



### I. Introduction

Robinson Brother Construction, LLC (RBC), and its project team are dedicated to protecting sensitive environmental resources and ensuring environmental compliance for the Zayo Prineville to Reno Fiber Optic Line Project (“Project”), through the implementation of the mitigation measures as outlined in the Final Environmental Impact Report (FEIR) established through the California Environmental Quality Act (CEQA) process and existing federal and state regulations, as well as all other Project permit requirements and conditions. RBC’s environmental team has extensive experience in environmental compliance on long line fiber optic projects. Its members possess deep knowledge and understanding of the project-specific requirements needed to successfully complete projects while complying with environmental permits and approvals.

RBC’s goal, and the goal of the environmental team, is to provide quality service to the client by helping the construction team understand environmental sensitivities, while simultaneously following the terms and conditions of the mitigation measures, project permits and approvals, applicable Project requirements, and applicable laws regarding protection of the environment.

### II. Corporate Responsibility

The project team prides itself in being a leader in the industry when it comes to performing a variety of work, whether constructing long line fiber optics, urban vault installations, providing civil services, geotechnical services, or supporting utility maintenance projects. As such, one key component that the leadership adheres to in every aspect of its work is respect for the environment. It is clear to both RBC employees and RBC’s subcontractors that environmental performance reflects RBC’s overall performance.

As a company, RBC values the importance of safeguarding the environment. RBC and its employees are expected to do the following when conducting business:

- Value environmental compliance when conducting business
- Address environmental issues quickly and effectively
- Work with customers and find approaches to reduce environmental impacts

The Project leadership shares these same attitudes regarding environmental stewardship and will ensure this value resonates throughout the Project, ensuring that all employees, subcontractors, and sub-consultants are good corporate citizens and neighbors. To realize this, project leadership is committed to the following measures:

- Ensure compliance with all applicable federal, state, and local environmental regulations
- Promote business activities and operations that minimize impacts to sensitive environmental resources
- Ensure proper and appropriate environmental training is taking place for all employees, subcontractors, and sub-consultants.
- Foster a corporate culture that values environmental sustainability
- Engage our customers to find ways to promote sustainable methods

### III. Mitigation Measures

Per the FEIR, RBC shall comply with the Hazards and Hazardous Materials mitigation measures as they apply to Project-related work. More specifically the following applicable mitigation measure(s) (MM) and applicant proposed measure(s) (APM) shall be adhered to by RBC:

HAZ-1: Hazardous Substances Contamination Prevention Plan (applicable excerpts).

- Hazardous Materials Inventory and Safety Data Sheet (SDS) recordkeeping
- Site-specific buffers to be used if work occurs adjacent to any hazardous sites, and remediation or containment efforts to be taken if construction activities occur in a hazardous site
- Analytical testing of soil within and adjacent to known hazardous materials sites prior to the start of

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construction activities

- Development of a Lead Compliance Plan outlining procedures to be implemented should aerially deposited lead be discovered
- Emergency response and reporting procedures
- Proper disposal of potentially hazardous materials
- Containment of spills from construction equipment and vehicles (also required through the preparation of a Spill Prevention, Control, and Countermeasure Plan), which would include the following:
- Maintenance and inspection of all construction vehicles
  - Refueling and parking restrictions to prevent fuel from entering adjacent waterbodies
  - Secondary containment for stationary diesel generators
  - Specifications for the availability of spill containment and response equipment
  - Designation of responsibilities and communication and reporting procedures in the event of a spill
  - Spill response procedures

The following sections shall address the requirements outlined in the mitigation measure. As the storage and management of hazardous materials is subject to change depending on field conditions and progress of work, this document is to be considered a living document (i.e., subject to revision when necessary to respond to unforeseen changes in the Project).

### **IV. Stormwater Pollution Protection**

#### **Best Management Practice Manual**

RBC shall adhere to the guidance provided by the Best Management Practice (BMPs) to ensure protection of environmental resources. the following BMP guidance shall be reviewed and implemented as appropriate:

- Spill Control (NS-6 & WM-4)
- Hazardous Materials/Waste Management (WM-5 & WM-6)
- Vehicle and Fueling (NS-9)
- Contaminated Soil Management (WM-7)

This document is Appendix F to the Project's SWPPP Manual.

#### **Project Stormwater Pollution Prevention Plan**

Additionally, RBC shall adhere to the Project-specific Stormwater Pollution Prevention Plan (SWPPP) when performing its work to ensure protection of environmental resources. BMPs are typically identified within the SWPPP as required by the State of California Construction General Permit (CA CGP). Within the SWPPP BMP specifications have been described and provided.

### **V. On-site Hazardous Materials**

#### **List of Hazardous Materials**

The following is a list of hazardous materials to be stored on our mobile maintenance equipment.

- Diesel Fuel
- Diesel Fuel (within a generator for office power)

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- Oily Debris (hydraulic leak material and clean-up from vehicles and equipment)

### **VI. Material and Waste-Specific Management**

A key factor in environmental compliance is employee awareness. RBC and its Project team will work closely in conjunction with Stantec and its designated environmental compliance representative(s) to ensure that employees and subcontractors attend Worker's Environmental Awareness Program (WEAP) training as required by the Project. All environmental compliance training required by federal, state, or local regulations will be provided to appropriate project personnel, as needed. Additionally, as part of its on-boarding process, RBC's employees and subcontractors receive environmental general awareness training that includes information on hazardous material and waste management as well as spill response. RBC will ensure that employees and subcontractors are properly trained in spill response procedures and spill prevention techniques and follow conditions as required by the SWPPP. Vehicles and equipment will be supplied with "spill kits" containing materials necessary for responding to a hydrocarbon spill.

RBC will ensure continued education throughout the Project. Daily job hazard analysis meetings (tailboards) will be held by each crew at the beginning of each workday, where the environmental team can discuss ongoing project requirements for site-specific activities and help foster continued environmental awareness and address concerns.

In addition to spill response, the construction team will ensure that hazardous materials and waste are properly stored, and materials and waste storage areas are monitored for drips, leaks, or other potential threats of release. The construction team works closely with onsite safety personnel to designate those materials that are hazardous to human health and/or the environment. Materials are managed and monitored, in accordance with safety and environmental regulations, until they can be properly utilized or disposed. Hazardous construction wastes are disposed of in accordance with federal, state, and local regulations, and all necessary permitting is obtained before disposing of any regulated materials.

To ensure compliance with spill and hazardous material and waste requirements both for the Project and in accordance with federal, state, and local regulations, RBC intends to follow best management practices, prior to, during, and after construction.

#### **Prior to construction**

This is a linear project. In order to minimize ground disturbance, the appropriate BMPs will be put into place with a just in time start – this will eliminate excessive number of time we need to return to a location. Appropriate BMPs would be installed per the approved Storm Water Pollution Prevention Plan (SWPPP) and could include:

- Storm drain/storm channel inlet protection
- BMPs such as an earthen berms may be placed around work areas where potential fluid exchanges will occur (e.g., vehicle maintenance sites)
- All employees will be briefed on the environmental compliance requirements of the project

Spill kits shall be readily available both in construction vehicles as well as at material storage yards. No hazardous materials will be stored at the yards.

#### **During Construction**

All self-propelled equipment fueling will be done in designated refueling locations with spill kit onsite. Any stationary equipment (i.e., generators, pumps, drill rig, etc. that cannot be moved for fueling will have secondary containment or some alternative BMP on the ground prior to placing the equipment in location.

**FUEL NOZZLES WILL NOT BE LEFT UNATTENDED DURING THE FUELING PROCESS.**

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#### Vehicle and Equipment Maintenance

Maintenance of vehicles and equipment is key to minimizing the amount of spills and leaks on the Project. Personnel should routinely inspect vehicles and equipment, including hydraulic lines, valves, and other hoses. Should there be equipment in need of service, prompt repairs shall take place.

Should a spill occur, the following protocol shall take place.

#### **VII. Spill Response**

##### Initial Identification and Assessments of Hazards

Project personnel will be instructed to identify and report any hazardous conditions observed during construction activities to the designated field representative. Project personnel will receive instruction on reporting hazardous conditions. Personnel will also be instructed to act in accordance with the following procedures:

- Work will be halted if an imminent hazard or danger to human health or the environment exists.
- Access to the release area will be restricted if necessary to avoid physical injury.
- Report all significant releases or threatened releases of hazardous materials: First Call 9-1-1, Then Call: Cal OES State Warning Center (800)852 – 7550 or (916) 845 – 8911. (Refer to California Office of Emergency Management Hazardous Materials, Spill / Release Notification Guidance (<http://www.caloes.ca.gov/>)).
- RBC shall contact Stantec's Project Lead Environmental Inspector upon discovery of a hazardous spill but no later than 24 hours.
- The fire and/or police departments will be contacted if assistance is needed. The designated environmental field representative will advise on whether the release site is safe to enter, and any injuries will be addressed and 911 will be called if emergency assistance is needed. If required, notification of the hazardous condition will be provided as soon as possible following the discovery of a spill or release, as described in Notification Procedures.

##### Cleanup and Disposal Procedures

Once the release of a hazardous material has been contained in accordance with the procedures identified, the Construction Contractor will clean up the contaminated area by implementing the following measures:

- Absorbent materials and/or shovels will be used to remove as much free product from the soil or ground surface as possible.
- In locations where hydraulic fluid may have been released into flowing water, RBC will utilize absorbents at the surface of the water to capture any oily sheen that may be present.
- Based on the size of the spill and the discretion of the designated field representative, larger equipment such as backhoes and roll-offs may be required to remove contaminated materials.
- Spills will not be diluted with water or other liquids for purposes of mitigating the spill.
- If the use of water or other liquids is necessary for final cleaning, the water or other liquids will be collected, properly labeled, and disposed of in accordance with all federal, state, and local regulations.
- Monitoring and inspection of hazardous material/waste areas shall be periodically performed by general on-site monitors, as well as inspected by stormwater inspectors per the SWPPP. Additionally, general monitoring and inspections shall be managed by a 40-hour HAZWOPER trained individual.

In the event of a drips and spills, Project personnel shall contain the area if safe to do so. Personnel will perform clean-up to the extent practicable. All spill clean-up material, including all spill kit material such as absorbent, etc. shall be placed in approved containers (e.g., drums) and stored in the appropriate yard locations. Should



the spill be larger than what personnel are trained to handle, personnel shall contain the spill and a clean-up contractor shall be called to perform the work.

### **VIII. Secondary Containment and Countermeasures**

#### **On-site Fuel Storage**

At this time no site will have Fuel Storage. If this plan changes, this will be the procedures used:

Fuel products shall be stored in appropriate containers in such a manner to prevent any leaks or spills. These can include double-walled tanks or within secondary containment. Storage areas shall have proper signage and tanks shall be labelled as required by federal, state, or local law. Inspections of fuel storage area typically occur during the fueling process and any indication of leaks or potential spills shall be reported to either a supervisor or designated party. Indicators of potential leaks include bulging and corrosion of the container.

Proper BMPs shall be in place at all times. In addition to secondary containment around the tank, BMPs will include locating the fuel area in a level grade, placing plastic fencing and gravel bags at the low point of the fueling area, and/or placing secondary containment under the fueling process of the equipment/vehicle.

During tailboards and awareness sessions, supervisors in charge of SWPPP implementation shall discuss procedures and notifications.

#### **Spill Control**

Fuel storage shall be inspected regularly during normal business hours. Personnel will inspect tanks during all dispensing operations. Employees will check for leaks at hoses, dispensers, and storage containers as well as areas of weakened tank integrity. Personnel will check for leaks into the containment area associated with each container making sure there is no sign of leaks. The inspections are completed by individuals working in the assigned area of work. Supervisors and environmental personnel also do a walk-through of the work area including yards and visually inspect the tanks.

The RBC Project Manager or his designee shall be accountable for discharge prevention. This person shall be designated prior to the start of oil handling during the project.

The source of the spill shall be stopped immediately should a spill occur. The spill shall then be contained.

Containment of a hazardous material release will be performed only by properly trained Project personnel and will be conducted using the proper personal protective equipment such as gloves, goggles, and aprons. If containment can be safely implemented, the following general containment procedures will be employed:

- If the release is relatively small, absorbent pads will be applied to the surface of the release to absorb all of the liquid.
- If the release is of a larger quantity, earthen ditches or dikes will be constructed around the release site to prevent the discharge from flowing off site or into waterways.
- Discharge into storm drains or other storm water conveyance systems will be prevented by obstructing drains located in the area of the release with plastic and/or earthen dikes.
- If a release cannot be safely managed by Project personnel, a cleanup contractor will be contacted to contain, cleanup, and remediate, if necessary, the area in accordance with federal, state, and local requirements.
- Other individuals and vehicles will be prevented from entering the release area until an assessment is made of the situation for safety. Following the completion of cleanup activities, waste materials will be placed in appropriate disposal containers, properly labeled, and stored in the designated hazardous materials staging area(s) in accordance with federal, state, and local regulations.

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### IX. Spill Response Material(s)

#### Spill Kit Contents

Spill kit response items will include items necessary for a hydrocarbon release. The following items may be included in the yard spill kit; however, items may change based on usage and/or field conditions. Crew spill kits would have an abbreviated version of this list in a five-gallon bucket.

#### Emergency Spill Kit:

- 3 – Absorbent Socks
- 6 – Disposable bags and ties
- 2 – Pairs of rubber gloves
- 2 – Pairs of safety glasses
- 1 – Sorbent drip pillow
- 12 – 16" x 16" sorbent pads
- 1 – Emergency Response Guidebook
- 4 – Hazardous Labels
- 1 – 50 lb. Bag granular sorbent (kitty litter)
- 1 – shovel
- 1 – broom
- 1 – 55-gallon spill kit storage barrel

Material collected from spill kits shall be stored at the designated Hazardous Storage Location.

### X. Exiting Environmental Awareness

#### Existing Hazardous Sites

Known existing hazardous sites found in Table 1 are located within or adjacent to the Project alignment. Existing hazardous sites will be avoided as much as possible. As construction progresses, construction crews will look for surface signs of contamination (e.g. soil staining, stressed vegetation, odors, etc.) and will avoid where possible.

If contaminated material is encountered, crews will stop work and notify Zayo or their qualified designee. Zayo will contact the State Permit Inspector and determine the appropriate response. If required, a Sampling and Analysis Plan (SAP), and a Health and Safety Plan (HaSP) will be prepared by a Certified Industrial Hygienist (CIH) to comply with California Code of Regulations title 8, section 5192, "Hazardous Waste Operations and Emergency Response" for sampling activity permit application. Additional environmental documents may be required prior to resumption of construction activity.

Tests may include but not be limited to contaminants such as hydrocarbons, lead, or other heavy metals. Once test results are returned a plan will be implemented to commence work in the area.

Open excavations will be backfilled and recompacted with native soils. At locations where the excavated material is not adequate to use for backfilling, construction crews will remove it from the project workspaces and dispose



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of it at a location that meets Caltrans requirements and comply with the Department of Toxic Substances Control (DTSC) ADL requirements for roadway soil management.

**Table 1: Known Existing Hazardous Sites**

Listed Facility Name/Address	Database Listing	Distance to the Project	Site Type
Wayside Inn 718-710 Highway 395 Standish, CA 96128	CA UST; CA CERS; CA CUPA; CA LUST; CA Cortese	Adjacent to US 395	UST
Termo Store 713-785 Highway 395 Termo, CA 96132	CA CPS-SLIC	Approximately 20 feet from construction footprint	Water well contamination
XL Ranch Rancheria / XL Ranch – Hay Loading Area Madeline, CA 96119	Indian Reservation/ Open Dumps / CA NPDES; CA CIWQS	Adjacent to US 395	Contains an open dump
Sierra Army Depot	DOD	Adjacent to US 395, approximately 900 feet from the right-of-way	Ammunition storage
PacifiCorp – Alturas Substation Northwest Side of US Highway 395 0.3 Miles Northeast of EA Alturas, CA 96101	CA CERS	Adjacent to US 395	Chemical storage facility
Federated Community Church First and East Streets Alturas, CA 96101	CA HIST UST	Adjacent to US 395	UST
Riverside Texaco / B&B Liquor 103 East Carlos Street Alturas, CA 96101	EDR HIST Auto; CA SWEEPS UST; CA HIST Cortese	Adjacent to US 395	UST
Monitoring Station / US Forest Services 600 South Main Street Madeline, CA 96119	FINDS; CA CERS; CA HAZNET; CA HWTS; RCRA-LQG	Adjacent to US 395	Air quality monitoring station
Caltrans – Alturas 406 East Hwy 395 Alturas, CA 96101	CA AST; CA CERS	Adjacent to US 395	AST
Modoc National Forest 700 South Main Street Alturas, CA 96101	CA HAZNET; CA HWTS	Adjacent to US 395	Offsite disposal area with inorganic solid waste
Alturas Ranches – Alturas Shop 65A County Road 187 C Alturas, CA 96101	CA CERS; CA AST	Adjacent to US 395	UST

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Listed Facility Name/Address	Database Listing	Distance to the Project	Site Type
Likely General Store 3260 Highway 395 Alturas, CA 96101	CA CERS	Adjacent to US 395	Above ground petroleum storage
Walter Sphar Trucking 3112 Highway 395 Likely, CA 96116	FINDS; CA AST	Adjacent to US 395	AST
Bureau of Land Management 474-000 Highway 395 Litchfield, CA 96117	CA CUPA, CA CERS	Adjacent to US 395	Chemical storage facility
Sierra Cascade Aggregate 474-315 Highway 395 Madeline, CA 96119	CA CERS; CA CUPA	Adjacent to US 395	AST
Mapes Lane Bridge 7C-02 Replacement Susanville, CA 96130	CA CIWQS; CA CERS	Adjacent to US 395	Dredge/fill site
Milford Yard 450-040 US Highway 3 Milford, CA 96121	CA CERS; CA CUPA; CA AST	Adjacent to US 395	AST – petroleum
Ross Ranch 454-175 US Highway 395 N Milford, CA 96121	CA HIST UST	Adjacent to US 395	UST
Donald Morgan 450-415 US Highway 395 Milford, CA 96121	CA HIST UST	Adjacent to US 395	UST
Milford Yard / Milford Maintenance 450-040 US Highway 395 Milford, CA 96121	FINDS; CA AST	Adjacent to US 395	AST
The Mark 445-625 Highway 395 Herlong, CA 96113	CA CERS; CA CUPA; CA AST	Adjacent to US 395	AST – petroleum
Payless Gas and Grocery / Doyle Payless Highway 395 and Rachel Drive 745-7500 Rachel Drive Doyle, CA 96130	CA HIST UST; CA SWEEPS UST; EDR HIST Auto; CA HIST UST; FINDS; CA AST; CA CERS; CA CUPA;	Adjacent to US 395	UST
02 4E4204 Bordertown 02 LAS 395 PM 0 0 5 6 02 sie 395 pm 0 0 3 1 Chilcoat, CA 96105	CA NPDES; CA CIWQS; CA CERS	Adjacent to US 395	Construction site with stormwater permit
Modoc Road Department – Davis Creek Shop 41900 Hwy 395 Davis Creek, CA 96108	CA AST; CA CERS	Adjacent to US 395	AST – petroleum
Bureau of Land Management	CA CUPA; CA CERS; CA AST	Adjacent to US 395	AST – petroleum



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Listed Facility Name/Address	Database Listing	Distance to the Project	Site Type
Highway 395 Ravendale, CA 96128			
B&B Deli 130 Carlos Street E Alturas, CA 96101	CA LUST; CA CERS	Adjacent to US 395	UST
Heard's Market 473-525 Market Street Litchfield, CA 96117	CA LUST; CA SWEEPS UST; CA HIST UST; CA CERS	Adjacent to US 395	Release of gasoline to groundwater
Lassen County Road Department District 3 718-950 Church Street Standish, CA 96128	CA CUPA; CA CERS	Adjacent to US 395	Chemical storage facility
Sierra Landy Placer County P.O. Box 34719	CA Mines	Adjacent to US 395, approximately 100 feet west of the construction footprint	Mining operations
Hindle Pit-Modoc 202 West 4 <sup>th</sup> Street	CA Mines	Adjacent to US 395, approximately 230 feet southeast of the construction footprint	Mining operations
Pozzolan Hill Pit- Reclaimed 608 SE 50 <sup>th</sup> Avenue County of Lassen, CA	CA Mines	Adjacent to US 395, approximately 270 feet southeast of construction footprint	Mining operations
Surian Litchfield 707-010 Wingfield Road County of Lassen	CA Mines	Adjacent to US 395, approximately 270 feet southeast of construction footprint	Mining operations
Madeline Pit 1657 Riverside Drive County of Lassen, CA	CA Mines	Adjacent to US 395, approximately 280 feet east of the construction footprint	Mining operations
Holdorff's Recycling 605 North Court Street Altura, CA 96101	CA SWRCY	Adjacent to US 395, approximately 330 feet west of construction footprint	Recycling center

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Listed Facility Name/Address	Database Listing	Distance to the Project	Site Type
Davis Creek Transfer / Davis Creek Disposal 1 MI S Davis Creek / County Road 133B Davis Creek, CA	CA SWF/LF; CA CERS	Adjacent to US 395, approximately 400 feet east of the construction footprint	Waste collection facility

**Notes:**

AST = aboveground storage tank  
 CA = California  
 CERS = California Environmental Reporting System  
 CIWQS = California Integrated Water Quality System  
 Cortese = California Hazardous  
 CPS-SLIC = Cleanup Program Sites – Spills, Leaks, Investigations, and Cleanups  
 CUPA= Certified Unified Program Agency  
 DOD = United States Department of Defense  
 FINDS = Facility Index System/Facility Registry System  
 HAZNET = Facility and Manifest Data  
 HIST = historical  
 HWTS = Hazardous Waste Tracking System  
 Sources:  
 EDR 2020, SWRCB 2020, DTSC 2020

LUST= Leaking Underground storage tank  
 NPDES = National Pollution Discharge Elimination System  
 RCRA-LQG = Resource Conservation and Recovery Act – Large Quantity Generator  
 SWEEPS = Statewide Environmental Evaluation and Planning System  
 SWRCY = Recycling Facilities in California Database  
 SWF/LF = Solid Waste Information System / Landfill  
 US 395 = United States Highway 395  
 UST = underground storage tank

### **XI. Records and Response**

#### **Record Keeping**

This plan is a living document and it will have the most current Hazardous Materials Inventory. The Project has not started, so at this time there is no Inventory.

#### **Safety Data Sheet (SDS)**

RBC has an online library of the most current and updated SDS sheets. At this time no Hazardous Materials are on site, but if/when that changes the most current SDS sheets will be available.

#### **Emergency Response and Reporting Procedures**

Bill McCoy is the Project Director and is responsible for the oversight of all reporting on the project. All incidents will be reported to Bill by phone, text or email.

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