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

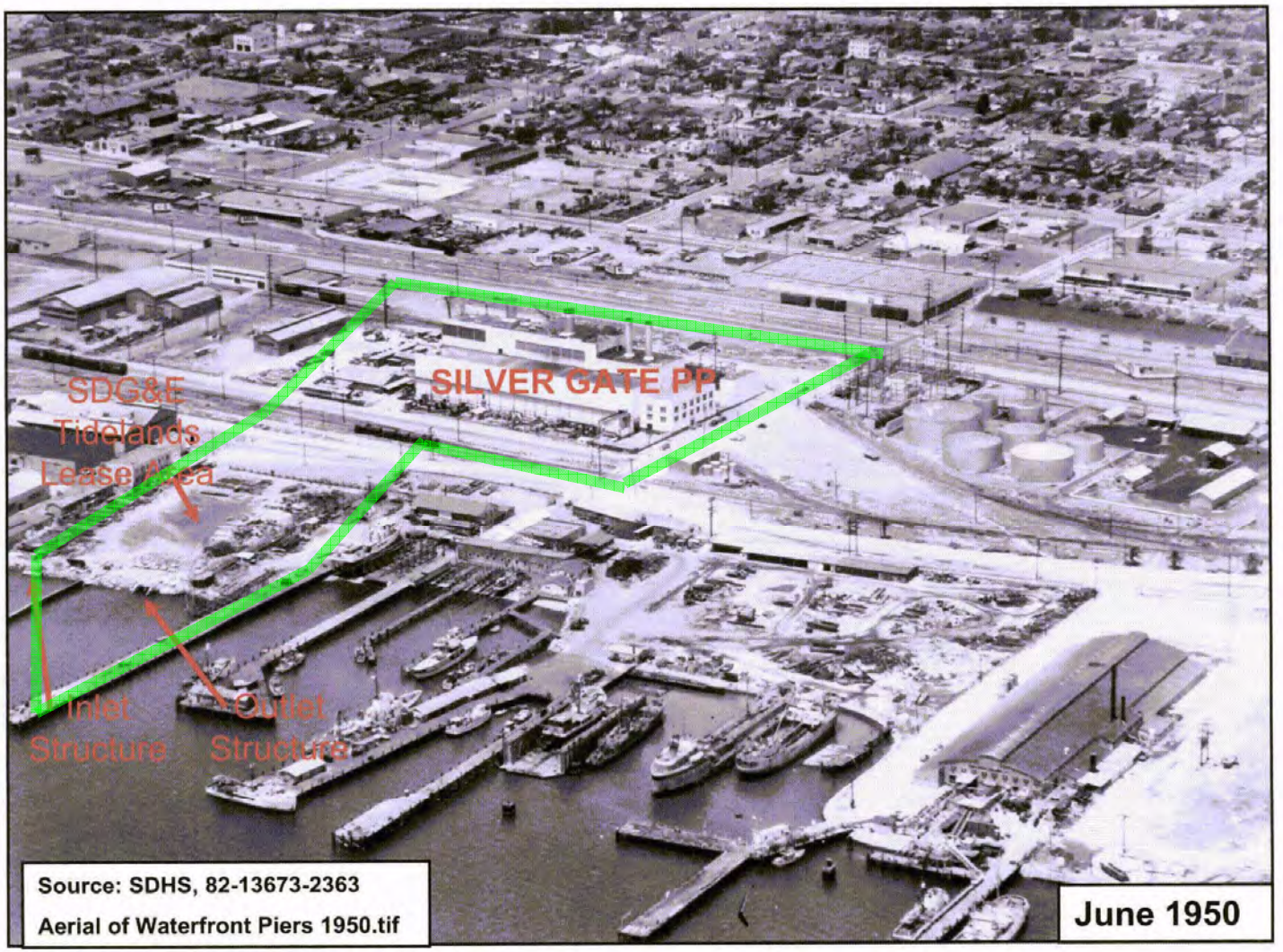
November 9, 14, 15, 16

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



F:\SDG&E\Silvergate\Wasteponds SA\SA report\Draft\Part 1 Aerial Photos

SAR193370

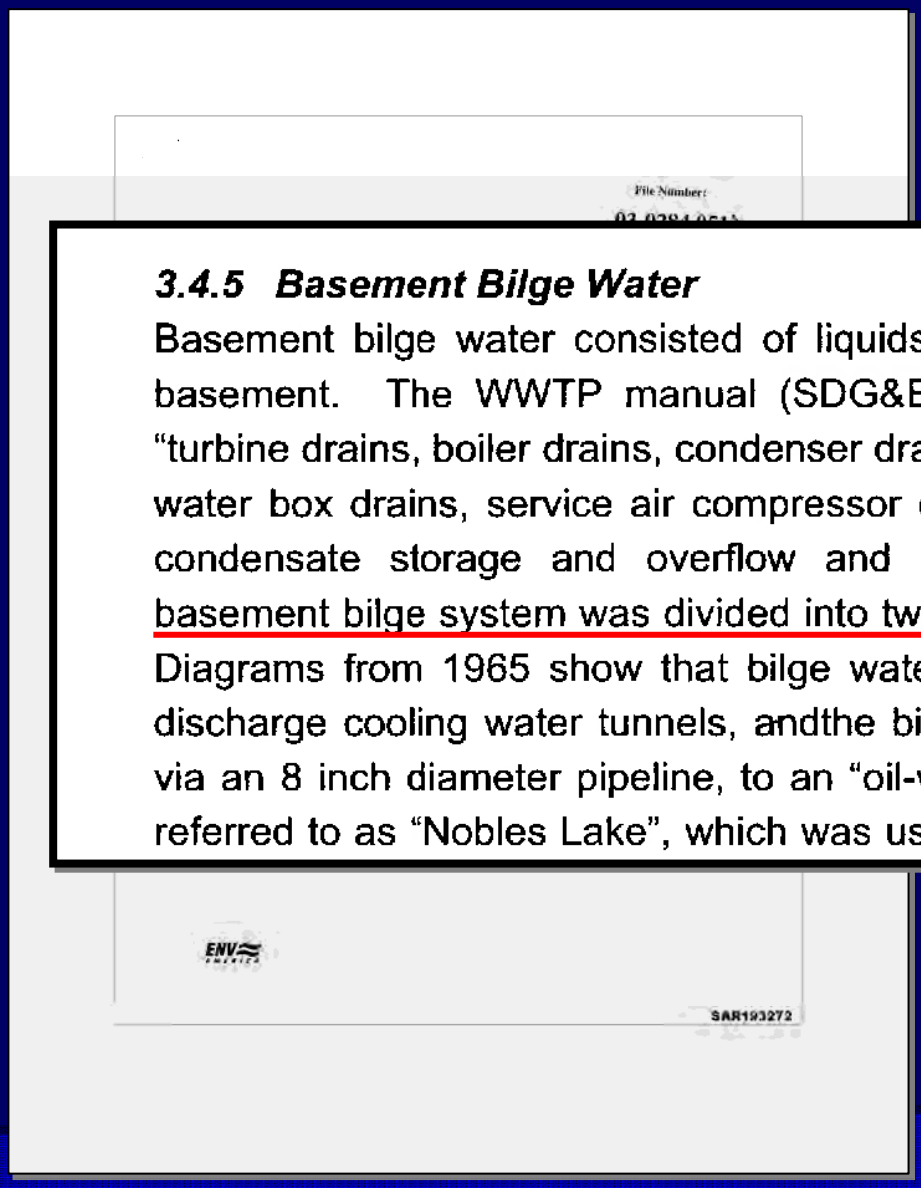
COC Sources and Pathways - Plant

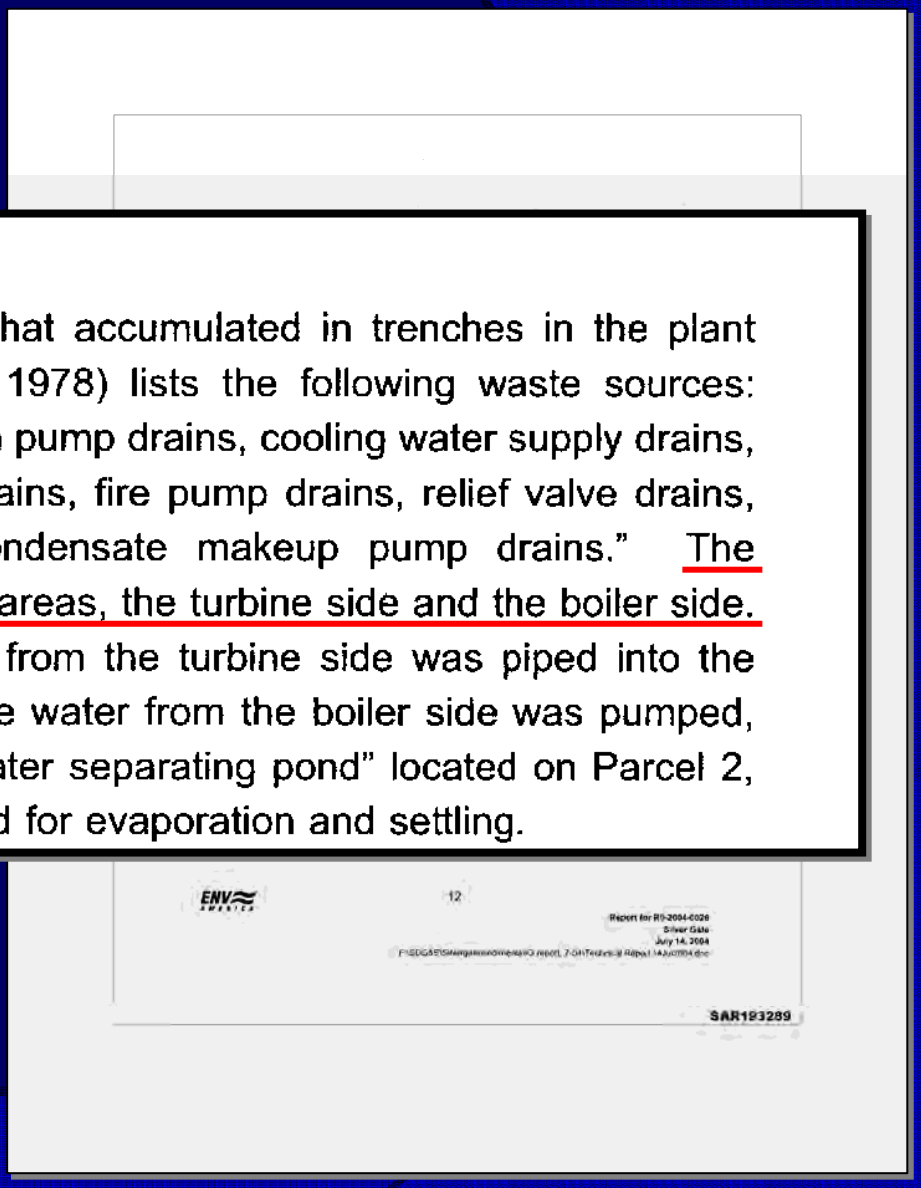
- Plant Housed PCB Containing Equipment
- Plant Wastewater Discharged Through Cooling Water Tunnels
- Plant Wastewater Discharged to Unlined Ponds and Oil-Water Separators

COC Sources and Pathways - Plant

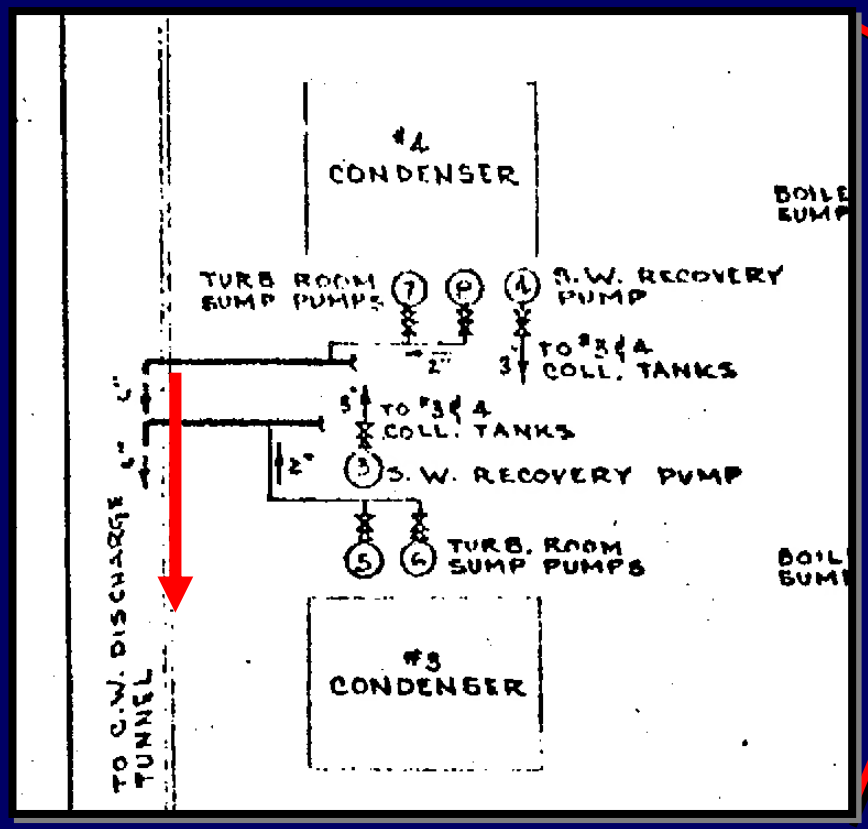
3.4.5 Basement Bilge Water

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, andthe 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.





COC Sources and Pathways - Plant



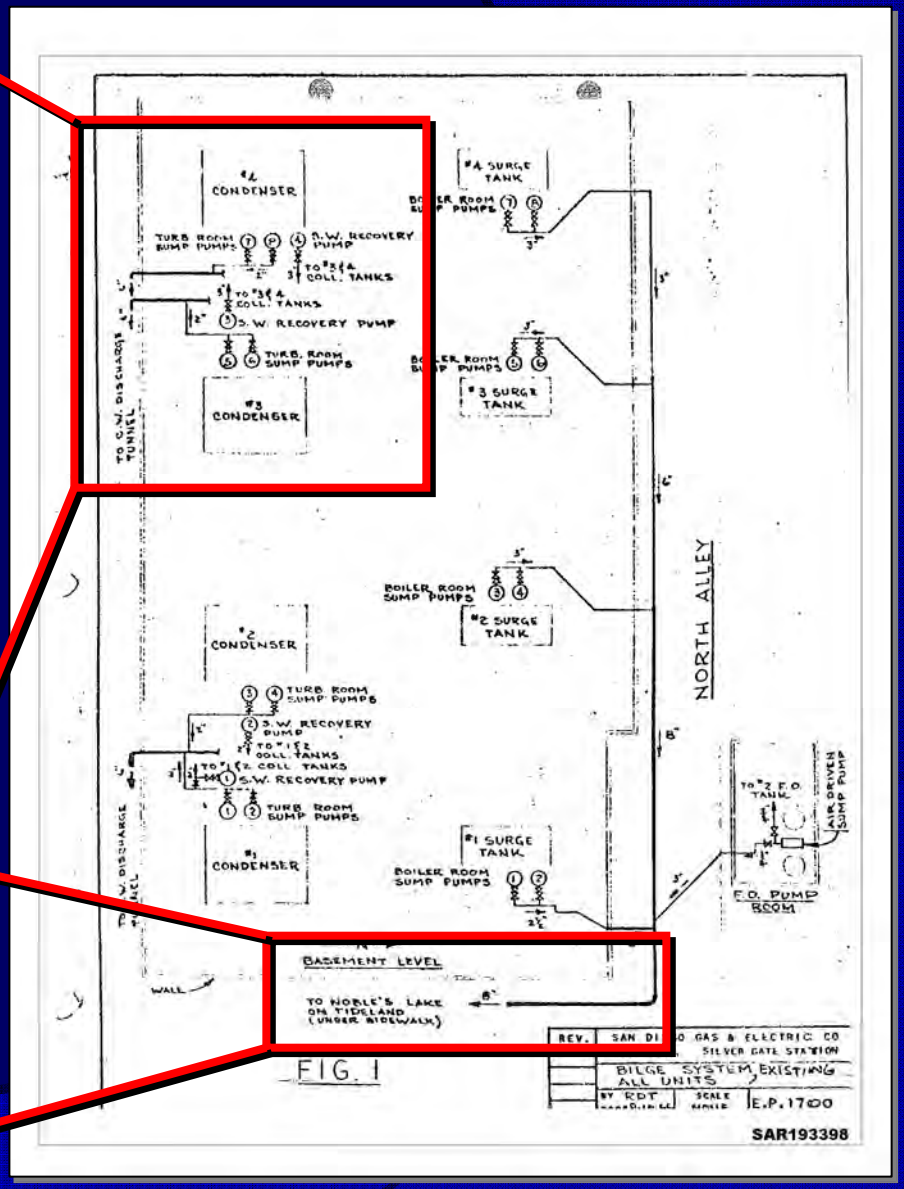
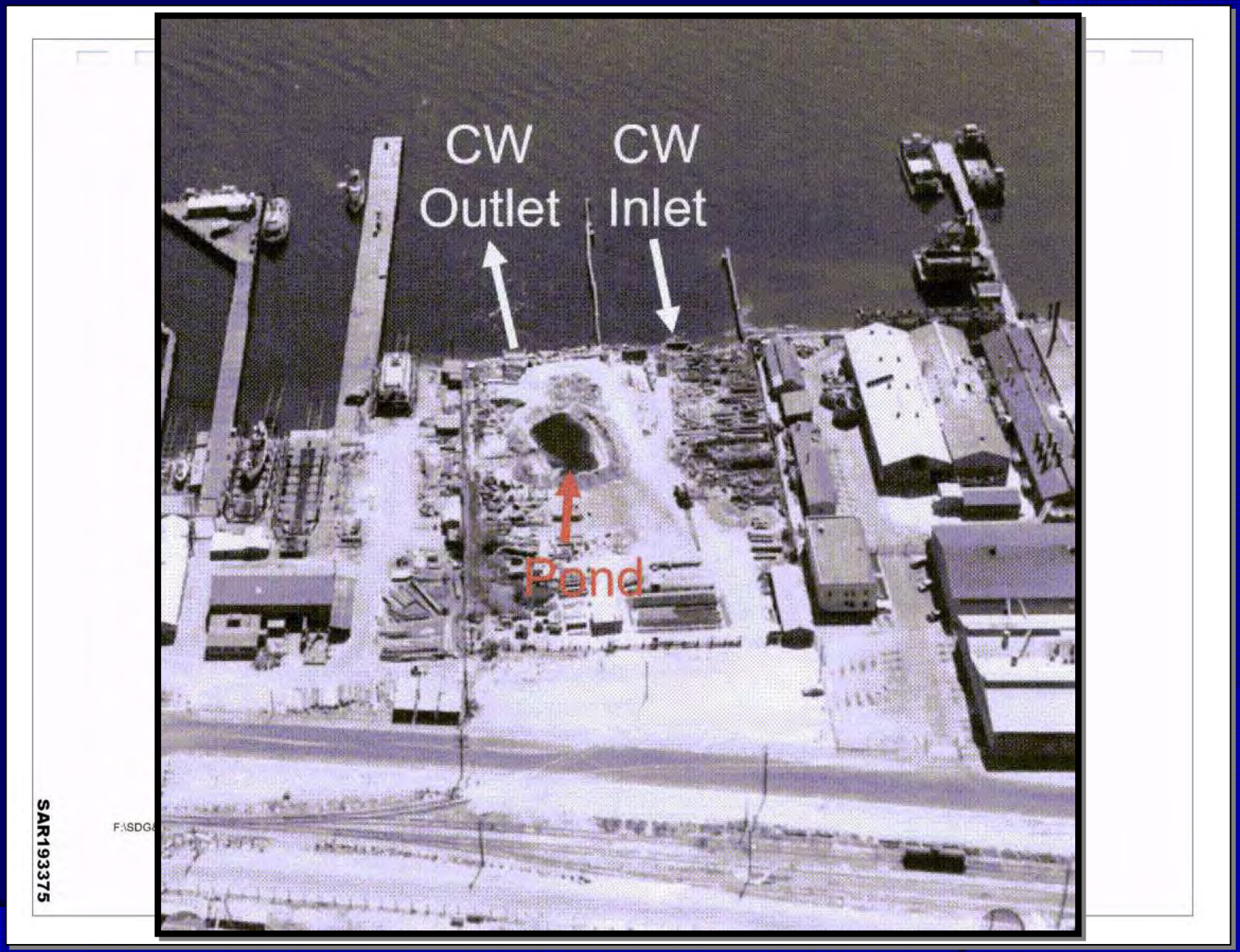


FIG. 1

COC Sources and Pathways - Plant



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

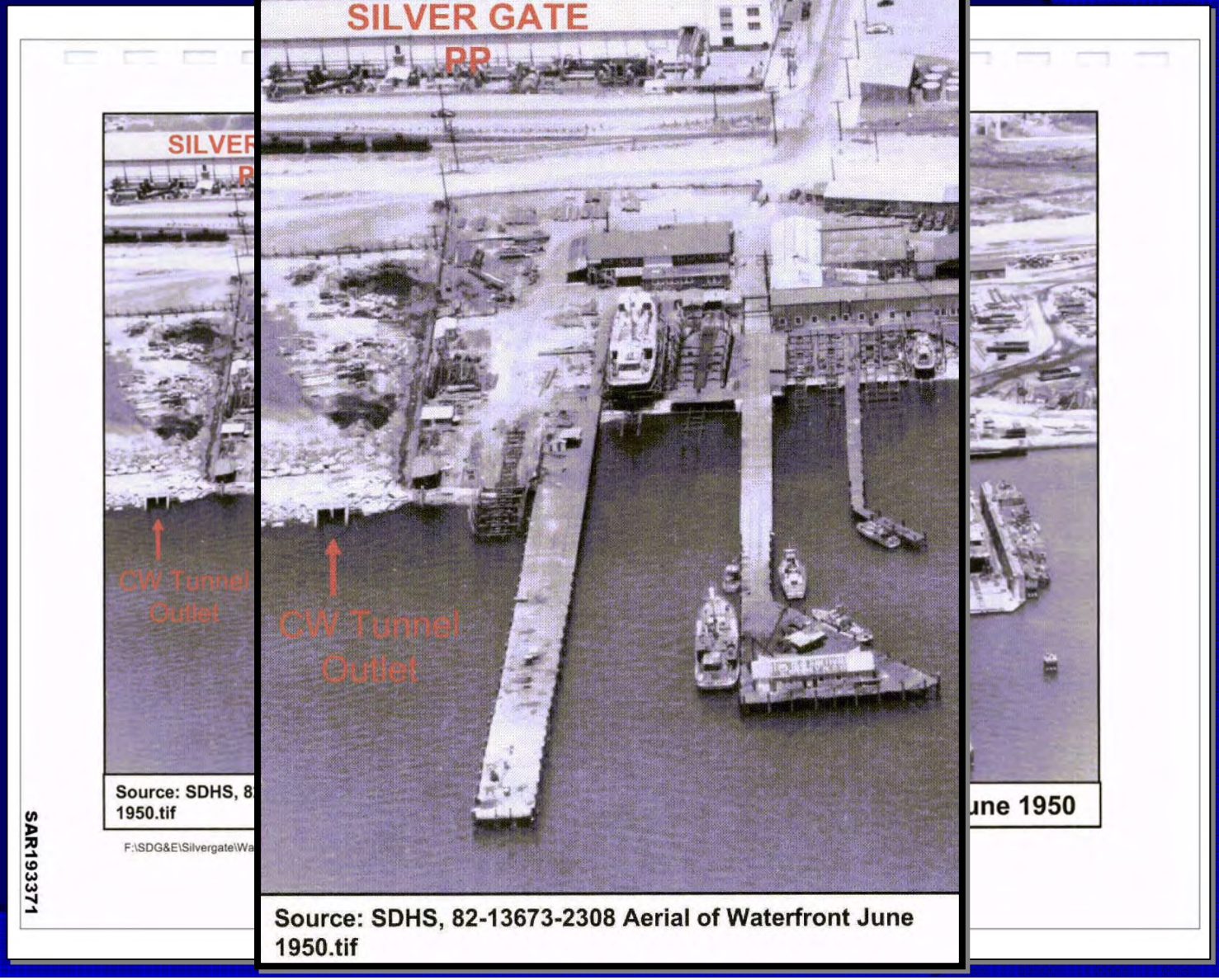
May 1, 1950

Mr. M. Hjalmarsen,
Supt. Construction

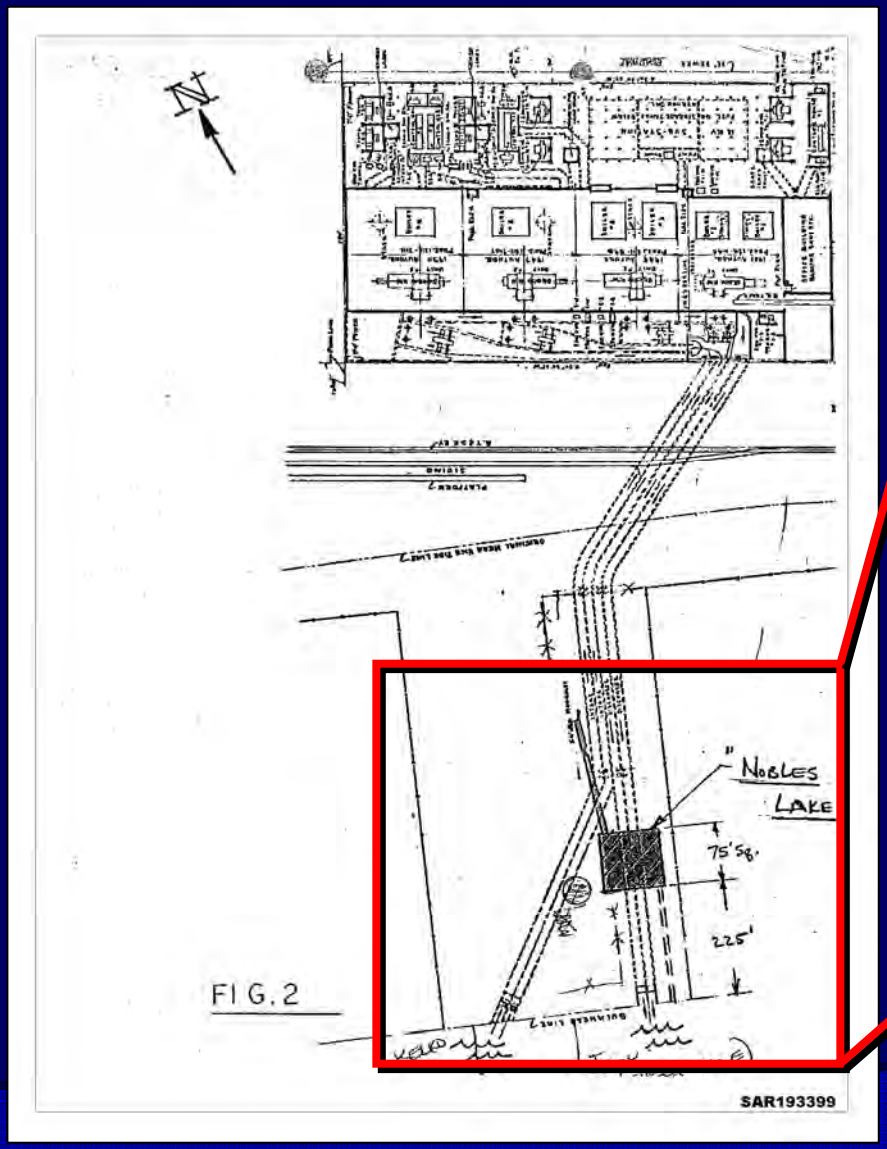
In a recent survey of Unit #3 construction, the following items were noted;

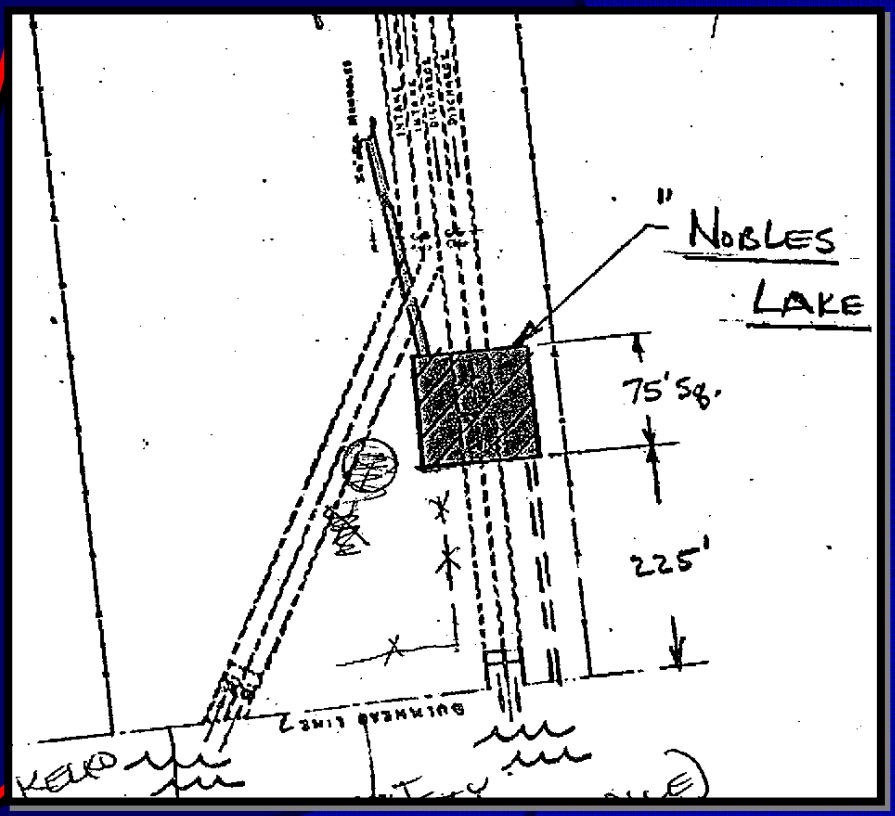
1. It is noted that our water disposal lake on the tide lands has been overflowing, and a ditch has been cut to the water's edge. This cannot be permitted, because oil would thereby be admitted to the bay and our company would be subject to a heavy fine by the Fish and Game Commission. It may be necessary 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

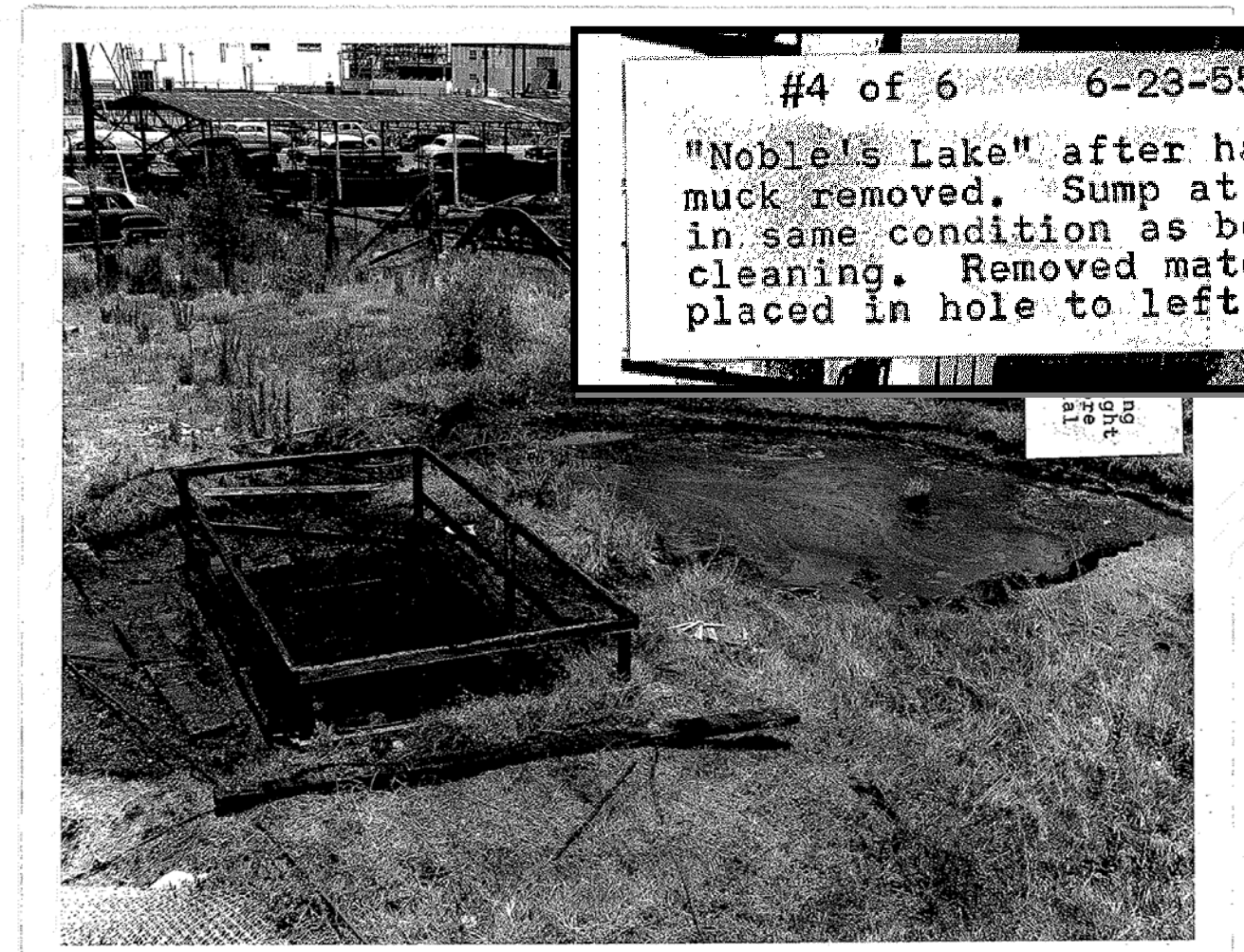


COC Sources and Pathways - Tidelands





COC Sources and Pathways - Tidelands

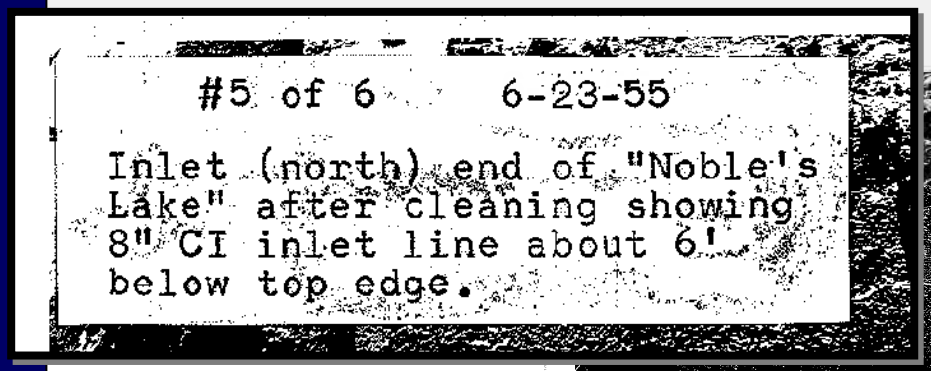


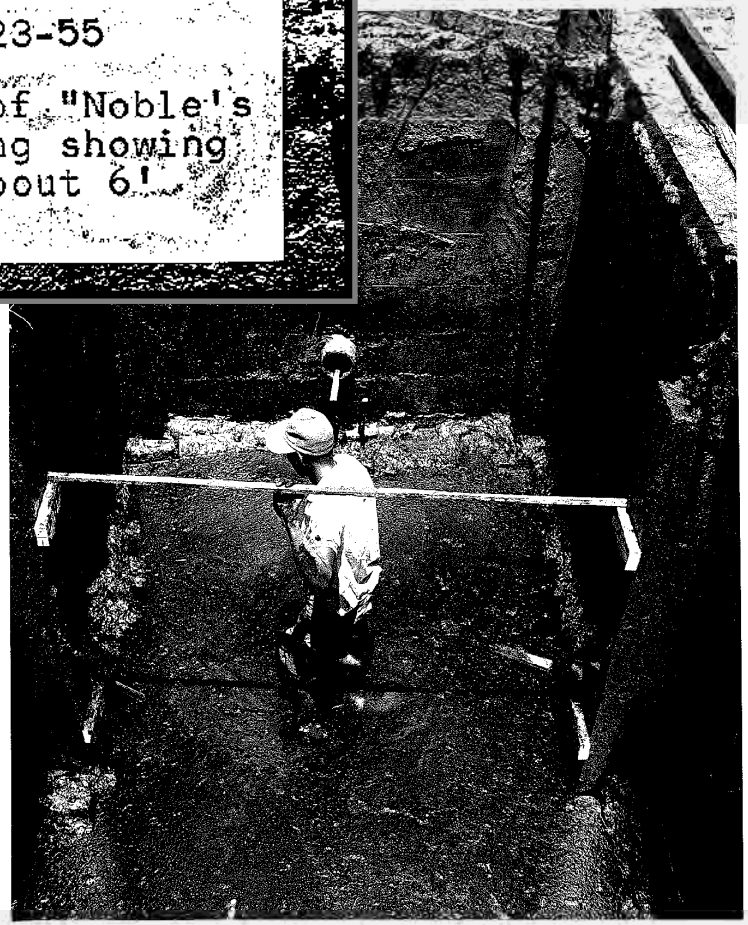
Source: SDG&E

June 23, 1955

SAR193577

COC Sources and Pathways - Tidelands





Source: SDG&E
F:\SDG&E\Silvergate\Wasteponds SA

June 23, 1955

SAR193578

COC Sources and Pathways - Tidelands

SAN DIEGO GAS & ELECTRIC COMPANY

INTERNAL CORRESPONDENCE

FORM 118-61438

FROM A. W. Hovland

TO M. J. Horna

DATE September 10, 1974

FILE NUMBER EPE 000

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

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

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.

GHConnelly

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

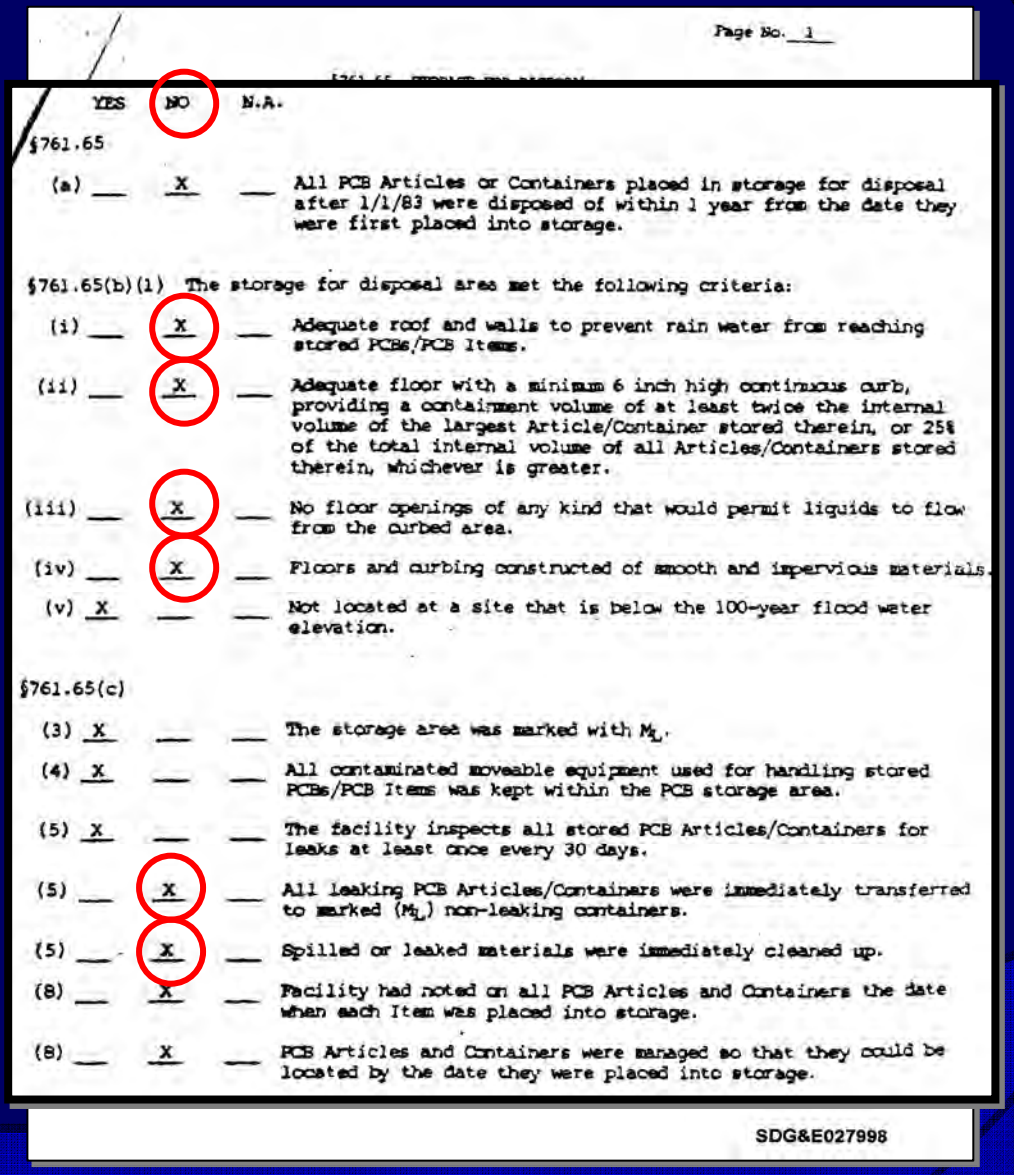
EPA ID Number: CAT000618934

Report Number: T(87)E043

Dates of Investigation: 5 February 1987

SDG&E027986

COC Sources and Pathways - Switchyard



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	YES	NO	N.A.	
§761.65				
(a)	___	X	___	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)	___	X	___	Adequate roof and walls to prevent rain water from reaching stored PCBs/PCB Items.
(ii)	___	X	___	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)	___	X	___	No floor openings of any kind that would permit liquids to flow from the curbed area.
(iv)	___	X	___	Floors and curbing constructed of smooth and impervious materials.
(v)	X	___	___	Not located at a site that is below the 100-year flood water elevation.
§761.65(c)				
(3)	X	___	___	The storage area was marked with M_L.
(4)	X	___	___	All contaminated moveable equipment used for handling stored PCBs/PCB Items was kept within the PCB storage area.
(5)	X	___	___	The facility inspects all stored PCB Articles/Containers for leaks at least once every 30 days.
(5)	___	X	___	All leaking PCB Articles/Containers were immediately transferred to marked (M_L) non-leaking containers.
(5)	___	X	___	Spilled or leaked materials were immediately cleaned up.
(8)	___	X	___	Facility had noted on all PCB Articles and Containers the date when each Item was placed into storage.
(8)	___	X	___	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

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November 9, 14 – 16

Downey Brand LLP