Exhibit 19

Demonstrative Exhibits Summary

Evidence	Shipyard	SDG&E
COC Use	☑ Substantial documented evidence	☑ Substantial documented evidence
Environmental Pathways	Direct releases to/directly adjacent to Bay ☑ Paint and sandblast material ☑ Runoff ☑ Waste disposal ☑ Direct releases	Direct releases to Bay ☑ Cooling water Indirect/incomplete pathways ☐ Tidelands ponds ☐ CB-1 ☐ Substation runoff to Sampson St.
High Magnitude of COC Mass Releases	☑ Substantial evidence	☐ No evidence
Corresponding Site-specific Chemistry Data	Strong evidence indicating shipyard source ☑ Concentrations in source areas (shipways) higher than sediment ☑ Logical concentration gradient leading to source areas ☑ Chemical fingerprint match	Strong evidence indicating <u>absence of source</u> ☐ Concentrations in source areas and along transport pathways lower than sediment ☐ Lack of logical concentration gradient leading to source areas ☐ Chemical fingerprint mis-match

☑ = Evidence supporting condition of pollution or nuisance

Exhibit 1a

Shipyard COC Sources

Sandblast Material and Paint [1]
- Marine railways
- Sandblasting and painting areas

Fluids (functional fluids, oils, and dielectric fluids) [2]
- Equipment in marine railways and other locations such as machine shops located on piers (over water)
- Electrical infrastructure (transformers, liquid-filled cables)

Ship-related Sources [3]
- Ship solid materials released during repair in marine railways
- Ship bilge waters released in railways and adjacent to piers.
- Leaching of COCs from ship paints.
- Sandblasting and painting areas

Creosote in Marine Piers and Structures [4]

Soil

Stormwater Discharge Via SW01-SW03 and SW05-SW08

&

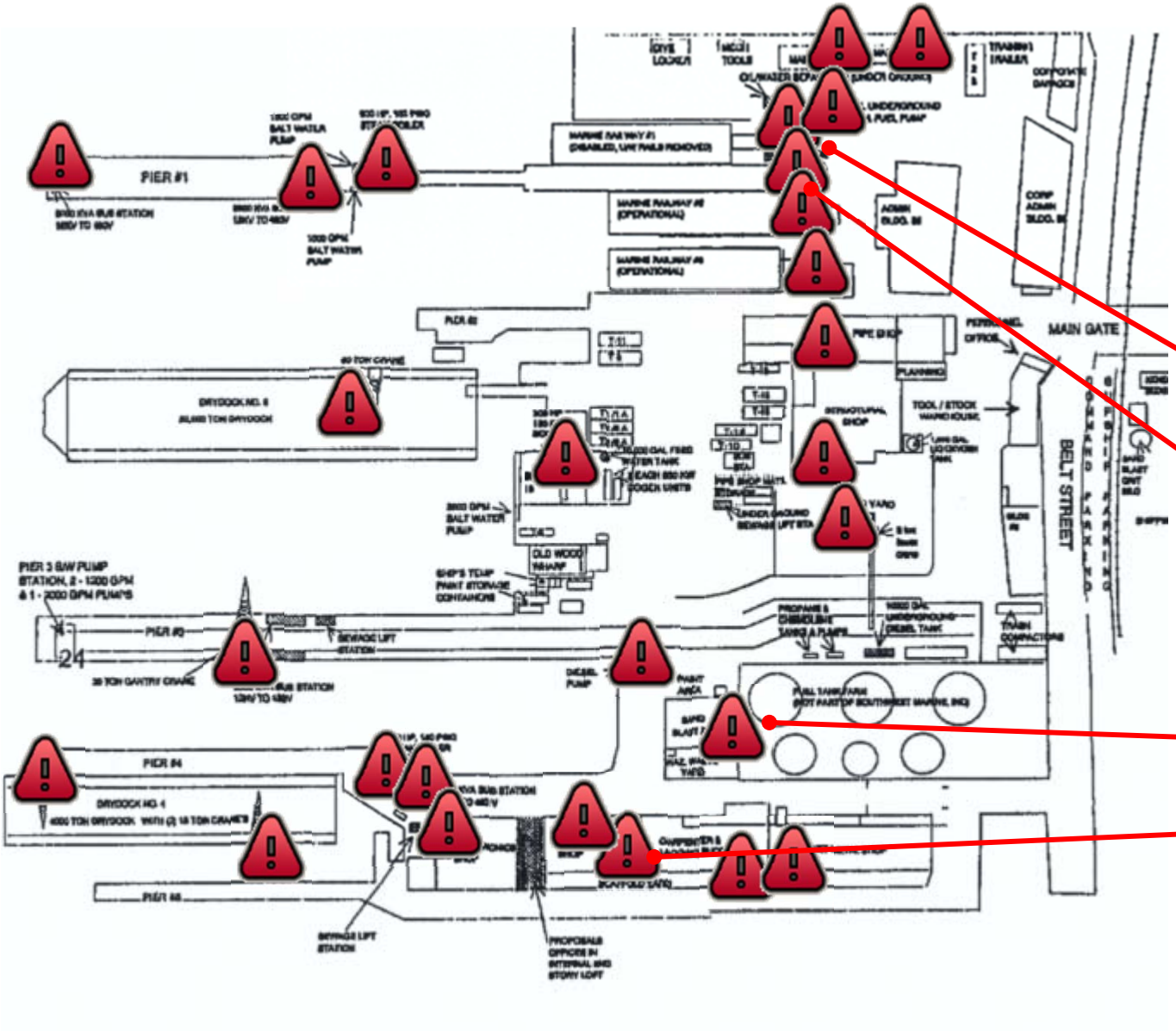
Direct Discharge to SW4

San Diego Bay

COCs Associated with Shipyard Sources:
1. PCBs, TBT, Copper, and Mercury.
2. PCBs, HPAHs.
3. PCBs, TBT, Copper, Mercury, and HPAHs.
4. HPAHs.

Exhibit 1b

Shipyard COC Sources



Active primary sources associated with shipyard features:

Oil-water separator

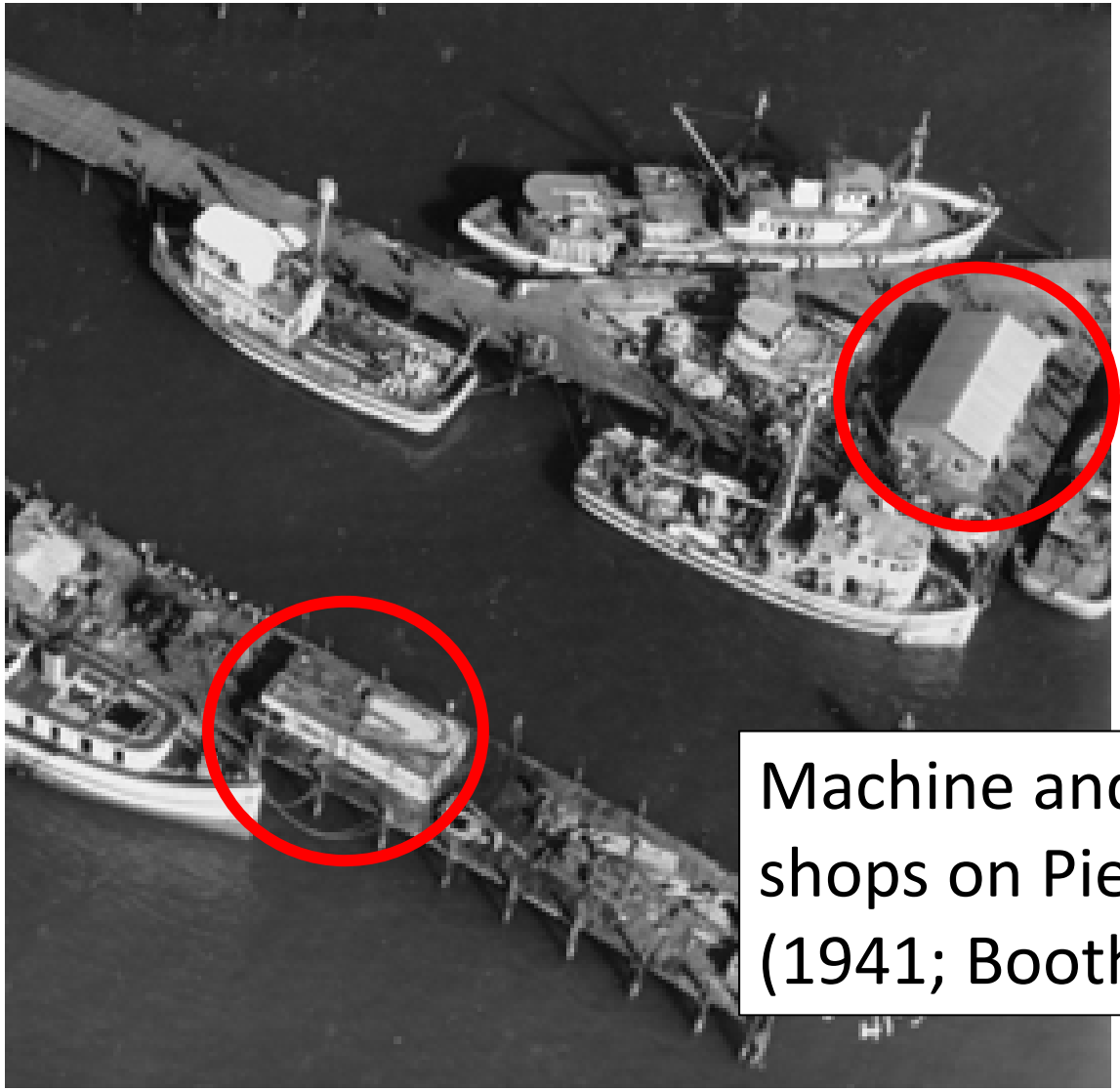
Wenches or other sources associated with shipways

Sandblasting Area

Building 40.3 Electrical Transformer

Exhibit 1c

Shipyard COC Sources



Machine and electrical shops on Piers 1 & 2 (1941; Booth et al., 2004)

Exhibit 1d

Shipyard COC Sources

55-gallon drums located adjacent to water on Pier 1 (1941; Booth et al., 2004)

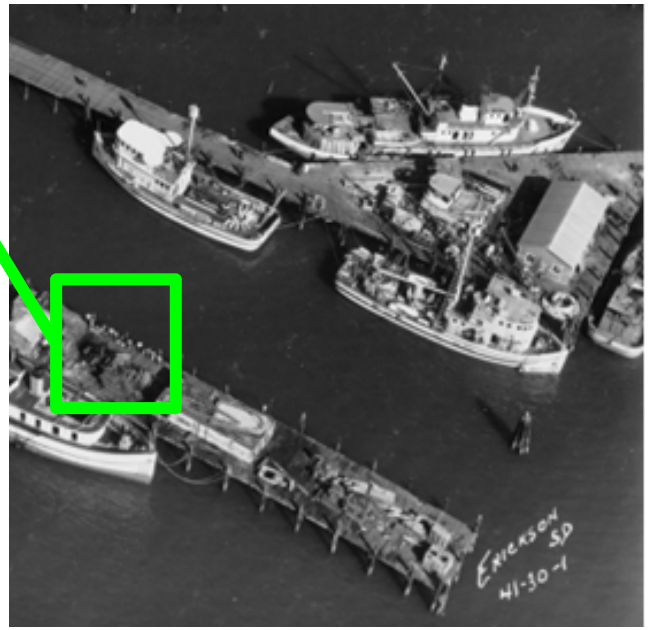


Exhibit 1e

Shipyard COC Sources

Wastes in Pier 1 shipways
(1998; Moser, 1998).

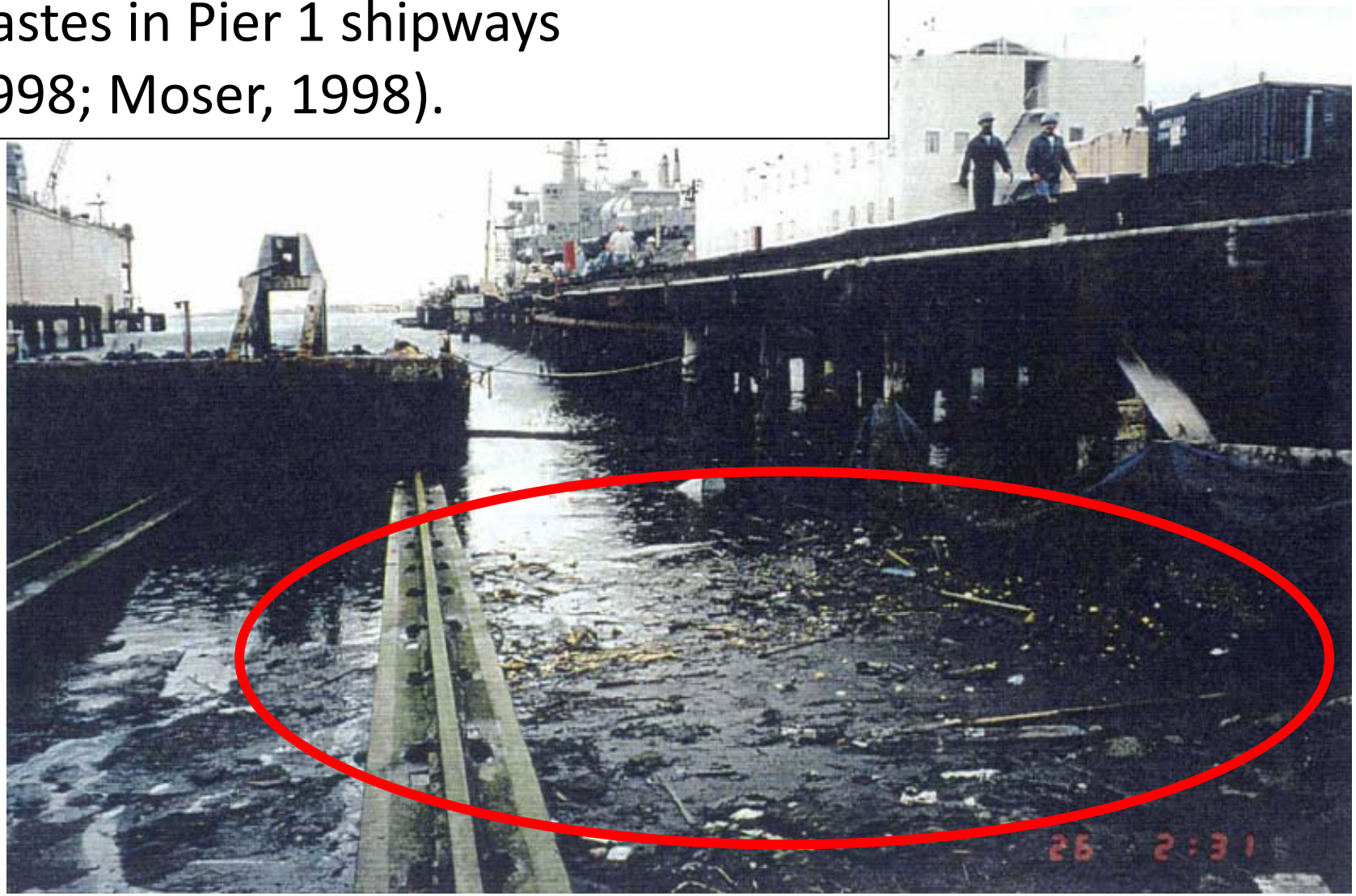


Exhibit 2

Shipyard PCB Uses and Sources

Shipyard Features	PCB Sources (OPEN system sources highlighted in yellow)				
	Hydraulic Fluid	Cutting / Machine Oils	Dielectric Fluid	Paint and Sand-blasting	Shipbuilding and Repair Materials
Repair Stations on Shipways	●	●	●	●	●
Stormwater outfalls	●	●	●	●	●
Cranes, Winches, Pumps, and Hydraulics	●	●			
Boiler, Steam Sheds, and Compressors	●	●			
Electric Saw, Electric Shops, Electric Sheds, Electrical Parts and Storage, Machine Shops, Welding Shops	●	●	●		●
Paint Shop, Paint Storage				●	
General Storage, Warehouses, Storage Tanks	●	●	●	●	●
Lumber and Woodworking Sheds	●	●			
Transformers and electrical infrastructure			●		

Active primary sources associated with shipyard features: ●

Exhibit 3

Widespread Shipyard PCB Use in Marine Paint

- 1971 inventory of pervasive use of PCBs in shipyard marine paint in Southern California, including San Diego (Young and Heesen, 1974)

Exhibit 4

Shipyard Marine Paints

Direct Releases of Paint to Shipyard Site Sediment

- Circa 1971, CRWQCB estimated that 5-10% of sandblasting material discharged to San Diego Shipyard Site, a mass of **~200-300 tons annually** (CRWQCB, 1972)
- During spray painting of ships in San Diego shipyards, 5-30% of paint is lost to the environment (USEPA, 1974)

Exhibit 5

SWM/BAE Sandblast and Paint Wastes Contaminated Surrounding Areas

- Internal memo from CRWQCB (1991, provided in Booth, 2004)
  - "sand blasting dust was observed on the ground at Chevron"
  - "dust from sand blasting operations at Southwest [Marine] is continually observed coming over the fence."
  - "a 'haze' over the sand blasting areas was obvious"
  - "Southwest [Marine] is causing a nuisance at Chevron and discharging sand blast dust to San Diego Bay…"
  - "TBT could be directly attributable to Southwest Marine's operations"

INTERNAL MEMORANDUM

TO: DTB/RS/BWP/DSJ DATE:4/29/91
FROM:CLS

SUBJECT: APPARENT VIOLATIONS OF SOUTHWEST MARINE'S NPDES PERMIT

While at Chevron's Tank Farm, located adjacent to Southwest Marine, sand blasting dust was observed on the ground at Chevron. The dust from sand blasting operations at Southwest is continually observed coming over the fence. A "haze" over the sand blasting area was obvious. When Chevron initiates stormwater sampling, it is most likely that analytical results will show high concentrations of metals and TBT unless the ground at Chevron is frequently swept.

Southwest is causing a nuisance at Chevron and discharging sand blast dust to San Diego Bay through Chevron's storm drain system. If Southwest can't control their sand blast dust, maybe they should be required to sweep Chevron's property after each sand blasting operation.

Chevron has a three-stage clarifier for runoff. It might be interesting to sample the clarifier sediments for metals and TBT. The TBT could be directly attributable to Southwest Marine's operations.

file: Southwest Marine 03-137.01
Chevron, San Diego Marine Terminal 10-245.01

Exhibit 6

SWM/BAE's Consultant Acknowledges PCB Source Attributable to Marine Railways

- "From [the beginning of San Diego Marine Construction Corporation's use of the site] through to the mid 1970s, **sandblast and paint wastes were discharged directly to the Bay** from upland and drydock areas (SWM/BAE reports: Woodward Clyde, 1995; Anchor, 2005)

contract work in the blasting area (3). Dust suppression system for blasting house consisted of blowers directed at the bay with a water spray to cause the blast dust to settle in the water (4). All wastes generated on the dry dock including blast grit, paint, etc. were discharged into the Bay (5).

Woodward Clyde (1995)

were deposited in recent industrial times in the vicinity of the marine railway. The nature of the elevated chemical concentrations (metals and PCBs) is consistent with past industrial uses of the marine railways (repair, maintenance, and sandblasting). Therefore, the potential sources of waste constituent discharges at the project site appear to be, overall, primarily confined to historical ship repair and maintenance activities.

Anchor (2005)

Exhibit 7a

Ubiquitous Oil Saturation Noted in SWM/BAE Shipways During Marine Railways Removal (1998)

Daily Log- Observations/ Turbidity Monitoring
Southwest Marine- Marine Railway Removal Project, Ways 1 & Ways 2/3

Date: 8-18 98

Observer: [illegible]

Weather: clear, sunny, wind SW @ 5 k

Observations:

	ways 1 time: [illegible]	ways 2/3 time: [illegible]	Comments
1) Appearance of oil or other materials of petroleum origin	(yes)/no minor [illegible] layer w/ some [illegible]	(yes)/no	Thin oil/water "mousse" layer or oil sheen [illegible] corner of ways 2/3. Retrieved during excavation of E2-4
2) Discoloration and extent of any visible turbidity plume	none/(minor)/significant Some visible [illegible] 0-5' off [illegible] @ (1330)	none/(minor)/significant [illegible]	Some additional [illegible] (weighting down silt curtain) @ [illegible] - where [illegible] runs [illegible] pier (south west facing) - Repaired [illegible] 8-18-98 ~1300-1400
3) Condition of silt curtain, and any turbidity	good/(poor)/unacceptable [illegible] @ low tide	(good/poor)/unacceptable [illegible] small hole (~1") w/ 6 [illegible]	See comment 2 above
4) Odors	none/minor/significant v. minor - during excavation.	none/minor/significant v. minor - during excavation	

Turbidity Monitoring:

	Station A (@ 0-10 feet) time: 1304	Station B (@ >50 feet) time:	Difference (Sta A- Sta B)	Difference less than 20%?
Turbidity Units (feet)	Bottom was @ ~1 ft clearly visible	Bottom was @ 2-3 ft - clearly visible	ø	(yes)/no- If no, halt dredging operations, see note.

Comments: A Secchi Disc will be used for turbidity measurements. Station A will be inside any visual plume if possible.
Note: If the turbidity at Station A increases more than 20% over the turbidity of Station B, the dredging operations shall be suspended and appropriate measures taken. These include notifying the Regional Board Executive Officer and implementing remedial measures.

Exhibit 7b

Ubiquitous Oil Saturation Noted in SWM/BAE Shipways During Marine Railways Removal (1998)

Daily Log- Observations/ Turbidity Monitoring
Southwest Marine- Marine Railway Removal Project, Ways 1 & Ways 2/3

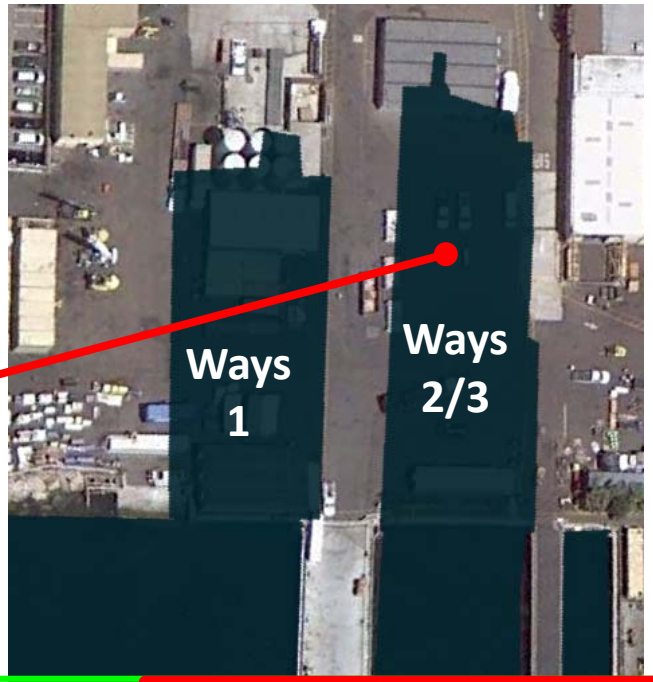
Date: 8-18-98

Observer: [illegible]

Weather: [illegible]

Observations:

	ways 1 time: [illegible]	ways 2/3 time: [illegible]	Comments
1) Appearance of oil or other materials of petroleum origin	(yes)/no	(yes)/no	THIN OIL/WATER "MOUSSE" LAYER OF OIL SHEEN WIND-DEPOSITED ON NW CORNER OF WAYS 2/3. REMOVED DURING EXCAVATION OF E2-4
2) Discoloration and extent of any visible turbidity plume	none/minor/significant	none/minor/significant	
4) Odor	none/minor/significant	none/minor/significant	

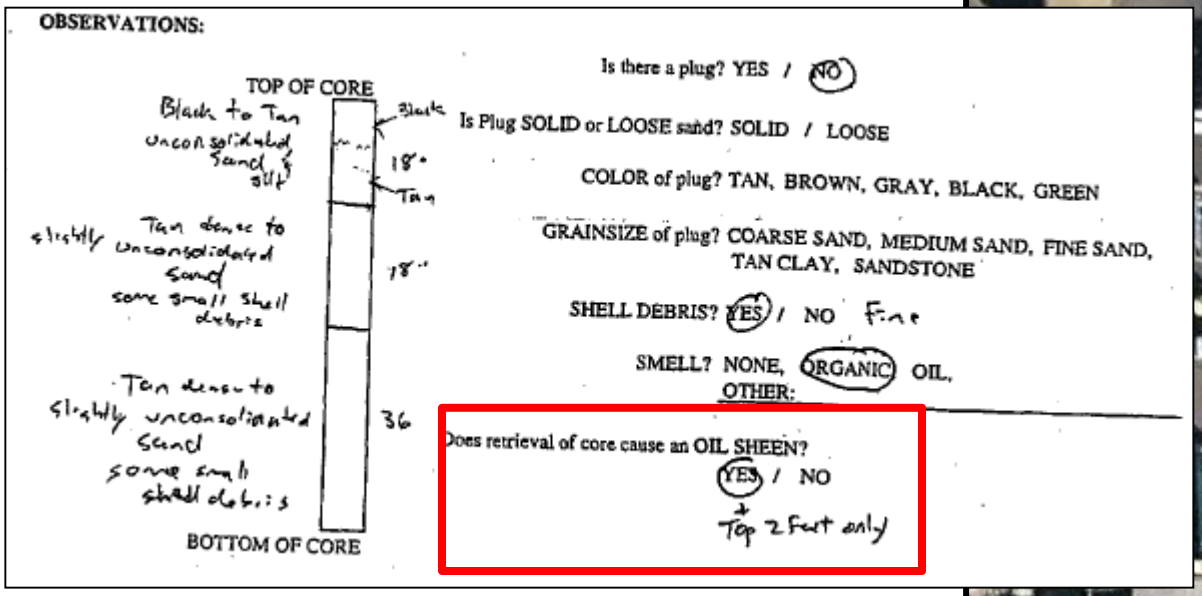


1) Appearance of oil or other materials of petroleum origin	(yes)/no	(yes)/no	THIN OIL/WATER "MOUSSE" LAYER OF OIL SHEEN WIND-DEPOSITED ON NW CORNER OF WAYS 2/3. REMOVED DURING EXCAVATION OF E2-4

THIN OIL/WATER "MOUSSE" LAYER OF OIL SHEEN WIND-DEPOSITED ON NW CORNER OF WAYS 2/3. REMOVED DURING EXCAVATION OF E2-4

Exhibit 8

Extensive Oil Saturation in Shipways Migrated to Bay



OBSERVATIONS:

TOP OF CORE

Black to Tan unconsolidated Sand & silt

18"

Tan dense to slightly unconsolidated Sand some small shell debris

18"

Tan dense to slightly unconsolidated Sand some small shell debris

36

BOTTOM OF CORE

Is there a plug? YES / NO

Is Plug SOLID or LOOSE sand? SOLID / LOOSE

COLOR of plug? TAN, BROWN, GRAY, BLACK, GREEN

GRAINSIZE of plug? COARSE SAND, MEDIUM SAND, FINE SAND, TAN CLAY, SANDSTONE

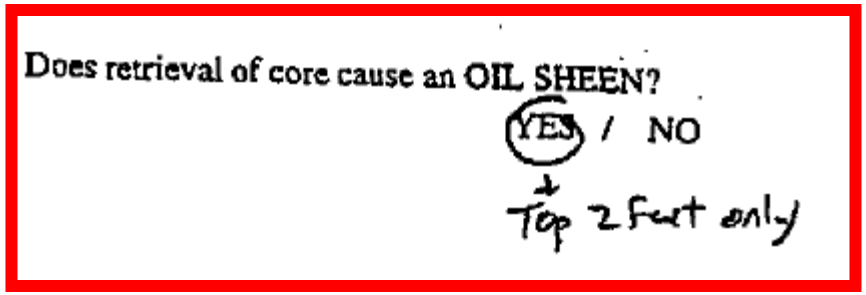
SHELL DEBRIS? YES / NO Fine

SMELL? NONE, ORGANIC OIL, OTHER:

Does retrieval of core cause an OIL SHEEN?

YES / NO

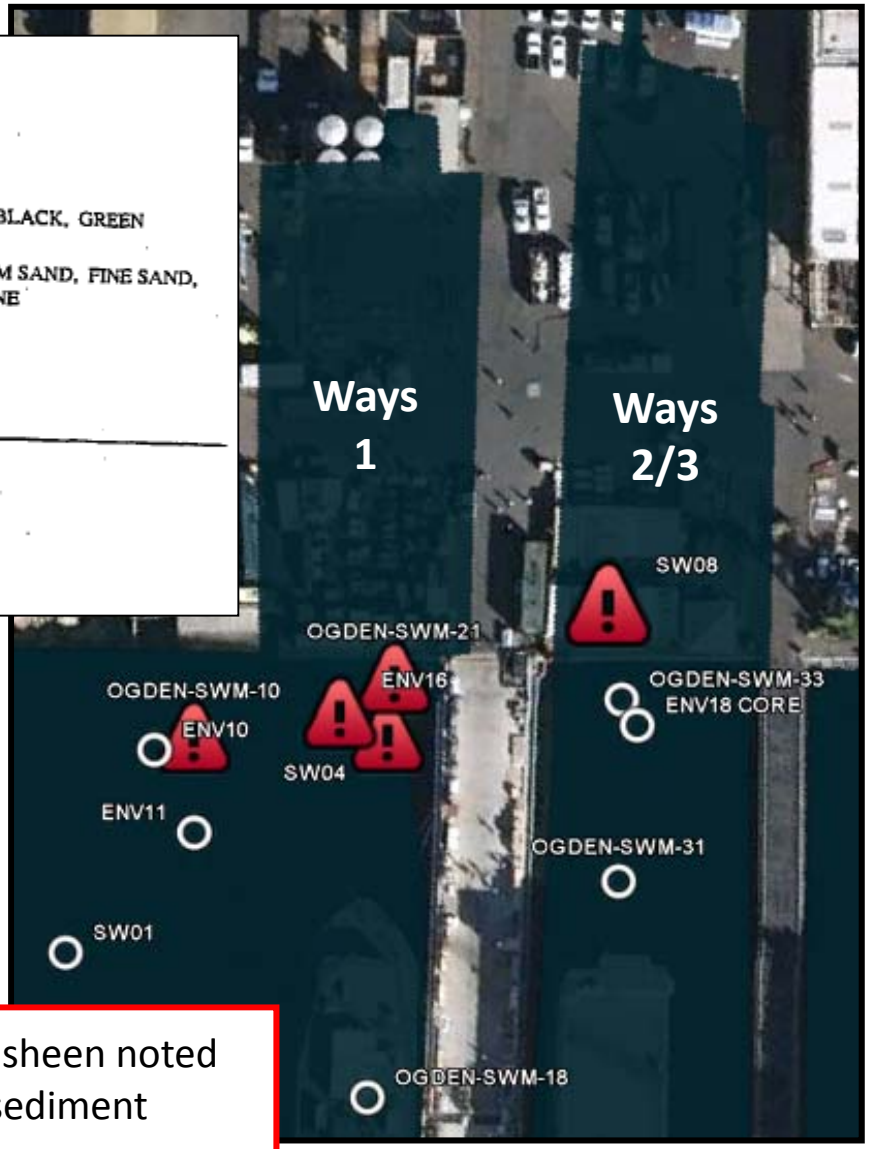
Top 2 Feet only



Does retrieval of core cause an OIL SHEEN?

YES / NO

Top 2 Feet only

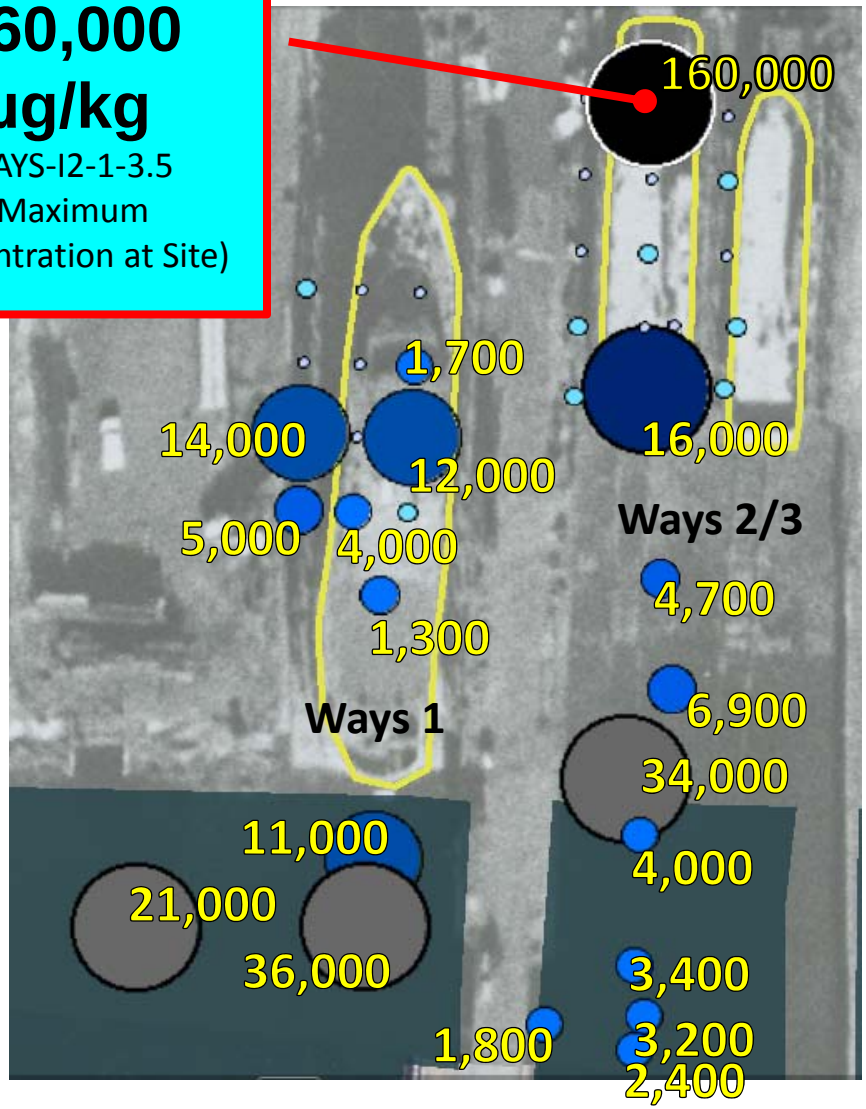


Oil sheen noted in sediment cores

Exhibit 9

PCB Data Confirm SWM/BAE Shipways as PCB Source

160,000 µg/kg
WAYS-I2-1-3.5
(Maximum concentration at Site)



Total PCB Aroclor Sum
Aroclor
- Background
- 21.1 - 1,000 ug/kg
- 1,000.1 - 5,000 ug/kg
- 5,000.1 - 10,000 ug/kg
- 10,000.1 - 15,000 ug/kg
- 15,000.1 - 20,000 ug/kg
- 20,000.1 - 50,000 ug/kg
- 50,000.1 - 157,485 ug/kg

Ships in shipways

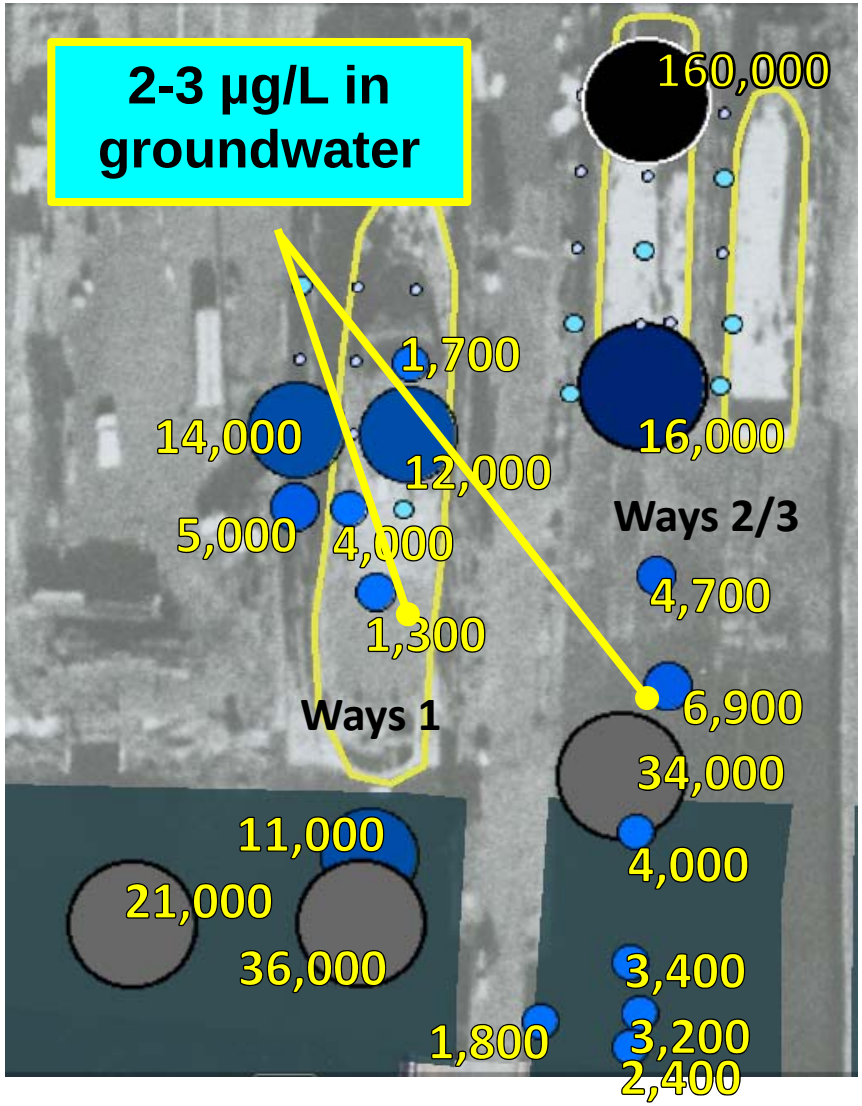
Concentrations represent maximum concentration of total PCB Aroclors at each location

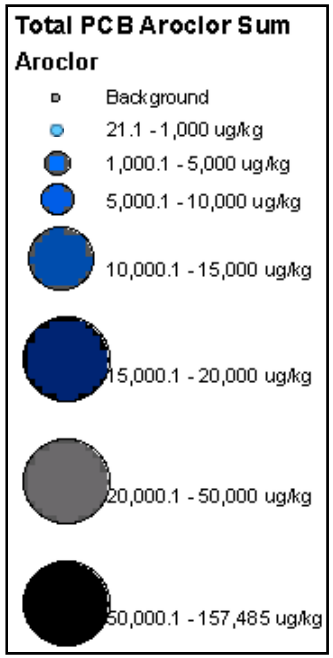
Samples in shipways collected post-excavation of contaminated soils/sediments

Data Sources
SAIC. 1992. SAR056453.; Ogden. 1998. SAR198846.; Ogden. 1998. SAR061831.; Ogden. 1998. SAR199495; Exponent. 2003. SAR105417.; CRWQCB et al. 1996. SAR280617.; Anchor. 2005. SAR374410. Aerial photo: ENVIRON. 2011.

Exhibit 10

PCB Contamination Persists in SWM/BAE Shipways as Late as 2005





Ships in shipways

Concentrations represent maximum concentration of total PCB Aroclors at each location

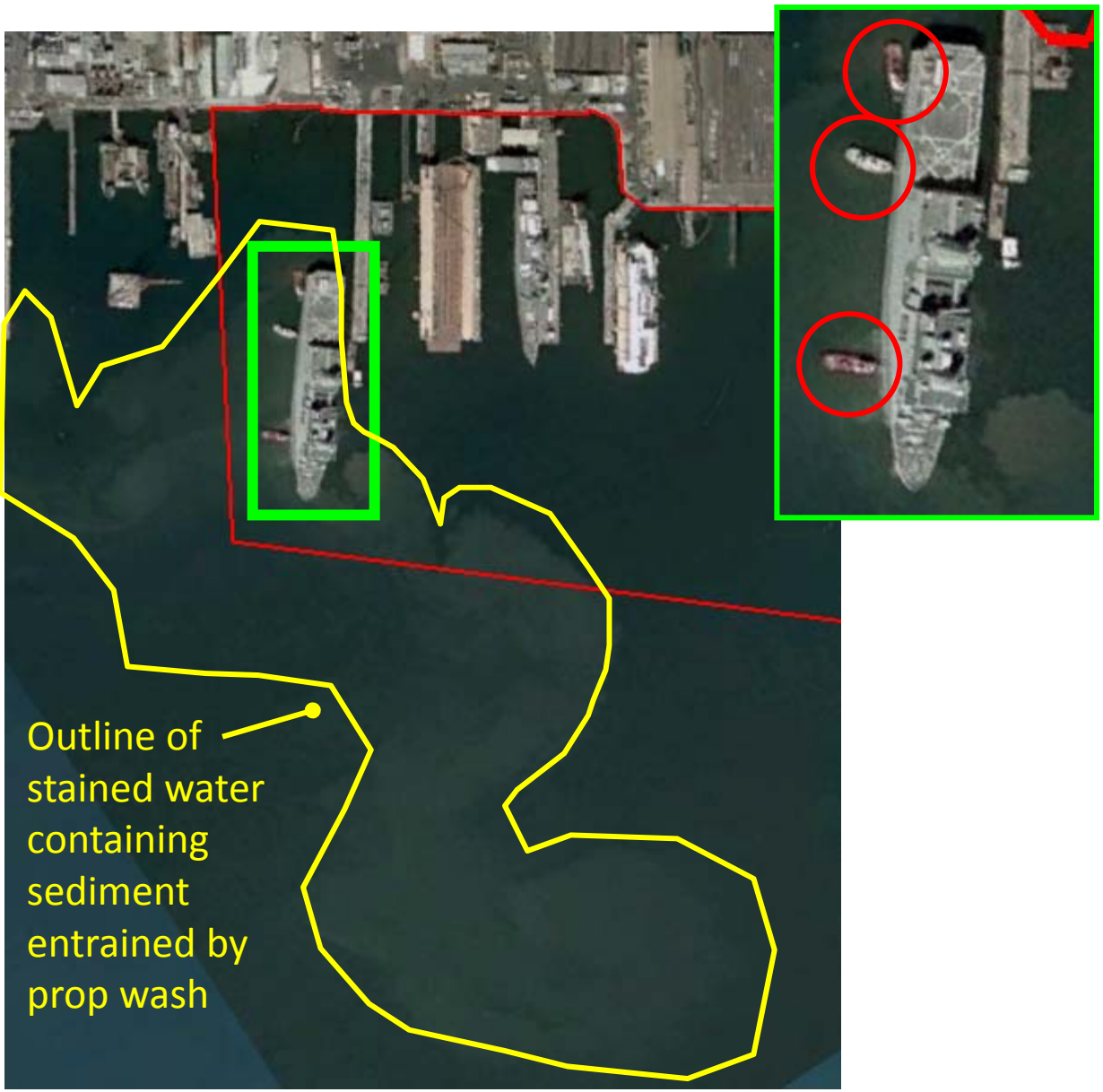
Samples in shipways collected post-excavation of contaminated soils/sediments

Data Sources

SAIC. 1992. SAR056453.; Ogden. 1998. SAR198846.; Ogden. 1998. SAR061831.; Ogden. 1998. SAR199495; Exponent. 2003. SAR105417.; CRWQCB et al. 1996. SAR280617.; Anchor. 2005. SAR374410. Aerial photo: ENVIRON. 2011.

Exhibit 11a

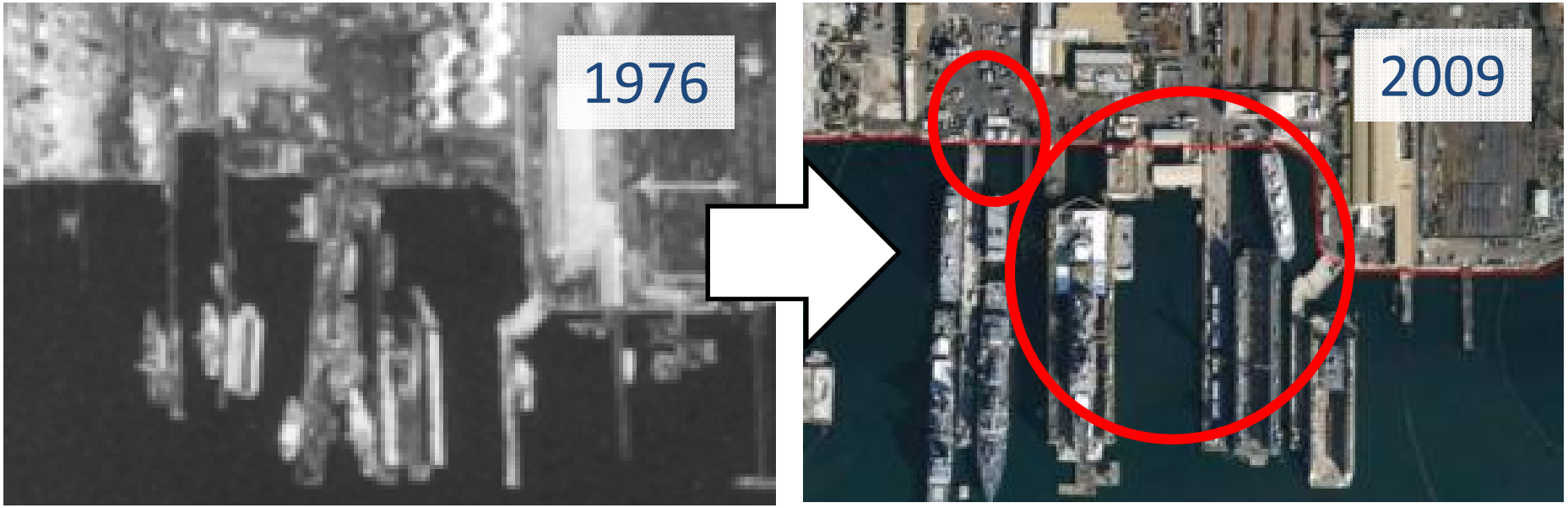
SWM/BAE Operations Spread Historical Contamination



- Physical movement of sediment by shipyard activity:
  - Propeller wash (shown at left)
  - Dredging
  - In-water construction

Exhibit 11b

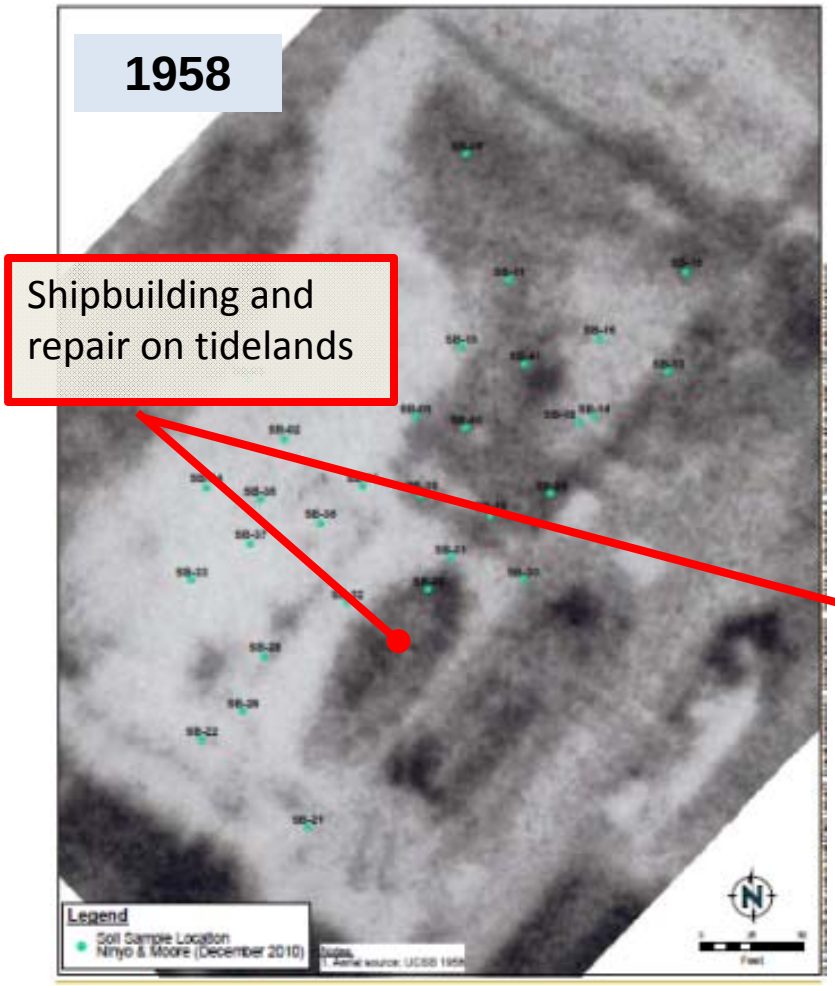
SWM/BAE Operations Spread Historical Contamination



1970s-2000s: Major Pier Construction (Including complete replacement and extension of Pier 1); Filling of Shipways 1 and 2/3

Exhibit 12

Shipyard Use of SDG&E Tidelands Began in 1958



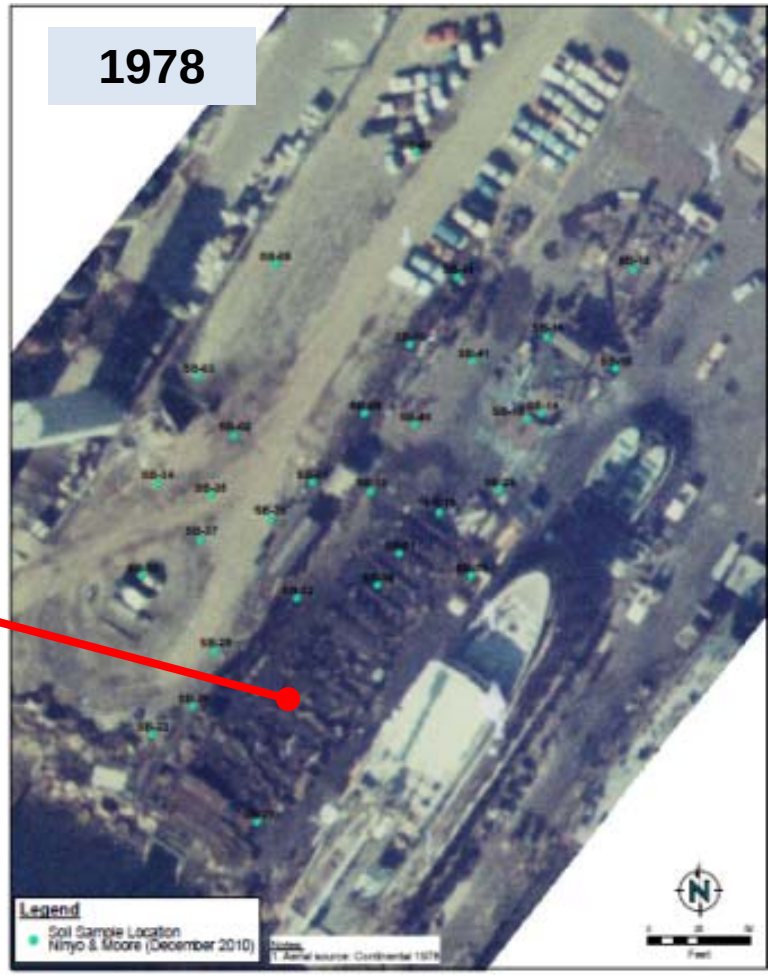
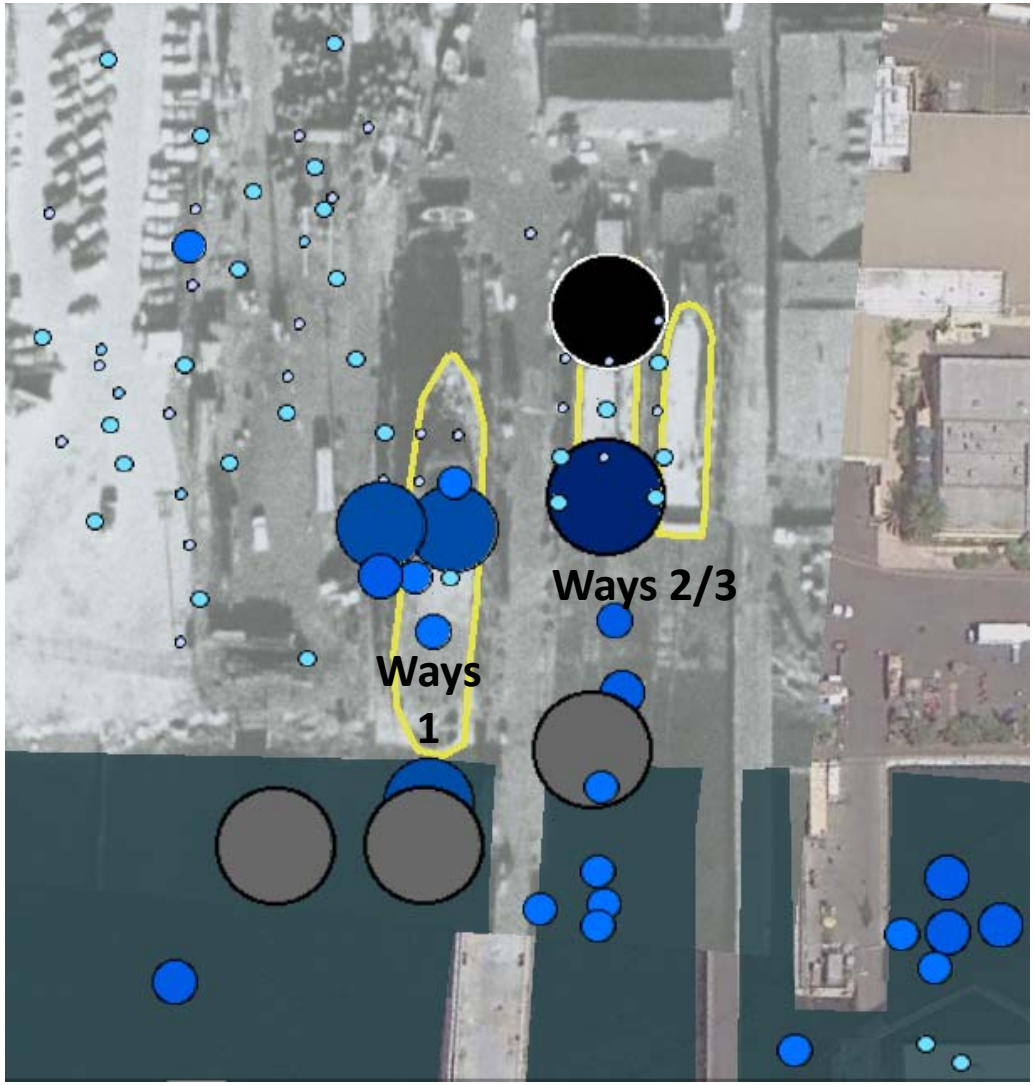
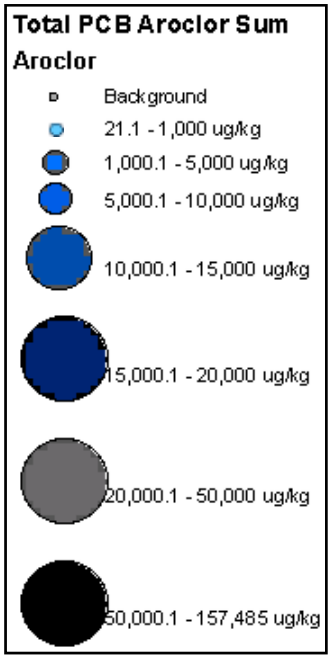


Exhibit 13a

Runoff from Tidelands Insufficient to Cause a Condition of Pollution or Nuisance





Ships in shipways

Concentrations represent maximum concentration of total PCB Aroclors at each location

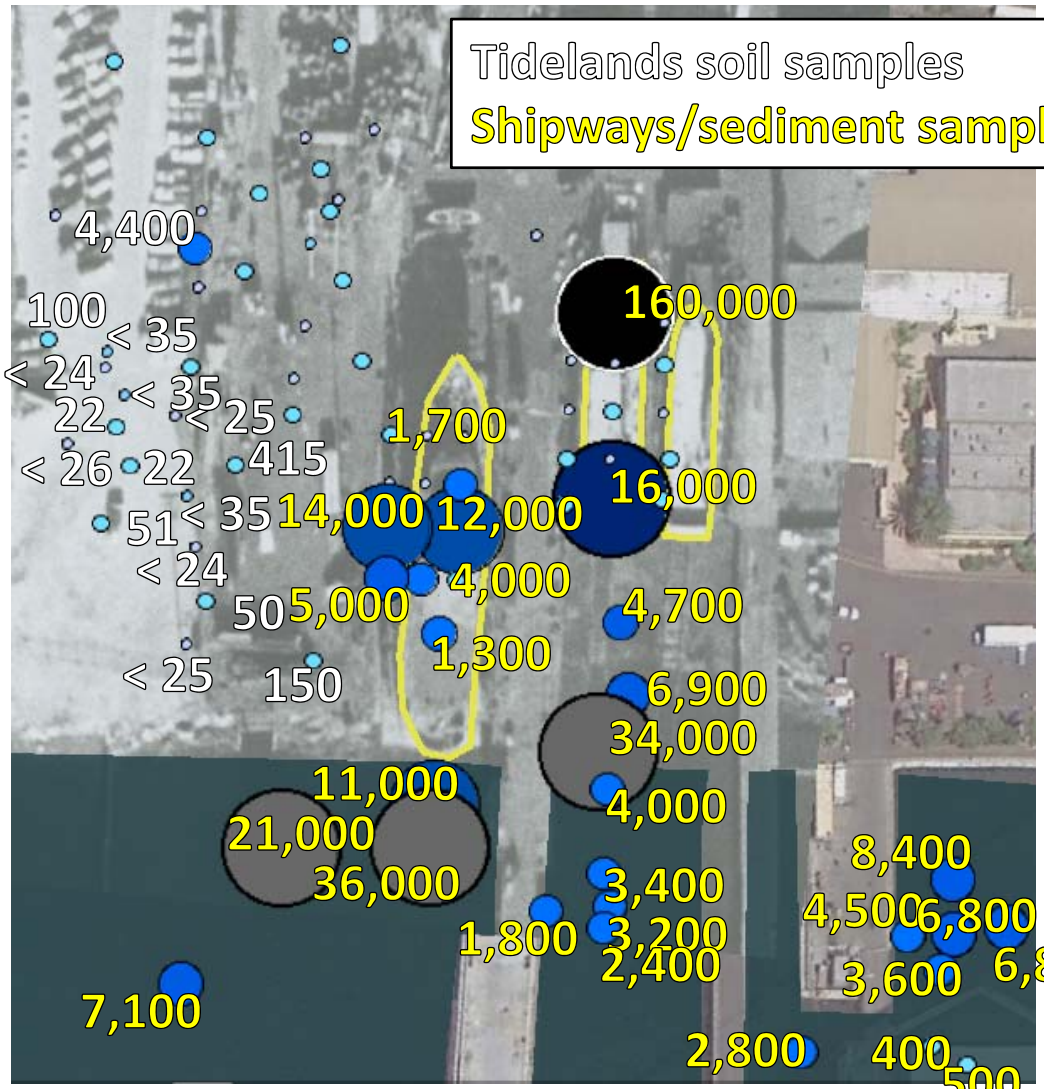
Samples in shipways collected post-excavation of contaminated soils/sediments

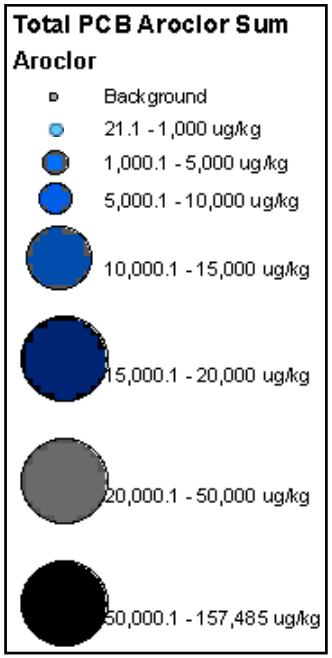
Data Sources

SAIC. 1992. SAR056453.; Ogden. 1998. SAR198846.; Ogden. 1998. SAR061831.; Ogden. 1998. SAR199495; Exponent. 2003. SAR105417.; CRWQCB et al. 1996. SAR280617.; Anchor. 2005. SAR374410.; ENVIRON. 2011.

Exhibit 13b

Runoff from Tidelands Insufficient to Cause a Condition of Pollution or Nuisance





Ships in shipways

Concentrations represent maximum concentration of total PCB Aroclors at each location

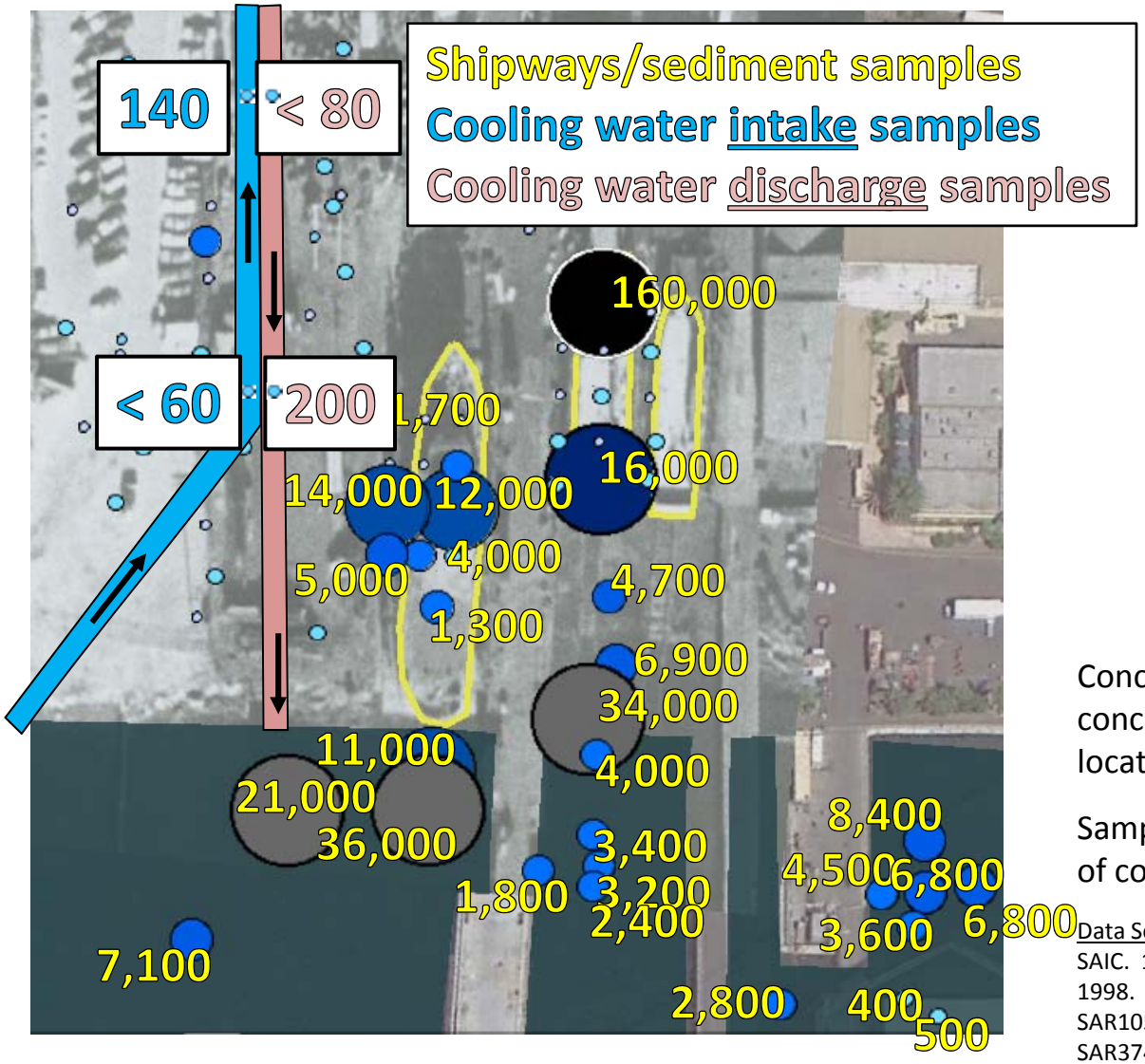
Samples in shipways collected post-excavation of contaminated soils/sediments

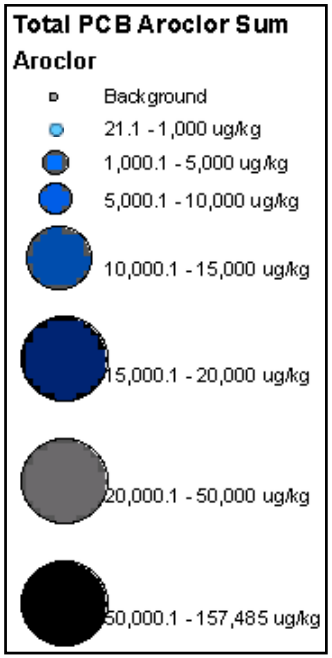
Data Sources

SAIC. 1992. SAR056453.; Ogden. 1998. SAR198846.; Ogden. 1998. SAR061831.; Ogden. 1998. SAR199495; Exponent. 2003. SAR105417.; CRWQCB et al. 1996. SAR280617.; Anchor. 2005. SAR374410.; ENVIRON. 2011.

Exhibit 14

Cooling Water Discharge Insufficient to Cause a Condition of Pollution or Nuisance





Ships in shipways

Concentrations represent maximum concentration of total PCB Aroclors at each location

Samples in shipways collected post-excavation of contaminated soils/sediments

Data Sources

SAIC. 1992. SAR056453.; Ogden. 1998. SAR198846.; Ogden. 1998. SAR061831.; Ogden. 1998. SAR199495; Exponent. 2003. SAR105417.; CRWQCB et al. 1996. SAR280617.; Anchor. 2005. SAR374410.; ENVIRON. 2011.

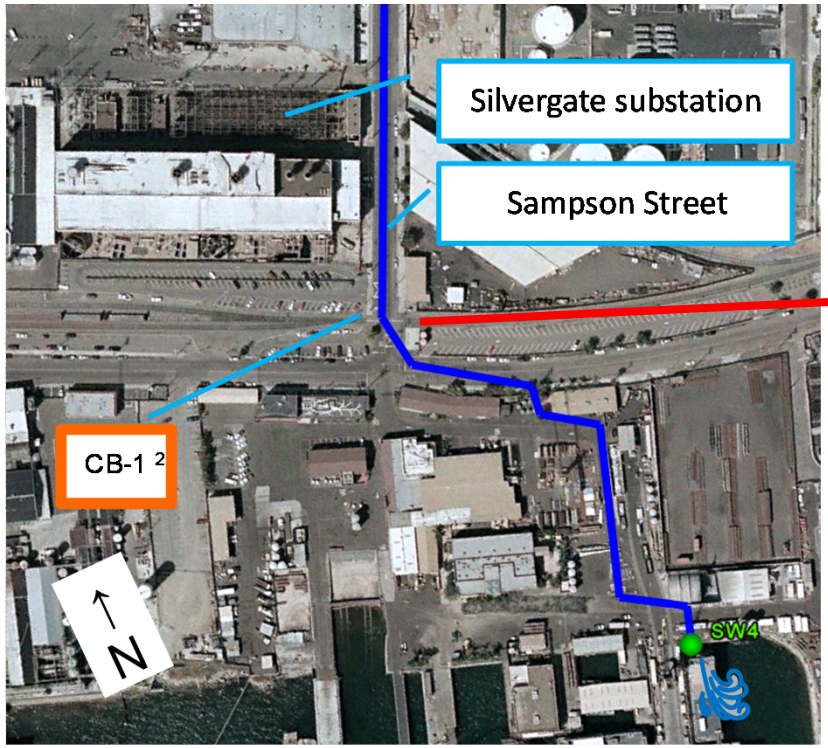
Exhibit 15

Runoff from Silvergate Substation Did Not Flow Through CB-1

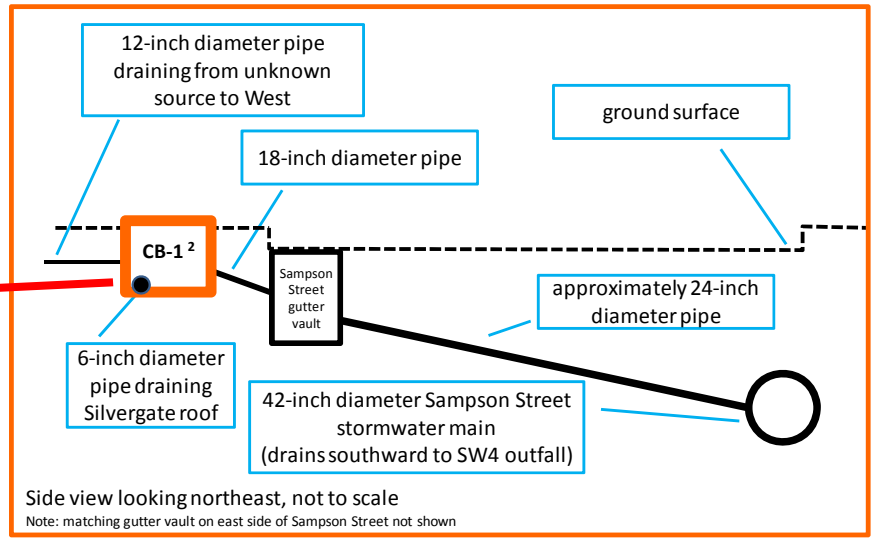
Legend

SW4 stormwater outfall location

SW4 stormwater main



Notes:
1. December 30, 2004 USGS aerial photo.
2. CB-1 is upgradient of the Sampson Street gutter vault.

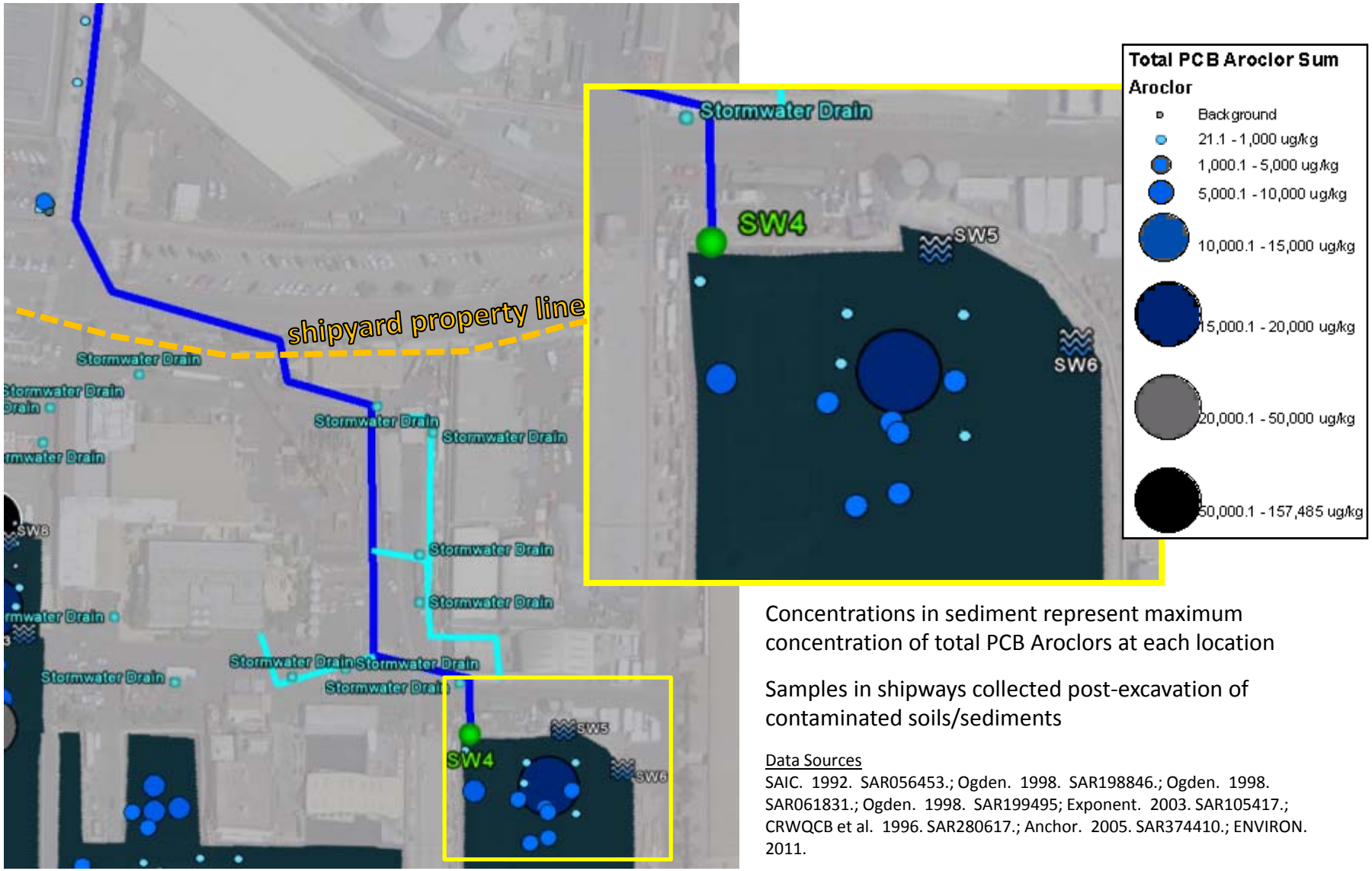


Side view looking northeast, not to scale

Note: matching gutter vault on east side of Sampson Street not shown

Exhibit 16a

Stormwater Runoff Insufficient to Cause a Condition of Pollution or Nuisance



Concentrations in sediment represent maximum concentration of total PCB Aroclors at each location

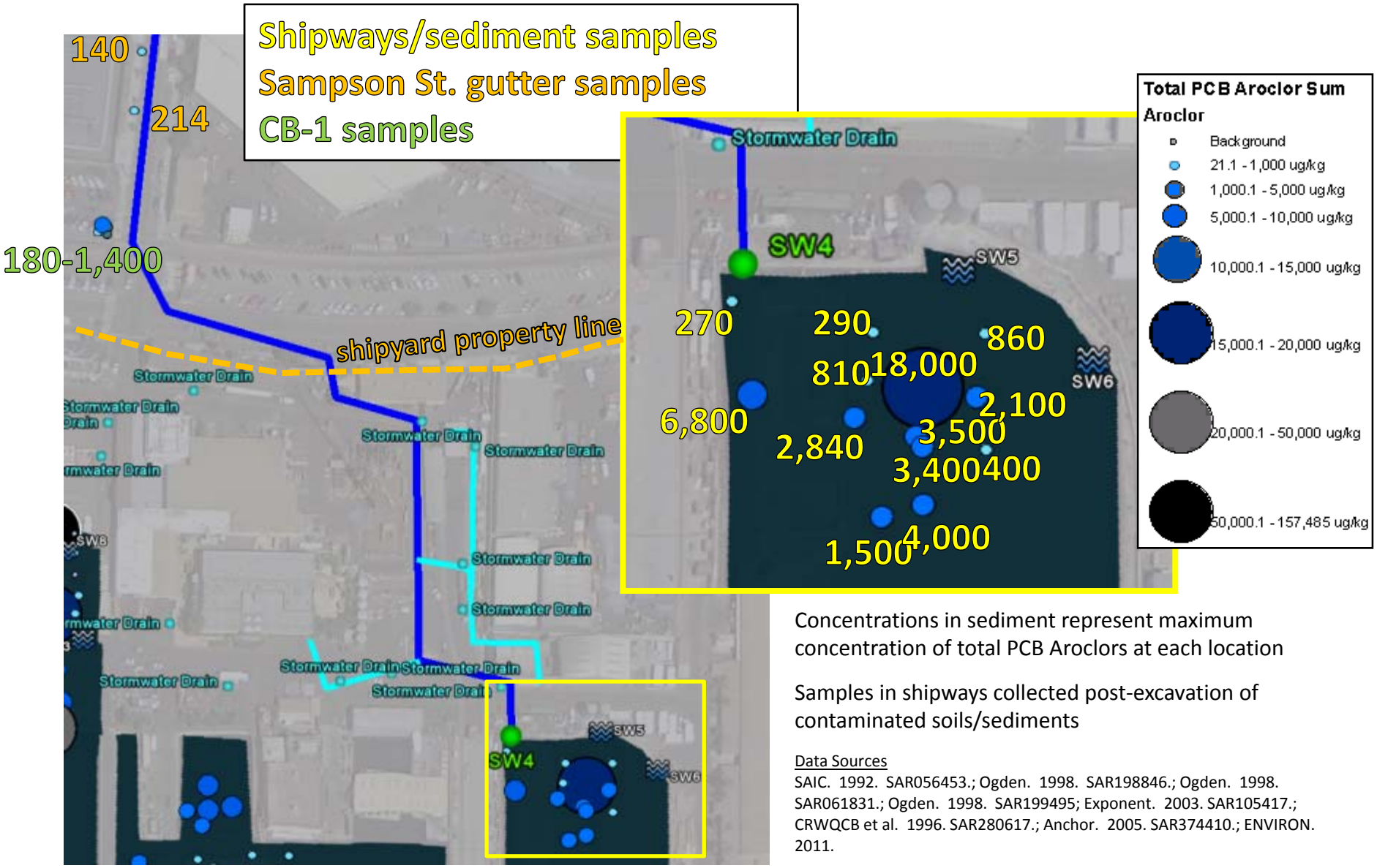
Samples in shipways collected post-excavation of contaminated soils/sediments

Data Sources

SAIC. 1992. SAR056453.; Ogden. 1998. SAR198846.; Ogden. 1998. SAR061831.; Ogden. 1998. SAR199495; Exponent. 2003. SAR105417.; CRWQCB et al. 1996. SAR280617.; Anchor. 2005. SAR374410.; ENVIRON. 2011.

Exhibit 16b

Stormwater Runoff Insufficient to Cause a Condition of Pollution or Nuisance



Concentrations in sediment represent maximum concentration of total PCB Aroclors at each location

Samples in shipways collected post-excavation of contaminated soils/sediments

Data Sources

SAIC. 1992. SAR056453.; Ogden. 1998. SAR198846.; Ogden. 1998. SAR061831.; Ogden. 1998. SAR199495; Exponent. 2003. SAR105417.; CRWQCB et al. 1996. SAR280617.; Anchor. 2005. SAR374410.; ENVIRON. 2011.

Exhibit 17

Over 100 SWM/BAE Violations Noted in Administrative Record and DTR from 1983-2005

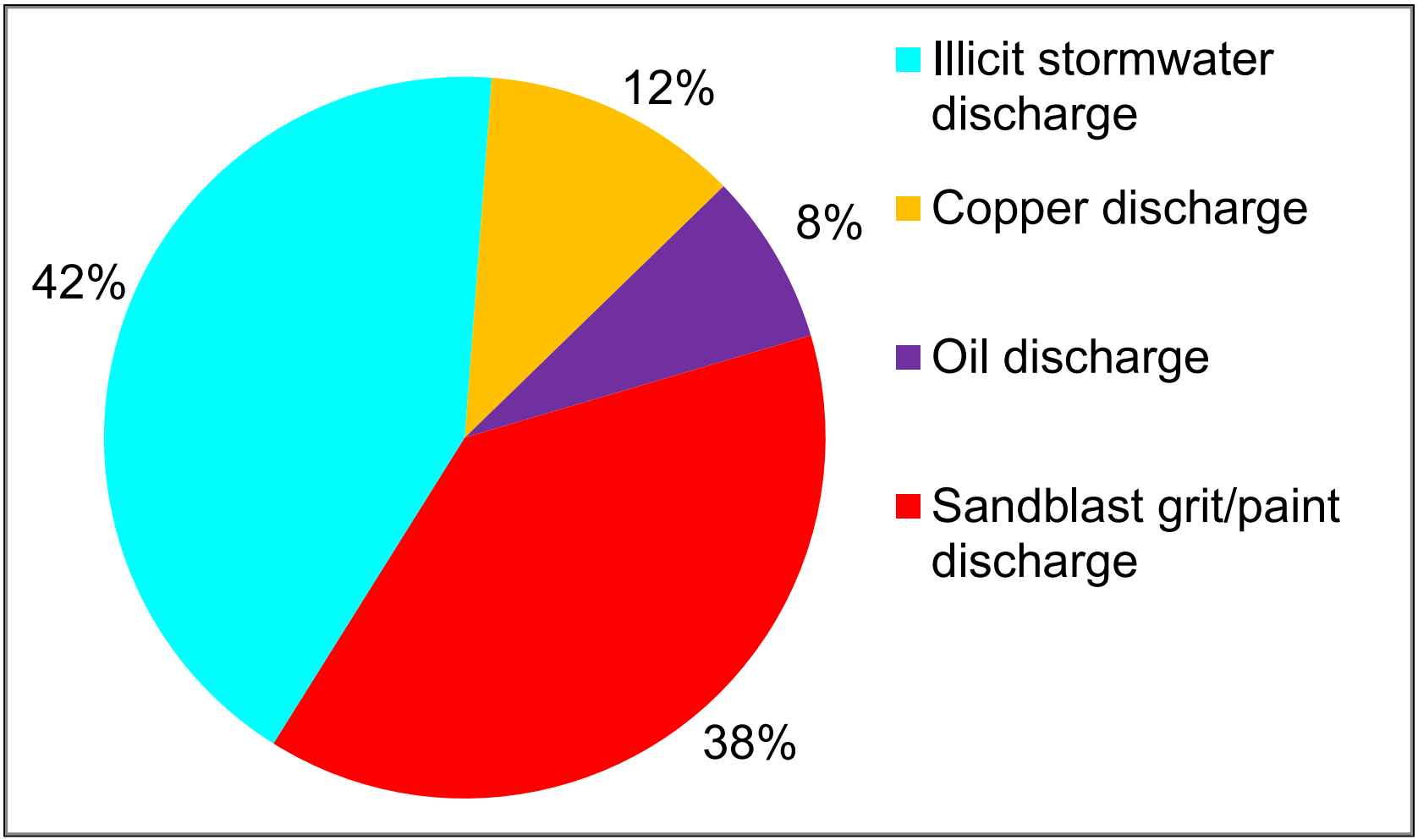


Exhibit 18

CUT's Misstatement of SDG&E PCB Use in October 19, 2011 Hearing Brief

SDG&E also claims it should not be named as a Discharger despite operating a steam turbine power plant where equipment containing large quantities of PCBs was operated in "open" systems in close proximity to San Diego Bay for over 40 years. Despite its best effort to foist off

- Section 6 of the Toxic Substances Control Act (TSCA) states "no person may manufacture, process, or distribute in commerce or use any [PCB] in any manner other than in a totally enclosed manner" as of one year after the effective date of TSCA (i.e., as of January 1, 1978)."

Exhibit 19

Demonstrative Exhibits Summary

Evidence	Shipyard	SDG&E
COC Use	☑ Substantial documented evidence	☑ Substantial documented evidence
Environmental Pathways	Direct releases to/directly adjacent to Bay ☑ Paint and sandblast material ☑ Runoff ☑ Waste disposal ☑ Direct releases	Direct releases to Bay ☑ Cooling water Indirect/incomplete pathways ☐ Tidelands ponds ☐ CB-1 ☐ Substation runoff to Sampson St.
High Magnitude of COC Mass Releases	☑ Substantial evidence	☐ No evidence
Corresponding Site-specific Chemistry Data	Strong evidence indicating shipyard source ☑ Concentrations in source areas (shipways) higher than sediment ☑ Logical concentration gradient leading to source areas ☑ Chemical fingerprint match	Strong evidence indicating absence of source ☐ Concentrations in source areas and along transport pathways lower than sediment ☐ Lack of logical concentration gradient leading to source areas ☐ Chemical fingerprint mis-match

☑ = Evidence supporting condition of pollution or nuisance

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Exhibit 1a-e - Shipyard COC Sources

- ENVIRON. 2011. Technical Comments on May, 26, 2011 Documents Submitted on Behalf of Parties to the San Diego Shipyard Sediment Site. June 23.
- Booth. 2004. SAR163351. (Shipyard facility map)

Exhibit 2 – Shipyard PCB Uses and Sources

Exhibit 3 - Widespread Shipyard PCB Use in Marine Paint

- Young, D.R., Heesen, T.C. 1974. Inputs and Distributions of Chlorinated Hydrocarbons in Three Southern California Harbors. SAR393796.

Exhibit 4 - Shipyard Marine Paints -
Direct Releases of Paint to Shipyard Site Sediment

- CRWQCB. 1972. Wastes Associated with Shipbuilding and Repair Facilities in San Diego Bay. SAR374265.
- USEPA. 1974. Guidelines for the Control of Shipyard Pollutants. Draft Report to the San Diego Regional Water Quality Control Board. SAR374317.
- Eco Systems. 1992. Report. SAR011470.
- Eco Systems. 2000. Report. SAR035020.

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Exhibit 5 - SWM/BAE Sandblast and Paint Wastes Contaminated Surrounding Areas

- Booth, S. 2004. Historical Study, San Diego Waterfront Sampson Street to 28th Street, Appendix J, San Diego, California. SAR169862.

Exhibit 6 - SWM/BAE's Consultant Acknowledges PCB Source Attributable to Marine Railways

- Woodward Clyde. 1995. HISTORICAL OCCUPANCY SEARCH, SOUTHWEST MARINE. Submitted to California Regional Water Quality Control Board. SAR056270.
- Anchor. 2005. Site Investigation and Characterization Report For 401 Water Quality Certification, BAE Systems, Inc. (Formerly southwest Marine, Inc.) Bulkhead Extension and Yard Improvement Phase 2 Activities. Revised August 2005. SAR374410.

Exhibit 7a-b - Ubiquitous Oil Saturation Noted in SWM/BAE Shipways During Marine Railways Removal (1998)

- Ogden. 1998. Final Report Site Remediation, Marine Railway Removal Project, Southwest Marine Shipyard. December. SAR198846.

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Exhibit 8 - Extensive Oil Saturation in Shipways Migrated to Bay

- Ogden. 1998. Final Report Sediment Characterization Study and Remediation Plan, Southwest Marine Shipyard. December. SAR061831.

Exhibit 9 - PCB Data Confirm SWM/BAE Shipways as PCB Source

- SAIC. 1992. SAR056453.
- Ogden. 1998. SAR198846.
- Ogden. 1998. SAR061831.
- Ogden. 1998. SAR199495
- Exponent. 2003. SAR105417.
- CRWQCB et al. 1996. SAR280617.
- ENVIRON. 2011. Summary of Sampling and Analysis of Soil and Cooling Water Tunnels, BAE Subleasehold Area, San Diego Bay, San Diego, CA. February 23.

Exhibit 10 - PCB Contamination Persists in SWM/BAE Shipways as Late as 2005

- Anchor. 2005. Site Investigation and Characterization Report For 401 Water Quality Certification, BAE Systems, Inc. (Formerly southwest Marine, Inc.) Bulkhead Extension and Yard Improvement Phase 2 Activities. Revised August 2005. SAR374410.

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Exhibit 11a-b - SWM/BAE Operations Spread Historical Contamination

- Conder, J.M. 2011. Comparison of 2001-2002 and 2011 Chemical Conditions in Surface Sediment at the San Diego Shipyard Sediment Site. March 11.
- ENV America. 2004. SAR193391.

Exhibit 12 - Shipyard Use of SDG&E Tidelands Began in 1958

- ENVIRON. 2011. Summary of Sampling and Analysis of Soil and Cooling Water Tunnels, BAE Subleasehold Area, San Diego Bay, San Diego, CA. February 23.

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Exhibit 13a-b - Runoff from Tidelands Insufficient to Cause a Condition of Pollution or Nuisance

- SAIC. 1992. SAR056453.
- Ogden. 1998. SAR198846.
- Ogden. 1998. SAR061831.
- Ogden. 1998. SAR199495
- Exponent. 2003. SAR105417.
- CRWQCB et al. 1996. SAR280617.
- Anchor. 2005. SAR374410.; ENVIRON. 2011.
- ENVIRON. 2011. Summary of Sampling and Analysis of Soil and Cooling Water Tunnels, BAE Subleasehold Area, San Diego Bay, San Diego, CA. February 23.

Exhibit 14 - Cooling Water Discharge Insufficient to Cause a Condition of Pollution or Nuisance

- SAIC. 1992. SAR056453.
- Ogden. 1998. SAR198846.
- Ogden. 1998. SAR061831.
- Ogden. 1998. SAR199495
- Exponent. 2003. SAR105417.
- CRWQCB et al. 1996. SAR280617.
- Anchor. 2005. SAR374410.; ENVIRON. 2011.
- ENVIRON. 2011. Summary of Sampling and Analysis of Soil and Cooling Water Tunnels, BAE Subleasehold Area, San Diego Bay, San Diego, CA. February 23.

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Exhibit 15 - Runoff from Silvergate Substation Did Not Flow Through CB-1

- ENVIRON. 2011. Technical Comments on May, 26, 2011 Documents Submitted on Behalf of Parties to the San Diego Shipyard Sediment Site. June 23.

Exhibit 16a-b - Stormwater Runoff Insufficient to Cause a Condition of Pollution or Nuisance

- SAIC. 1992. SAR056453.
- Ogden. 1998. SAR198846.
- Ogden. 1998. SAR061831.
- Ogden. 1998. SAR199495
- Exponent. 2003. SAR105417.
- CRWQCB et al. 1996. SAR280617.
- ENVIRON. 2011. Technical Comments on May, 26, 2011 Documents Submitted on Behalf of Parties to the San Diego Shipyard Sediment Site. June 23.

Exhibit 17 - Over 100 SWM/BAE Violations Noted in Record

- SAR050536-SAR050539.

Exhibit 18 - CUT's Misstatement of SDG&E PCB Use in October 19, 2011 Hearing Brief

- SWRCB. 2011. In the Matter of Tentative Cleanup and Abatement Order No. R9-2011-0001 (Formerly R9-2010-0002) Shipyard Sediment Cleanup; San Diego Water Board Cleanup Team's Hearing Brief. October 19.
- SDG&E. 1981. Spill Prevention and Countermeasure Plan. Silver Gate Power Plant. Phase I Appendix. SARI193541.

Exhibit 19 - Demonstrative Exhibits Summary