SECTION V—REGULATED WASTE MANAGEMENT

CONTENTS

1. GENERAL ........................................................................................................................................... V-1
2. DEFINITIONS ..................................................................................................................................... V-3
3. REGULATED WASTES ..................................................................................................................... V-4
4. DOCUMENTATION REQUIRED IF REGULATED WASTES SHIPPED BY INSTALLATION SUPPLIER ............................................................................................................................. V-6

TABLE V-1 – SUMMARY OF CHANGES IN SECTION V

<table>
<thead>
<tr>
<th>Revision Date</th>
<th>Item</th>
<th>Action</th>
<th>Requirements Change Notification</th>
</tr>
</thead>
<tbody>
<tr>
<td>06/01/2016</td>
<td>4.1.2</td>
<td>Modification</td>
<td>ATT-TP-76300-338</td>
</tr>
<tr>
<td>06/01/2016</td>
<td>2.1.5</td>
<td>Modification</td>
<td>ATT-TP-76300-339</td>
</tr>
</tbody>
</table>

1. GENERAL

1.1.1 The Installation Supplier shall ensure, as part of the evaluation of the installation, that all equipment added, rearranged or modified is properly installed and in conformance with AT&T installation specifications.

1.1.2 The Installation Supplier shall assure, as part of the evaluation of the installation, that all work has been done in accordance with the detail specifications or approved changes to the detail specifications.

1.1.3 This section covers general requirements for Hazardous Materials and Regulated Waste management in AT&T sites. This includes Hazardous Materials, Hazardous Waste, Universal Waste, and other Regulated Wastes.

1.1.4 The information in this section is not intended to be an all-inclusive guide. It is intended to provide an awareness of the types of Regulated Waste that may be present in AT&T sites.
1.1.5 Waste materials (including but not limited to Regulated Waste) resulting from work performed at AT&T facilities by the Installation Supplier shall not be left on AT&T property or placed in waste or recycling containers placed there for AT&T’s use, except as authorized by 1.1.5 a) below. Such wastes may include, for example, packaging material for new equipment, new equipment that was not installed, and/or old equipment that was removed. Waste materials resulting from work performed by the Installation Supplier must instead be removed promptly by the Installation Supplier, and disposed of or otherwise managed in compliance with all applicable legal requirements.

   a) The Installation Supplier may leave such waste materials on AT&T property or in waste or recycling containers placed there for AT&T’s use only if and to the extent it receives prior written approval to do so, describing the specific types of materials, from an AT&T Director or above.

1.1.6 Employees of the Installation Supplier who handle regulated materials/wastes must be trained on the hazards associated with those materials and on the proper methods and procedures to use when handling, storing, offering for transport, transporting or disposing of such regulated materials/wastes. The level of training required is dependent on each employee’s current/future waste management job responsibilities. All employees should be able to demonstrate a general understanding of environmental issues and how they relate to their jobs.

1.1.7 Proper handling and management of Regulated Waste is necessary to:

   a) Protect AT&T employee and installation supplier’s health
   b) Protect public welfare, and
   c) Maintain AT&T’s corporate objective to conduct, manage and maintain its operation in compliance with environmental laws and regulations with full regard to their potential impact on the environment and the community.

1.1.8 For more guidance regarding Hazardous Materials and Regulated Waste management, the AT&T Representative can refer to the AT&T EH&S (Environment, Health & Safety) web site, http://www.ehs.att.com/, or contact the AT&T EH&S Hotline at 1-800-KNOW-EHS (1-800-566-9347) prompt 4.

1.1.9 The Installation Supplier shall be responsible for compliance with federal, state and local environmental regulations, including those concerning Hazardous Materials, Hazardous Waste, Universal Waste, Electronic Waste, and other Regulated Wastes.

1.1.10 The Installation Supplier shall employ environmentally safe practices in the performance of its duties.

1.1.11 The Installation Supplier shall obtain the necessary environmental permits (e.g., standby engine permits), notifications (e.g., notification of regulating agency and AT&T EH&S) and training (e.g., floor drilling training) prior to initiating work activities.

1.1.12 The AT&T Representative shall monitor the Installation Supplier’s compliance with the procedures established in this section V.
1.1.13 The Installation Supplier shall coordinate with the AT&T Representative before starting any activity related to Regulated Waste.

1.1.14 Installation Supplier shall issue appropriate warnings to inform and educate its employees, agents, subcontractors, other invitees, and the employees of any of them, entering AT&T facilities of the information in this section V.

1.1.15 In the event of any of the following occurrences, the Installation Supplier shall immediately contact the AT&T Representative, who will contact the appropriate AT&T organization:

<table>
<thead>
<tr>
<th>Type of Occurrence</th>
<th>AT&amp;T Representative will contact…</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulatory agency inspector visit to site</td>
<td>AT&amp;T EH&amp;S: 1-800-KNOW-EHS (1-800-566-9347)</td>
</tr>
<tr>
<td>Accidental release/spill of Regulated Waste or Hazardous Materials</td>
<td></td>
</tr>
<tr>
<td>Accidental exposure of workers to Regulated Waste or Hazardous Materials</td>
<td></td>
</tr>
</tbody>
</table>

2. DEFINITIONS

These definitions relate to the types of materials that can be present at AT&T sites.

2.1.1 Wastes are materials that will no longer be used for their original intended purpose and will be discarded. Examples of wastes that do not fall under the categories of Regulated Waste (defined below) include uncontaminated construction and demolition debris, office trash, garbage, rubbish and refuse or other materials such as recyclable scrap cable/wire.

2.1.2 Regulated Wastes are wastes that require special handling and disposal, including but not limited to Hazardous Waste, Universal Waste, some Electronic Wastes, PCB wastes, asbestos wastes, used oil, and radioactive wastes. Regulated waste materials could include (but are not limited to) chemicals, paint, caulking, cleaners, degreasers, adhesives, epoxies, oil, lubricants, mercury-containing lamps (MCLs), light ballasts, smoke detectors, aerosol spray cans, batteries, and electronic devices (any device that contains a circuit board, chip or digital display or screen).

2.1.3 Hazardous Wastes are waste materials that are regulated by applicable federal or state rules as “hazardous wastes”. Generally, a material becomes a waste when its owner determines it is no longer useful or valuable, and therefore intends to discard it (which includes not only disposal, but also some kinds of recycling). Federal or state rules define which wastes are hazardous based on physical characteristics such as ignitability, reactivity, corrosivity or toxicity (“characteristic wastes”) or by listing certain wastes (“listed wastes”). Some Hazardous Wastes that may be generated at AT&T facilities include spent batteries, leaking batteries, mercury and Carrier Communications Space switch components that contain mercury.

2.1.4 Universal Wastes are materials that are classified as Hazardous Waste but which are exempt from certain of the federal Hazardous Waste management requirements, as long as
the materials are intact, intended to be recycled rather than disposed in a landfill. They are required to be protectively packaged prior to transport for disposal. Currently, batteries, agricultural pesticides, thermostats, fluorescent lamps and mercury-containing lamps (MCLs) are the only wastes classified by the USEPA as Universal Wastes. Some states such as California have specified that used cathode ray tubes (“CRTs”), including those in computer monitors, be managed as a Universal Waste.

2.1.5 Electronic Waste (“e-waste”) may be defined as computers, TVs, entertainment device electronics, mobile phones, and other items containing electronic parts or electronic circuit of any kind, after they have been used and are transferred from the original owner for reuse, resale, salvage, recycling, or disposal. Some but not all e-waste is classified as Hazardous Waste, Universal Waste, or other Regulated Waste. Some states, including California, have strenuous e-waste regulations. In states where e-wastes are regulated (e.g., CRTs in California), they may be exempt from selected waste management requirements as long as they are intact and are recycled, rather than disposed in a landfill. Check with the AT&T RRC at 1-800-KNOW-EHS (1-800-566-9347), prompt 4 if unsure of proper disposal of electronic equipment.

2.1.6 Hazardous Materials are materials that are regulated by U.S. Department of Transportation (DOT) regulations when offered for transport. (These regulations apply to both wastes and non-wastes.) DOT requirements include proper packaging, labelling, and marking of the materials and placarding of the vehicle.

3. REGULATED WASTES

3.1.1 Installation Suppliers often handle Regulated Wastes in the course of their work activities. Handling of Regulated Wastes requires specialized training and knowledge. The following Regulated Wastes, not to be considered inclusive, may be encountered in AT&T facilities:

<table>
<thead>
<tr>
<th>Materials That May Be Regulated Wastes</th>
<th>Examples That May Be Found at AT&amp;T Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asbestos</td>
<td>Floor tile, cable holes and covers, cable sheath, ceramic resistor washers, asbestos textiles, asbestos sheets, generator, boiler insulation, transite sheeting and pipe/ducts</td>
</tr>
<tr>
<td>Electrolyte (battery acid/alkali)</td>
<td>Wet-cell, gel-cell, Ni-Cd batteries</td>
</tr>
<tr>
<td>Lead</td>
<td>Lead-sheathed cable, solder and paint wastes</td>
</tr>
<tr>
<td>Mercury</td>
<td>Switches, relays, tubes and interrupters. These may be frame-mounted, plug-in units or mounted on plug-in circuit boards; fluorescent light tubes</td>
</tr>
<tr>
<td>Petroleum products</td>
<td>Fuel for emergency power generating equipment and in lubricating fluids and</td>
</tr>
</tbody>
</table>
3.1.2 The Installation Supplier is responsible for removing all waste materials used or generated during the job from AT&T property for proper disposal.

3.1.3 When the Installation Supplier will move equipment containing Hazardous Materials (e.g., 1-AESS switches, transformers, rectifiers, relays, etc) between AT&T facilities, the Installation Supplier shall notify its AT&T Representative prior to removal or transportation, to ensure compliance with environmental regulations. All Hazardous Materials and equipment containing Hazardous Materials must be protectively packaged in accordance with U.S. Department of Transportation (DOT) and any other applicable local, state or federal packaging requirements.

3.1.4 Before the Installation Supplier removes equipment that is to be sold as scrap or for salvage and which would be (or contains components that would be) Regulated Waste, the Installation Supplier shall contact the AT&T Representative. There are two options for disposal of such regulated waste:

a) An Installation Supplier may remove, store, and arrange for reclamation of Regulated Waste, if the Installation Supplier (A) is contracted by AT&T to conduct such work; (B) has agreed to and included the terms and conditions outlined in this section V; (C) agrees to forward all shipping papers to the RRC Record Keeper including certificates of recycling/reclamation; and (D) agrees to create and sign shipping papers on behalf of AT&T

b) Alternatively, the AT&T Representative may submit a disposal request to the RRC via the EH&S Waste Tracking System (WTS) or call the RRC at 1-800 KNOW EHS (1-800-566-9347), Prompt 4. In this case, AT&T will arrange for proper disposal.

3.1.5 When batteries are removed, procedures described in this section (section V) shall be followed:

a) Batteries staged for reuse shall be prepared for shipment as noted below. Cells shall be marked and reinstalled in the same order as placed in the original installation. Miscellaneous battery items such as spark arrestors and thermometers shall be packed and stay with the cell in which they were originally installed.

b) Vents shall be covered with a shipping cap

c) Filling tubes shall be plugged and terminals shall be protected against short circuits with tape, caps or protective packaging.
d) Each container or unit shall be marked with proper identification and address of the assignee and consignor. Also a 4" x 4" label, with the word "corrosive" shall be applied to each.

e) Batteries shall be secured during transport.

f) Batteries shall be transported in compliance with applicable DOT regulations.

g) The Installation Supplier shall have agreed to and included the terms and conditions outlined in the AT&T Battery Amendment in its contract.

4. DOCUMENTATION REQUIRED IF REGULATED WASTES SHIPPED BY INSTALLATION SUPPLIER

4.1.1 The Installation Supplier shall use the documents identified in this section V to manage Hazardous Materials, Hazardous Waste, Universal Waste, or Electronic Waste. These may include:

a) Hazardous Waste Manifests

b) Hazardous Materials Bills of Lading

c) Bills of Lading

d) Non-Hazardous Waste manifests

e) Certificates of Reclamation/Recycling

4.1.2 Material Disposition Record Forms - A Material Disposition Record (MDR) is an AT&T document completed from the point or site where Carrier Communications Space scrap is generated, itemizing the type of material, location address, and project information. A MDR shall be completed by the installation supplier prior to the removal of Carrier Communications Space material. The Installation Supplier shall place a copy of the initial shipping documents in the job folder and within three business days after pick up for those states requiring an initial copy (i.e., California, Arizona, Connecticut, Illinois, Maine, Michigan, Minnesota, New Hampshire, New York, Rhode Island, Vermont, and Wisconsin) send a copy of the initial shipping documents to the Resource Recovery Center (RRC) Record Keeper:

<table>
<thead>
<tr>
<th>AT&amp;T Facilities Outside California</th>
<th>AT&amp;T California Facilities:</th>
</tr>
</thead>
<tbody>
<tr>
<td>AT&amp;T Services Inc.</td>
<td>ATTN: RRC Record Keeper</td>
</tr>
<tr>
<td>ATTN: EH&amp;S Record Keeper RRC</td>
<td>P.O. Box 5095 Room 4W200i</td>
</tr>
<tr>
<td>One AT&amp;T WAY, Room 1A111C</td>
<td>San Ramon, CA 94583-0995</td>
</tr>
<tr>
<td>BEDMINSTER, NJ 07921</td>
<td>FAX (925) 973-0584</td>
</tr>
</tbody>
</table>
| FAX: (281) 664-5145               | **(If using internal distribution, use the address: 5001 Executive Park, Room 4W2001, San Ramon, CA 94583-0995)**
4.1.3 CALIFORNIA ONLY - In addition to mailing/faxing a copy of the shipping documentation as directed in section 4.1.2, in California, a copy of shipping documentation must be placed in the location’s Green Binder. The Installation Supplier shall provide a copy of the shipping documentation to the AT&T Representative or the location’s GNFO Manager for placement in the Green Binder.

4.1.4 The Installation Supplier shall keep such full and detailed records as shall be necessary to reflect the Services performed, including, when applicable, all testing, sampling and investigative Services performed by it. The Installation Supplier will create the shipping papers and associated documents (e.g., land bans, uniform manifests, bills of lading, and/or certificates of recycling or reclamation as appropriate) and shall send the documents to the RRC manager for review prior to removing such materials from AT&T Premises. If changes are necessary upon review, the responsible RRC Manager and the Installation Supplier will make the applicable changes to the document prior to removal. The Installation Supplier shall sign such documents on behalf of and as an agent of AT&T.

4.1.5 The Installation Supplier shall attempt to provide the final, completed shipping documents to AT&T (EH&S) RRC within 15 days after pick-up, and shall ensure that such documents are received by the AT&T (EH&S) RRC no later than 30 days after pick-up (RRC address in section 4.1.2).