the event that discharge exceeds 50,000 gallons, Sonic will contact the appropriate agencies within 24 hours of the discharge.
- In the event of a release of hazardous pollutants during discharge, the discharge will be immediately stopped and the release will be contained to the extent possible. The spill will immediately be reported to the Sonic Network Operations Center (NOC) and Sonic environmental management, where reporting the spill to the National Response Center at (800) 424-8802 within 24 hours of the spill will be conducted. The appropriate local regulatory agencies will also be contacted within 24 hours of the spill.
- A written report describing the details of the excursion of the general permit will be prepared by Sonic for the appropriate Regional Water Board within 5 days of the excursion. The report will also outline measures planned to reduce or prevent a recurrence of the non-compliant event.
- If there is a release of hazardous pollutants to the state-owned waters of California, Sonic may employ a hazardous materials response contractor to manage the mitigation activities.
- Sonic will maintain detailed documentation of any spill and subsequent spill response activities. Records will be maintained at the Regional Office, and will be available for inspection by SWRCB and Regional Water Board Personal

7.1 MONITORING AND REPORTING PROGRAM

7.2 Discharge Monitoring Report

Sonic will prepare a Discharge Monitoring Report in accordance with the general permit. This plan is required under the general permit. This plan is required under the general permit and by Title 40 of the Code of Federal Regulations (CFR) Section 122.48, and under California Water Codes Sections 13267 and 13383. In accordance with the general permit, and as part of the Monitoring and Reporting Program, Sonic will sample up to 5 utility vaults within each Regional Water Board on an annual basis. The Discharge Monitoring Report will document the results of the sampling program. The Discharge Monitoring Report will be due on June 1 of each year, and will over the period from May 1 through April 30 prior to the June 1 report date. The report will be submitted to the SWRCB. Elements of each of the Monitoring and Reporting Plans, which will be prepared for each Regional Water Board, will include the following:

- Sonic will collect vault water samples at 5 locations within each Regional Water

Board. The vault water samples will be representative of the types of discharge waters that occur within vaults in that region

- All samples will be analyzed for oil and grease, pH, Total Petroleum Hydrocarbons (TPH) as a gasoline range organics (GRO) and diesel range organics (DRO) and total suspended solids (TSS). All analysis will be completed by laboratories certified by the California Department of Health Services.
- The Discharge Monitoring Report will contain a rationale for the selection of the sampling locations, a description of the sampling methods, tabulated sampling results, and a detailed map showing the locations of the sample points in each Regional Water Board.
- The Discharge Monitoring Report will contain information on the vault size and characteristics, discharge activities, descriptions of inspection procedures, and other relevant field observations
- The Discharge Monitoring report will contain an executive summary, a cover letter, and signatures of the appropriate Sonic personnel.

7.3 Discharge Characterization Study 1

Sonic will perform Discharge characterization study 1 in accordance with the general permit to characterize the discharges from dewatered utility vaults or underground structures to evaluate the potential for utility vault discharges to cause or contribute to an exceedance of water quality standards in compliance with the Clean Water Act in accordance with the general permit, and as part of the Monitoring and Reporting Program.

Sonic will sample up to 5 utility vaults within each Regional Water Board. A monitoring Plan and Time Schedule for Discharge Characterization Study 1 will be submitted to the State Water Board within eight months of the effective date of the general permit. The sampling of Phase 1 of Discharge Characterization Study 1 will be completed no later than the first rainy season following final approval of the Monitoring Plan. Phase II sampling will occur no later than the third rainy seasons following the final approval of the Monitoring Plan. All samples will be analyzed for the parameters required by the general permit

The final Report for Discharge Characterization Study 1 will be submitted to the State Water Board no later than four years and six months following the effective date of the general permit.

Sonic, in coordination with other dischargers may elect to form a coalition to develop a Monitoring Plan for Discharge Characterization Study 1. Sampling under this Monitoring Plan may be conducted as a coalition or individually.

7.4 Discharge Characterization Study 2

Sonic will perform Discharge Characterization Study 2, in accordance with the general permit to characterize the discharges from dewatered utility vaults or underground structures to evaluate the potential for utility vault discharges to cause or contribute to an exceedance of water quality standards in water discharged directly to MS4s that discharge to an ASBS. In the event that Sonic does not have any utility vaults or underground structures that discharge to MS4s that discharge to an ASBS, then Discharge Characterization Study 2 will not be required.

Sonic will sample up to 5 utility vaults within each Regional Water Board. Sonic will identify MS4s that discharge directly to ASBS within four months following the effective date of the general permit. A Monitoring Plan and time schedule for Discharge Characterization Study 2 will be submitted to the State Water Board within eight months of the effective date of the general permit. Discharge Characterization Study 2 will begin no later than the second rainy season following the final approval of the Monitoring Plan and no later than three years following the effective date of the general permit. All samples will be analyzed for the parameters required by the general permit.

Sonic, in coordination with other dischargers may elect to form a coalition to develop a Monitoring Plan for Discharge Characterization Study 2. Sampling under this Monitoring Plan may be conducted as a coalition or individually.

The Final Report for Discharge Characterization Study 2 will be submitted to the State Water Board no later than three years and six months following the effective date of the general permit.

8.1 COMPREHENSIVE SITE COMPLIANCE EVALUATION

The PPP is designed to comply with the Best Available technology Economically Achievable/Best Conventional Pollutant Control Technology (BAT/BCT) to ensure Sonic's compliance with the requirements of the general permit. Sonic will review the PPP annually to determine its compliance with the general permit. The PPP will be amended under specific conditions that include, but are not limited to the following:

- Changes in the inspection and evaluation procedures for the underground vault water prior to discharge
- Incidents of non-compliance of the PPP
- Changes in Sonic personnel with respects to certification of the PPP.
- Changes in the Monitoring and Reporting Plan
- The PPP has not achieved the general objective in controlling pollutants in the discharges to surface waters

Based on the results of the comprehensive site compliance evaluation, Sonic will amend any portions of the PPP within two weeks of the evaluation, Sonic will submit

and amended PPP to the appropriate Regional Water Board. Sonic will write and retain for 3 years a report summarizing the scope of evaluation, personnel making the evaluation, the date of the evaluation and major observation relating to the implementation of the PPP an amendment page has been placed at the beginning of the PPP to address any amendments.

9.1 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”.

Printed Name: _____

Signature: _____

Date: _____

Title: _____

APPENDIX

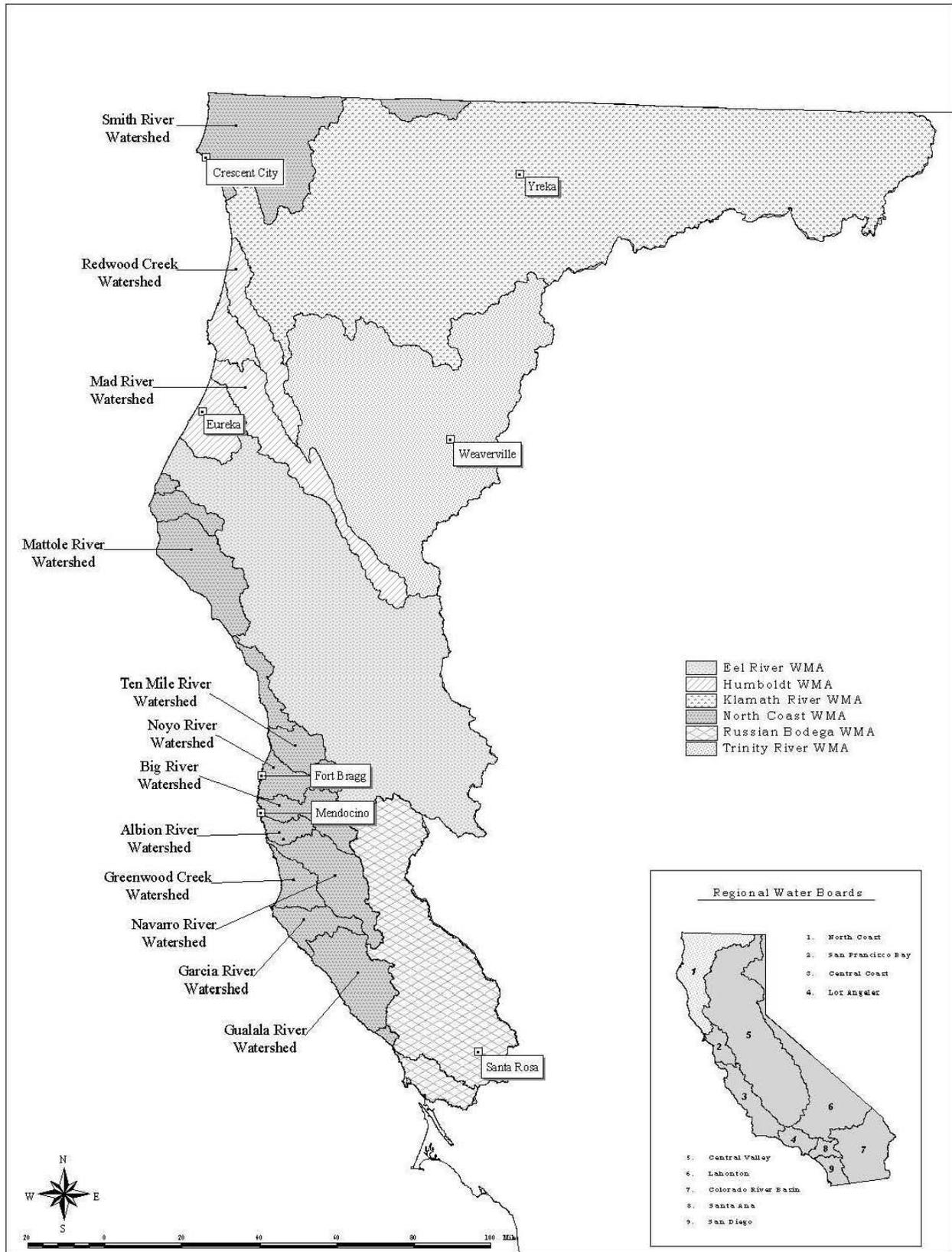
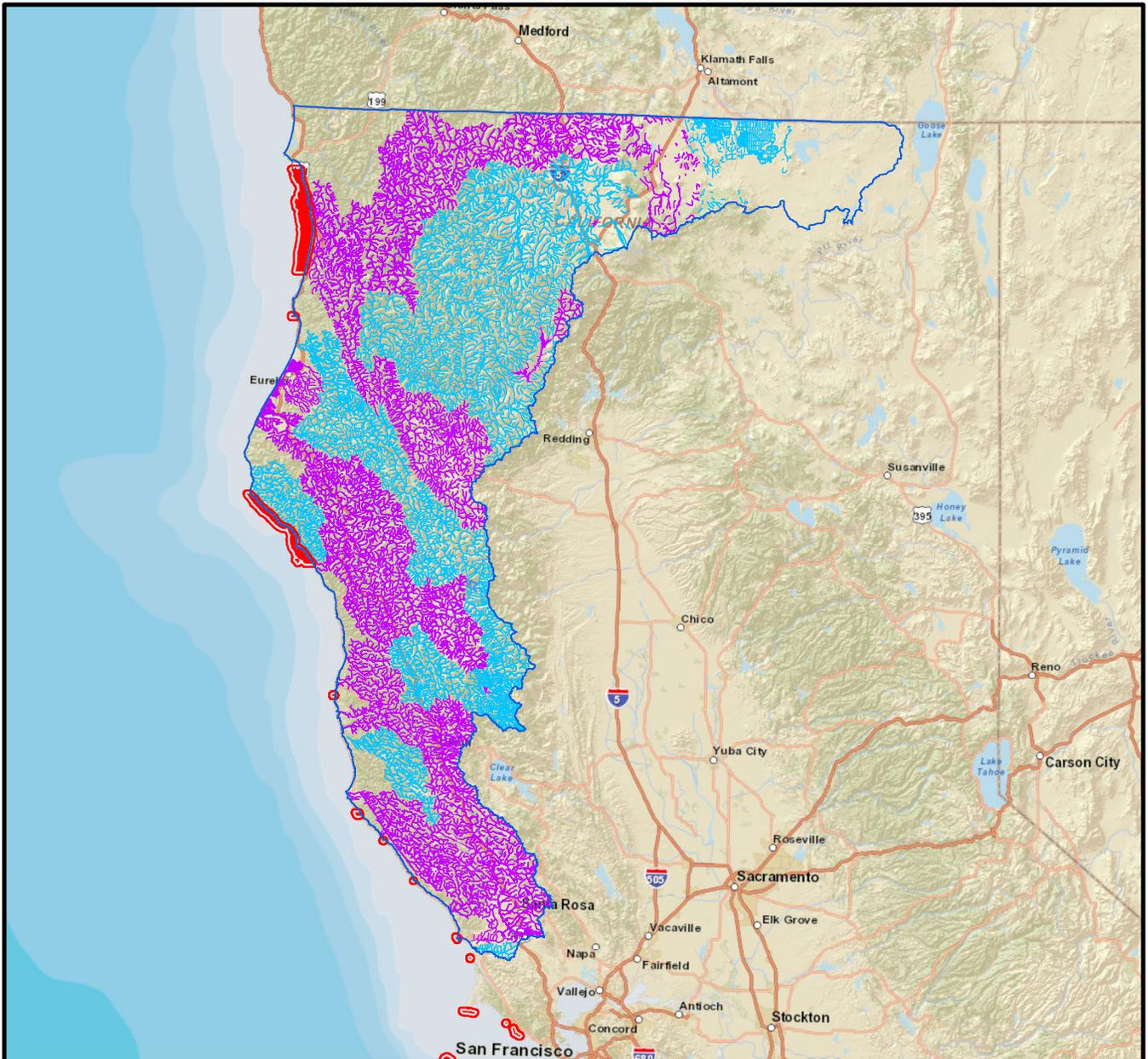


Figure 1. Watershed Management Areas for the North Coast Regional Water Quality Control Board



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

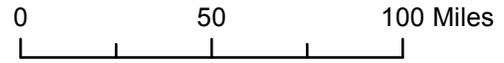


Figure Group 1a. North Coast Region 1 Drainage Maps-Overview

Underground Vault Locations Distributed
 Regionally

ASBS Boundary and One-Mile Buffer

Integrated Report Category, 303d Waters

4a 4b 5

RWQCB Boundary and Number

ASBS = Area of Special Biological Significance

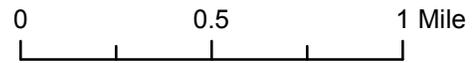
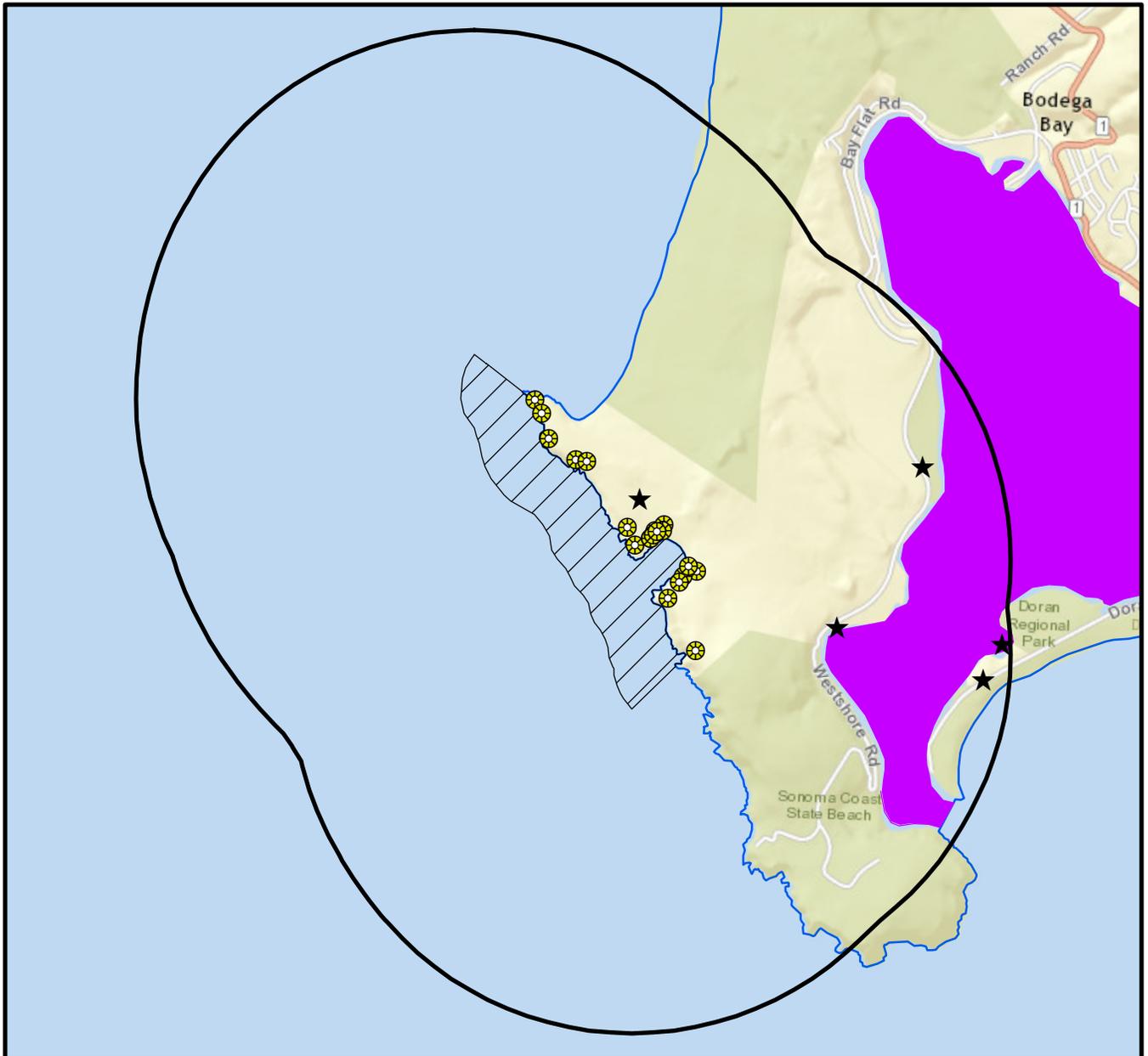


Figure Group 1b. North Coast Region 1 Drainage Maps-Bodega

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

Integrated Report Category, 303d Waters

- 4a
- 4b
- 5

- 1 RWQCB Boundary and Number

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

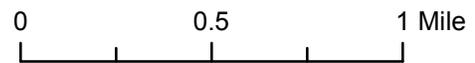
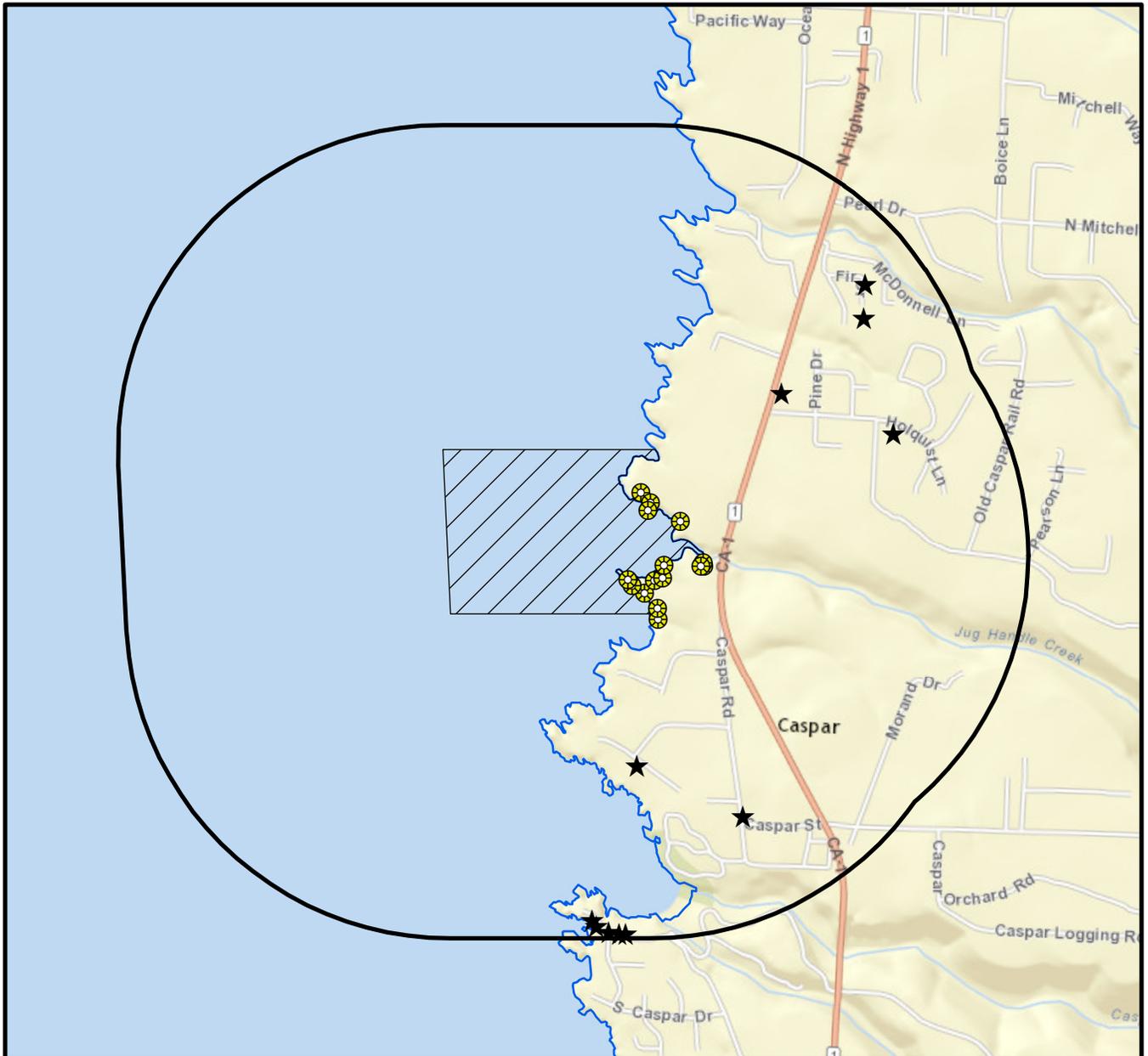


Figure Group 1c. North Coast Region 1 Drainage Maps-Jughandle Cove

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

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

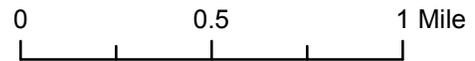


Figure Group 1d. North Coast Region 1 Drainage Maps-Trinidad Head

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

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

APPENDIX B

See next page for underground inspection form

