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Appendix 3

BCI Market Assessment of Environmental Compliance Worksheet

Instructions for Assessment of Environmental Compliance Worksheet

1. Determine the current number of total new site builds and modification scopes in the market build plan. Enter this number into Row "A" of the worksheet.
2. Determine the number of sites that have not been released to Construction (i.e., those that have not yet attained 093/NTP). Enter this number into Row "B" of the worksheet.
3. Subtract "B" from "A" to determine number of sites released to Construction, and thus eligible for assessment. Enter this number into Row "C" of the worksheet.
4. Determine the number of sites assessed in previous market visits. Enter this number in Row "D."
5. Subtract "D" from "C" to determine number of sites eligible for the current assessment. Enter this number in Row "E" of the worksheet.
6. All sites determined to be eligible for the current assessment are to be checked for the following:
 - a. Properly completed and signed Release to Construction form (for modification scopes, this provision is applicable for sites released to construction after April 9, 2007 (the effective date of SAPP 1TP-X01G-00013-000- Env. Due Diligence/Regulatory Compliance SAPP); Form should be either in the market site file in hard copy, or in Documentum in electronic copy.
 - b. Complete NEPA documentation with no further recommendations; NEPA documentation will consist of one of the following:
 - i. New and replacement towers: NEPA Checklist Letter Report, including SHPO letter of concurrence with either a finding of "no effect" or "no adverse effect".
 - ii. Collocations within the Nationwide Programmatic Agreement (NPA): Tower Owner Self Certification/Compliance Statement or Collocation Exemption Letter, including Collocation Questionnaire completed and signed by facility owner/representative.
 - iii. Collocations outside the NPA: Section 106 Consultation Letter Report, completed either by the facility owner or Bechtel (after consultation with facility owner and customer).
 - iv. Modifications within the NPA: Bechtel self-screening questionnaire (release date: Summer 2007) or Tower Owner Self Certification/Compliance Statement or Growth Exclusion Letter (GEL)
 - v. Modifications outside the NPA: Section 106 Consultation Letter Report, completed either by the facility owner or Bechtel (after consultation with facility owner and customer).
 - c. Complete Phase I Environmental Site Assessment (ESA) documentation; Phase I ESA documentation is complete when one of the following is applicable:
 - i. The new or existing Phase I ESA contains no recommendations for further action.
 - ii. On a modification scope, if no environmental trigger activities are to be performed- no Phase I ESA required.
 - iii. The new or existing Phase I ESA contains recommendation(s) for Phase II ESA action, however a HazMat Disturbance Survey has determined that the Construction scope can be executed without disturbing the suspect material(s).
 - iv. The new or existing Phase I ESA contains recommendation(s) for Phase II ESA action, and a HazMat Disturbance Survey has determined that disturbance of the suspect material(s) during the execution of the Construction is unavoidable. In this instance, the site would only go forward upon notice from Bechtel's customer of one of the following:
 1. The customer performed Phase II ESA sampling, and the Phase II ESA samples did not indicate the presence of contamination;
 2. The customer performed Phase II ESA sampling, confirmed the contamination was present, and has completed abatement/remediation of the site such that the construction scope can now be performed without release of the suspect material(s) in question. This is documented with an "abatement release" letter and supporting documentation from Bechtel's customer;
 3. The customer proceeded directly to and completed abatement/remediation of the site such that the construction scope can now be performed without release of the suspect material(s) in question. This is documented with an "abatement release" letter from Bechtel's customer.
7. Upon completion of the activities outlined in Item 6 above, the BCI Market Assessment of Environmental Compliance Worksheet will be completed and signed.

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8. Copies of the completed worksheet should be provided to the Market Manager, Market Site Acquisition Lead, Regional ES&H Manager, and Project Environmental Lead (PEL). The person completing the assessment should retain a copy, and the original should be sent to the BCI Environmental Services Manager (ESM).
9. When action items are noted during an assessment, the PEL will work with the Market Manager and Market Site Acquisition Lead to bring outstanding issues to resolution.
10. The PEL will compile assessment results and report out to Program Management and the ESM.
11. The ESM will compile program data and provide monthly to the BCI ES&H Manager.
12. Environmental market assessment scores will be reported in the monthly regional safety performance reports.

PROGRAM:

MARKET OFFICE:

DATE:

BCI Market Assessment of Environmental Compliance—Worksheet

Item	Description	Number	Comments
A	Overall Total Sites ¹		
B	Sites w/o 093 or NTP ²		
C	Total Sites w/ Construction Started (A-B)		
D	Total Sites Previously Assessed		
E	Total Sites Eligible for Current Assessment (C-D)		
F	Sites Lacking NEPA Documentation		
G	SITES LACKING PHASE I ESA DOCUMENTATION		
H	Sites Needing Phase II or Abatement Work		
I	Sites verified as having no issues		

Notes:

1. For purposes of this review, all new site builds and modification scopes in the market's current year build plan are to be reviewed, less any sites previously reviewed. This number includes all new site builds and modifications released to Construction (actual milestone 093/NTP) since the previous assessment.
2. Sites without actual 093/NTP achieved represents sites that have not currently been released to Construction.

Additional Comments:

Completed by (Name):

Title: