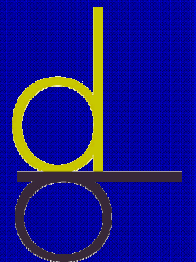


In the Matter of:
Tentative Cleanup and Abatement
Order No. R9-2011-0001

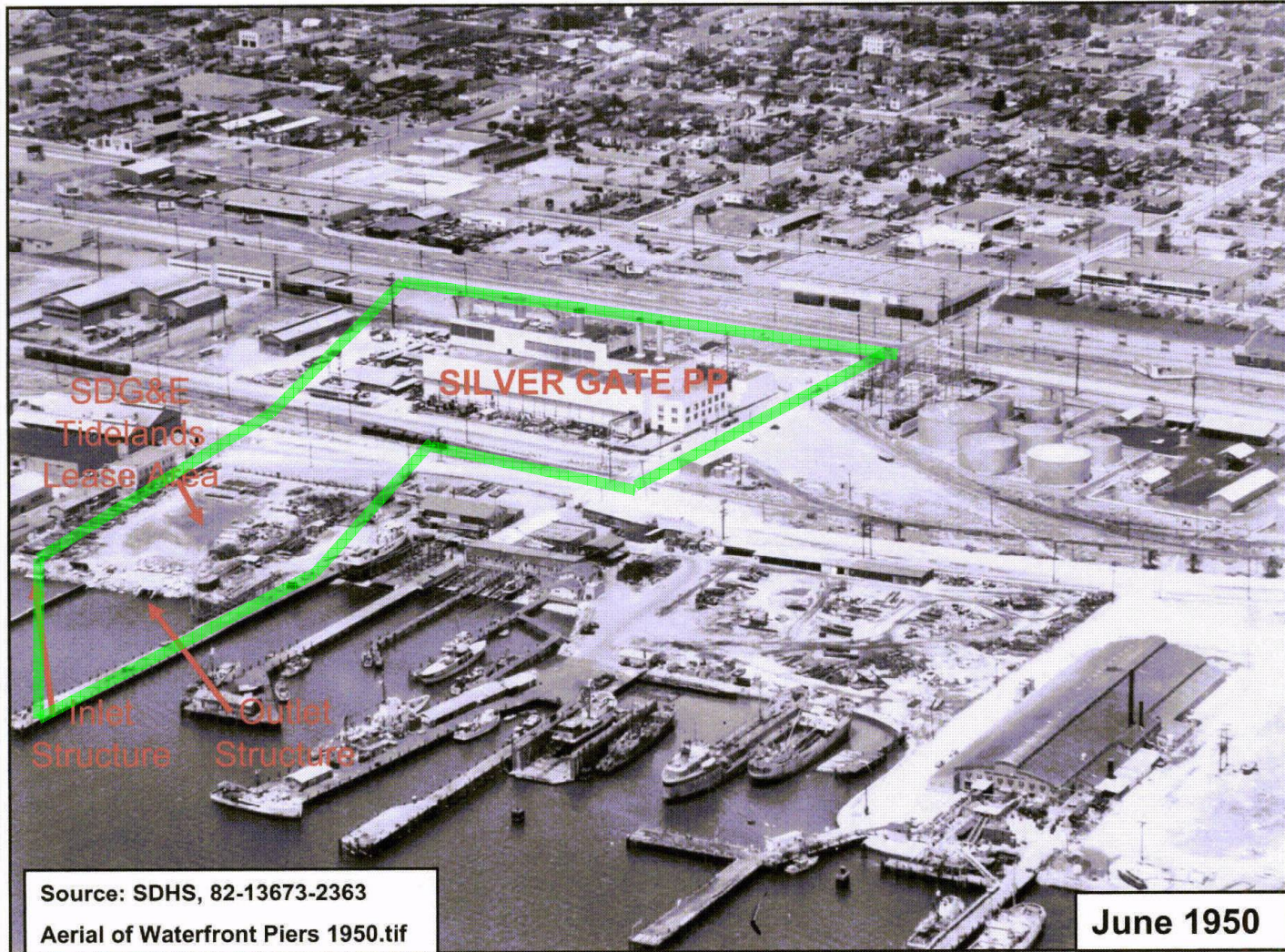
November 9, 14, 15, 16
Downey Brand LLP



Overview – SDG&E as Discharger

- Introduction
- Silver Gate Plant Overview
- Sources and Pathways of PCB's/COC's
- Conclusion

Orientation and Operational History



SAR193370

COC Sources and Pathways - Plant

- Plant Housed PCB Containing Equipment
- Plant Wastewater Discharged Through Cooling Water Tunnels
- Plant Wastewater Discharged to Unlined Ponds and Oil-Water Separators

COC Sources and Pathways - Plant

File Number:
03-0284-0518

3.4.5 Basement Bilge Water

Basement bilge water consisted of liquids that accumulated in trenches in the plant basement. The WWTP manual (SDG&E, 1978) lists the following waste sources: “turbine drains, boiler drains, condenser drain pump drains, cooling water supply drains, water box drains, service air compressor drains, fire pump drains, relief valve drains, condensate storage and overflow and condensate makeup pump drains.” The basement bilge system was divided into two areas, the turbine side and the boiler side. Diagrams from 1965 show that bilge water from the turbine side was piped into the discharge cooling water tunnels, and the bilge water from the boiler side was pumped, via an 8 inch diameter pipeline, to an “oil-water separating pond” located on Parcel 2, referred to as “Nobles Lake”, which was used for evaporation and settling.

ENV
AMERICA

SAR193272

ENV
AMERICA

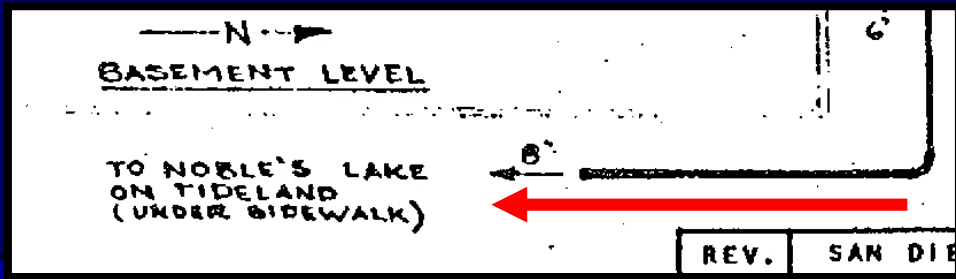
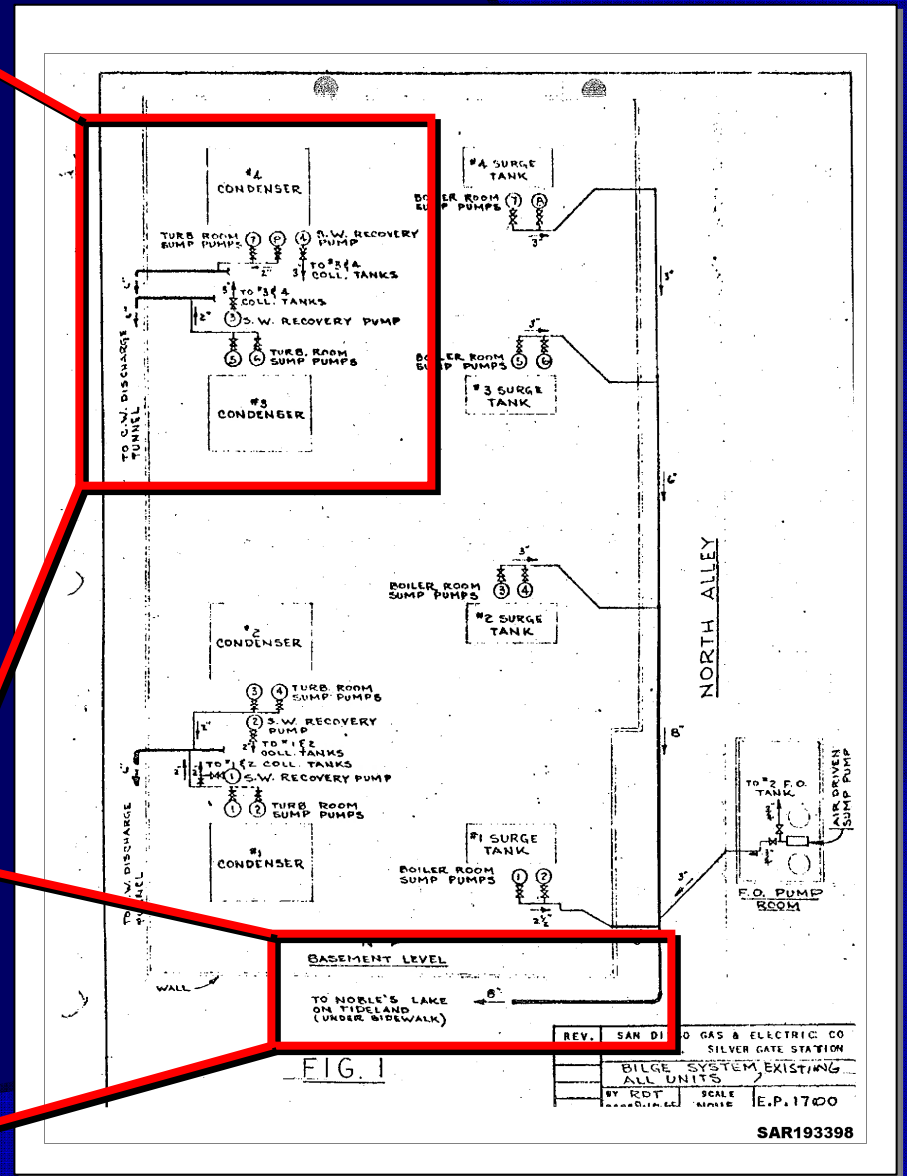
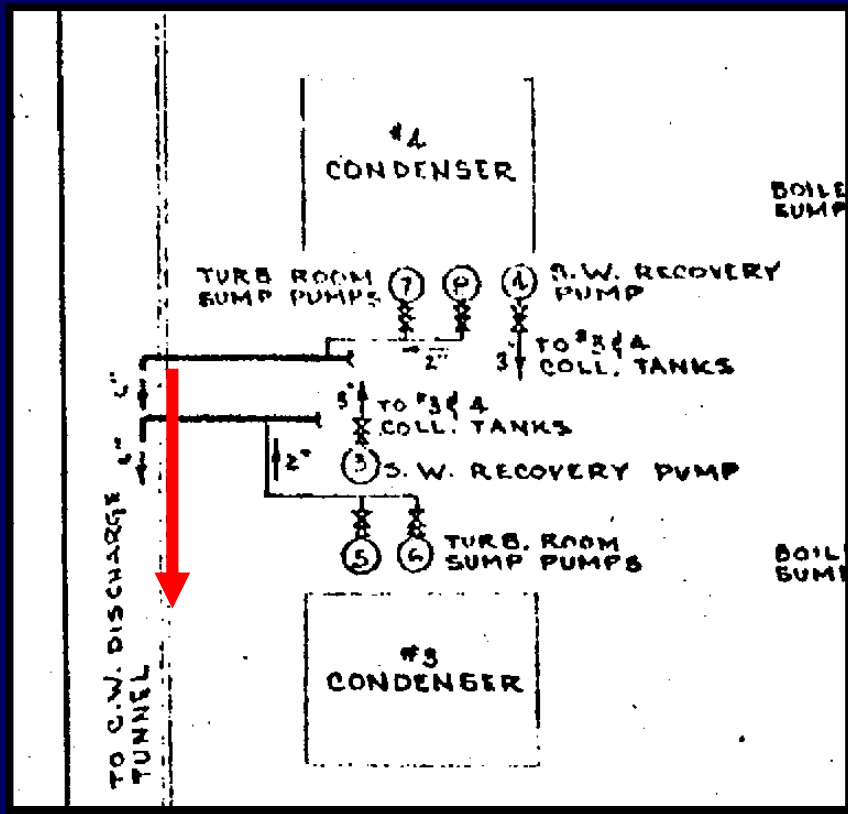
12

Report for R9-2004-0026
Silver Gate
July 14, 2004

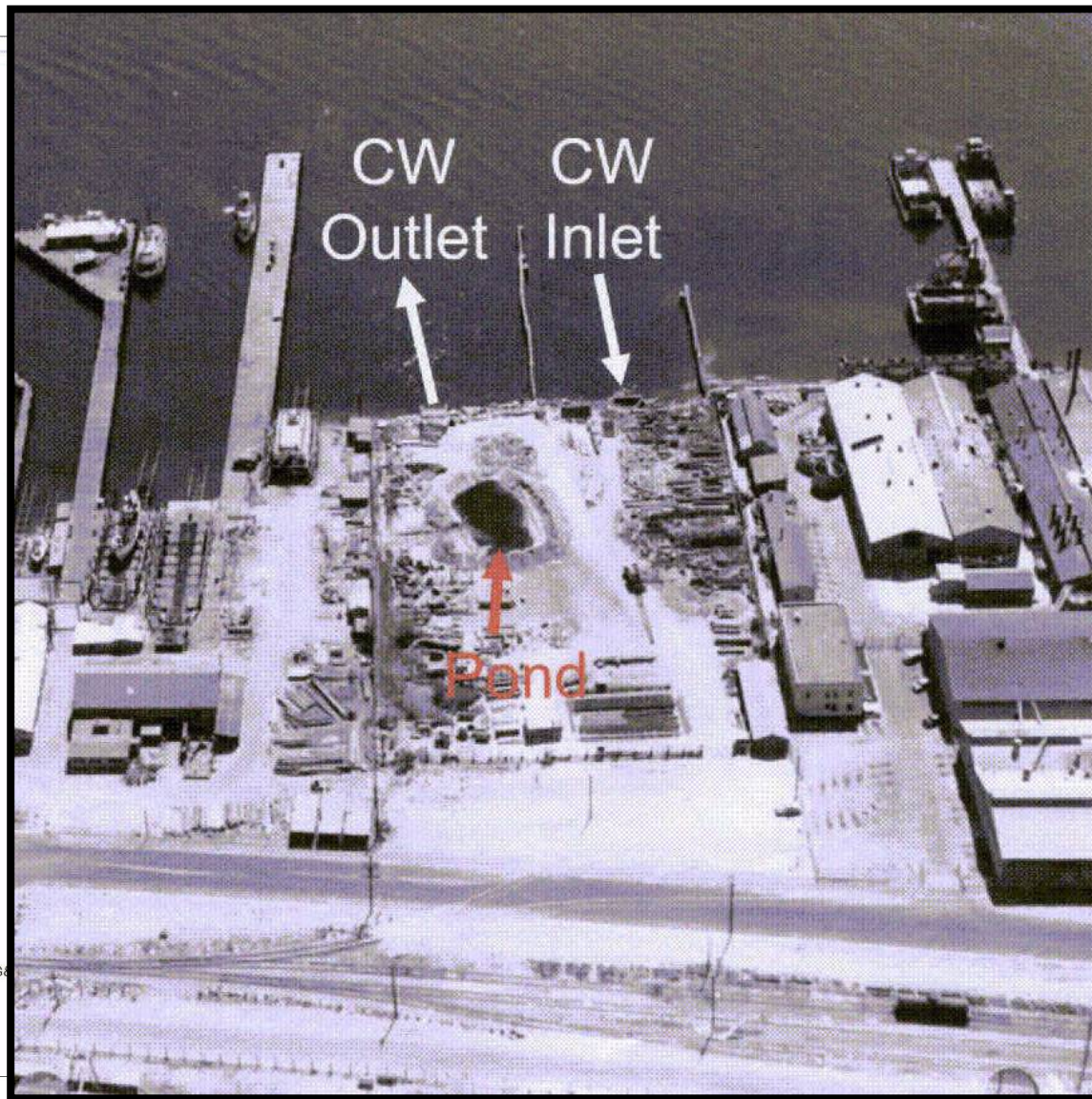
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SAR193289

COC Sources and Pathways - Plant



COC Sources and Pathways - Plant



SAR193375

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COC Sources and Pathways - Tidelands

- Tidelands Housed Unlined Ponds
- Tidelands Housed Oil-Water Separators
- Untreated Wastewater Discharged to Ponds
- Ponds Overflowed
- Ponds Discharged Directly to Bay

COC Sources and Pathways - Tidelands

SILVER GATE STATION

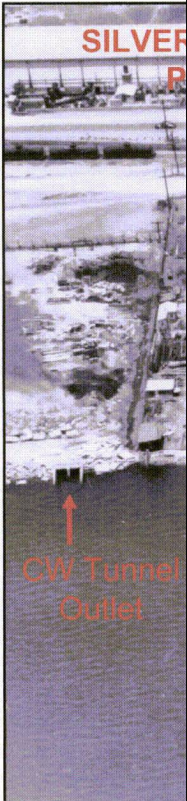
May 1, 1950

Mr. M. Hjalmarson,
Supt. Construction

In a recent survey of Unit #3 construction, the following items were noted:

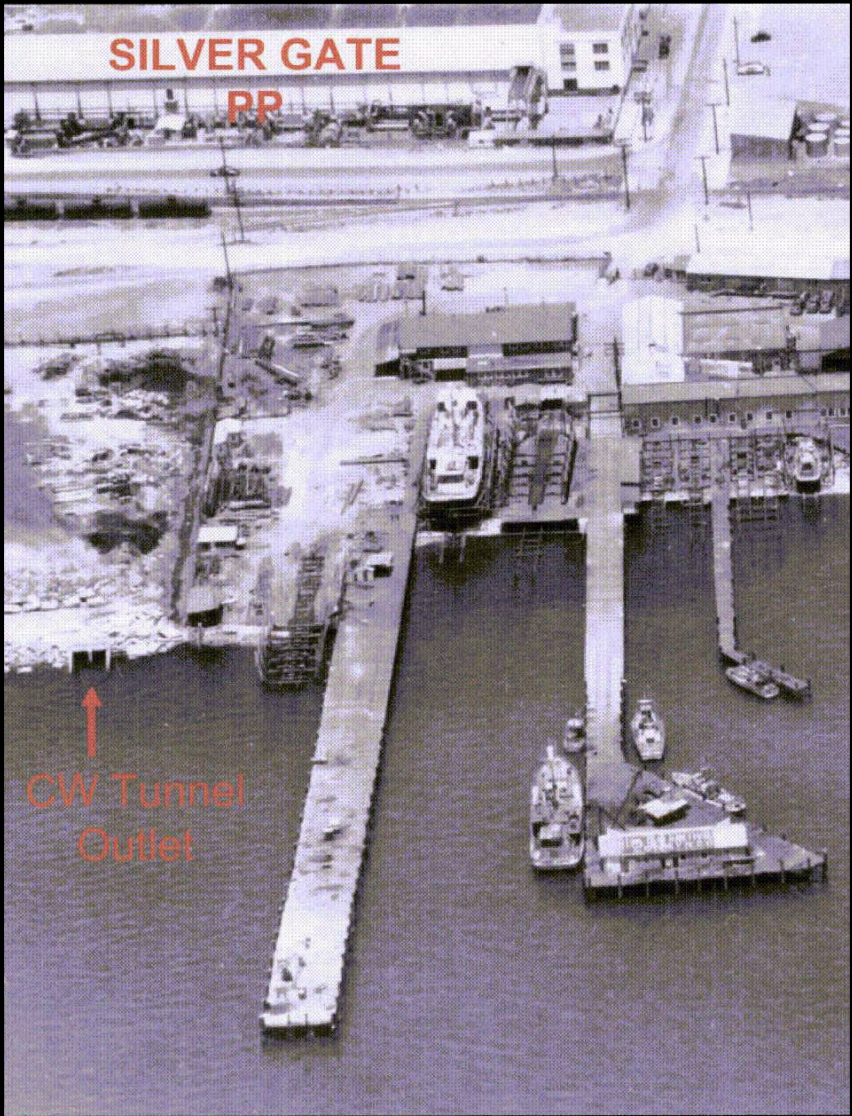
1. It is noted that our water disposal lake on the tide lands has been overflowing, and a ditch has been cut to the water's edge. This cannot be permitted, because oil would thereby be admitted to the bay and our company would be subject to a heavy fine by the Fish and Game Commission. It may be necessary to throw up a dike around the lake for the time being, or to take a clam shell and dig out additional space for the water's discharge.

COC Sources and Pathways - Tidelands



Source: SDHS, 82-13673-2308 Aerial of Waterfront June 1950.tif

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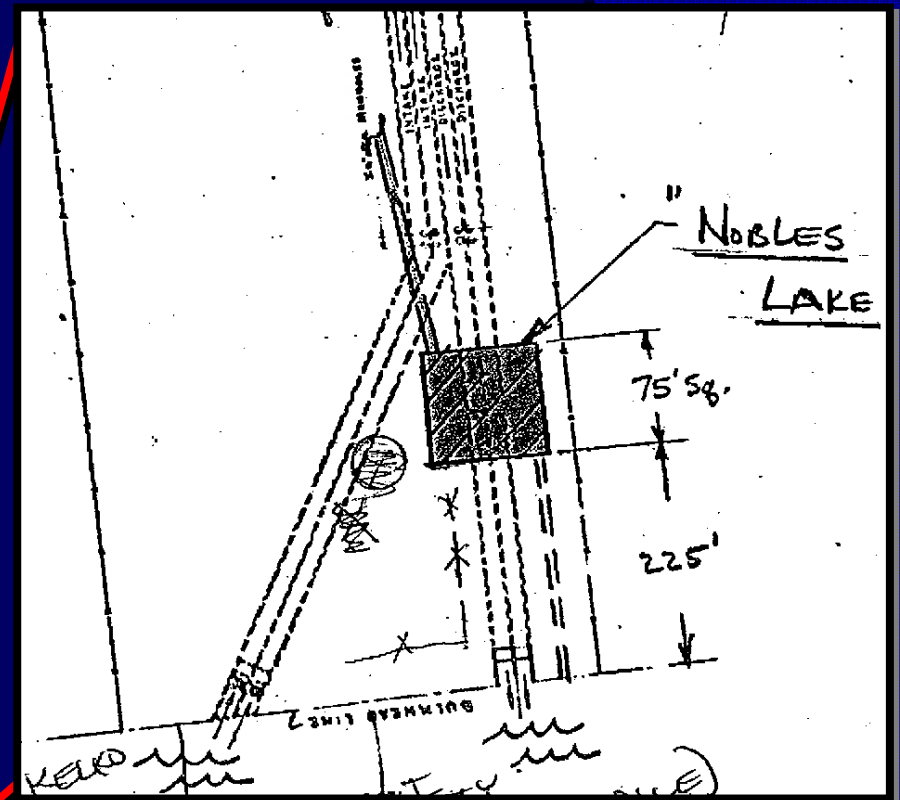
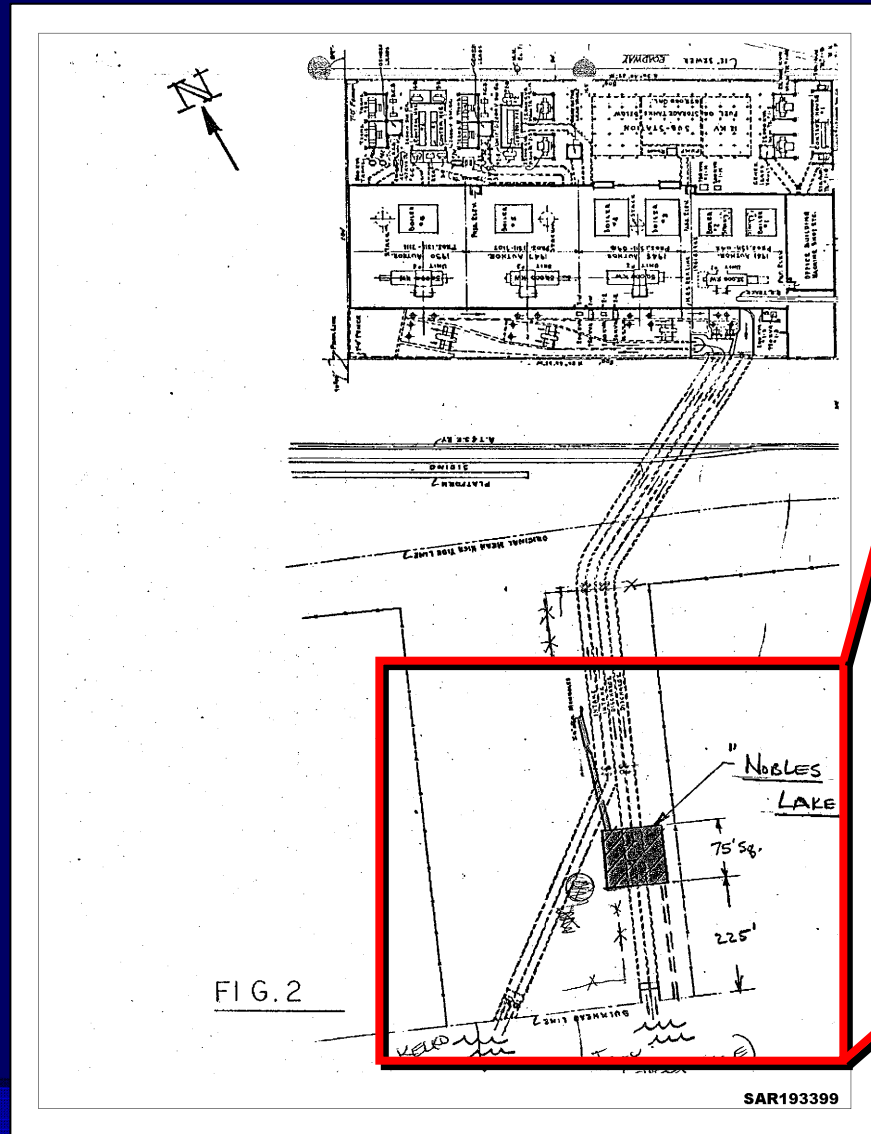
Source: SDHS, 82-13673-2308 Aerial of Waterfront June 1950.tif



June 1950

SAR193371

COC Sources and Pathways - Tidelands



COC Sources and Pathways - Tidelands



#4 of 6 6-23-55
"Noble's Lake" after having
muck removed. Sump at right
in same condition as before
cleaning. Removed material
placed in hole to left.

ng
ght
le
al

Source: SDG&E

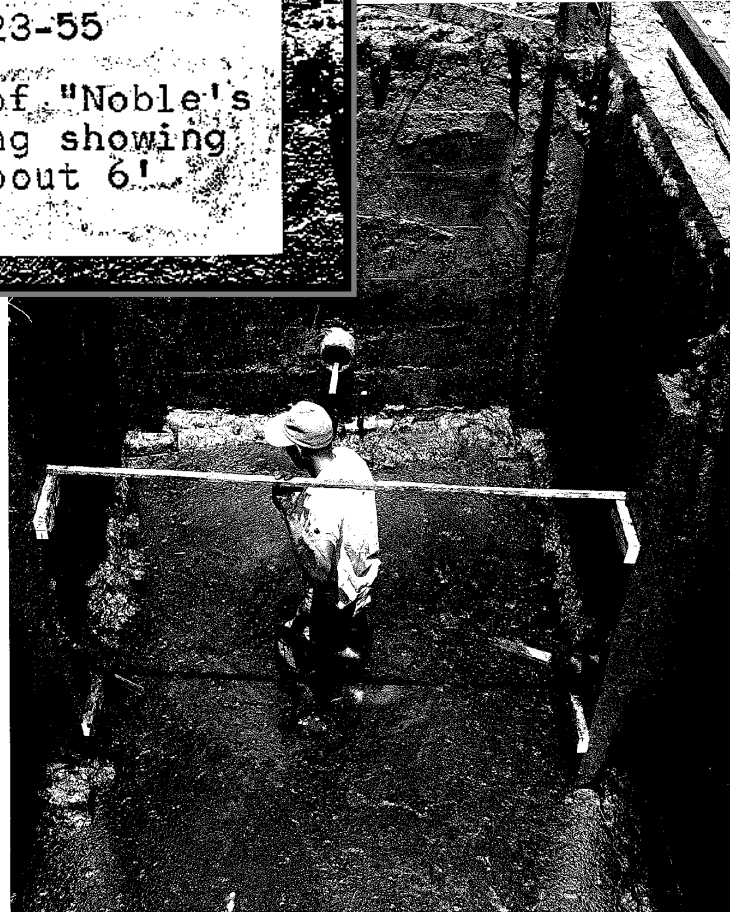
June 23, 1955

SAR193577

COC Sources and Pathways - Tidelands

#5 of 6 6-23-55

Inlet (north) end of "Noble's Lake" after cleaning showing 8" CI inlet line about 6' below top edge.



Source: SDG&E

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June 23, 1955

SAR193578

COC Sources and Pathways - Tidelands

SAN DIEGO GAS & ELECTRIC COMPANY

INTERNAL
FORM 118-61438

FROM
TO
SUBJECT

SAN DIEGO GAS & ELECTRIC COMPANY

INTERNAL CORRESPONDENCE

FORM 118-61438

1.0

FROM A. W. Hovland

DATE September 10, 1974

TO M. J. Horna

FILE NUMBER EPE 000

SUBJECT Proposed Bilge System Revision for Oil Spill Prevention
at Silver Gate

The nature of this memo is to review both of the above comments

2
Nobles Lake is filled to the brim and is at least 11 feet deep with a mixture of oil and earth. It is no longer an acceptable settling pond. It is not desirable to pump any additional bilge water to it.

SAR193394

SAR193395

COC Sources and Pathways - Switchyard

- Switchyard Housed PCB Containing Equipment
- Equipment Leaked
- Switchyard Stormwater Discharged to MS4

COC Sources and Pathways - Switchyard

SAN DIEGO GAS & ELECTRIC COMPANY
INTERNAL CORRESPONDENCE
15414C

FEB 000
8-5-2
(IMP - SG)

DATE May 14, 1981

On April 7, 1981, Electric Construction and Maintenance (ECM) were notified by Brian Heramb, Safety Representative, that PCB fluid was leaking from transformers located at Silver Gate Power Plant. An ECM crew, consisting of Don Swinney and others, soon met with Heramb and Don Darbonne, Silver Gate Foreman.

The transformer leaks were pointed out to the ECM crew at this time, but to date no action has been taken by ECM to clean up the spill and recommend necessary repairs.

GilConnelly

MAY 14 1981

SDG&E020718

COC Sources and Pathways - Switchyard

DATE 2/11/83

DAILY PCB INSPECTION REPORT

PCB EQUIPMENT: #1 S. Load trans. LOCATION: Silver Gate West. 2978783

DATE OF INSPECTION: 2/11/83

DATE OF LEAK DISCOVERY: 11/22/82

NAME OF INSPECTOR: R. Manes

ESTIMATE OF FLUID LEAKED: Medium leak at sample valve and small leak at the small drain valve

DATE OF CLEAN-UP(S), CONTAINMENT, OR REPAIR PERFORMED: No action taken

DESCRIPTION OF CLEAN-UP, CONTAINMENT, OR REPAIR PERFORMED: None

RESULTS OF ANY CONTAINMENT AND DAILY INSPECTION FOR UNCORRECTED ACTIVE LEAKS: No action taken

COC Sources and Pathways - Switchyard

INSPECTION REPORT

INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 9
TOXICS AND WASTE MANAGEMENT DIVISION
FIELD OPERATIONS BRANCH

Purpose: TSCA §6 PCB Investigation

Facility: San Diego Gas & Electric Silvergate Power Plant
1348 Sampson Street
San Diego, CA 92113

FPA ID Number: CAT000618934

Report Number: T(87)E043

Dates of Investigation: 5 February 1987

SDG&E027986

COC Sources and Pathways - Switchyard

Page No. 1

| | YES | NO | N.A. | |
|---|-------------------------------------|-------------------------------------|--------------------------|---|
| §761.65 | | <input checked="" type="checkbox"/> | | |
| (a) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | All PCB Articles or Containers placed in storage for disposal after 1/1/83 were disposed of within 1 year from the date they were first placed into storage. |
| §761.65(b)(1) The storage for disposal area met the following criteria: | | | | |
| (i) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Adequate roof and walls to prevent rain water from reaching stored PCBs/PCB Items. |
| (ii) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Adequate floor with a minimum 6 inch high continuous curb, providing a containment volume of at least twice the internal volume of the largest Article/Container stored therein, or 25% of the total internal volume of all Articles/Containers stored therein, whichever is greater. |
| (iii) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No floor openings of any kind that would permit liquids to flow from the curbed area. |
| (iv) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Floors and curbing constructed of smooth and impervious materials. |
| (v) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Not located at a site that is below the 100-year flood water elevation. |
| §761.65(c) | | | | |
| (3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The storage area was marked with M ₁ . |
| (4) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All contaminated moveable equipment used for handling stored PCBs/PCB Items was kept within the PCB storage area. |
| (5) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The facility inspects all stored PCB Articles/Containers for leaks at least once every 30 days. |
| (5) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | All leaking PCB Articles/Containers were immediately transferred to marked (M ₂) non-leaking containers. |
| (5) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Spilled or leaked materials were immediately cleaned up. |
| (8) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Facility had noted on all PCB Articles and Containers the date when each Item was placed into storage. |
| (8) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | PCB Articles and Containers were managed so that they could be located by the date they were placed into storage. |

SDG&E027998

Summary and Conclusion

- 40 Plus Year Operational History
- Multiple COC (PCB) Sources
- Multiple Pathways to the Bay
- Substantial Evidence
- SDG&E Properly Named as Discharger

In the Matter of:
Tentative Cleanup and Abatement
Order No. R9-2011-0001

November 9, 14 – 16
Downey Brand LLP

