

LEVEL 3 COMMUNICATIONS, LLC POLLUTION PREVENTION PLAN FOR

GENERAL NATIONAL POLLUTANT
DISCHARGE ELIMINATION SYSTEM
(NPDES) PERMIT FOR DISCHARGES FROM
UTILITY VAULTS AND UNDERGROUND
STRUCTURES TO SURFACE WATERS

ORDER NO. 2006-0008-DWQ NPDES NO. CAG990002

Primarily prepared and edited by
Tait Environmental Services, Inc.
In Cooperation with
Level 3 Communications, LLC

Level 3 Communications, LLC

General Permit Order No. 2006-0008-DWQ NPDES No. CAG990002 Pollution Prevention Plan

Amendments

Regional Water Quality Board:	
Plan Location Address:	
Street:	
City:	
State:	
Zip Code:	

Description of Amendment	Page No.	Date	Preparer

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1.0 PLAN OVERVIEW

The State of California Water Resources Control Board (SWRCB) is the regulatory authority over the Discharge of Waters from Utility Vaults and Underground Structures to Surface Waters under Order No. 2006-0008-DWQ, and National Pollutant Discharge Elimination System (NPDES) CAG990002. The SWRCB is responsible for these discharges under the Federal Clean Water Act of 1972. Under this General Permit, a discharger must submit a separate enrollment for discharges to the SWRCB and to each of the individual Regional Water Boards where these discharges will occur.

This Pollution Prevention Plan (PPP) will cover all areas where Level 3 Communications, LLC (Level 3) 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 structures.

1.1 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.

1.2 Description of the Plan

The PPP will cover the procedures involved with the evaluation of the intermittent water discharges from Level 3 utility vaults and underground structures to allow for the discharge of the waters within the water quality objectives. This plan will describe and contain the following:

- Level 3 Pollution Prevention Team
- Employee Training
- Potential Pollutant Sources
- Types and Schedules of Discharges
- Procedures for Discharge Water Evaluation
- Pollution Control Measures
- Monitoring and Reporting Plan
- Comprehensive PPP Revisions and Evaluation
- Certifications and Signatures

The PPP will be signed and certified by the Level 3 person responsible for the implementation of the PPP.

2.0 PLAN ADMINISTRATION

The PPP will be administered by Level 3 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.

2.1 Pollution Prevention Team

The Pollution Prevention Team is overseen by Robert Gurdikian, Senior Environmental Project Manager for Level 3. The team also consists of the following members:

Name	Title	Responsibilities	Contact Information
	OSP Engineer		
	Southern California	Pollution Prevention Team Oversight –	
James Daily	Operations	Southern California	858-292-2108
	Planning and		
	Deployment		
Natalia	Manager, Southern	Pollution Prevention Team Oversight –	
Nikolaeva	California Operations	Northern California	415-819-1134

2.2 Employee Training

Level 3 will ensure that all 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
- Preventive maintenance
- Runoff controls
- Spill prevention and response
- Recordkeeping

Records of employee training within each Regional Water Board will be maintained at the Level 3 designated Gateway facility at 185 Berry, San Francisco, and 818 W 7th Street in Los Angeles California, as well as maintained electronically with Level 3's Environmental Management Team and will be available for inspection by SWRCB and Regional Water Board personnel.

2.3 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 and to maintain water-free conditions within dry structures.

3.0 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, gasoline)
- Organic matter
- Sewage
- Miscellaneous pollutants in storm water
- Sediment

3.1 Description of Underground Structures

Level 3 structures covered under the General Permit include manholes, underground utility vaults, and other underground structures. They are classified as either dry structures or wet structures. The primary purpose of the underground structures is to provide Level 3 with access to fiber cable. In general, mechanical equipment is not located within the vault structures. At this time, Level 3 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

Dry Structures

Dry structures are defined as environmentally controlled structures that contain equipment which is sensitive to temperature and moisture. Dry structures are sealed preventing most surface and subsurface inflow of water into the vaults. They are generally air conditioned to protect the contained equipment, and water collection within dry structures consists of condensate from the air due to climate control activities within the vaults. Dry structures are equipped with sump pumps that activate once water levels reach predetermined levels, and the water does not come into contact with the equipment in the vault. Discharges from dry structures are significantly less than discharges from wet structures.

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 the structure. Water infiltrating into wet structures will require removal prior to the commencement of work within these structures by Level 3 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.

3.2 Drainage Maps

Regional Water Board drainage maps for Level 3 locations that are covered under the General Permit are contained in Appendix A. Drainage Maps were obtained primarily from the Basin Plans and other documents available on line from the Regional Water Boards.

3.3 Underground Structure Location Maps

Maps showing the locations of the Level 3 underground vaults, as well as accessible non-Level 3 vaults and structures are contained in Appendix B.

4.0 TYPES OF DISCHARGES

Two types of discharges from Level 3 facilities are covered under the General Permit. Manual discharges are performed primarily from wet structures, but may be completed on dry structures, as required. Automatic discharges occur at dry structures. Discharges can also be categorized as unscheduled and scheduled. The types of discharges are described below in the following sections.

4.1 Manual Discharges

Water discharges from wet structures are primarily manual discharges. Following infiltration of water into wet structures, Level 3 personnel must first pump the water out of the vault or structure prior to safely entering the structure to perform network operations. Dry structures may require manual discharges under certain situations.

4.2 Automatic Discharges

Water removal from dry structures is considered as an automatic discharge. Dry structures typically contain sump pumps that will automatically discharge water once the water levels reach a predetermined point. Water discharged from dry structures is of considerably less volume than the water discharged manually from wet structures.

4.3 Unscheduled Discharges

Unscheduled discharges represent the majority of discharges from both wet and dry structures. The discharge from wet structures occurs when Level 3 personnel are required to enter the vault or underground structure to perform network operations maintenance. Unscheduled discharges from dry structures are determined automatically based on the amount of water in the structure.

4.4 Scheduled Discharges

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

5.0 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 Level 3 to discharge these waters to the receiving waters of the United States and the State of California. All waters that are contained in vaults that do not pass the inspection and evaluation described below will be containerized and subsequently disposed according to all applicable regulations. The following sections cover the inspection, evaluation, discharge procedures, and recordkeeping activities related to discharges under the General Permit.

5.1 Inspection of Underground Structures

Prior to removing water from vault, qualified Level 3 personnel will initially inspect the structure to determine if a discharge is required prior to performing work within the vault. In most cases, these procedures will apply to wet structures; however, these procedures will also apply to the manual removal of water from dry structures, as necessary. 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 Level 3 equipment that would not allow for the discharge of waters of the structure under the General Permit.

5.2 Evaluation of Waters Contained in Underground Structures

The procedures contained within this section will be undertaken by trained Level 3 personnel to evaluate the quality of the water contained in the vault and determine if it meets the requirements under the General Permit for discharge. The evaluation is subdivided into two sections below: an initial Phase I Testing to determine if the water in the vault is clear, and a detailed Phase II Testing to determine if discharge can be undertaken if the water is cloudy or milky in appearance. A flow chart summarizing these evaluation procedures is contained in Appendix C.

Phase I Testing

If the initial inspection has determined that there are no visible pollutants in the contained water, a clean unused bailer will be lowered into the vault to obtain a representative sample of the vault water. The bailer 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.

Observe the water sample in the bailer. 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 return the sample to the vault.

If the water sample in the bailer does not contain product and odors as noted above, test the water for pH, using an approved methodology. If the pH of the sample is outside of the range of 6.5 to 9.0, the water cannot be discharged, and the sample should be returned to the vault.

If the water sample is clear (i.e. not cloudy) and passes the odor and pH tests as outlined above, the water can be discharged under the General Permit. Ensure that all floating debris is removed from the water prior to discharge. Best Management Practices (BMPs) as outlined below in Section 5.3, will be employed at all times during the discharge operations.

If the vault water sample does not pass the odor and pH tests as outlined above and is cloudy or milky in appearance or contains an oily sheen, additional observations/tests will be made as outlined below in Phase II Testing.

Phase II Testing

If the sample 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, refer to the procedures in the following paragraph.

If the vault water sample contains any sediment layers, solids, or an oily sheen, or if a cloudy sample has settled into layers or material at the bottom of the sample, make an identification of the settled materials. If the settled materials cannot be identified, they may consist of sludge, sewage, solvents, or other unidentifiable material, and the vault waters cannot be discharged under the General Permit.

If the settled solids in the vault water sample consist of sediment, soil, leaves or mud, determine if there is an oily sheen present on the surface of the water. If there is an oily sheen present, determine if it can be removed by using absorbent materials. If the absorbent materials will not remove the oily sheen, the vault waters cannot be discharged under the General Permit.

If the vault water passes all of the above tests, it can be discharged under the General Permit. All floating debris should be removed from the water prior to discharge. The vault water sample should be returned to the vault prior to discharge, and any materials used to mitigate any pollutants (e.g. absorbent pads) must be disposed according to all applicable regulations. BMPs as outlined below in Section 5.3 will be employed at all times during the discharge operations.

In the event that the vault water does not pass the evaluation 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.

5.3 Water Discharge Procedures

Waters contained in vaults that pass the inspection and evaluation procedures outlined above can be discharged to the receiving waters in accordance with the 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.

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. Any water and sediment remaining in the vault following pumping operations should be removed and disposed according to all applicable regulations.

During discharge operations, Level 3 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, Level 3 will contact the appropriate agency within 24 hours of discharge.

5.4 Recordkeeping

All procedures related to the inspection, evaluation, and discharge of waters from vaults will be recorded on a Underground Structure Inspection Form. A copy of that form is included at Appendix D. 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, the type of corrective action should be documented, and the date of the completion of the corrective action will be noted. 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.

6.0 POLLUTION CONTROL MEASURES

Level 3 will maintain measures and controls to ensure that waters discharged from its vaults are in compliance with the General Permit. These measures include good housekeeping, preventive maintenance, and spill prevention and response procedures.

6.1 Good Housekeeping

Good housekeeping at all underground vaults and structures is critical to ensure that potential pollutants are kept to a minimum. Level 3 will maintain the integrity of their equipment in each of their vaults, 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.

6.2 Preventive Maintenance

Level 3, in general does not have mechanical equipment in its manholes and underground structures, as they are primarily used for fiber cable. In cases where mechanical equipment is present, Level 3 will perform preventive maintenance on its equipment in the vaults on a regular schedule. Any issues determined during the preventive maintenance will be addressed.

6.3 Spill Prevention and Response

Level 3 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 the State of California:

- In the event that the discharge exceeds 50,000 gallons, Level 3 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 Level 3 Network Operations Center (NOC) and Level 3 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 Level 3 for the appropriate Regional Water Board within 5 days of the excursion. The report will also outline measures planned to reduce or prevent a reoccurrence of the non-compliant event.
- If there is a release of hazardous pollutants to the state-owned waters of California, Level 3 may employ a hazardous materials response contractor to manage the mitigation activities. Level 3 utilizes HazMat One for all its emergency response activities.
- Level 3 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 personnel.

7.0 MONITORING AND REPORTING PLAN

Level 3 will prepare an Annual Monitoring and Reporting Plan in accordance with 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, dischargers who are enrolling for the first time, will develop a representative sampling and analysis program that can be used as a case study to represent typical discharges within each Regional Water Board. The case studies will be completed within six months of the enrollment under the General Permit, or within 12 months when no discharge occurs within the first six months. Level 3, as a first-time discharger, will submit the results of the case studies with the first annual report.

Elements of each of the Monitoring and Reporting Plans, which will be prepared for each Regional Water Board, are as follows:

- Level 3 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 the vaults in that region.
- All samples will be analyzed for oil and grease, pH, Total Petroleum Hydrocarbons (TPH), and total Suspended Solids (TSS). All analysis will be completed by

laboratories certified by the California Department of Health Services.

• The annual report will contain a rationale for the selection of the sampling locations, a description of the sampling methods, and a detailed map showing the locations of the sample points in each Regional Water Board.

8.0 COMPREHENSIVE SITE COMPLIANCE EVALUATION

The PPP is designed to comply with the Best Availably Technology Economically Achievable/Best Conventional Pollutant Control Technology (BAT/BCT) to ensure Level 3's compliance with the requirements of the General Permit. Level 3 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 Level 3 personnel with respect 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, Level 3 will amend any portions of the PPP within two weeks of the evaluation. Level 3 will submit an amended PPP to the appropriate Regional Water Board. Level 3 will write and retain for 3 years a report summarizing the scope of the 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.

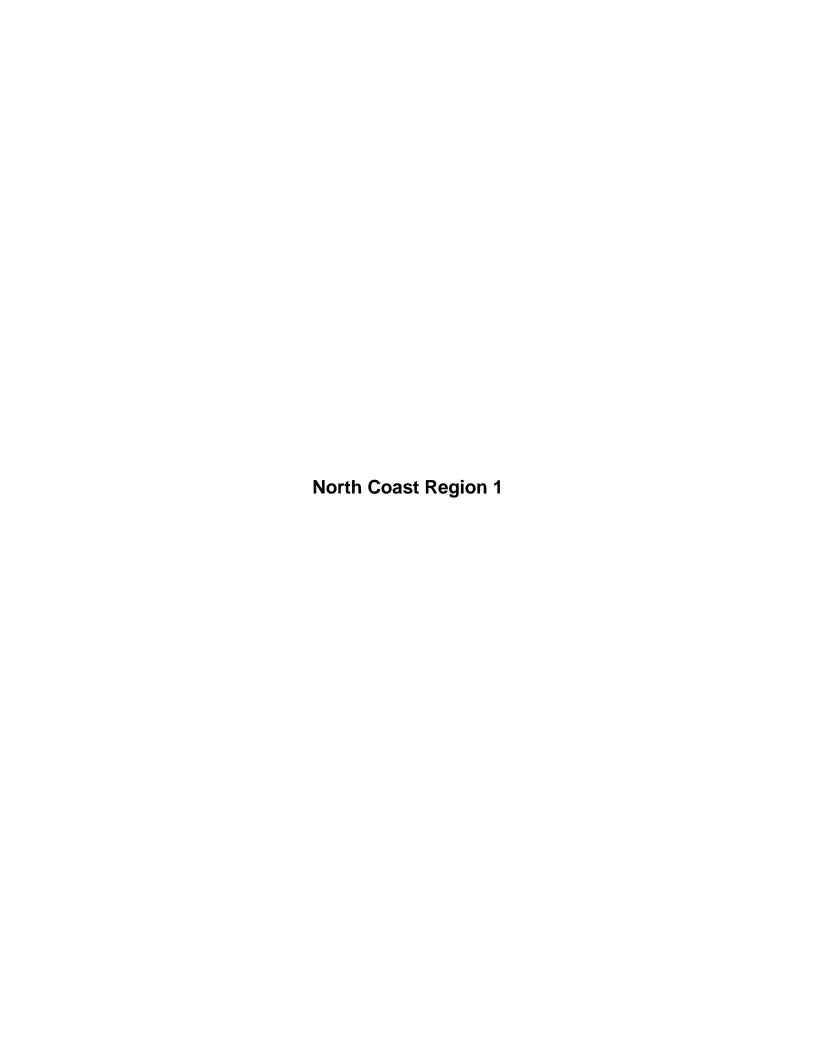
9.0 CERTIFICATION

"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:
B.	Signature:
C.	Date:
D.	Title:



APPENDIX A
Drainage Maps



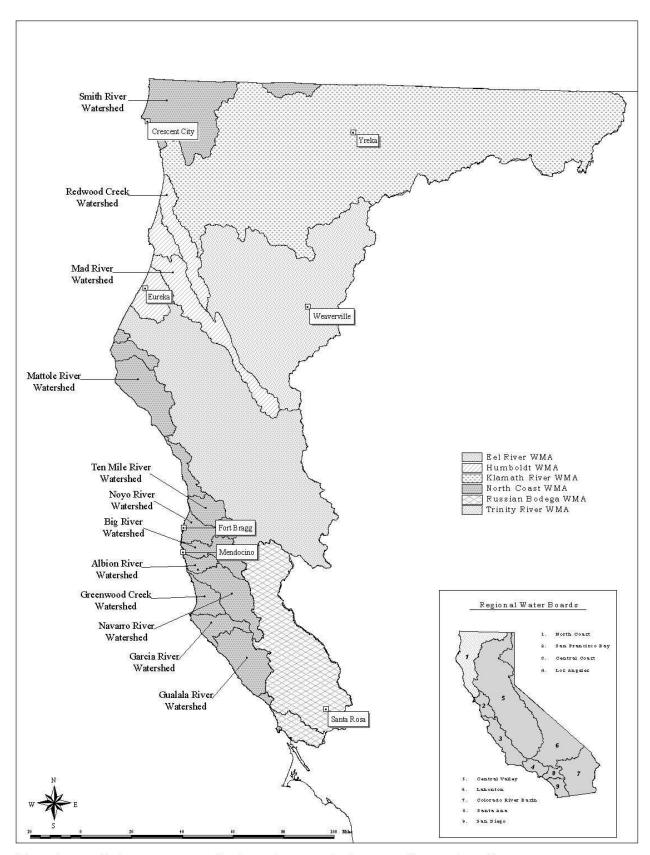
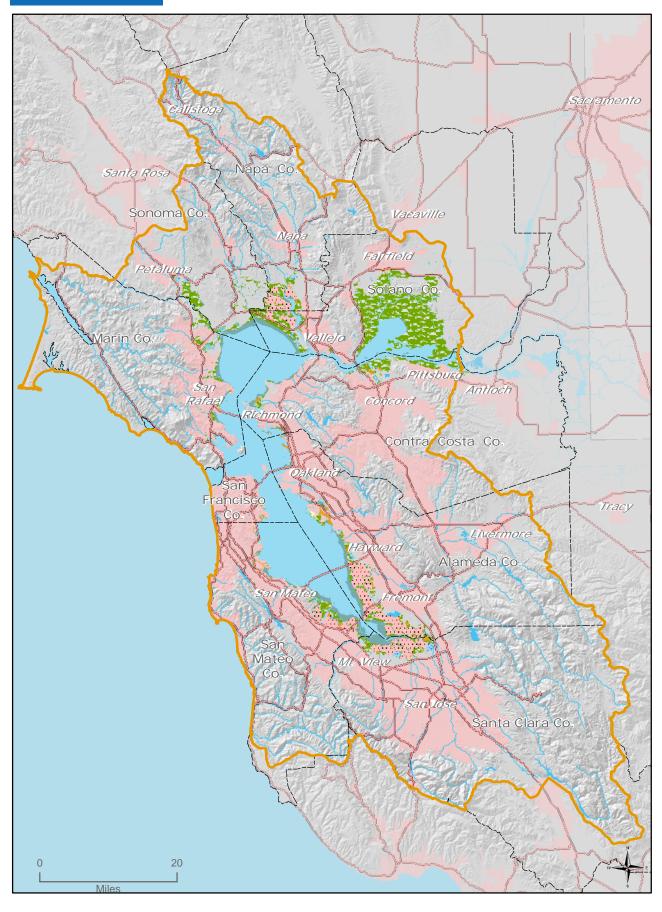


Figure 1. Watershed Management Areas for the North Coast Regional Water Quality Control Board



Figure 1-1 San Francisco Bay Basin



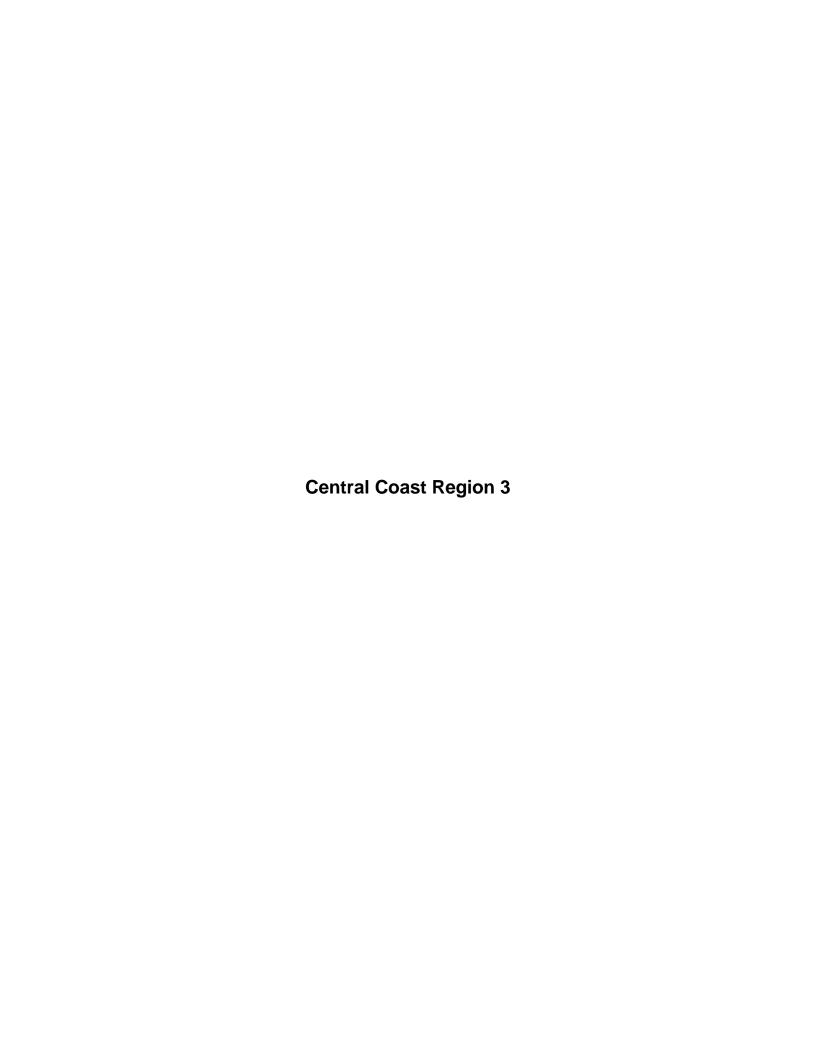
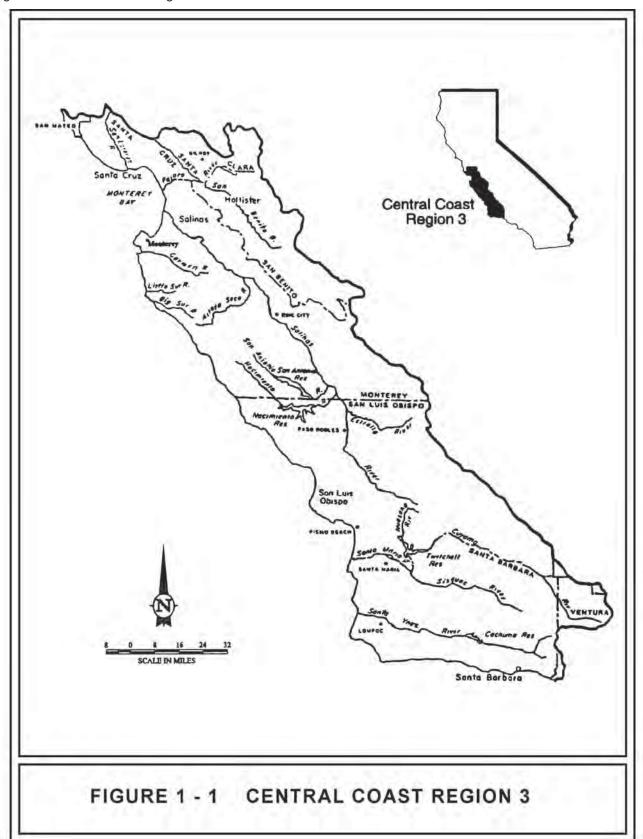


Figure 1-1. Central Coast Region 3



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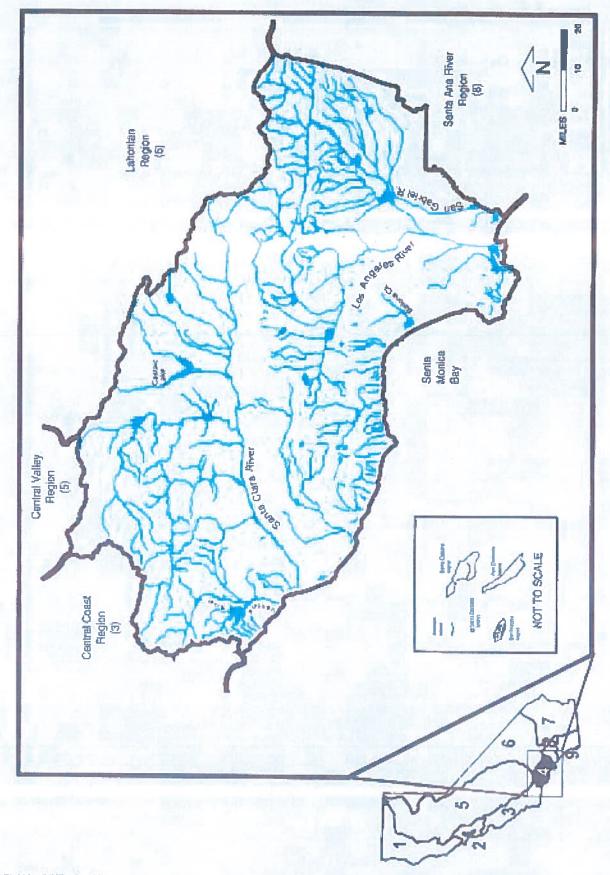
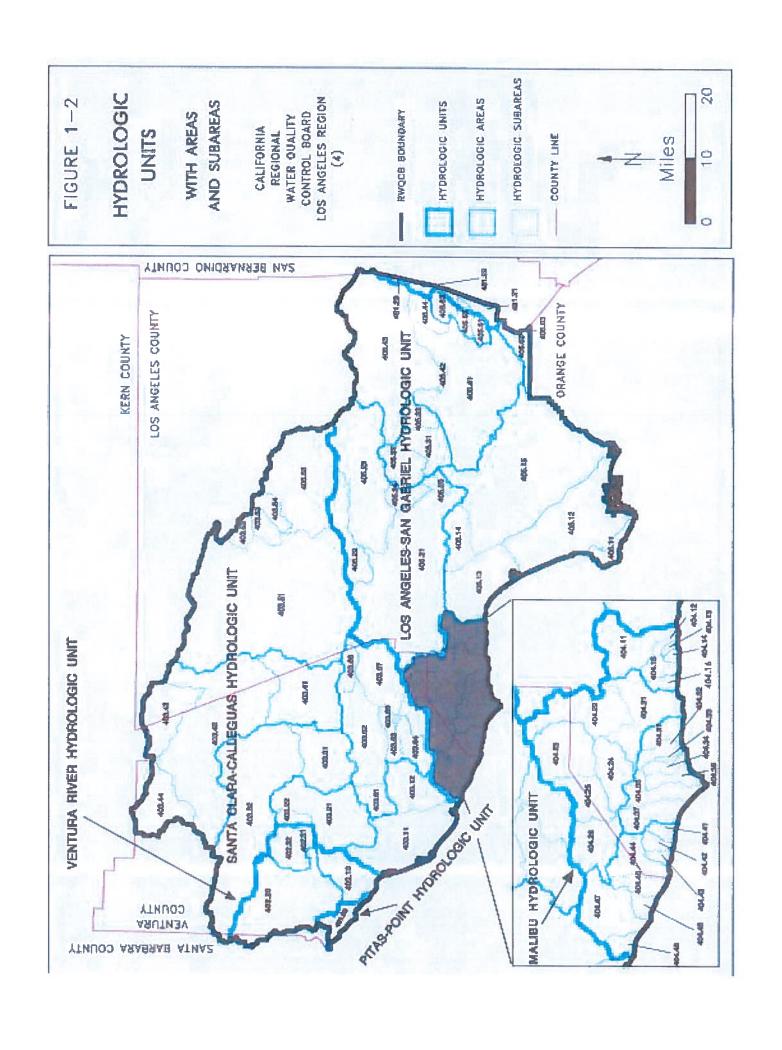
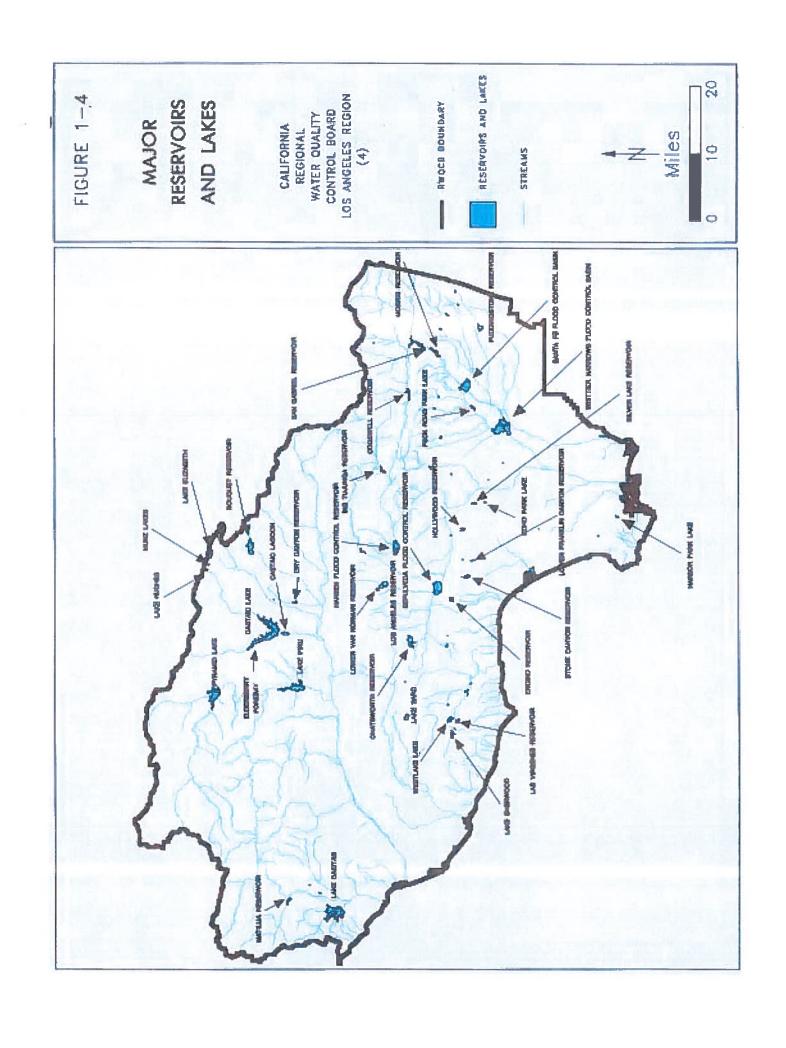
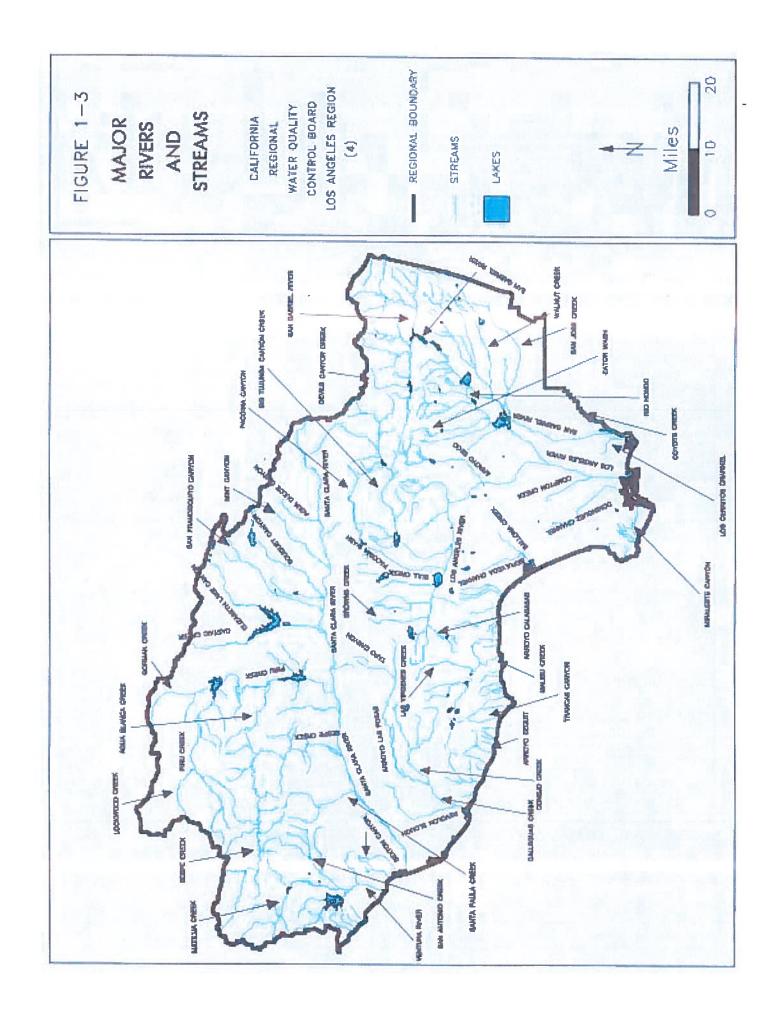
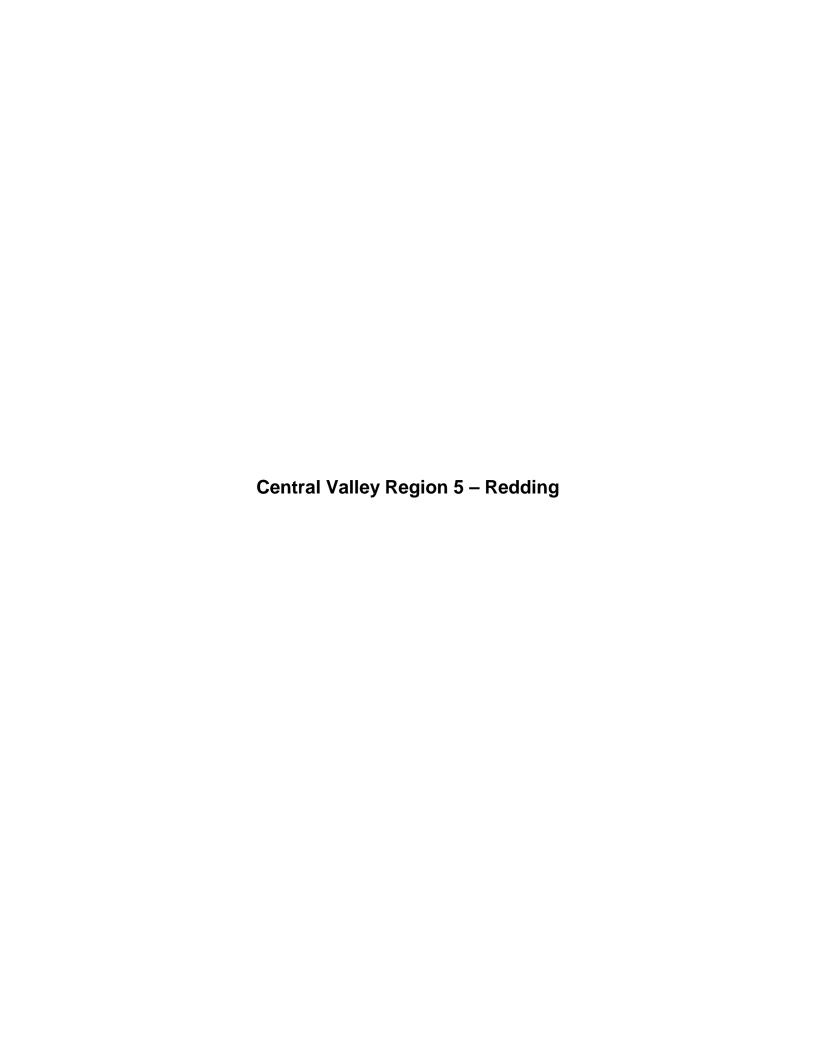


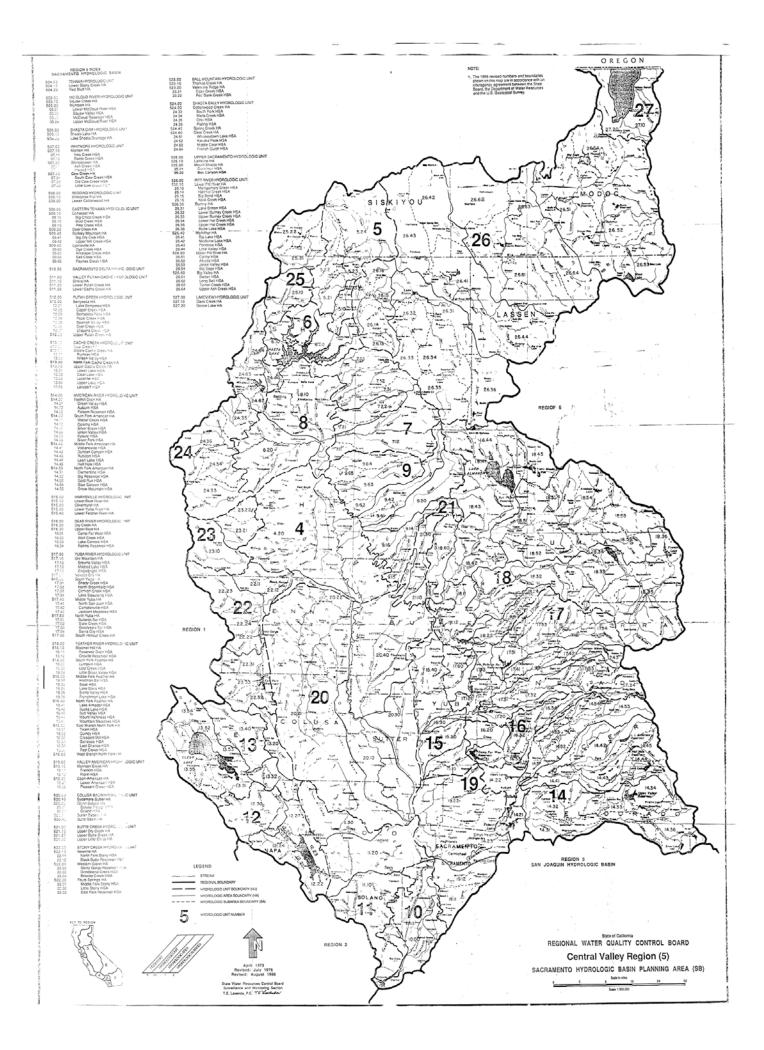
Figure 1-1. Regional Map: Regional Water Quality Control Board, Los Angeles Region.



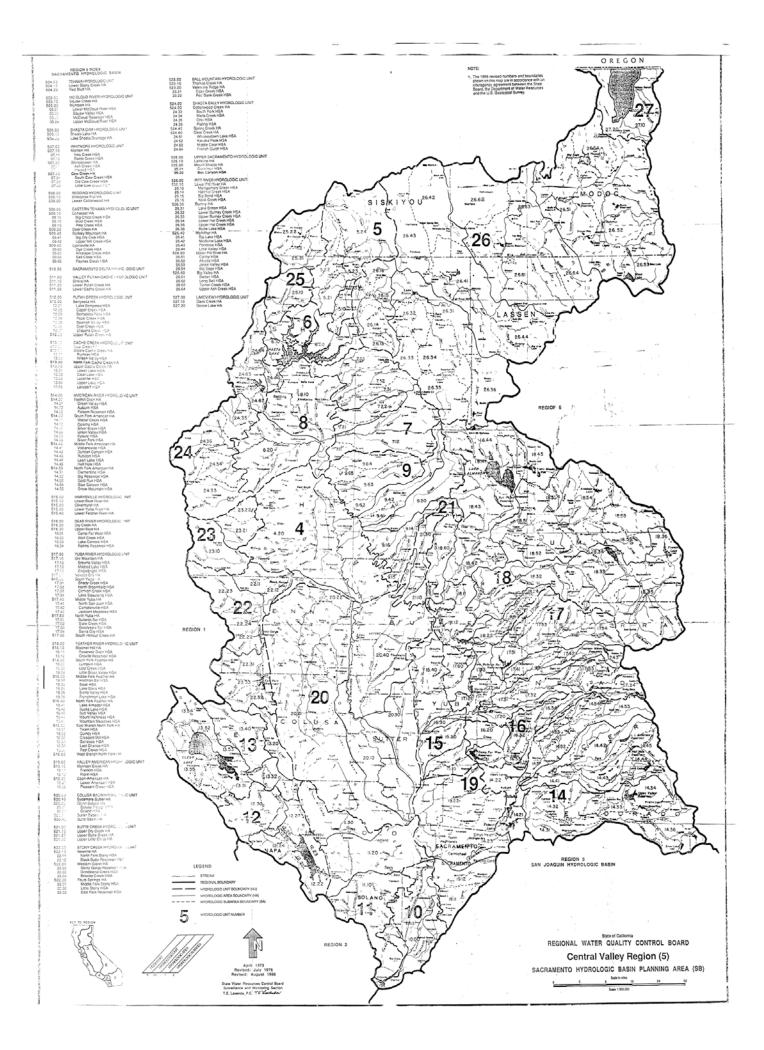






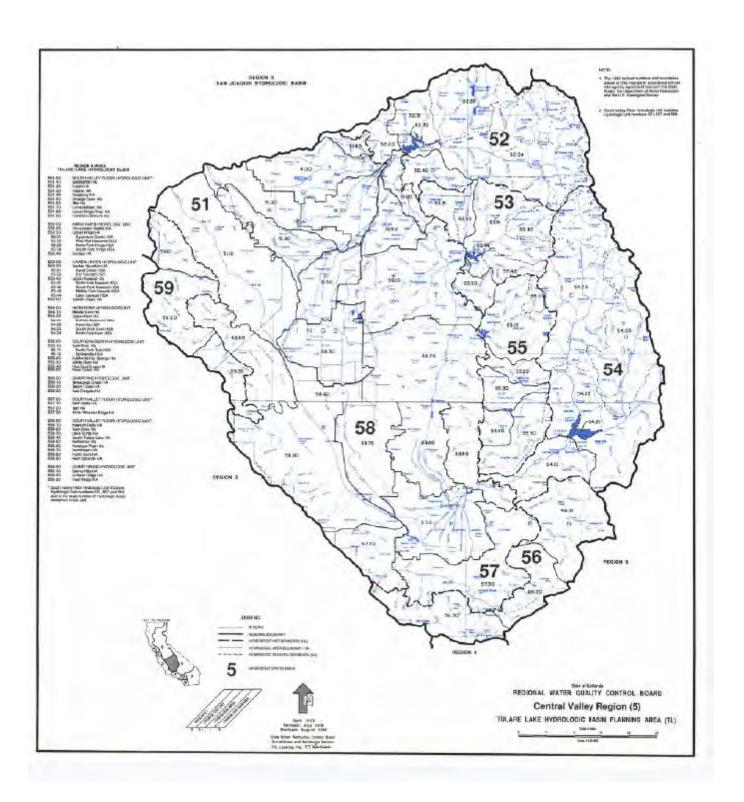




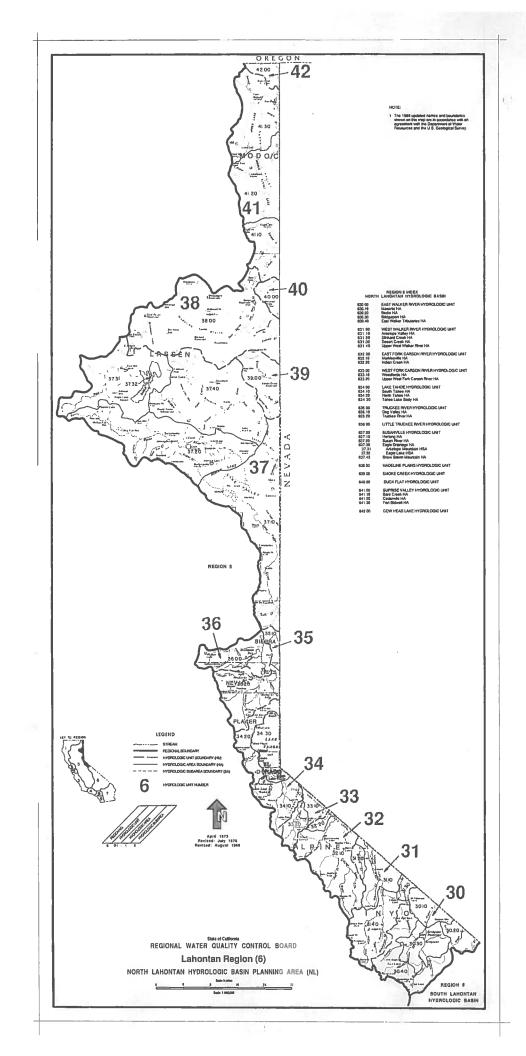




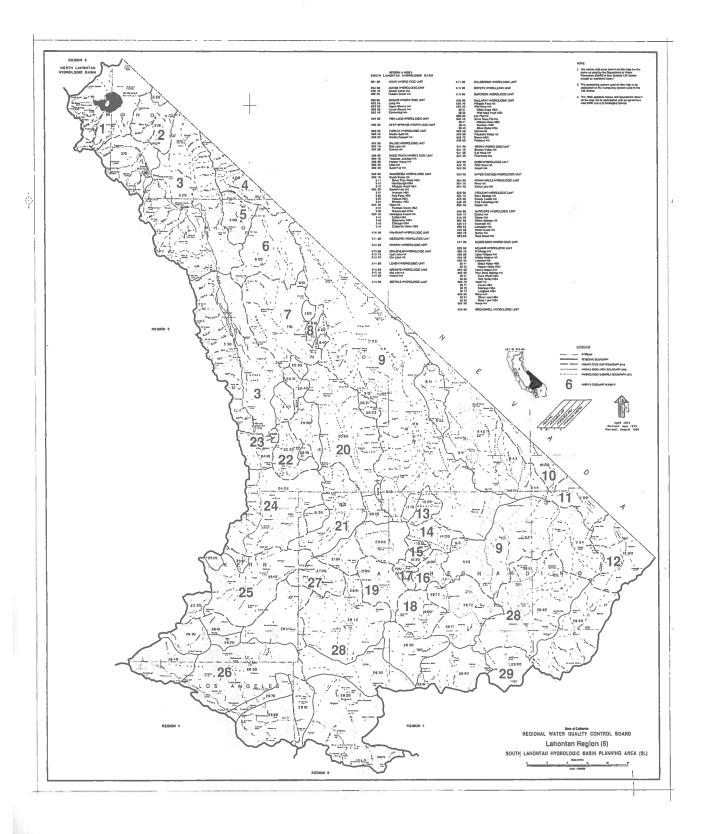




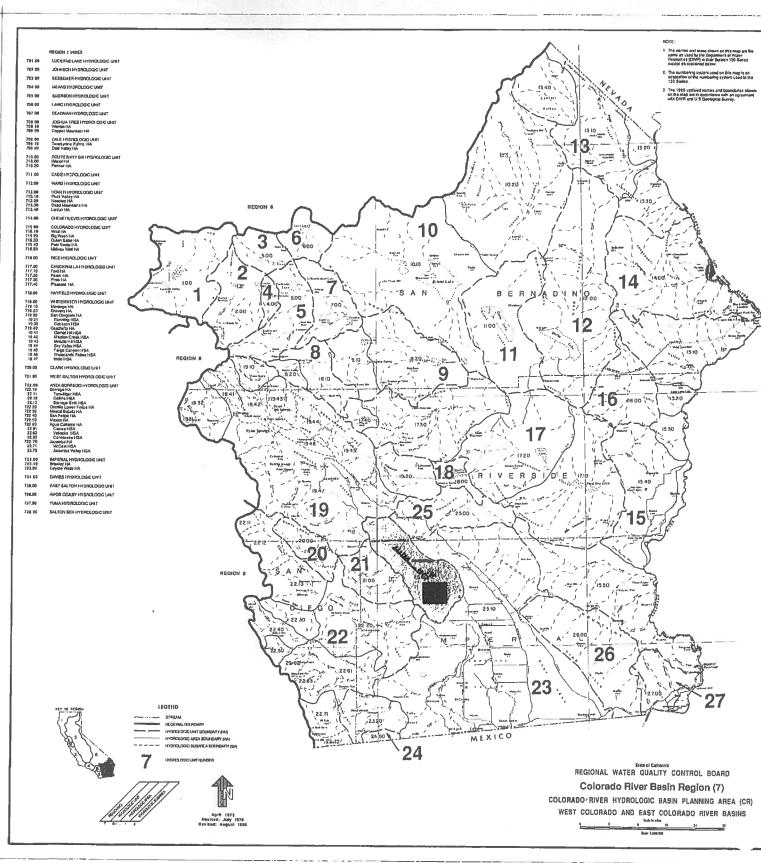




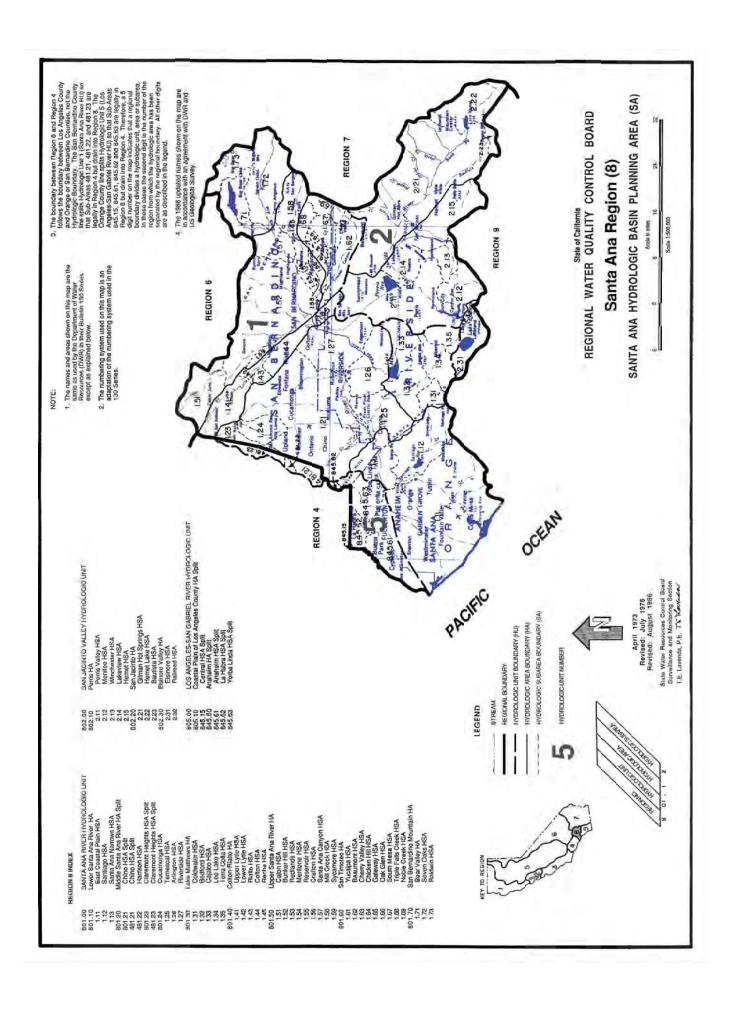




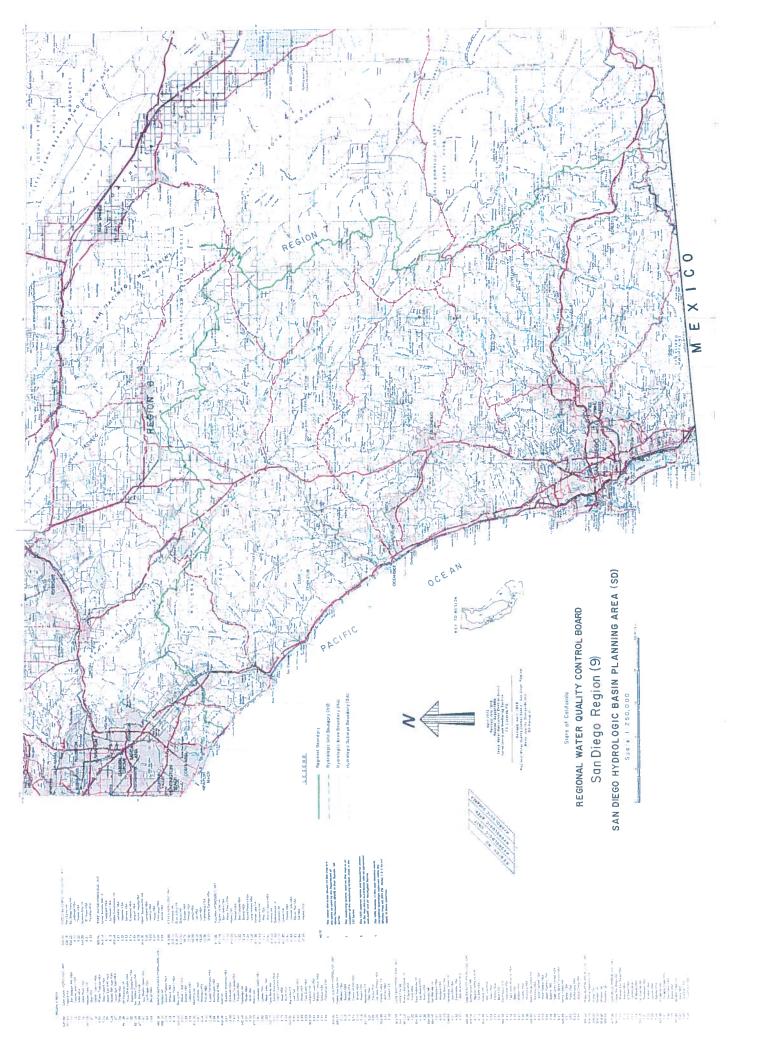




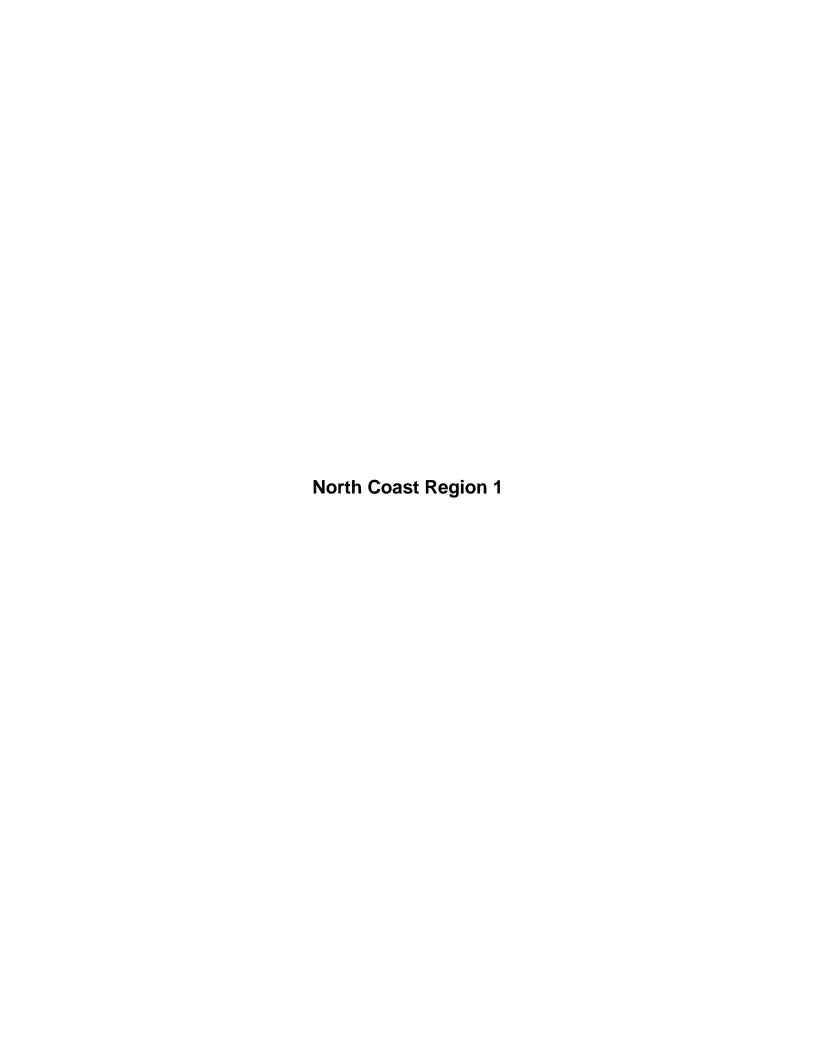


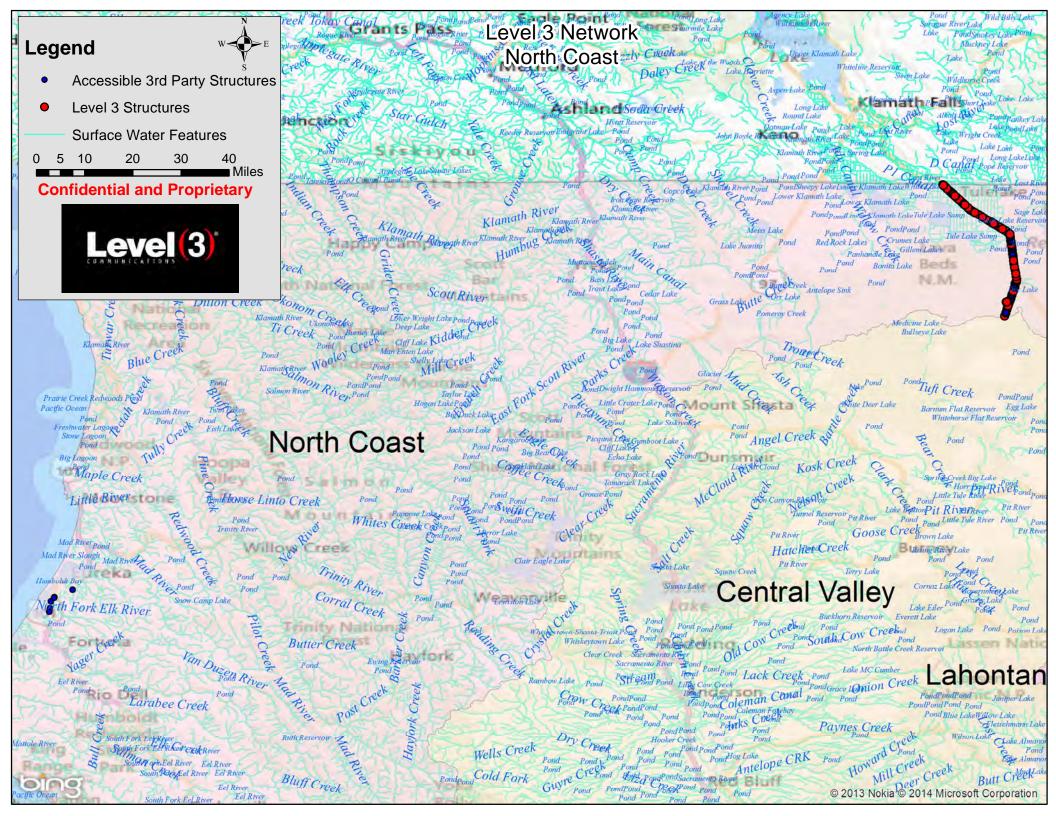




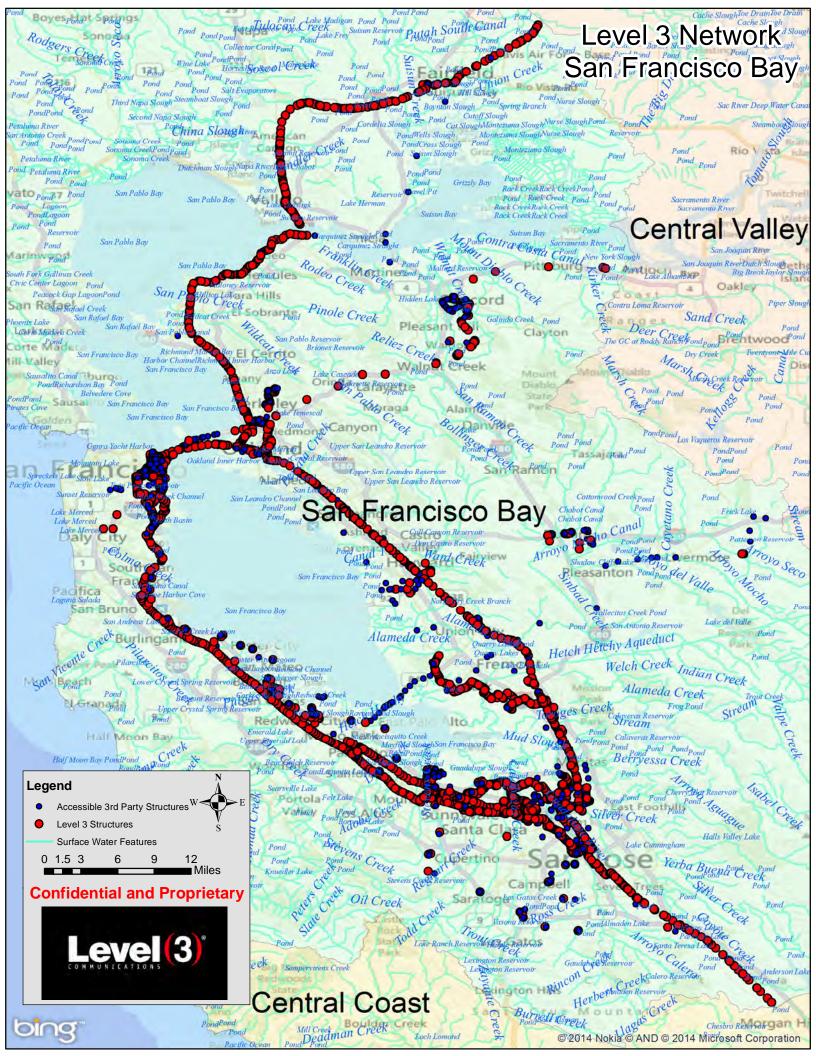


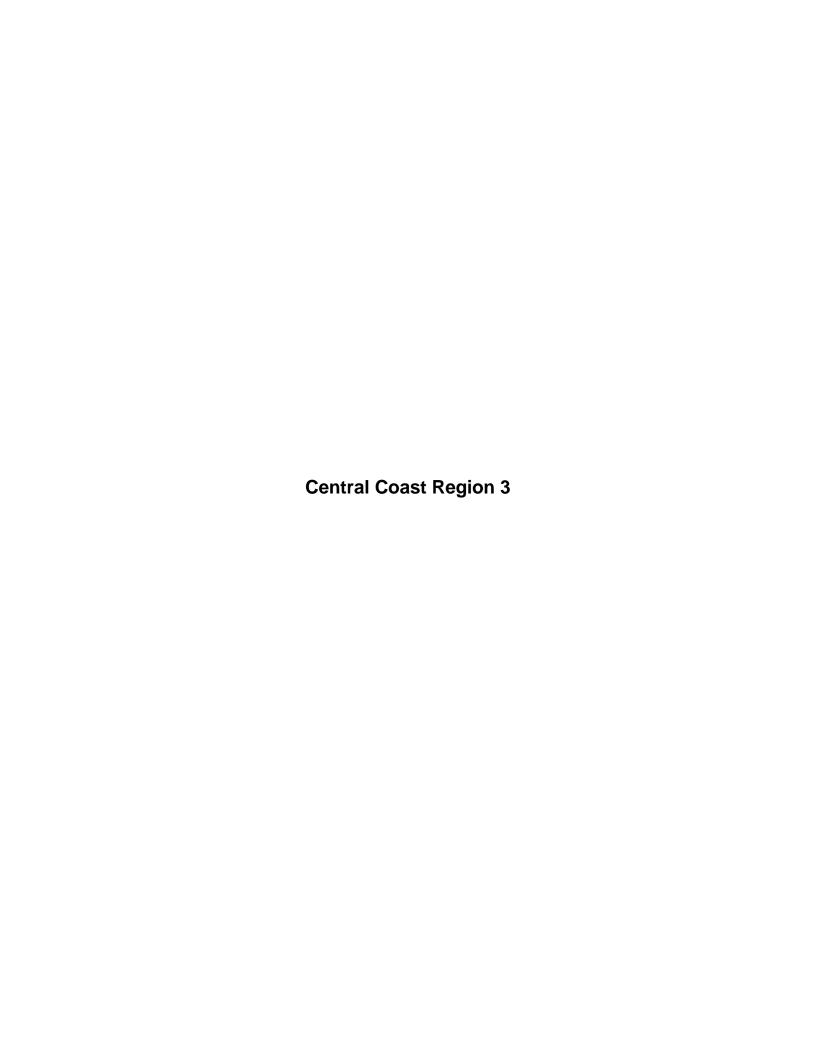
APPENDIX B Underground Vault Location Maps







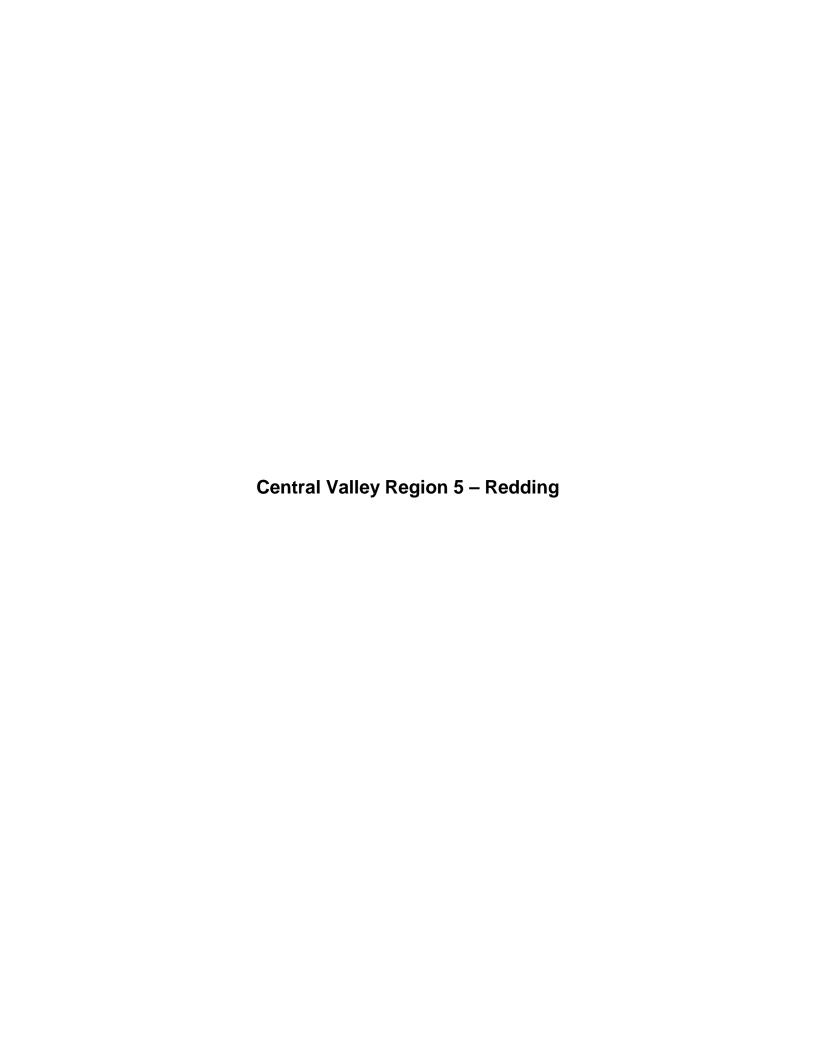


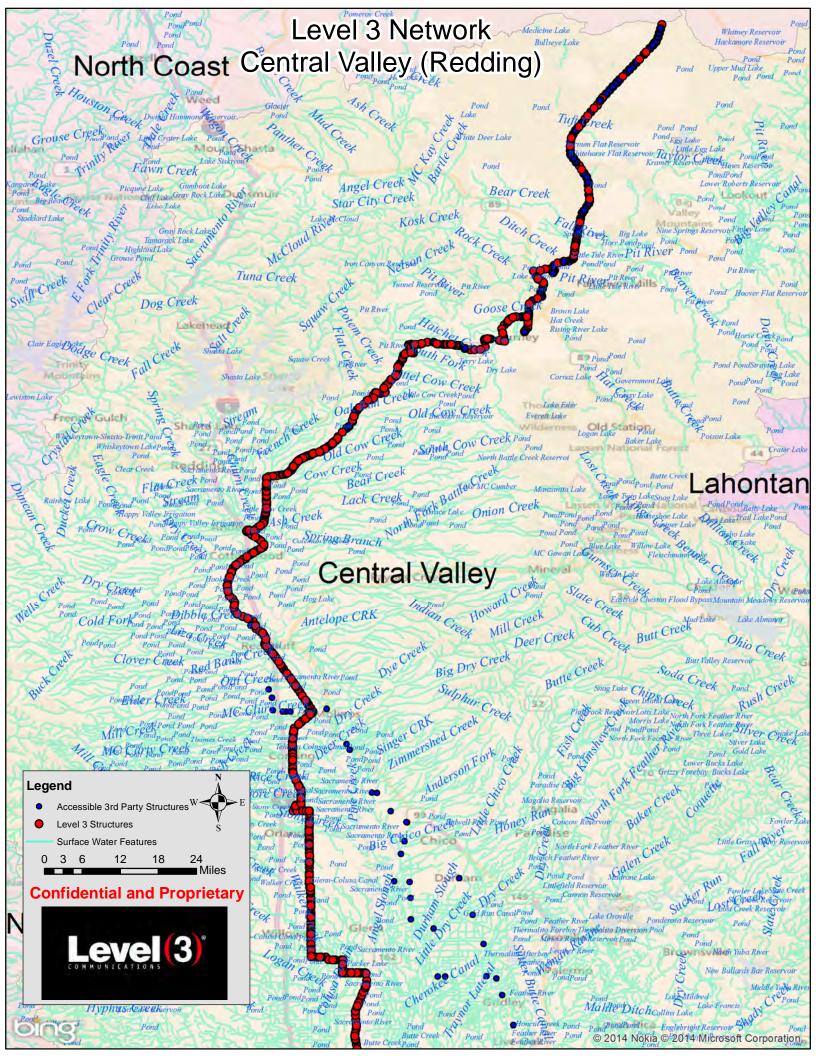




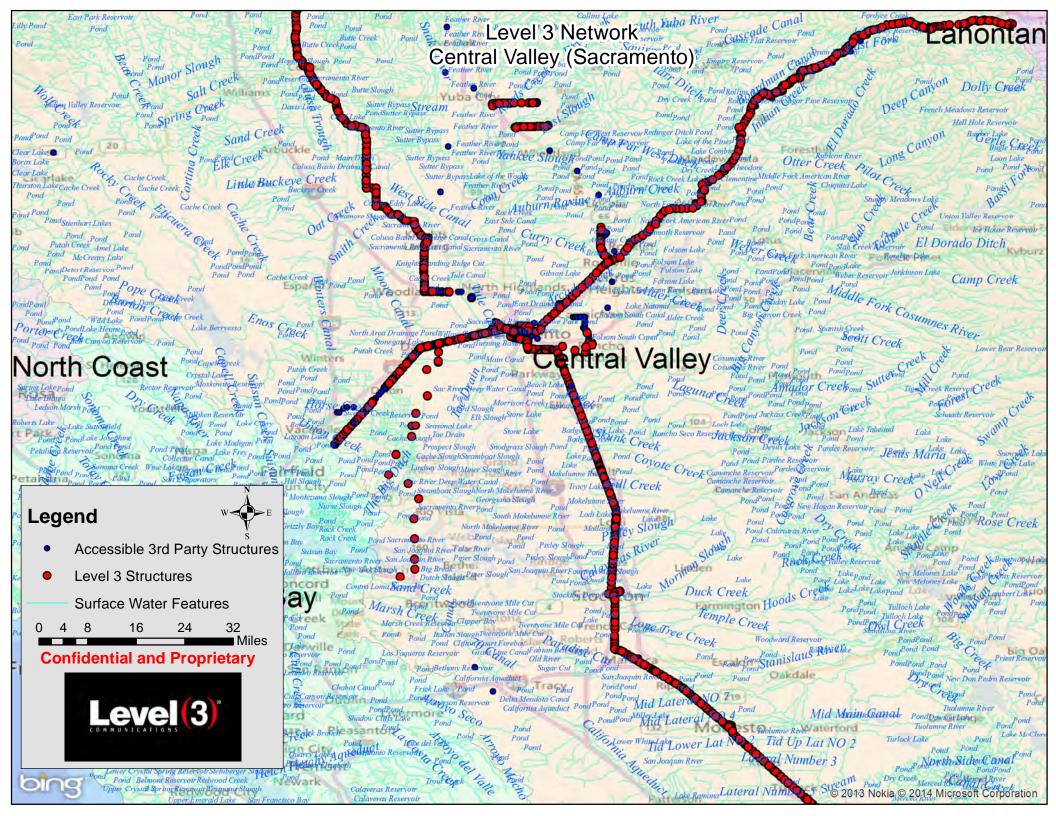




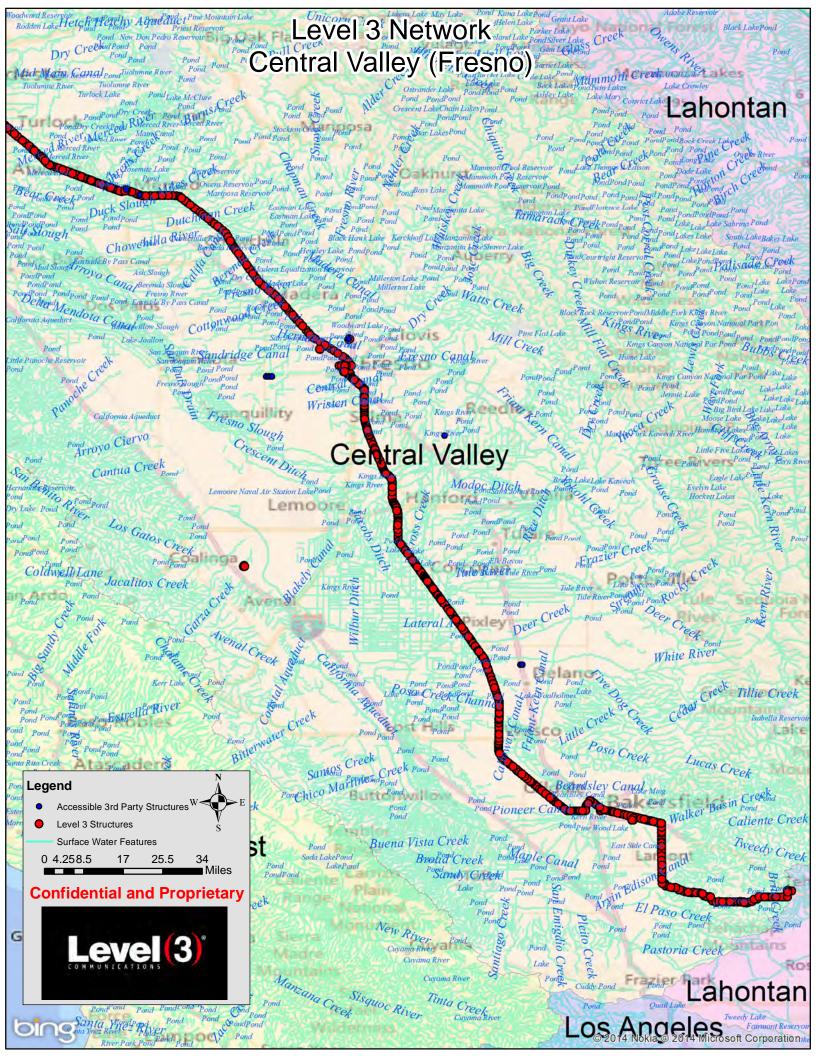




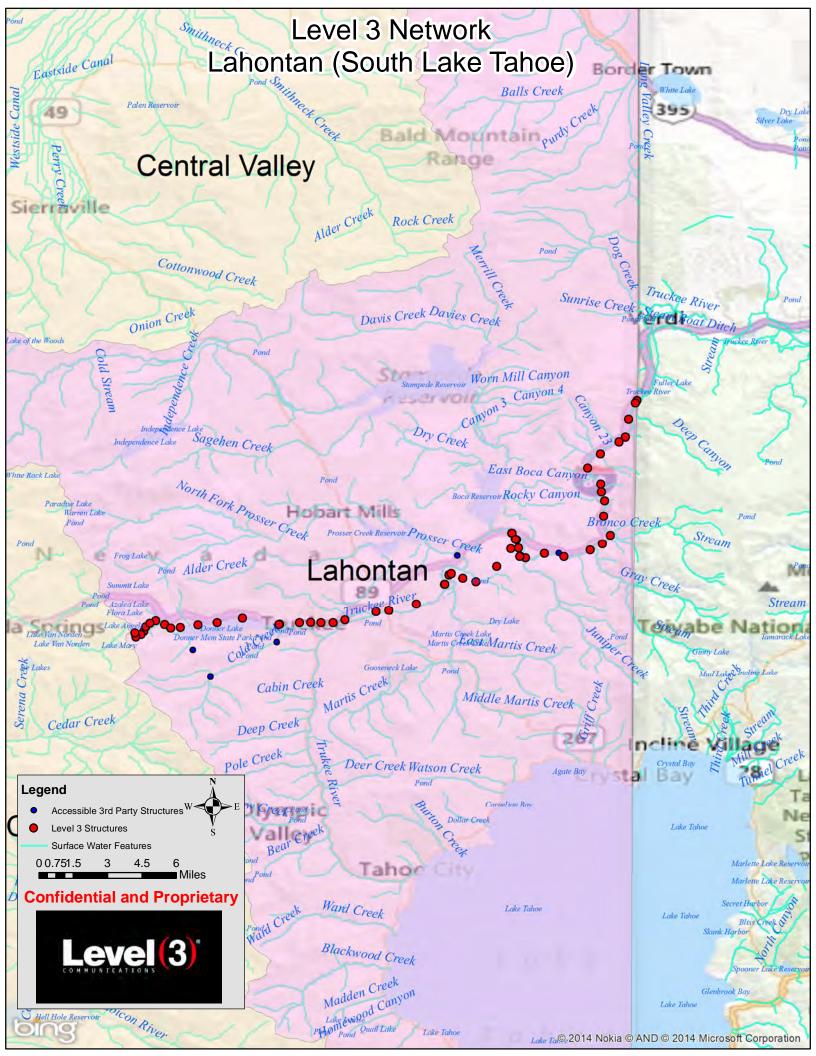




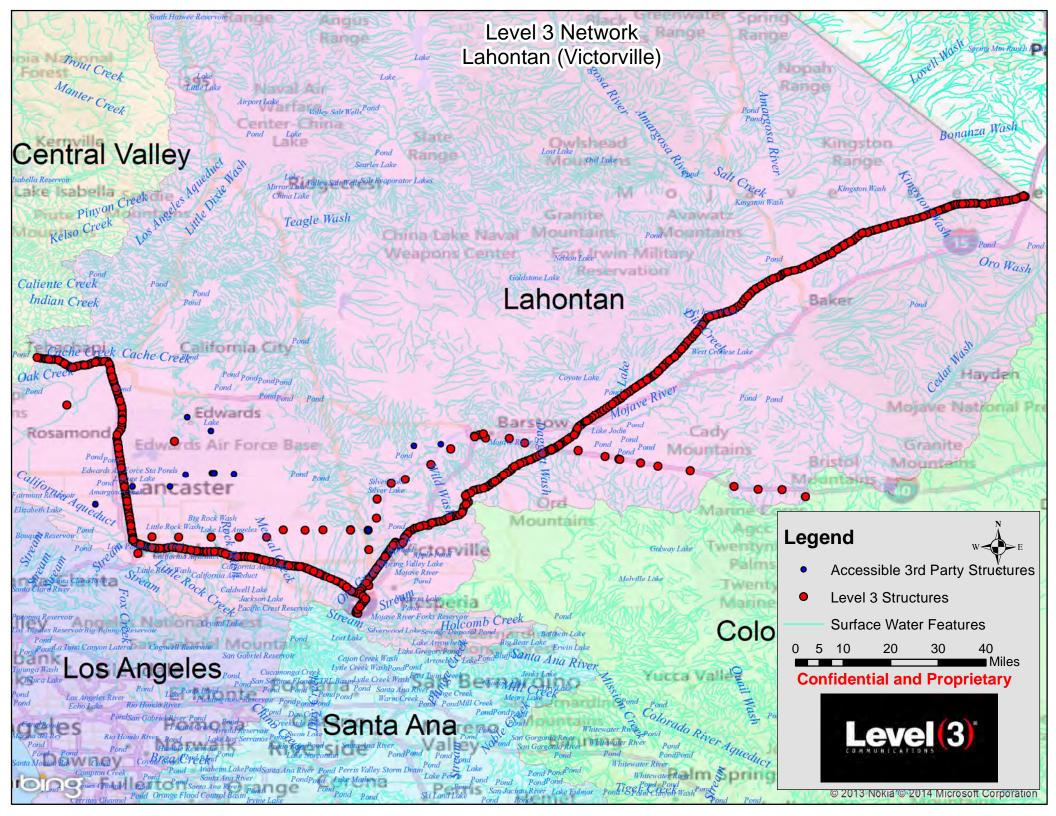




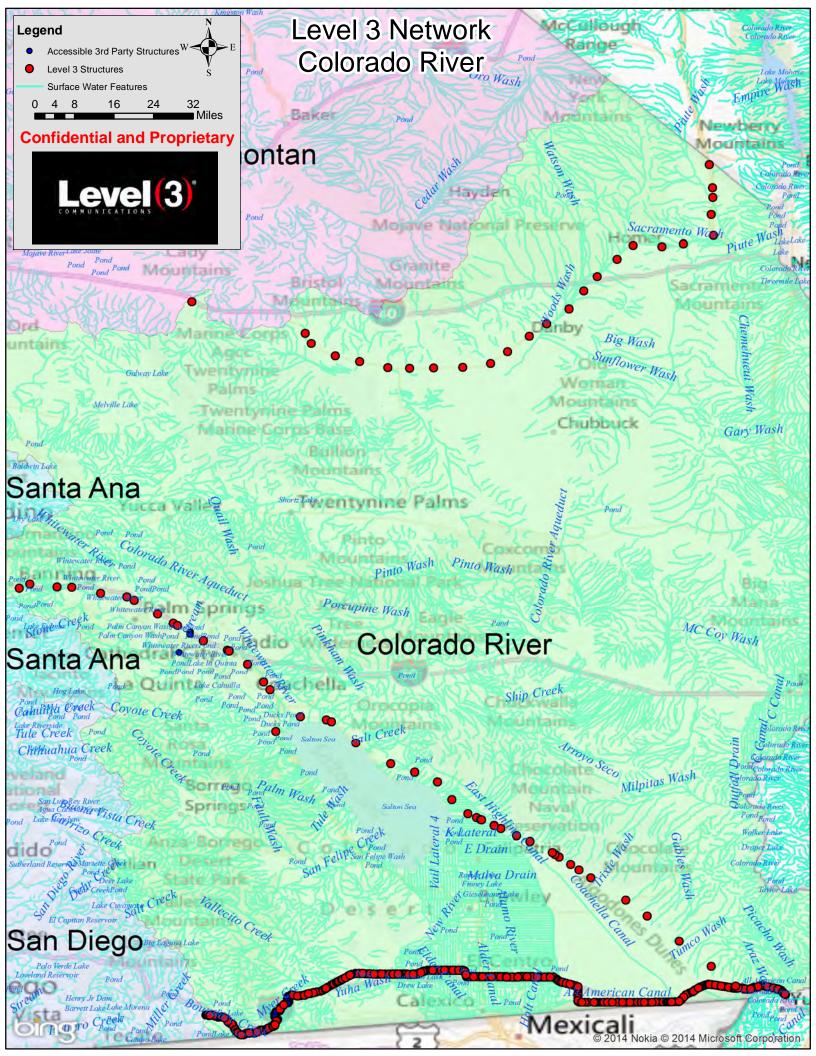




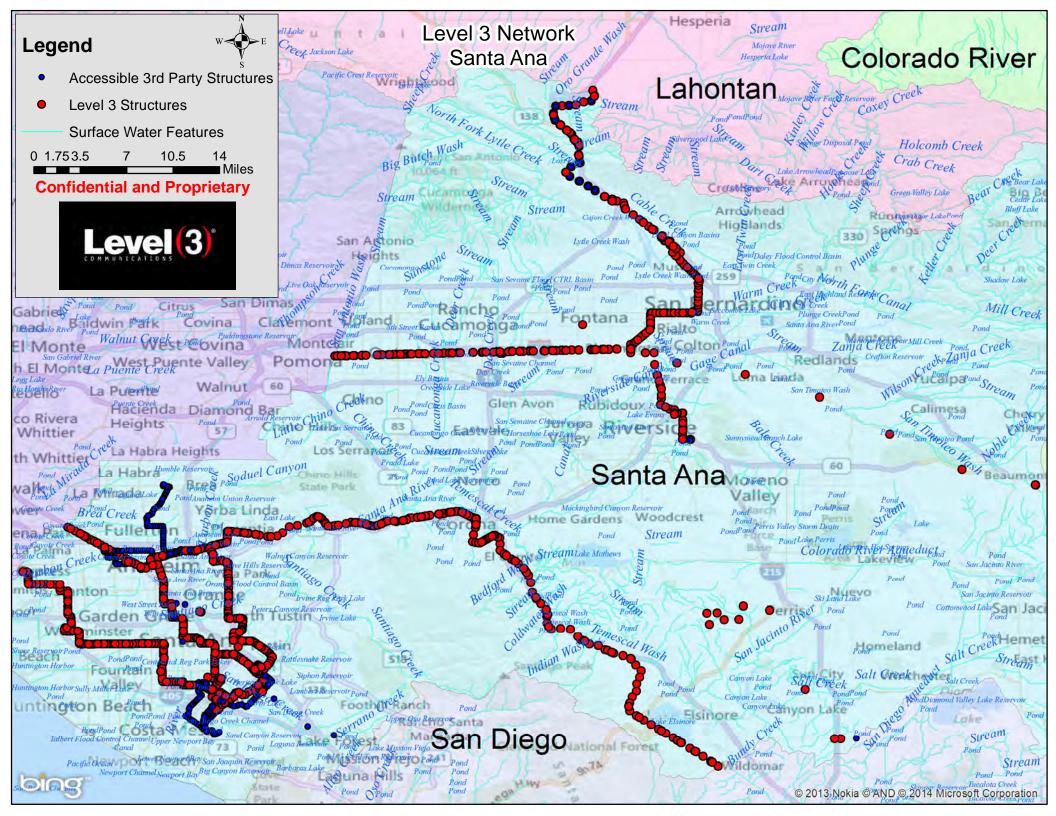




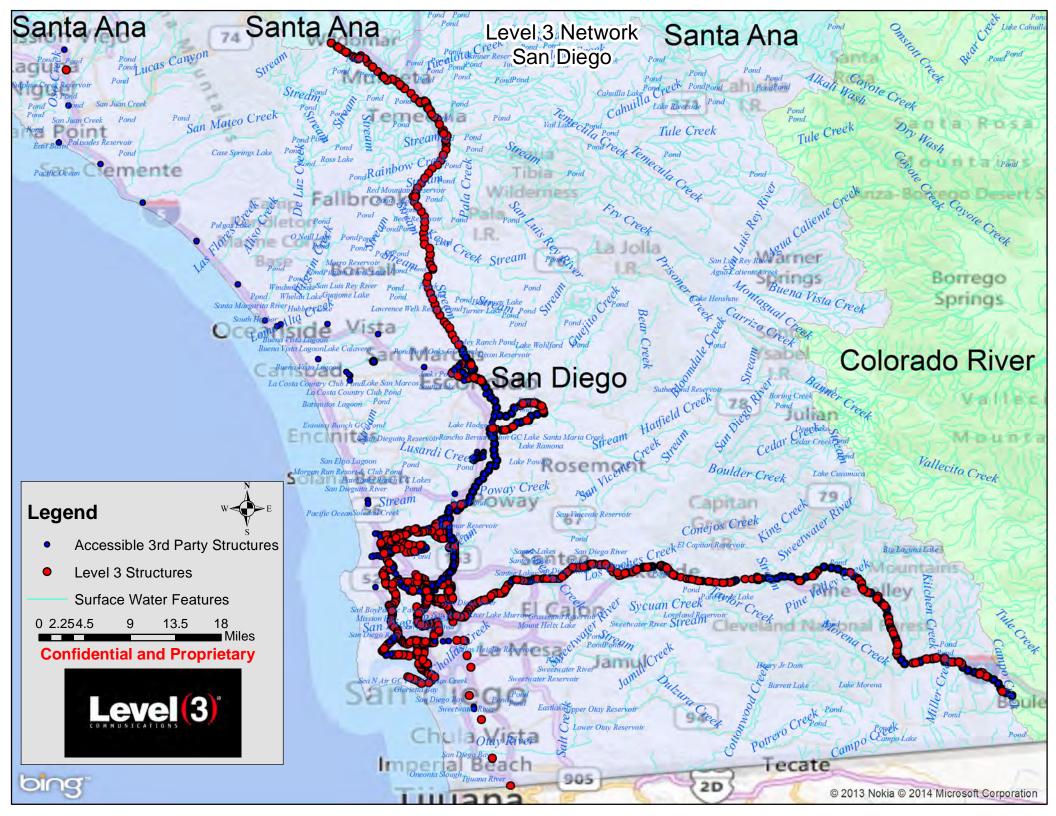








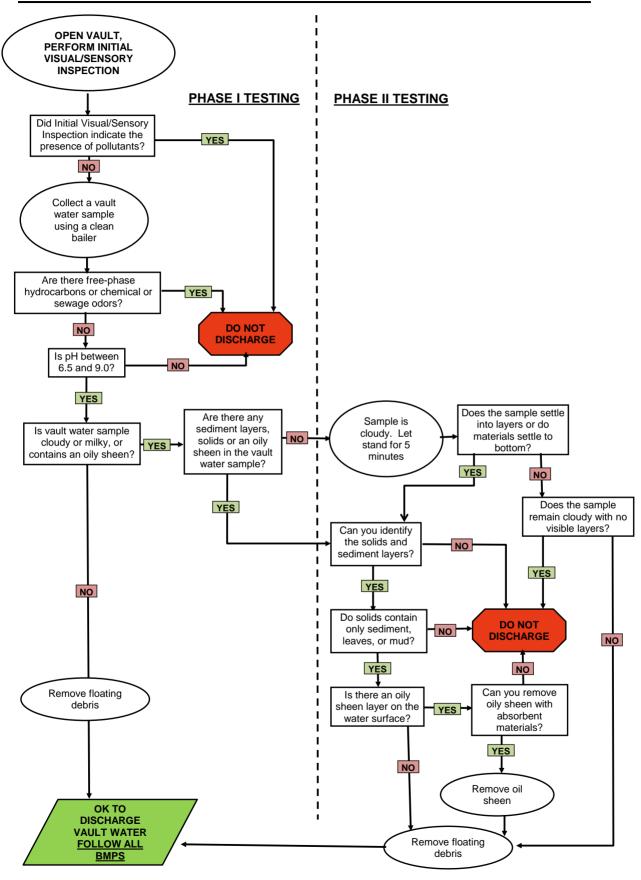




APPENDIX C

Evaluation Chart for Utility Vault Discharges

LEVEL 3 EVALUATION FLOW CHART FOR UTILITY VAULT DISCHARGES



APPENDIX D Underground Structure Inspection Form

Vault Location Location Code Date Time 1 INITIAL VAULT INSPECTION YES NO Vault integrity good?

vauit integrity good?	
Equipment integrity good?	
Water Free from Odors and Discoloration?	

If any of the answers are "NO", do not discharge and contact Level 3 Preventive Maintenance

If all answers are "YES", go to Section 2 below

2 COLLECT A VAULT WATER SAMPLE ACCORDING TO POLLUTION PREVENTION PLAN Phase I Testing

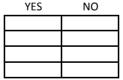
Sample contains visible hydrocarbon layers? Sample contains odors?
Is pH of sample <u>not</u> between 6.5 and 9.0?
Water sample has visible oily sheen?
Is water sample cloudy or milky?
Are there sediments/solid layers?

YES	NO

If any of the answers are "YES", do not discharge and go to Phase II Testing below
If all answers are "NO," remove floating debris and discharge using BMPs in accordance with
the Pollution Prevention Plan

Phase II Testing

Does cloudiness clear after 5 minutes? Are layers only soil, mud, leaves? Is there an absence of odors? Can oil sheen be removed with pads?



If all answers are "YES," remove floating debris and discharge using BMPs in accordance with the Pollution Prevention Plan

If any of the answers are "NO", inform Level 3 Environmental Management Team

WATER DISCHARGE LOG

			Р	age 2 of 2
Time Discharge Star				
Time Discharge Com	pleted			
Discharge Condition	s (storm drain, gutter, etc.)			
· ·	, , , ,			
Best Management P	ractices (BMPs) used			
Comments				
Number of gallons d	ischarged			
If number of gallo	ns discharged is >50,000 gallons, contact	Level 3 Environmental Managemen	t Team immediately	
DISCHARGE CERTII	FICATION			
Technician Name				
Signature		Date		