

RECEIVED
JUN 19 2015

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

DIVISION OF WATER QUALITY

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	WDID# 20000000011
	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 Comcast 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 3055 Comcast Place				
C. City Livermore	D. County Alameda	E. State CA	F. Zip Code 94551	
G. Contact Person Debi Emery	H. Title Environmental Manager	I. Phone (925) 424-0286		
J. Email Address debra_emery@cable.comcast.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.
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:

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:

Average discharges are short term, small volume (average 0.5-15 gallons) on an emergency basis.

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: Cable TV

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 <u>Comcast Cable</u>		B. Contact Person <u>Debi Emery</u>	
C. Street Address Where PLAN is Located <u>3055 Comcast Place</u>		D. Title of Contact Person <u>Environmental Manager</u>	
E. City <u>Livermore</u>	F. County <u>Alameda</u>	G. State <u>CA</u>	H. Zip Code <u>94551</u>
I. Phone <u>(925) 424-0286</u>		J. Email Address <u>debra_emery@cable.comcast.com</u>	

IX. DESCRIPTION OF DISCHARGE(S)

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

Average discharges will be small intermittent discharges from vaults and hand holes. Discharge will be pre-screened following procedures in the Pollution Prevention Plan. Water may contact total suspended and total dissolved solids and possible small concentrations of petroleum hydrocarbons as a result from street run-off.

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: MICHAEL M MINERVA

B. Signature: *Michael M. Minerva*

C. Date: 06/02/15

D. Title: DIRECTOR, ENVIRONMENTAL, HEALTH + SAFETY

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 #:	



COMCAST

Pollution Prevention Plan

for

Water Discharges from Utility Vaults/Subsurface Structures

IN COMPLIANCE WITH THE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR DISCHARGES FROM
UTILITY VAULTS AND UNDERGROUND STRUCTURES TO SURFACE WATERS
ORDER NUMBER 2014-0174-DWQ
NPDES NO. CAG990002

JUNE 2015

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Figure Group 3	Central Coast Region 3 Drainage Maps
Figure Group 4	Central Valley Region 5 Drainage Maps

Comcast does not have vault discharge operations within Regions 4, 6, 7, 8 and 9

**MAPS ARE CONFIDENTIAL COMMUNICATION BETWEEN THE BOARD AND COMCAST
Do not forward or distribute to others without prior permission from the Comcast.**

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1.0 Introduction

1.1 Overview

The California State Water Resources Control Board (State Board) has authority under the Federal Water Pollution Control Act of 1972, known as the Clean Water Act (CWA), to issue statewide General National Pollutant Discharge Elimination System (NPDES) Permits to regulate the discharge of pollutants into United States waters.

To facilitate regulation of discharges from the dewatering of utility vaults and similar underground structures, the State Board has developed an NPDES Permit specific to utilities for *Discharges from Utility Vaults and Underground Structures to Waters of the United States* (General Permit CAG990002). The State Board allows utilities to apply for coverage under the General Permit with each Regional Water Quality Control Board (Regional Board) in which they have discharges to surface waters.

Under the General Permit, utility companies are required to prepare a pollution prevention plan (PLAN), which contains pollution prevention practices and Best Management Practices (BMPs) for discharges from utility vaults and underground structures to surface waters during short-term intermittent discharges to surface waters.

This PLAN explains Comcast's procedures for discharging water from vaults and other underground structures to comply with the provisions of the General Permit.

1.2 Pollution Prevention Team

Team Lead: Mike Minerva
Comcast Title: Environmental Director
Email: michael_minerva@cable.comcast.com
Primary Contact Phone: (925) 424-0195

Regional Lead: Debi Emery
Comcast Title: Regional Environmental Manager (SW and NE Bay)
Email: debra_emery@cable.comcast.com
Primary Contact Phone: (925) 424-0286 (office)

Regional Lead: Ben Harris
Comcast Title: Regional Environmental Manager (Sacramento and South Valley)
Email: benjamin_harris2@cable.comcast.com
Primary Contact Phone: (916) 599-4745 (office)

Spill Response: Comcast crews can report a spill or request **emergency** cleanup to the Pollution Prevention Team (PPT). If the PPT cannot be reached, Comcast employees are trained to contact a company approved waste cleanup contractor.

1.3 PLAN Location

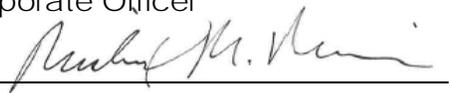
Hard Copy: Comcast Regional Offices
3055 Comcast Place
Livermore, CA 94551

Soft Copy: Available to all employees on Comcast Environmental SharePoint site.

2.0 Certification and Signature

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

** To be signed by the Responsible Corporate Officer **

By: 

Title: Environmental Director

Date: June 12, 2015

3.0 Provisions of the PLAN

3.1 Purpose of the PLAN

Comcast Cable supplies essential phone, internet and cable television services that are necessary for statewide communications, including 911 services. In many instances, Comcast Cable utility equipment was required to be installed in below grade vaults by local zoning and planning codes. The infrastructure within these vaults presents little or no risk to the environment, nor does it generate water. Small amounts of water accumulate occasionally in these structures due to storm water runoff, surface and irrigation water drainage, and groundwater infiltration. It is critical that Comcast be able to respond to outages and remove any accumulated water immediately in order to make the necessary repairs and restore service to our customers. This General Permit was intended to allow for such discharges, provided a thorough evaluation of any accumulated water is performed, as detailed within this PLAN.

3.2 Updating of the PLAN

Comcast understands the permit requirement to update this PLAN whenever there is a change in construction, operation, maintenance, or corporate policy. In addition, this PLAN must be updated if a procedure within it is determined to violate any condition of the General Permit or it has not achieved the general objective of controlling pollutants in discharges to surface waters.

3.3 Pollution Prevention Team

The Pollution Prevention Team (PPT) is headed by Mr. Mike Minerva and includes Regional Environmental Managers Debi Emery and Ben Harris. Members of the PPT are responsible for developing the PLAN and assisting in its implementation, compliance, and revision. Comcast field technicians are trained in the procedures of this PLAN. Comcast training modules foster employees to be mindful of the importance of maintaining overall environmental stewardship of their workplace.

3.4 Employee Training

Comcast field technicians are trained to understand this PLAN and their role in ensuring company compliance with the General Permit.

Comcast will train all employees that periodically dewater underground structures. Training will occur on an annual basis and within 30 days of hire for new employees. Training will be

conducted by a member of the PPT or by the use of multimedia modules developed by the PPT management team. The areas of training will include:

- Evaluation of discharge water within the vaults and underground structures
- Good housekeeping practices
- Runoff controls
- Spill prevention and response
- Recordkeeping

3.5 Annual PLAN Evaluation and Revision

In compliance with Section VII.C.3.d of the General Permit, Comcast will conduct an annual environmental effectiveness evaluation of this PLAN. During this evaluation, Comcast will assess their yearly representative vault water samples to ensure General Permit water quality objectives are being met and that the procedures outlined in this PLAN are still appropriate.

4.0 Types of Discharges and Potential Pollutant Sources

This PLAN covers discharges that originate from water accumulation in underground structures. These discharges can be divided into two main types: unscheduled and scheduled (refer to Section 5.0). The following sections describe the two types of discharges, as well as potential pollutant sources associated with each type of discharge.

The need to discharge water originates with water intrusion into vaults, handholes, and similar underground structures that are not completely sealed from the inflow of subsurface and surface water, including storm water. Since these structures are not generally constructed to be watertight, water occasionally accumulates due to storm water runoff, surface and irrigation water drainage, and groundwater infiltration.

Comcast operates three controlled environment vaults within Region 2 (City of Fremont, San Francisco Bay Regional Board) that are equipped with automatic sump pumps; noting these are considered dry vaults and only once had a known water intrusion and subsequent discharge. All other vaults are subject to manual discharge operations.

Section 6.0 of this PLAN addresses operational controls designed to prevent and mitigate the potential that pollutants could be discharged during the dewatering of vaults.

5.0 Discharge Schedule

5.1 *Unscheduled Discharges*

The majority of discharges from underground structures are unscheduled and occur when equipment stored in these structures require maintenance. Water may accumulate in these structures over time and require de-watering to allow field technicians to perform repair activities on the equipment. The frequency of discharge is dependent on the rate and volume of water entering the structure. Unscheduled discharges will be controlled using practices described in this PLAN.

5.2 *Scheduled Discharges*

Comcast does not typically practice scheduled discharges. However, such discharges would be controlled utilizing the same BMPs described in this PLAN.

5.3 *Emergency Discharges*

Emergency discharges from vault structures can be controlled by the same methods described in this PLAN.

In emergency situations involving an imminent threat to human life, serious property damage and/or in cases of natural disaster or catastrophic events, field supervisors have the authority to take whatever action is necessary to mitigate the immediate threat, including discharge of unevaluated water.

5.4 *Spills and Leaks*

Comcast field technicians are trained and equipped with materials needed to immediately deal with a spill or leak of hazardous pollutants. If the leak or spill is of significant size, Comcast will engage an emergency response vendor.

Comcast field technicians must call their supervisor, their Regional EHS Manager, and/or the Environmental Health and Safety (EHS) Department hotline at (800) 490-2595 to report a suspected spill or leak of hazardous pollutants. In the event the EHS Department does not respond, employees may also call 1-800-UNICALL to request to reach the emergency spill cleanup vendor directly. The Comcast emergency vendor is listed in Section 1.2 of this PLAN. At their discretion, the PPT and/or their designated representatives shall report the incident to the appropriate local agency, such as the fire department, to assist and/ or oversee any cleanup.

6.0 Pollution Prevention Practices

6.1 Overview

The operating procedures used for on-site evaluation of water in underground structures must be simple and concise to permit workers to quickly determine if the water can be pumped from the structure so work can resume.

The field technicians are instructed to contact their supervisor and/or EHS for immediate direction if large discharges are anticipated (>100 gallons or -more) or when water fails field evaluation. Depending on the nature of the issue, there are several prearranged licensed contractors available to handle the situation. Only water that has passed the PLAN evaluation process will be discharged.

6.2 When to Apply

This PLAN is to be used for the short-term, intermittent discharge of water from underground structures that need to be emptied to allow for repair of equipment housed in these structures. Structures will be dewatered only to the point required to allow for safe access to, and proper operation of, our equipment.

Also, the PLAN addresses the control of pollutants discharged from automatically pumped sumps in vaults and other subsurface structures that are to be kept free of moisture and water.

6.3 Water Discharge Procedures for Wet Structures

This section describes the process used by Comcast field technicians to evaluate water prior to discharging it from wet underground structures. The purpose of these procedures is to assist the field technicians in identifying the quality of water being pumped from the underground structure, as well as aid in identification of any material that may prevent such water from being discharged. The average below grade "wet" vault size ranges from 3 to 15 cubic feet, resulting in an estimated potential discharge of less than 1 to 15 gallons.

6.3.1 Local MS4 Discharge Notification Procedures

Section II (E) of the General Permit requires utilities to comply with specific MS4 notification requirements. Comcast is committed to these MS4 notification requirements and will advise MS4s of Comcast's intent to discharge under this permit. Copies of this plan will also be provided to any MS4 upon request.

6.3.2 Best Management Practices

General Housekeeping:

- Upon arriving at a vault for routine maintenance, ensure nearby ground surfaces are generally clean and orderly prior to dewatering activities so as to minimize the presence of pollutants in discharges.
- When feasible and safe, clear or sweep the area surrounding the discharge point (e.g., street, roadway, storm drain inlet) to prevent washing sediment and debris into storm drains.

Evaluation of Accumulated Water Procedures

Prior to beginning work operations in an underground structure, the Comcast field technician must use applicable work site procedures outlined in the Comcast Environmental Insight - De-Watering Vaults (Appendix A) to assure the general work area is safe, clearly marked, and that all appropriate personal safety equipment is employed.

6.3.3 Water Passes the Evaluation Procedures

After passing all aspects of the discharge water evaluation process (no odors, layers, or solids), and the pH is tested and verified the water is greater than 4 and less than 9, the water may be discharged. Since many Comcast vaults are located in landscaped areas, whenever possible, small amounts of water shall be discharged to the adjacent vegetated or landscaped area, where no run off to the storm drain will occur. If absolutely necessary, waste may also be discharged into the street, along the curb or directly into a storm sewer or catch basin. The path of travel to the proper discharge point will be minimized. Methods to ensure the prevention of soil erosion during discharge must be followed.

Water removal should be performed from the top to the bottom to minimize disturbance of sediments. Every effort should be made not to disturb any sediment that might have collected in the vault. The vault effluent will be limited to the minimum amount required to safely access the equipment and ensure proper operation of our equipment. The vault may not be completely dewatered. Most Comcast vaults have gravel bottoms so some sediments and moisture will remain on the bottom.

When discharging water from underground structures to the surface, Comcast field technicians should always make certain that the area is clean. Trash and debris in the vicinity shall be picked up and properly disposed. Comcast field technicians shall also remove any debris or heavy soil around the underground structure prior to discharge to ensure that excessive sediments and wastes do not enter the discharge stream and nearby storm drain systems.

If discharging to unpaved surfaces with significant slopes, discharge volumes and flow rates should be reduced to minimize erosion.

6.3.4 Water Fails the Evaluation Procedures

If vault water is determined to be of a quality that cannot be discharged, field staff will notify their Supervisor and EHS will be contacted at 800-490-2595. Examples include, but are not limited to:

- The vault water is clear, but has a strong chemical odor.
- The vault water has free-phase floating hydrocarbons or chemical solvents in any amount greater than a slight surface sheen.
- The vault sample is not clear (transparent) and is instead very cloudy, milky and/or dark in color.
- The pH is less than 4 or greater than 9.

The Supervisor and EHS will make a determination as to whether the water may be removed by Comcast personnel directly, or whether we require the assistance of our contracted spill cleanup contractor.

Any water removed from the vaults under these conditions will be handled, labeled, stored, and disposed of in accordance with all local, state and federal requirements.

6.4 Procedures for Water Discharge from Vaults with Automatic Sumps

Comcast has only several Controlled Environmental Vaults (CEV's). These vaults are equipped with sophisticated ventilation and monitoring systems, and may contain signaling equipment, fire suppression systems and sealed gel batteries. They are designed to be occupied for short periods of time. They are "dry" under normal conditions and would only accumulate water under very unusual and infrequent circumstances. They are however, equipped with automatic sump pumps in the event of water accumulation.

The procedures below apply to these CEV's, as well as any underground structure with an automatic or manually-activated sump pump that discharges water to storm drains or surfaces.

To prevent pollution in discharges from structures with automatic sumps, it is essential that the structures are kept clean and that inspections are made. The following are Comcast guidelines for maintaining automatic structures:

- No prohibited materials (e.g., oil, trash, etc.) will be allowed to accumulate in the sump, except condensate water
- The vault floor will be kept clean by removing any trash or debris.
- No chemicals, other than sealed gel batteries and fire suppression materials, shall be stored in the vault.
- Any substances spilled on the vault floor will be immediately cleaned up to prevent sump contamination.
- The sump area will be routinely inspected for debris or signs of staining.

6.5 Vector Control

Comcast understands that stagnant water is the chief attractant for mosquitoes, whose larvae develop in such conditions. Water that has been allowed to stand for as little as four days can be attractive to mosquitoes. Comcast undertakes efforts to ensure their underground structures remain watertight and openings to the outside environment are plugged. Comcast does not use chemical additives to control mosquitoes.

FIGURES

MAPS ARE CONFIDENTIAL COMMUNICATION BETWEEN THE BOARD AND COMCAST
Do not forward or distribute to others without prior permission from the Comcast.

APPENDIX A

De-watering Vaults (Environmental Insight)

De-Watering Vaults

June 1, 2015

Objective

This guideline summarizes the procedure necessary to evaluate and discharge any accumulated water in Comcast below grade vaults.



Don PPE: safety vest, safety glasses & nitrile gloves



Inspect the inside of the vault and any accumulated water for signs of contamination, residue/sheen, or the presence of other solid contaminants, such as sharps.



If a slight sheen is present, use an absorbent pad/material on the water's surface prior to dewatering.



Slowly lower a sample collection jar into the water to collect a sample of only the top layer of water. Avoid disturbing any accumulated sediment on the bottom of the vault.



CAUTION

If there is **significant** residue/discoloration/oily sheen, and/or signs of hazardous wastes/illegal dumping – **STOP & immediately call your supervisor and COMCAST Environmental Department 1-800-490-2595, Option 3, for further instructions.**



Environmental Insights

Inspect the water in the container again for visible discoloration, residue, oily sheen or unusual smell.



Allow the water to sit on a flat until most of the sediment settles to the bottom of the jar and the water is clear.



If batteries are present in the vault, using a pH test strip, test the pH of the water in the container.



Next observe the appearance and smell of the water in the jar. (Note: do not place open jar directly under nose to detect odors)



If the pH is between 4 and 9, and there is no visible residue, no significant discoloration or oily sheen, and no unusual smell, the water may be removed.



Discharge the water to a nearby vegetated area (lawn or landscaping if possible). If there is no vegetated area nearby, you may discharge to the gutter, street or storm drain, after first ensuring the path is clear of any debris.



Not OK to discharge



OK to discharge



CAUTION

If there is *significant* residue/discoloration/oily sheen, and/or signs of hazardous wastes/illegal dumping – **STOP &** immediately call your supervisor and **COMCAST Environmental Department 1-800-490-2595 , Option 3,** for further instructions.

pH of Water

