

FEB 10 2016

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**Pollution Prevention Plan for
Water Discharges from Utility
Vaults and Subsurface Structures
Located in the State of California**

Prepared in Compliance with NPDES General
Permit Number CAG990002

December 9, 2015

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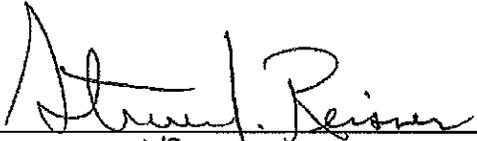
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A	Notice of Intent	
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PLAN CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to 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, to the best of my knowledge and belief, is 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 and Title VP OF RISK MANAGEMENT

12/10/2015
Date



1. Introduction

1.1 General Overview

The State of California Water Resources Control Board has regulatory authority for the protection of water quality under the US Federal Clean Water Act of 1972. The California Water Resources Control Board may issue NPDES permits for the legal discharge of pollutants to surface waters of the United States. The State of California Water Resources Control Board has developed a National Pollutant Discharge Elimination System (NPDES) Permit for Discharges from Utility Vaults and Underground Structures to Surface Waters (General Permit CAG990002). The State board allows utilities to apply for coverage under the General Permit with each Regional Water Quality Control Board in which they have discharges to surface waters. Utilities must develop and implement a Pollution Prevention Plan (PLAN) designed to prevent or control the discharge of pollutants. A copy of the Notice of Intent (NOI) to apply for coverage under the General Permit is presented in Appendix A.

Time Warner Cable (TWC) must discharge water from underground vaults as a result of storm water inflow, subterranean seepage, inflow of other surface waters and / or condensate from air conditioning units, and this water must be pumped out prior to accessing equipment in the vaults. Discharges of this nature are a routine part of network operation and maintenance.

This PLAN has been developed to meet the requirements of the General Permit for all utility vaults and underground structures owned by TWC in the State of California. TWC has facilities as far north as Santa Paula on the west side and Barstow on the east side of the state. TWC also has facilities as far south as San Diego and Coronado on the west side and Imperial County on the east side of the state. This PLAN outlines the procedures and precautions that TWC will follow to insure that water discharged from manholes, utility vaults and other sub surface structures do not degrade the quality of receiving surface waters.



1.2 Contact Information

Primary Contact: Tim Gotto, Sr. EH&S Manager

Office: 858.635.8325; Cell: 619.921.0147

Secondary Contact: Nicolas Johnson, Environmental Manager

Office: 858-309-8533; Cell: 619-643-7674

Location of Plan: 10450 Pacific Center Ct, San Diego, CA 92121

1.3 Purpose

This PLAN is designed to prevent or control the discharge of pollutants as a result of dewatering activities from underground structures (vaults). The PLAN covers short term intermittent discharges of pollutants to surface waters by TWC, and it serves to address two major objectives:

- Identify situations which may lead to a discharge from underground structures.
- Describe and ensure the implementation of practices to reduce pollutants in the discharge from normal operations.

1.4 Plan Requirements and Updates

This PLAN is designed to comply with Best Available Technology and/or Best Control Technology (BAT/BCT) to ensure compliance with water quality standards. This PLAN shall be amended whenever there is a change in construction, operation, or maintenance procedures. Any PLAN amendment(s) should incorporate BAT/BCT and compliance with water quality standards. It shall also be amended if deemed in violation of any conditions of the General Permit or has not achieved the general objective of controlling pollutants of discharges to surface waters. The amended PLAN shall be submitted to the appropriate Regional Water Quality Control Board (RWQCB) and to the California State Water Resources Control Board (SWRCB). Any amendments shall be certified by TWC.



1.5 Pollution Prevention Team

The Pollution Prevention Team (PPT) is led by the PacWest Market Area Environmental Health & Safety (EHS) Market Leader and includes all TWC staff authorized and trained in the proper discharge of water from underground structures.

1.5.1 PPT Members

- Tim Gotto, (PacWest Market EHS Leader)
- Nicolas Johnson (Environmental Manager)
- Jerry Wilson (EHS Manager)
- Keith Fleury (Sr. EHS Specialist)
- Bill Burton (Sr. EHS Specialist)
- Lana Maslianka (EHS Specialist)
- Joanna Kaestle (EHS Specialist)
- Rob Meyers (Director Tech Ops)
- Ron Johnson (Director Tech Ops)

1.5.2 Responsibilities of the PPT Members

PacWest Market EHS Leader	<p>Certify that the Vault Dewatering Program is in compliance with the General Permit.</p> <p>Make any required changes to the PLAN and submit the updated PLAN to the SWRCB and RWQCBs (by March 30 yearly) as required under the General Permit if changes have been made.</p>
EHS Managers Sr. EHS Specialists EHS Specialists	<p>Facilitate employee pollution prevention awareness and education through training program(s).</p> <p>Complete all annual monitoring and reporting required by the General Permit on or before March 20 each year.</p> <p>Review recommendations and ensure that the PLAN will be updated if changes are required and provide additional training for any new BAT/BCT.</p>
Tech Ops Directors	Solicit input from employees who utilize the PPPs and BMPs in the field, document any issues or areas that need clarification or would require additional training.



2. Types of Discharges

TWC has underground vaults that may accumulate water and must be pumped prior to accessing the equipment contained within. Water that accumulates in these spaces will remain there until a worker must enter. The amount of discharge that must be released is dependent upon the dimensions of the structure and the depth of the water trapped within the structure.

The accumulated water is generally the result of trapped water from storm runoff, irrigation runoff and/or groundwater seepage. Typically, water from the vaults can contain trace amounts of hydrocarbons, oil and grease, fertilizers, organic matter, and other natural and artificial pollutants. Such pollutants are consistent with common storm and irrigation runoff events.

The normal operations within substructures do not produce contaminants. Occasionally, minor repair or installation procedures may involve soldering to make electrical connections. These activities have the potential to add insoluble lead or other inorganic traces to the floor of structures. TWC staff is trained to minimize and mitigate environmental impacts while conducting routine work tasks.

2.1 Scheduled and Unscheduled Discharges

The majority of discharges from the vaults are unscheduled. Both scheduled and unscheduled discharges will be handled the in the same manner according to this PLAN. A discharge is only warranted when a repair or maintenance crew discovers standing water inside the structure prior to routine work. The accumulated water must be removed from the vault in consideration of the safety of TWC workers.

The procedures used for field screening of trapped water prior to discharge is designed to allow workers to quickly determine if they can pump and release water from the structure to complete their tasks. Details of the field screening methods are presented in Appendix C.

2.2 Emergency Discharges

Emergency discharges from wet or dry structures are capable of control by the same methods described in Section 4.2 of this PLAN.



In emergency situations involving an imminent threat to human life or substantial property loss, field personnel have the authority to take whatever action is necessary to relieve the immediate threat including discharge of unscreened water. If practical, a sample of the discharged water would be taken and retained for screening. Telephone reports are to be provided to the TWC EHS Department at the earliest possible opportunity. A written report that details the nature, estimated quantity, and circumstances of the emergency discharge must be submitted to the TWC EHS Department following the verbal report.

3. Potential Pollutant Sources

3.1 General Site Location Map including Surface Water Drainage Maps

The maps presented in Appendix B show all of the RWQCB areas in which TWC utility vaults are located and the surface waters to which water may be discharged (if any surface water bodies are present).

3.2 Inventory of Exposed Materials

TWC utility vaults generally do not contain materials that are exposed to precipitation which would pose a threat to water quality. TWC underground structures are located in roadways, parking lots, and right-of-way zones. These TWC structures could become subject to spills from materials kept near the sites by non-TWC and TWC personnel. All TWC materials stored onsite or brought onsite are kept and maintained in accordance with all local, state, and federal requirements.

3.3 Spills and Leaks

During the three years prior to the submission of the NOI, there were no significant spills or leaks of hazardous pollutants from vaults during the decontamination or dewatering of such structures maintained by TWC.

4. Pollution Prevention Plan Measures and Controls

TWC management ensures that internal procedures and training sessions maintain a high level of staff environmental awareness.



4.1 Applicability

This PLAN only applies to the short term intermittent discharge of water from TWC utility vaults to storm drainage systems, surface water, and / or to the land surface.

4.2 Pollution Prevention Practices

This PLAN includes Pollution Prevention Practices (PPPs) developed specifically for the dewatering of vaults. The description of wastewater management controls shall address the following components, including a schedule for implementing such controls.

4.2.1 Good Housekeeping

Discharge areas are cleaned and flows are directed to minimize contamination of discharge from the vault. The discharge is protected from any hazardous materials. Any debris or residues incidentally left must be scraped or swept and transported back to an authorized facility.

4.2.2 Vector Control

Shallow, stagnant water can become a location for mosquito activity during certain environmental conditions. Prior to any discharge, dewatering sources will be examined and evaluated for the presence of abnormal mosquito activity. Additionally, measures will be taken during dewatering activities to ensure that minimal water is left stagnant during dewatering activities and after the completion of dewatering activities. In the event that abnormal levels of mosquito activity are determined, a certified vector control contractor will be notified to evaluate and elevate the situation.

4.2.3 Preventative Maintenance

There are no wastewater management devices present, therefore this is not applicable.

4.2.4 Vault Dewatering Procedures

TWC discharge procedures are detailed in the *Time Warner Cable Vault Dewatering Guide* (Appendix C) and must be followed when pumping water trapped in underground vaults to the surface or storm drainage systems.



In the unlikely event that a single discharge *exceeds 50,000 gallons* of water EHS and applicable supervisor will be immediately notified. Management will notify the local regulatory agency(s) having jurisdiction within 24 hours of discharges exceeding 50,000 gallons. This 24-hour notification is a requirement of the utility company general discharge permit General Permit CAG990002 (Order Number: 2006-0008-DWQ).

4.2.5 Screening Procedure

Screening procedures summarized here are found in detail in the *Time Warner Cable Vault Dewatering Guide*, presented in Appendix C.

The vault will first be manually sampled with a sample jar. After the sample is allowed to settle, it will be visually inspected for the following:

- Soil particles or cloudiness
- Discoloration, odor, asphalt tar, or oil sheen

If a gasoline or chemical odor is observed, the water will not be discharged. A qualified Environmental Contractor will be notified to pump the water from the vault into a container and the contractor will collect samples which will be analyzed by a qualified laboratory.

The contractor will properly dispose of the containerized water, if the lab results confirm that the water contains hazardous materials.

4.2.6 Spill Prevention and Response Procedures

In case of an unexpected release, TWC field technicians are properly trained and equipped with materials needed to immediately handle a common spill or leak of oil or hazardous materials. For additional information on TWC Spill Containment practices, please refer to TWC Safety Practices Manual B.12. If the leak or spill is greater than the Reportable Quantity, or it impacted a storm drain or surface water, TWC will retain a local emergency response contractor to assist with remediation activities. TWC field technicians will also contact their supervisor and either the North or South TOC, and the local EHS representative.



Additionally, significant spills shall be reported by the TWC EHS Department to the appropriate local agency, such as the fire department, to assist in cleanup at their discretion.

A spill containing oil of reportable quantity (greater than 42 gallons) must be reported to the California Office of Emergency Services 800.852.7550 and the National Response Center at 800.424.8802.

4.2.7 Inspections

The TWC Vault Dewatering Guide must be followed during each vault dewatering event. A Vault Dewatering Report (VDR) which details all the dewatering activities must be completed during each discharge event.

4.2.8 Employee Training

TWC's personnel training will consist of housekeeping, vault integrity inspections, vault water inspection practices, determination of when to discharge versus contacting a qualified contractor to containerize vault water, and erosion prevention. The training will be provided annually to TWC personnel that periodically dewater vaults.

Training in vault water testing and discharge procedures will be provided by the PPT and/or the local EHS representatives. Records of training roster/evaluations will be retained by the TWC EHS Department.

4.2.9 Record Keeping and Internal Reporting Procedures

Per requirements in the General Permit, TWC shall report any noncompliance that may endanger health or the environment to the appropriate RWQCB. This information must be provided orally within 24 hours. A written submission shall also be provided within five days of the time the discharger has become aware of the incident.

Additionally, all TWC internal reporting requirements will be followed, and all records and reports pertaining to TWC's Vault Dewatering Program will be retained for a period of five (5) years.



4.2.10 Sediment and Erosion Control

TWC will employ appropriate soil erosion prevention methods during discharge of water from underground vaults. These methods may include but are not limited to the use of overflow pipes to channel water to street storm drains and/or splash blocks.

4.2.11 Management of Runoff

All facilities are located below ground, therefore there is no runoff management needed.

5. Annual Monitoring and Reporting Program

An annual monitoring and reporting program is required under this General Permit and by Title 40 of the Code of Federal Regulations (CFR) section 122.48. All sampling will be conducted in accordance with the Monitoring and Reporting Program identified in the General Permit.

Annually (during the wet season, October-April), the monitoring program requires a minimum of one representative sample for each type of discharge from each RWQCB jurisdiction be collected and sampled for oil and grease; TPH as diesel, TPH as gasoline with benzene, ethyl benzene, toluene, and xylene (BTEX) reported; TSS; and pH, using test procedures specified in 40 CFR section 136. TWC will subcontract with a California certified laboratory to complete these analyses. Analytical results will be included in the annual report filing due on or before March 20 of the following year.

6. Plan Amendments

This PLAN shall be amended whenever there is a change in the General Permit, or annually if any conditions discovered in the annual certification of the pollution prevention practices checklist deems it necessary to revise the PLAN. As appropriate, this PLAN will be revised, recertified, and re-submitted to the appropriate RWQCB and the SWRCB.



Appendix A

Notice of Intent

ATTACHMENT E – NOTICE OF INTENT

**ORDER WQ 2014-0174-DWQ
GENERAL PERMIT NO. CAG990002**

**STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
(NPDES) PERMIT FOR DISCHARGES FROM UTILITY VAULTS AND UNDERGROUND
STRUCTURES TO WATERS OF THE UNITED STATES**

I. NOTICE OF INTENT STATUS (See Instructions)

MARK ONLY ONE ITEM	1. <input type="checkbox"/> New Discharger	2. <input checked="" type="checkbox"/> Existing Discharger
	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 TIME WARNER CABLE		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 7800 CRESCENT EXECUTIVE DRIVE				
C. City CHARLOTTE	D. County MACKLEBURG	E. State NC	F. Zip Code 28217	
G. Contact Person STEVE REISNER	H. Title VP OF RISK MANAGEMENT	I. Phone 704-731-3976		
J. Email Address STEVE.REISNER@TWCABLE.COM				

Additional Owners _____

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

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

IV. RECEIVING WATER INFORMATION

A. 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. MAP ATTACHED
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: REGIONS 4, 6, 7, 8 AND 9

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:

LAND DISPOSAL/RECLAMATION NOT APPLICABLE DUE TO LOCATION AND VOLUME OF DISCHARGE

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 TIME WARNER CABLE		B. Contact Person TIM GOTTO	
C. Street Address Where PLAN is Located 10450 PACIFIC CENTER COURT		D. Title of Contact Person SR. EHS MANAGER	
E. City SAN DIEGO	F. County SAN DIEGO	G. State CA	H. Zip Code 92121
I. Phone 619-921-0147		J. Email Address TIM.GOTTO@TWCABLE.COM	

IX. DESCRIPTION OF DISCHARGE(S)

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

THE ACCUMULATED WATER IS GENERALLY THE RESULT OF TRAPPED STORM RUNOFF, IRRIGATION RUNOFF AND/OR
GROUNDWATER SEEPAGE. WATER FROM THE VAULTS MAY CONTAIN TRACE AMOUNTS OF HYDROCARBONS,
OIL AND GREASE, FERTALIZERS, ORGANIC MATTER OR OTHER TRACE POLLUTANTS.

X. REMINDERS

- A. Have you included service territory/watershed map(s) with this submittal? Yes No
Separate maps must be submitted for each Regional Water Board where a proposed discharge will occur.
- B. Have you included payment of the filing fee (for first-time enrollees only) with this submittal? Yes No N/A
- C. Have you included your PLAN? Yes No

XI. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment."

A. Printed Name: STEVEN J. REISNER

B. Signature: *Steven J. Reisner* C. Date: 12/10/2015

D. Title: VP OF RISK MANAGEMENT

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 #:	



Appendix C

Time Warner Cable Vault Dewatering
Guide

VAULT DEWATERING GUIDE

Time Warner Cable field employees encountering water that has seeped into TWC vaults will follow the process outlined below to safely discharge water onto surface areas from our vaults. This procedure will be closely followed; any questions will be directed to individual supervisors or PacWest EH&S for resolution.

Step	Action
1	Inspect the vault prior to sampling for signs of contamination. If a slight sheen is present, use absorbent pad to remove the sheen and place the absorbent pad in a container for proper disposal.
2	While wearing a pair of disposable gloves & safety glasses, collect a sample of the water using the clean sampling jar. If possible, bring up at least one cup (8 oz.) of the vault water. Try to take a sample with just the top layer of water (avoiding contact with bottom of vault water).
3	Allow water to sit in the sampling jar for approximately 10 minutes. Sample containers must be clean before use. Sample jars may be reused. However, once a sample test fails (and vault water is containerized by a contractor), the jar cannot be reused and must be disposed of along with pumped water. 
4	After 10 minutes observe the sample in full light and fill out VDR form.
5	If batteries are present in the vault use a pH test strip to test the pH of the water in the sample.
6	<p>If the water in the sample jar is void of significant discoloration, significant suspended sediment and abnormal odor (and if batteries are observed in the vault the pH of the water is between 4 and 9):</p> <ul style="list-style-type: none"> • Hold the clear sample of water until the job is finished. • Discharge the water in the vault into nearby vegetated terrain. Ensure methods are in place to prevent erosion. If vegetated terrain is unavailable discharge into storm drain. • To eliminate the potential of mosquito activity, use methods to ensure stagnant water is not left for significant amounts of time. 
7	<p>If the water in the sample jar contains significant suspended sediment, is abnormally cloudy, has oily sheen, or significant discoloration (a slight tea color from soil contact or green from algae/vegetation contact is not considered significant), or has a chemical odor:</p> <ul style="list-style-type: none"> • DO NOT DISCHARGE. Contact your supervisor and the EHS Department immediately. The dewatering must be performed by an authorized contractor. • Contact the Technical Operations Center (TOC) Department. TOC will contact a licensed waste removal contractor and schedule the vault to be pumped out. • TWC Technical Operations Center (TOC) will schedule the vault to be pumped out by a licensed waste removal contractor. The technician is to contact TOC and provide the following information: exact location of vault/underground structure, approximate quantity of water, name & telephone number of TWC person onsite, name & telephone number of TWC person onsite and approximate required time of dewatering activities. 
8	TWC's VDR Form must be filled out during each discharge event and returned to your supervisor for filing in the department. Scan all copies and forward along with the associated sampling documents to los.socal.safety@twcable.com .

Technicians in the field who have been trained on this procedure will keep a current copy of this procedure with them and extra copies of the VDR form.

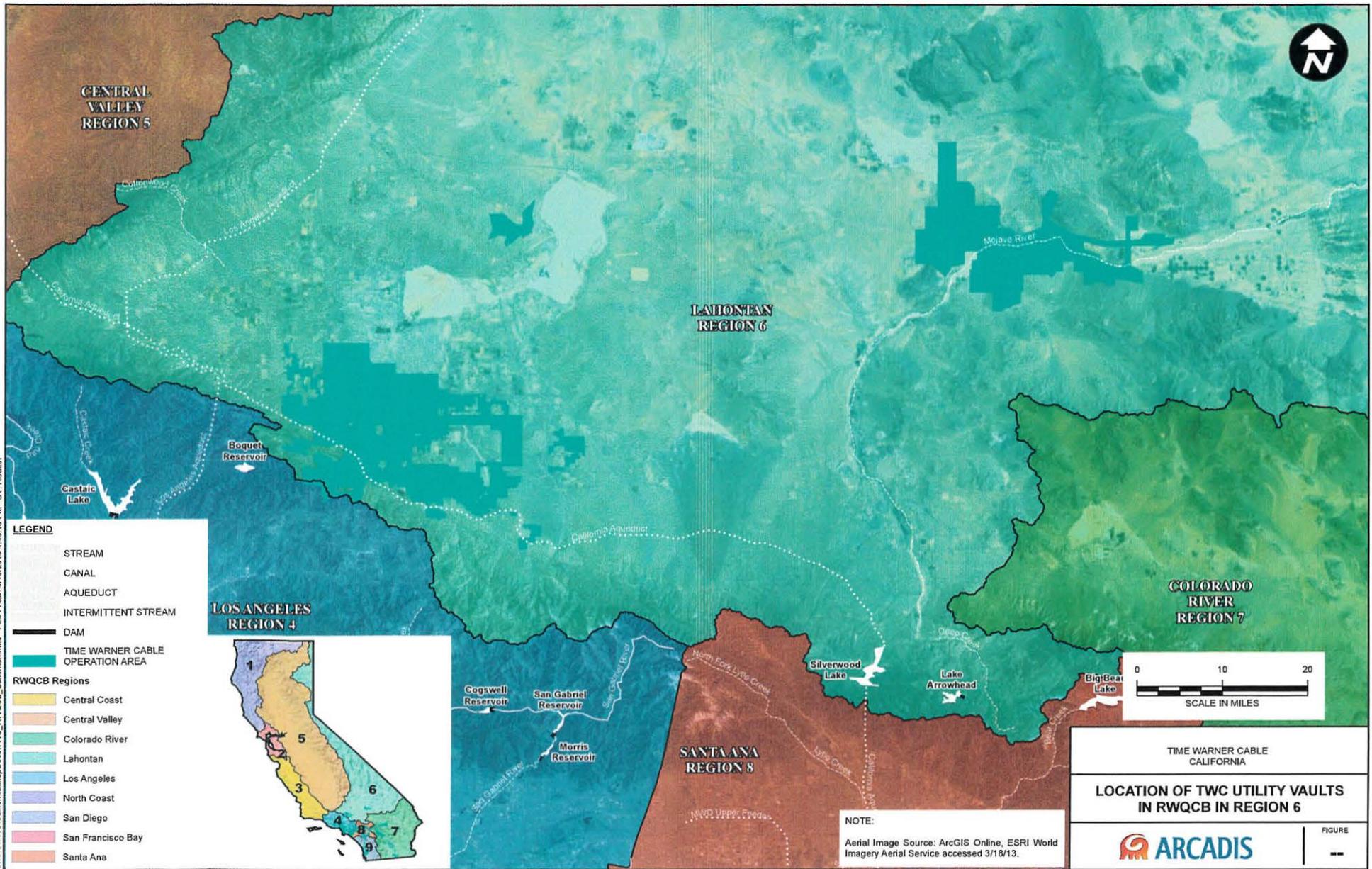
Each technician identified to use this procedure will keep all required supplies in their vehicle. Sampling jars can be reused unless they are used to sample a suspected contaminated vault. Previously identified material warehouses will stockpile replacement sampling jars and required PPE for the various tech ops centers.



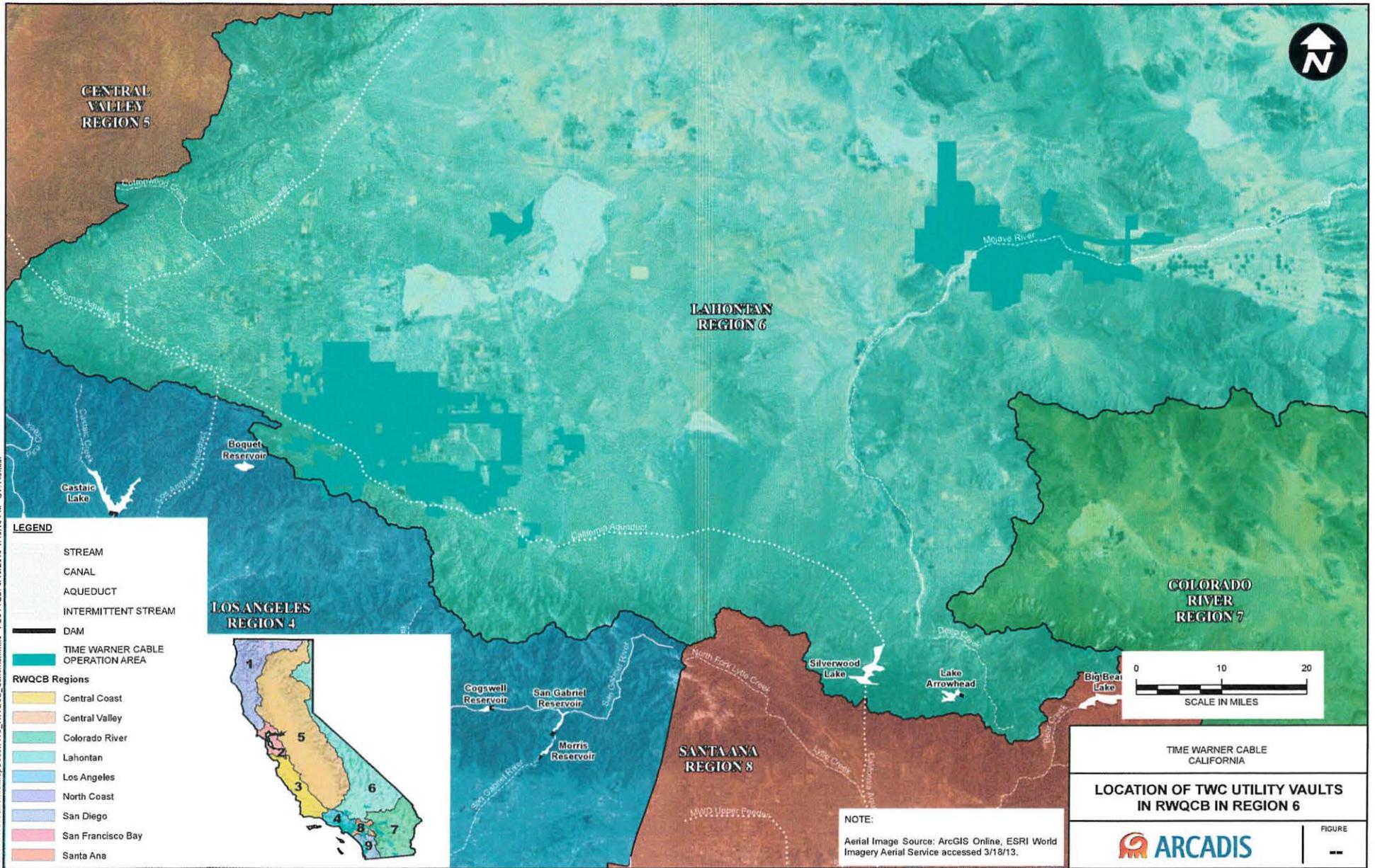
Appendix B

Maps Showing Locations of
TWC Utility Vaults in each
RWQCB Region

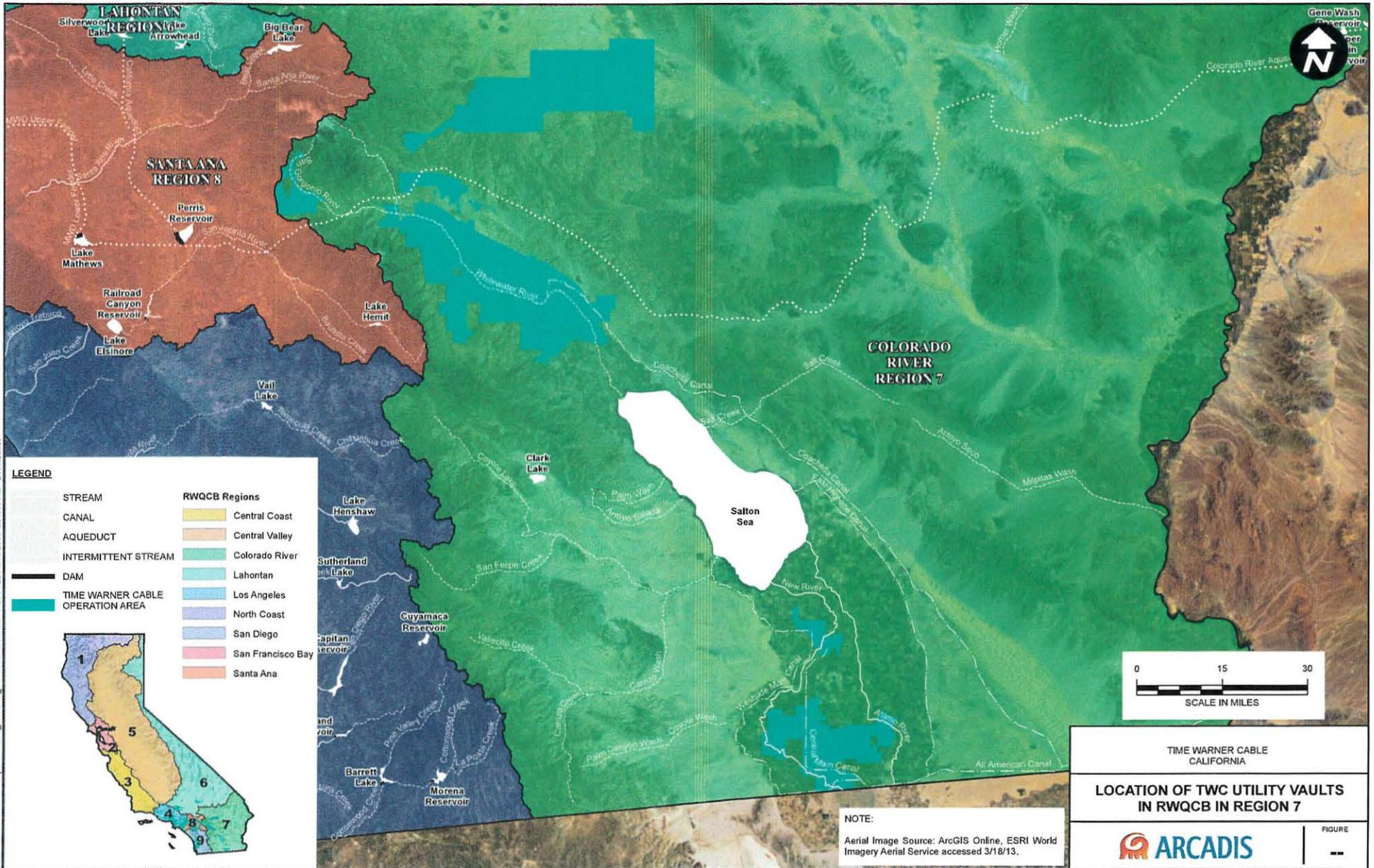
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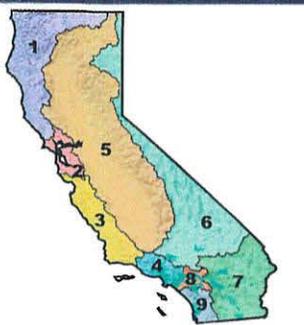
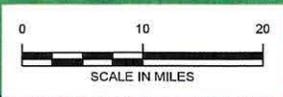
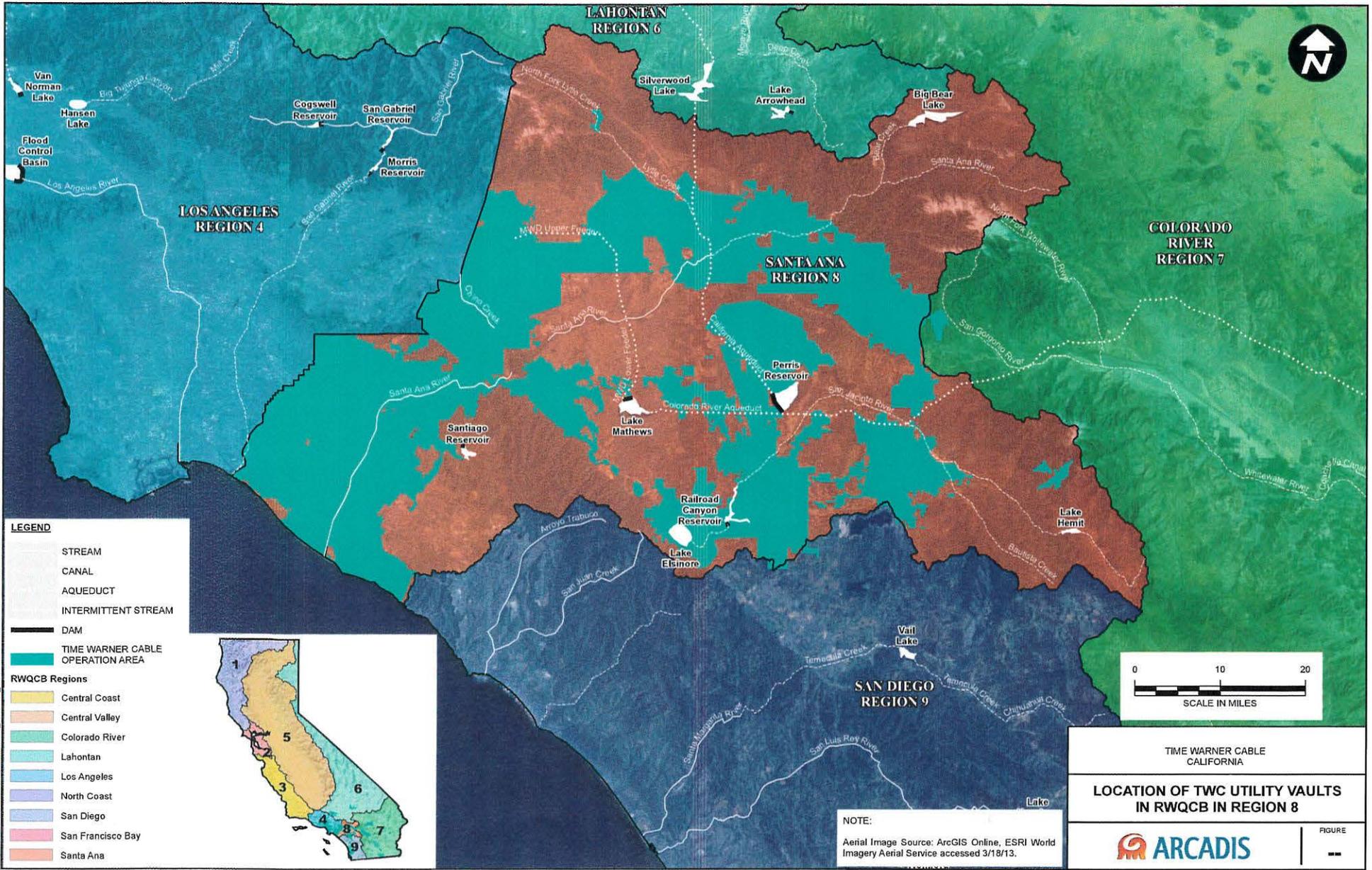
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NOTE:
 Aerial Image Source: ArcGIS Online, ESRI World Imagery Aerial Service accessed 3/18/13.

TIME WARNER CABLE CALIFORNIA

LOCATION OF TWC UTILITY VAULTS IN RWQCB IN REGION 8

ARCADIS

FIGURE --

