ATTACHMENT D

AT&T Corporation NexGen/Core Fiber Optic Telecommunications System Project

SPILL PREVENTION, CONTAINMENT AND CLEAN-UP PLAN

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SPILL PREVENTION, CONTAINMENT, AND CONTROL PLAN (SPCCP)

AT&T Corp. NEXGEN/CORE Fiber Optic Conduit Installation Project

Prepared for:

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1.0 INTRODUCTION

The purpose of this Spill Prevention, Containment, and Control Plan (SPCCP) is to outline practices to prevent, minimize, and/or clean up potential spills during construction of a fiber optic conduit which runs from El Toro to eastern San Diego. This plan establishes emergency response procedures and lines of communication and responsibilities. It also restricts the location of fuel/hazardous material storage and construction equipment maintenance along the construction right-of-way (ROW) and describes procedures and materials to contain and clean up spills of these materials, should they occur. The goals of the plan are to:

1. Minimize the potential for a spill of these materials
2. Contain any spillage to the smallest area possible
3. Protect areas that are considered environmentally sensitive (streams, wetlands, etc.)

All Star Telecom will comply with all environmental and safety laws and regulations and provide the necessary training and equipment to prevent pollution during construction of the pipeline project. All Star Telecom intends to do everything practicable to minimize the potential for a spill and the consequences if a spill occurs.

The Environmental Inspector (EI) will assure that a copy of this plan is available on site to all construction crews.

2.0 PROJECT DESCRIPTION

AT&T Communications Inc. is constructing a buried set of fiber optic conduits from Los Angeles to San Diego and continuing through to Blythe, California, to increase the capacity of their nationwide fiber optic network. The project will be constructed by All Star Telecom. The conduit will be installed using conventional trenching, plowing, rock sawing, and directional drilling methods. The conduit route addressed in this report is in Regional Water Quality Control Board (RWQCB) Region 9 and consists of two links totaling 148 miles. Link 5 begins near El Toro in Orange County and runs 88.5 miles south to downtown San Diego (MP 63 to 151.5). Link 4 then runs eastward 59.5 miles to the Imperial County border (MP 160.5 to 220) In total, six 1½-inch ducts will be installed in a trench approximately 42 inches deep. Actual trench width is approximately 18 inches. All Star Telecom plans either directional boring or bridge hanging for all water crossings.

2.1 SITE PREPARATION

Site preparation for areas within the clearing limits of road rights-of-way (ROW) will not be necessary. Where installation occurs within the ROW but outside the clearing limits, site preparation may include weed or brush removal, rock removal, or pavement cutting.

2.2 INSTALLATION

Facilities to be installed include conduit, regeneration stations, and access vaults.

2.2.1 Conduit Placement

Conduit will be installed by trenching, directional boring, or bridge hanging. After the conduit is laid in the trench, the trench will be backfilled and re-paved.

Directional boring or drilling is a process whereby a hole is bored using guidance equipment to provide continuous, accurate monitoring of the drill bit position. Duct is placed in the drilled hole going from one side of the crossing to an exit on the other side, without disturbing the stream banks, roads, or other sensitive resources or uses. The boring process would be lubricated with natural mineral clay materials that also serve to seal the walls of the borehole.

The attachment of fiber optic cable to bridges is accomplished by placing a steel pipe on the exterior portion of the bridge, generally at or below the level of the roadbed. The diameter of the steel pipe is determined by the number of ducts that would be attached to the bridge; the greater the number of ducts, the larger the diameter of the pipe. The pipe is secured to the bridge by drilling holes into the concrete exterior of the bridge structure on either side of the pipe, and setting threaded bolts with epoxy grout. The pipe is then fastened to the bridge with metal pipe straps, which consist of two ear straps, chisel point studs, nuts, washers, and epoxy capsules. Epoxy grout is used at both ends of the bridge head wall to seal the sleeve and pipe between the

ground and the bridge attachment. A handhole/manhole would be installed on either end of the bridge for cable slack and to serve as assist points for cable routing. The handholes/manholes would each contain a minimum of 100 feet of slack cable.

2.2.2 Optical Amplification Facilities

To maintain the integrity of signals being transmitted over the new system, signals will need to be optically amplified approximately every 50 miles at Optical Amplification (Op Amp) facilities. Easement arrangements are made with private property owners to site these stations, which require an approximately 2-acre parcel of land. Buildings at the station will be a maximum of 48 feet long by 29 feet wide by 12 feet tall. Each area requires a diesel-powered generator designed to provide back-up power in case of an electrical distribution outage. The back-up generator and a 336-gallon fuel storage tank are located outside each of the building areas. The generator and fuel tank are a single unit, with the double-walled fuel tank mounted below the generator in a concrete catch basin and accessible through a utility panel on the side of the generator. The generator is contained within a separate enclosure approximately 8 feet by 10 feet by 4 feet, with utility access panels along one side. The concrete catch basin will be inspected regularly to detect leaks. A spill prevention control and counter measure plan is not required for this facility pursuant to CFR 40 § 112.1, because the tanks are smaller than 660 gallons individually and 1,320 gallons collectively.

2.2.3 Access Vaults

As necessary, utility access vaults and manholes would be placed at intervals of approximately 2,500 feet along the project alignment to assist in cable installation and maintenance. For the majority of the project, buried utility access vaults would be used. The utility access vaults would measure 2.5 feet by 4 feet by 2 feet. In some areas, manholes would be used instead of utility access vaults. Manholes measure 4 feet by 4 feet by 6 feet and would be placed at intervals of 2,500 feet.

2.2.4 Construction Schedule

Construction is anticipated to begin in January 2001 and to be completed by January 2002. Each construction spread would require 8 to 15 workers, including foremen, equipment operators, general laborers, compliance monitors, and construction inspectors. Each spread would require several support vehicles and construction equipment, depending upon the activities performed. There may be as many as five spreads under construction at any one time over the entire route, requiring approximately 40 to 75 workers, their equipment, and support vehicles. Separate specialized crews would build the regeneration stations. These special crews average 5 to 7 workers each. Some of the duties of the construction crews may be subcontracted or combined, which could reduce the overall size of the construction force.

2.3 SITE RESTORATION

All roads will be restored to their pre-construction condition.

3.0 HAZARDOUS/TOXIC MATERIALS USED DURING CONSTRUCTION, OPERATION, AND SPILL PREVENTION

Potential spills from construction and operation are limited primarily to: (1) diesel used to fuel construction equipment and backup generators and (2) lubricating oils and hydraulic fluid used in construction equipment.

Hazardous substances, chemicals, fuels, and lubricating oils will not be stored within 100 feet of streambanks or wetlands to prevent them from reaching waterways. No refueling or maintenance of construction equipment will be allowed within 100 feet of any streambank or wetland or within 100 feet of sensitive plant populations or groundwater wells. At regeneration stations, diesel fuel will be stored in tanks within an approved containment system.

Strategic placement of these materials will be the first step in reducing the potential impact of a spill to the environment. The locations of all fuel storage and refueling areas, other material storage areas, and construction equipment maintenance areas will be clearly identified and their limits staked in the field.

The second step requires the construction contractor to visually inspect equipment tanks for cracks, excessive corrosion, or other flaws that may compromise their integrity. Hoses and valves will be similarly inspected. If the construction contractor determines that the equipment is in good mechanical condition, it may be moved onto the construction ROW. Otherwise, the equipment will be rejected and alternative equipment in good condition employed. Each tank will be similarly inspected as it is moved down the construction ROW.

The third step requires the construction contractor to inspect the integrity of the fuel containment area and repair the structure or replace the liner immediately if they become breached or torn. Catch basins or fuel/oil pans will be installed at each of the fueling locations to collect residual materials that may drain from hoses used to fuel the construction equipment. Draining of hoses will be occur in designated maintenance areas. Materials collected in the catch basin or fuel/oil pan or spillage collected in the liner will be stored in 55-gallon drums and sent off site to an approved recycling facility.

Lubricants will be drained from the construction equipment in maintenance areas. Before drainage occurs, a layer of at least 10-mil plastic liner will be placed under the equipment to collect any spilled material. Spilled material will be drained from the liner and recycled along with the fluids removed from the construction equipment. Under no circumstances will the construction contractor allow material from the liner to spill onto the ground surface.

4.0 PROPOSED TRAINING PROCEDURE

All Star Telecom employees and subcontractors responsible for spill reporting, containment, and cleanup, or involved with transporting or handling fuel or fueling and maintaining construction equipment, will be required to complete spill training prior to the start of construction. This training program will be implemented in the field.

The training program will incorporate the following:

1. Review of the provisions of the SPCCP and discussion of responsibilities of each employee
2. Location of spill control materials and operation of spill prevention and control equipment
3. Inspection procedures for construction equipment and hazardous materials location
4. Spill reporting procedures
5. Phone numbers and verifications of correctness
6. Contractor/employee responsibility in the event of a spill
7. Maintenance and monitoring requirements for possible sources of spills

5.0 RESPONSE TEAM CONFIGURATION AND AGENCY NOTIFICATION

The California Emergency Response Center (916 323-3600) (Response Center) serves as the coordinator of spill response in the State of California. The Response Center determines the severity of spills and contacts the appropriate local agency. Local emergency response contact numbers are also provided in the event that a spill involves injuries or fire. The Response Center also maintains an up-to-date list of approved disposal facilities to accept spill-related contaminated soils and clean-up materials.

CALIFORNIA STATE SPILL/RELEASE RESPONSE CONTACTS

Contact Name	Title or Location	Phone Number
TBD	Environmental Inspector	TBD
TBD	Authorized Alternate	TBD
TBD	Construction Contractor	TBD
TBD	All Star Telecom Representative	
Orange County Highway Patrol		(949) 223-5450
San Diego County Highway Patrol		(619) 220-5492
California DTSC Emergency Response (8 am to 5 pm)		(916) 323-3600
Governor's Office of Emergency Service		(916) 262-1621 (800) 852-7550
National Spill Response Center		(800) 424-8802
Los Angles County Fire Department		(323) 881-2455
South Orange County Fire Department		(949) 770-6016
San Diego County Fire Department- Camp Pendleton		(619) 725-3375

SPILL RESPONSE CONTRACTORS

Contact Name	Title or Location	Phone Number
TBD		TBD
TBD		TBD
TBD		TBD

6.0 EMERGENCY COORDINATOR

At all times, the EI will be designated as the Emergency Coordinator, with responsibility for coordinating all emergency response measures. The EI will be thoroughly familiar with all aspects of the construction activities, the location and characteristics of all hazardous substances and wastes handled, the location of all records associated with the construction spread, the location and condition of spill control materials, and the spread layout. Furthermore, the EI has been trained and has the authority to commit the necessary resources to implement this plan.

If a spill occurs, only those persons involved in the oversight or performance of emergency operations will be allowed within the spill area.

7.0 EMERGENCY EQUIPMENT

Emergency response equipment will be kept on hand and maintained at all times during construction. While construction activities are ongoing, the construction site will have fire extinguishers and related emergency response equipment on hand. All such equipment will be inspected daily for operability and accessibility. The locations of fire extinguishers and related emergency response equipment will be clearly marked with signs. Each foreman in charge of construction will be provided with and will maintain a readily accessible copy of this plan.

Prior to any construction activity, spill absorbent material to handle a spill of diesel fuel or other hazardous materials will be stored in the project area. At a minimum, a supply of the following spill control materials will be located in the project area prior to construction activities:

- One bale of Universal absorbent pads (200 count)
- 500 feet of 6- or 8-inch-diameter absorbent skimmer boom material (Pigalog SA2010 or equivalent)
- 50 packages of heavy duty trash bags
- 10 Universal absorbent particulate pillows
- 10 straw bales

All Star Telecom will designate a single employee to be responsible for maintenance of this equipment. Also, all fuel trucks will be supplied with one bail of absorbent pads.

8.0 EMERGENCY RESPONSE PROCEDURES

This section contains guidelines for site personnel to follow in the event of a hazardous materials spill associated with project activities. These materials include fuel oil, gasoline, hydraulic fluid, lubricants, antifreeze, and lead-acid batteries. In cases of an imminent or actual emergency situation, the person observing the incident will implement the procedures outlined in the following sections.

8.1 INITIAL RESPONSE

- Make every effort to stop the source of the spill
- Warn all personnel at the construction site
- Immediately contact the EI and report your name, location, and the nature and extent of the incident

The first rule of response to any spill is to contain the spill to the smallest area possible and stop the spill from reaching a waterway or other sensitive area (i.e., a groundwater well).
The following procedures are recommended for containment of small spills:

1. For a spill on the ground surface where it can be blocked, construct a ditch or dike to stop the flow of the spilled material and contain the spill to the smallest area possible.
2. In a moving water channel, set up a barrier as follows:
   a) Dam the channel with a bypass siphon or tube.
   b) Use a straw barrier.
   c) Install additional booms if the water is deep enough to float the boom.
   d) Excavate a side pool or holding pond to isolate the spilled material.
   e) Channel the water around the spilled material.

Use the following procedures for major spills:

1. For a spill on the ground where it can be blocked using a backhoe or other cleanup equipment, construct a ditch or dike to stop the flow of the spilled material and contain the spill to the smallest area possible.
2. Move the spilled material into a 55-gallon drum, an on-site containment structure, or a vacuum truck.
3. Provide for water removal, if it is raining.
4. In a moving water channel, set up a downstream barrier immediately. It may be necessary to provide more than one barrier downstream. Install as many barriers as needed to contain the flow of the spill material. Side channels can be used with collecting ponds, and it will be necessary to pick up the accumulated spilled material. All fuel or oil or traces of fuel or oil must be soaked up with straw or other absorbent material.

Containment devices suitable for field application include:

- **Earth Fill Dams**—An earth fill dam, in one form or another, is commonly used for spill containment. Dams of this type may range from simple, naturally constructed fills to more elaborate controlled-flow structures designed to trap petroleum products on water. Ideally, a spill should be caught in its earliest stage close to the source, thus permitting the simplest means of containment and recovery with minimal damage to the environment.
- **Sand Bagging**—Sand bagging may offer the best means of controlling a spill in congested areas or on paved surfaces where dirt moving, trenching, etc., is not practicable. This type of containment dam can be rapidly constructed and requires no specialized equipment. These advantages may well be the key to containing the spill close to the source, which is a prime objective.
- **Straw Barriers**—Experience with straw barriers has demonstrated their effectiveness not only as an absorbent medium, but as an underflow-type containment dam capable of backing up an oil film several inches in thickness. An oil layer up to 4 inches thick can be held for several hours before significant leakage is detected. Second- and third-stage barriers should be placed immediately downstream if leakage does occur.
- **Diverting booms**—When a spill occurs in a moving stream, one retrieval method to consider is diverting the spilled material to a backwater area so skimming devices can be used. Personnel and equipment must be concentrated downstream of the leading edge of the spill so that a minimum of three or four hours of working time is available. A location along a low bank or gravel bar in the streambed should be selected for an operational site.

8.2 SPILL RESPONSE

If a spill occurs, the release will be contained to the extent possible, and any hazardous material, contaminated material or soil will be cleaned up as soon as possible. The following general procedures will be used for rapid and safe response and control of the situation and to prevent the recurrence or spread of a release.

8.2.1 Hazard Assessment

If a spill is discovered, the employee will immediately report it to the EI and provide the following information:

- The material spilled or released
- The location of the release or spill of hazardous materials
- The location in which the spill is heading
- The rate at which the spill is being released
- Any threat to waterways
- Any injuries involved

This information will help the EI to assess the magnitude and potential seriousness of the spill or release. The EI will contact and deploy the necessary contract personnel. If the accident is

beyond the capabilities of the on-site equipment and personnel to handle, the EI will contact necessary local emergency assistance agencies (see Section 5) and, if necessary, will contact All Star Telecom's representatives and appropriate assistance personnel.

8.2.2 Response Coordination

The initial response to an emergency will be to protect human health and safety and then to protect the environment. Identification, containment, treatment, and disposal assessment will be the secondary response. Because of the potential fire hazard associated with diesel fuels used during construction, possible sources of ignition will be eliminated to prevent such an occurrence. If the spill involves more than one gallon, vehicular traffic and work in the immediate area will cease until the spill is contained. If the spilled materials are flammable, fire equipment will be made ready.

If a spill is not contained within a dike, an area of isolation will be established around the spill. The size of this area will generally depend on the size of the spill and the materials involved. The EI will be responsible for determining the extent of the isolation area. When any spill occurs, only those persons involved in the oversight or performance of emergency operations will be allowed within the designated hazardous area.

For all large spills or serious leaks in storage tanks, the following guidelines will be followed as closely as possible:

1. If a leak develops or a spill occurs, the person discovering the incident will contact the EI. The EI will obtain the following information:
   a. Person(s) injured and seriousness of the injury
   b. Location of the spill or leak, material involved, and source
   c. Approximate amount of spillage
2. Next, the EI will:
   a. Initiate evacuation of the hazard area
   b. Obtain medical attention for any injured persons and call the hospital
   c. Dispatch emergency personnel to the site to take the appropriate action
   d. Contact appropriate local emergency coordination centers so that any downstream water users can be notified
   e. Contact All Star Telecom's representative, who can assist with notifications of appropriate State and Federal agencies
3. Cleanup personnel will:
   a. Make sure all unnecessary persons are removed from the hazard area
   b. If possible, try to stop the leak
   c. Contain, divert, and clean up the spill

d. Properly dispose of all containment and cleanup materials, recovered waste, and contaminated soils

8.2.3 Required Notification

For spills occurring in California, the California Emergency Response Center (916 323-3600) and the National Spill Response Center (800 424-8802) will be notified immediately by the EI. Reports to these agencies must include the following:

- Name, address, and phone number of the person reporting the spill
- Date, time, and type of incident
- Quantity and type of hazardous waste or material involved in the incident
- Resource damages, if any (i.e., dead fish)
- Extent of injuries, if any
- Estimated quantity and disposition of recovered materials, if any

9.0 CLEANUP AND DISPOSAL OF SPILLS

Any soils contaminated by fuels, lubricating oils, or other hazardous materials will be cleaned up, removed from the ROW, and either treated by an approved contractor or hauled to an approved disposal site.

Cleanup of contaminated soils includes the removal of all soils that were subjected to the pollutant. If necessary, the EI may require the construction contractor to collect samples of soil strata below the spill to assure that all hydrocarbon-contaminated soils have been removed from the site.

All materials used to clean up the spill will be double bagged and inspected prior to removal from the spill site. All vegetation contaminated by the spilled material will be similarly collected, bagged, and disposed of at an approved disposal facility.

EXHIBIT D-1-1

SPILL REPORT FORM AND LIST OF HAZARDOUS SUBSTANCES AND REPORTABLE QUANTITIES

PROCEDURE FOR DETERMINING IF A HAZARDOUS MATERIAL SPILL IS OF A REPORTABLE QUANTITY

1. Determine the type and quantity of material that has been spilled.

2. Obtain a material safety data sheet (MSDS) for the spilled material and determine whether any of the constituents are listed in Table 302.4 in 40 CFR, Part 302. A copy of the CFR is attached.

3. If none of the constituents in the spilled material are listed in Table 302.4 (excluding ethylene glycol), the spill is not reportable.

4. If the constituents in the spilled material are listed in Table 302.4, use the following equation to determine the pounds of material spilled:

   Pounds Spilled = (V) (Wt%) (Sg) (0.0834)

   Where:

   V = Volume of the material spilled, in gallons
   Wt% = The weight percent of the constituents in the spilled material (see the MSDS)
   Sg = Specific gravity of spilled material (see the MSDS)

   For example:

   V = 7 gallons
   Wt% = 3.5
   Sg = 1.04
   Pounds spilled = (7) (3.5) (1.04) (0.834) = 2.13 pounds

5. If, based on the calculation, the pounds spilled are greater than the final reportable quantity (RQ) value listed in Table 302.4 of 40 CFR, Part 302 or the state's reportable quantity minimum amount, the spill must be reported to the appropriate Federal, State, and local agencies.

STORM WATER POLLUTION PREVENTION PLAN
SPILL REPORT FORM

Reported By: _____ _____
Name Telephone Number

Date Reported: _____ Time Reported: _____

Date of Spill: _____ Time of Spill: _____

Name of Facility: _____

Legal Description: _____ 1/4 _____ 1/4 _____ 1/4 SEC _____ TWP _____ Range _____

County: _____

Describe Spill Location and Events Leading to Spill: _____

_____

_____

_____

_____

Material Spilled: _____

Source of Spill: _____

Amount Spilled (gallons or pounds): _____

Amount Spilled to Waterway (gallons or pounds): _____

Nearest Municipality: _____

Containment or Cleanup Action: _____

_____

_____

List Environmental Damage (fish kill, etc.): _____

_____

_____

List Injuries or Personal Contamination: _____

_____

STORM WATER POLLUTION PREVENTION PLAN
SPILL REPORT FORM

Date and Time Cleanup Completed or Terminated: _____

If Cleanup Delayed, Nature and Duration of Delay: _____

_____

_____

Description of Materials Contaminated: _____

_____

_____

Approximate Depth of Soil Excavation: _____

Action To Be Taken to Prevent Future Spills: _____

_____

_____

Agencies Notified:

Local: _____ Date: _____

State: _____ Date: _____

Federal: _____ Date: _____

Signed: _____
Contractor Superintendent or
Environmental Inspector