

San Diego Gas and Electric, Kearny PCB Storage Facility
5488 Overland Avenue
San Diego, CA 92123-1205
SERIES C STANDARDIZED HAZARDOUS WASTE FACILITY PERMIT

ATTACHMENT "A"

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PART I. DEFINITIONS

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. **“DTSC”** as used in this Permit means the California Department of Toxic Substances Control.
2. **“Facility”** as used in this Permit means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage resource recovery, disposal or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combinations of these units.

For the purpose of implementing corrective action under California Code of Regulations, title 22, division 4.5, a hazardous waste facility includes all contiguous property under the control of the owner and/or operator required to implement corrective action.

3. **“Permittee”** as used in this Permit means the Owner and Operator.
4. **“RCRA”** as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).
5. **“RCRA hazardous waste”** as used in this Permit is as defined in Health and Safety Code section 25120.2.
6. **“Non-RCRA hazardous waste”** as used in this Permit is as defined in Health and Safety Code section 25117.9.

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. Owner of Facility

San Diego Gas & Electric Company
6875 Consolidated Way
San Diego, CA 92121-2602

2. Owner of Real Property

San Diego Gas & Electric Company
8335 Century Park Court
San Diego, CA 92123-1569

3. Operator of Facility

San Diego Gas & Electric Company
5488 Overland Avenue
San Diego, CA 92123-1205

4. Location

The address is 5488 Overland Avenue, in the City of San Diego, San Diego County, at latitude 32° 49' 59" and longitude 117° 07' 58". The Facility is located in an industrial zone of the City of San Diego on Assessor Parcel Number: 369-040-15. Figures 1, 2 and 3 show the Facility's location and Permitted Units.

5. Description of Facility Operations

Polychlorinated Biphenyl (PCB) contaminated hazardous waste generated by San Diego Gas and Electric Company (Permittee) is brought to this Facility. No RCRA hazardous waste is stored in the Permitted Units. The permitted units include a 7,400-gallon storage tank and two-storage sheds for storage of hazardous waste in containers/drums.

The permitted activities at this Facility will be the storage of hazardous wastes generated by the replacement of electrical equipment. Only PCB contaminated hazardous waste generated by San Diego Gas and Electric Company is brought to this Facility. Waste analyses will determine if the PCB contaminated hazardous waste also contains RCRA hazardous waste. If waste analyses determine that the PCB-contaminated hazardous waste is a RCRA hazardous waste, the hazardous waste is transported offsite to an authorized treatment/disposal facility.

6. Facility History

The facility receives hazardous wastes in container/drums which are generated on-site and off-site by Permittee's operations only. This Facility was constructed in 1982 and operated under an Interim Status Document issued by the Department of Health Services, Toxic Substances Control Division, on May 16, 1983. A Standardized Hazardous Facility Permit, Series C was issued in November 28, 2000 and expired on November 27, 2010. On May 25, 2010, the Permittee submitted a Standardized Hazardous Waste Facility Permit renewal application to DTSC. The approved Standardized Permit Application is dated January 31, 2012 and includes minor changes to the closure plan.

7. Facility Size and Type for Fee Purposes

This Permit is categorized as a "Series C" Standardized Permit pursuant to Health and Safety Code section 25201.6 and for purposes of Health and Safety Code sections 25205.2 and 25205.19.

8. CLOSURE COST ESTIMATES

The closure cost estimates approved is: \$806,168.00 (in 2012 US dollars).

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

The Standardized Permit Application, dated January 31, 2012 is hereby made a part of this Permit by reference.

2. EFFECT OF PERMIT

- (a) The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
- (b) The Permittee is permitted to store hazardous wastes in accordance with the terms and conditions of this Permit. Any management of hazardous wastes not specifically authorized in this Permit is strictly prohibited.
- (c) Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.
- (f) Failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code Regs., tit. 22, §66270.43).
- (g) In case of conflicts between the approved Standardized Permit Application

and the Permit, the Permit conditions take precedence.

- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A Notice of Exemption has been prepared in accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, section 15070 et seq. of California Code of Regulations, Title 14.

4. ANNUAL HAZARDOUS WASTE REDUCTION AND MINIMIZATION CERTIFICATION

The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9).

5. ACCESS

- (a) DTSC, its contractors, employees, agents, and/or any United State Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.

- (b) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit authorizes operation only of the facility units and activities listed below. The Permittee shall not store or otherwise manage hazardous waste in any unit other than those specified in this Part IV. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22, division 4.5.

UNIT NAME: Unit 1 (PCB Storage Tank)

LOCATION:

Unit 1 is located in the central part of PCB storage area, marked as "PCB Storage Tank" (See Figure 3).

ACTIVITY TYPE:

Storage in a tank.

ACTIVITY DESCRIPTION:

The storage of PCB oil in the above-ground tank is located within a secondary containment basin. PCB oil is pumped to the tank from a pump located in building #1.

PHYSICAL DESCRIPTION:

Square-shaped steel PCB storage tank with a capacity of 7,400 gallons and measures 22 feet 6.5 inches by 9 feet 3.5 inches by 10 feet 6 inches.

MAXIMUM CAPACITY:

The maximum storage capacity of the tank is 7,400 gallons.

WASTE SOURCES:

Hazardous waste is generated from the collection of mineral oil contaminated with PCBs from Permittee's operation and maintenance of high voltage electrical lines.

WASTE TYPE:

See Table 1, page 16 of permit.

CALIFORNIA HAZARDOUS WASTE CODES:

731

AIR EMISSION STANDARDS:

This Unit is not subject to the requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5 (Air Emission Standards for Tanks, Surface Impoundments, and Containers).

UNIT NAME: Unit 2 (PCB Storage Building #1)

LOCATION:

Unit 2 is located west of Unit 1 and labeled "PCB Storage Building #1" (See Figure 3).

ACTIVITY TYPE:

Storage in containers/drums and storage of PCB-contaminated electrical equipment such as capacitors, transformers, and bushings.

ACTIVITY DESCRIPTION:

This area is a shipping and receiving area where PCB liquids are pumped from containers to the PCB storage tank. This area is used for storage of PCBs in containers, and serves as an area for consolidating PCB wastes into containers and totes. PCB-contaminated equipment such as capacitors, transformers and other equipment that cannot fit in containers are stored on pallets once they are emptied. When the facility needs to empty the PCB Storage Tank this area is used for loading the PCB liquids from the PCB Storage Tank to bulk trucks.

PHYSICAL DESCRIPTION:

This building is a covered sheet metal shed measuring 22 feet 7 inches by 58 feet 8 inches by 10 feet with concrete containment berm 6 inches high.

MAXIMUM CAPACITY:

The maximum storage capacity of the building is 5,610 gallons, including the capacities indicated on the nameplates attached to each capacitor and transformer.

WASTE SOURCES:

Waste sources include liquids (transformer oil, sludge, and water) contaminated with PCBs, solids (soil, absorbent, rags, and personal protective equipment) contaminated with PCBs, and PCB-contaminated equipment (transformers, bushings, and capacitors).

WASTE TYPE:

See Table 2, page 16 of permit.

CALIFORNIA HAZARDOUS WASTE CODES:

261, 731

AIR EMISSION STANDARDS:

This Unit is not subject to the requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5 (Air Emission Standards for Tanks, Surface Impoundments, and Containers).

UNIT NAME: Unit 3 (PCB Storage Building #2)

LOCATION:

Unit 3 is located west of Unit 2 in the PCB storage area and labeled "PCB Storage Building #2" (See Figure 3).

ACTIVITY TYPE:

Storage in containers/drums and storage of PCB-contaminated electrical equipment such as capacitors, transformers, and bushings.

ACTIVITY DESCRIPTION:

This area is used for storage of PCBs in containers and serves as a shipping and receiving area. PCB-contaminated equipment such as capacitors, transformers and other equipment that cannot fit in containers are stored on pallets once they are emptied.

PHYSICAL DESCRIPTION:

This building is a covered sheet metal shed measuring 22 feet 7 inches by 58 feet 8 inches by 10 feet with concrete containment berm 6 inches high.

MAXIMUM CAPACITY:

The maximum storage capacity of the building is 6,215 gallons, including the capacity indicated on the nameplates attached to each capacitor and transformer.

WASTE SOURCES:

Waste sources include liquids (transformer oil, sludge, and water) contaminated with PCBs, solids (soil, absorbent, rags, and personal protective equipment) contaminated with PCBs, and PCB-contaminated equipment (transformers, bushings, and capacitors).

WASTE TYPE:

See Table 2, page 16 of permit.

CALIFORNIA HAZARDOUS WASTE CODES:

261, 731

AIR EMISSION STANDARDS:

This Unit is not subject to the requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5 (Air Emission Standards for Tanks, Surface Impoundments, and Containers).

PART V. SPECIAL CONDITIONS

1. The Permittee is prohibited from conducting any hazardous waste transfer, storage, treatment or other management activity unless it is specifically described in this Permit or otherwise authorized by law.
2. The Permittee shall not store any hazardous waste beyond one year (H&SC 25201.6).
3. In the event that any cracks, gaps or tears are detected in a hazardous waste management unit or a secondary containment system or device, repairs shall be initiated as soon as possible and completed within one week of discovery of the problem. The Permittee shall notify DTSC within 24 hours whenever a crack, gap or tear is found. Within seven days of discovery of the problem, the Permittee shall notify DTSC in writing of the corrective measures that have been taken.
4. Any non-hazardous waste that is stored in a unit authorized by this Permit for management of hazardous waste shall be subject to the conditions of this Permit, including volume calculations, compatibility and inspections.
5. The Permittee shall collect all rainwater and wash water accumulated within the authorized units and determine whether it is hazardous waste; if it is hazardous waste, the Permittee shall manage it accordingly.
6. The Facility shall not be a designated Treatment, Storage, or Disposal Facility on the manifests for any exempt transfer activities conducted pursuant to California Code of Regulations, title 22, section 66263.18.
7. For the purpose of calculating the permitted maximum capacity limitations for storage and for secondary containment, all containers in the authorized units are assumed to be full, and all hazardous waste that is stored or located in an authorized unit shall be included in the calculation for that unit, including any hazardous waste that is covered by the transfer facility exemption pursuant to California Code of Regulations, title 22, section 66263.18.
8. The Permittee shall conduct sampling activities only within an authorized unit or within a secondary containment system or device of a loading and unloading area designated in the permit.
9. The Permittee shall not stack containers holding hazardous waste more than two containers high. The Permittee shall not stack a container holding hazardous waste on top of any other container.
10. The Permittee shall maintain a minimum of 30 inches of aisle space between rows of containers holding or designated to hold hazardous waste.

11. The Permittee shall not conduct any hazardous waste management activities that would require a permit issued under RCRA or a RCRA-equivalent Hazardous Waste Facility Permit issued by DTSC.
12. The Permittee shall comply with the DTSC-approved Waste Analysis Plan to determine whether the PCB-contaminated hazardous waste is a RCRA hazardous waste. If the analyses show that received PCB-contaminated waste also contains RCRA hazardous waste constituents, it shall not be accepted in the SDG&E Kearny PCB Storage Facility.

PART VI. CORRECTIVE ACTION

1. The Permittee conducted corrective action at the Facility under the oversight of DTSC, in accordance with the Corrective Action Consent Agreement, Docket HWCA: P2-03/04-010. The Permittee prepared a Phase I Environmental Site Assessment dated June 17, 1996, which identified 68 Solid Waste Management Units (SWMUs) at the Facility. Additional investigation was conducted at 28 SWMUs and the findings were documented in an investigation report dated November 3, 2009. The Permittee prepared a Corrective Measures Study dated January 18, 2010. DTSC issued a Statement of Basis dated May 20, 2010 for the proposed corrective action remedy.

The corrective action remedy approved by DTSC and implemented at the Facility includes a land use covenant (LUC) and an Operations and Maintenance (O&M) Agreement entered into between DTSC and the Permittee. The LUC and the O&M Agreement apply to an impacted area totaling approximately 1.4 acres. The LUC prohibits use of the impacted area as a residence, hospital, school or daycare. The LUC also prohibits the extraction of groundwater without prior approval of DTSC. The O&M Agreement requires an annual inspection of the impacted area and maintenance of the steam clean sump and surface cover (paving). No activities that may disturb the soil are allowed without a DTSC-approved soil management plan.

2. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new SWMUs not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
3. DTSC may require the Permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment and newly identified SWMUs or releases of hazardous waste and/or hazardous constituents. If and when corrective action is required at the Facility, the Permittee shall conduct corrective action under either a Corrective Action Consent Agreement or an Enforcement Order for Corrective Action issued by DTSC pursuant to Health and Safety Code sections 25187 and 25200.10.
4. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such

property within 30 days of approval of any workplan for which access is required. "Best efforts" as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.

5. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.

Table 1
Description of Waste Streams Stored in Unit #1 (PCB Storage Tank)

SDG&E Waste Stream No.	Name of Waste Stream	California Waste Code	Process Generating Waste
9310	PCB Contaminated Mineral Oil < 5000 ppm	731	Decommissioning transformers and other electrical equipment.
9320	PCB Contaminated Mineral Oil < 1,500 ppm	731	Decommissioning transformers and other electrical equipment.
9510	PCB Contaminated Mineral Oil < 5000 ppm with water	731	Spill cleanup, salvage of PCB transformers, cleaning electrical vaults.
9520	PCB Contaminated Mineral Oil < 500 ppm contaminated with water	731	De-watering of vaults and sumps, berm rainwater,
9530	PCB Contaminated Mineral Oil < 50 ppm contaminated with water.	731	De-watering of vaults and sumps, berm rainwater,

Table 2
Description of Waste Streams Stored in Unit #2 and #3 (PCB Storage Building #1 and #2)

SDG&E Waste Stream No.	Name of Waste Stream	California Waste Code	Process Generating Waste
9000	PCB contaminated electrical equipment with a PCB concentration >10,000 ppm	261	Removal of PCB containing electrical equipment from service
9020	Equipment once containing PCB >500 ppm	261	Removal of PCB containing electrical equipment from service
9030	Equipment once containing PCB >50 and <500 ppm	261	Removal of PCB containing electrical equipment from service
9040	Equipment once containing PCB >1 ppm and < 50 ppm	261	Removal of PCB containing electrical equipment from service
9100	Emptied drums once containing PCB > 1 ppm and < 5000 ppm	261	Salvage operation
9102	Emptied drums previously containing oil w/499ppm >PCB< 1500ppm	261	Salvage operation
9130	Solids contaminated with PCB >1 ppm and < 5000	261	Spill cleanup, transformer refurbishing/salvage, waste created inside the facility.
9135	Solids, oily PCB >1000 ppm	261	Spill cleanup, transformer refurbishing/salvage, waste created inside the facility.
9150	Solids contaminated with PCB >1 ppm and < 50 ppm	261	Spill cleanup, transformer refurbishing/salvage, waste created inside the facility.
9310	PCB Contaminated Mineral Oil < 5000 ppm	731	Decommissioning transformers and other electrical equipment.
9320	PCB Contaminated Mineral Oil < 1,500 ppm	731	Decommissioning transformers and other electrical equipment.
9510	PCB Contaminated Mineral Oil < 5000 ppm with water	731	Spill cleanup, salvage of PCB transformers, cleaning electrical vaults.
9520	PCB Contaminated Mineral Oil < 500 ppm contaminated with water	731	De-watering of vaults and sumps, berm rainwater,
9530	PCB Contaminated Mineral Oil < 50 ppm contaminated with water.	731	De-watering of vaults and sumps, berm rainwater,

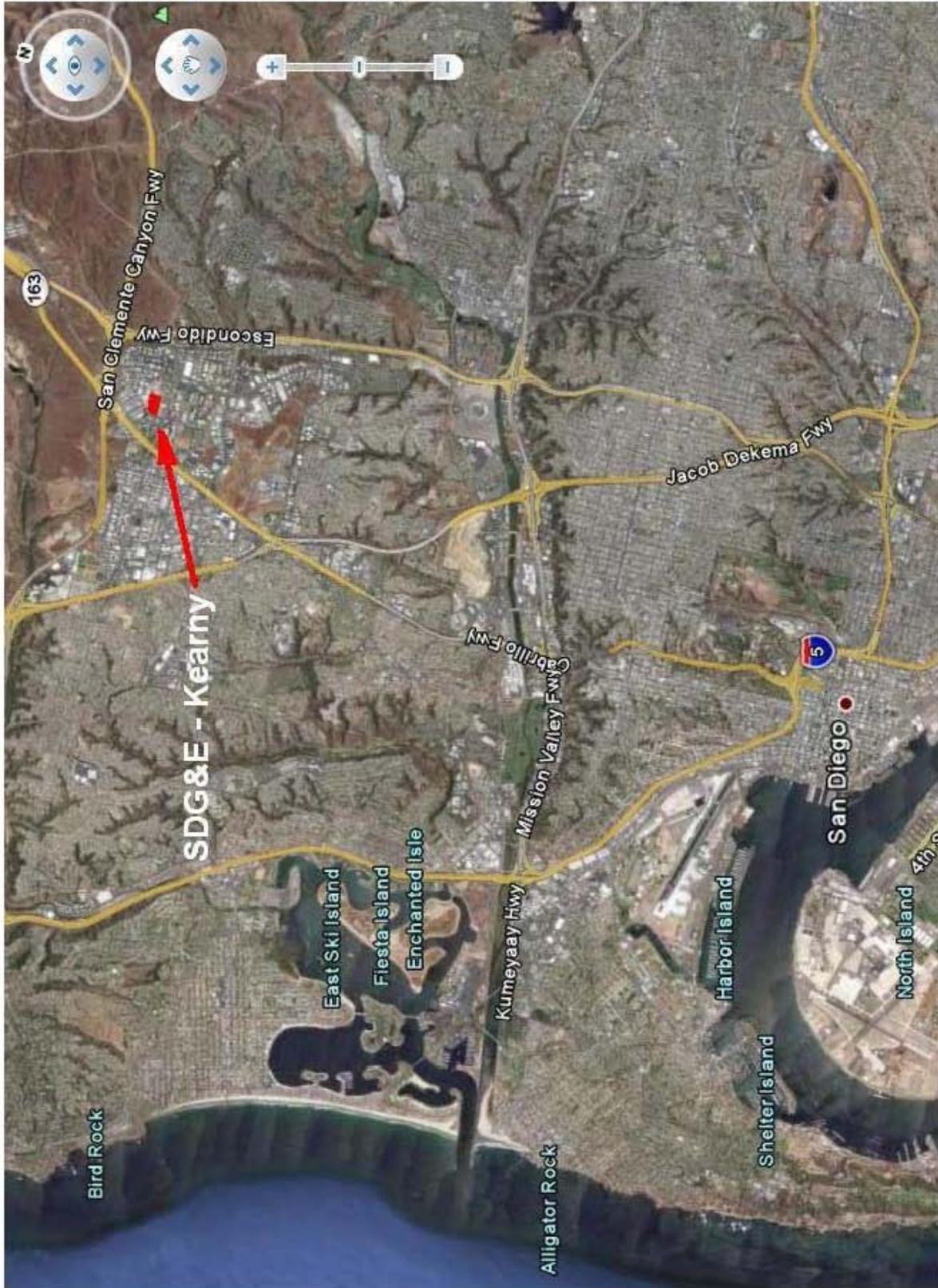


Figure 1 Regional Map, Google Earth, August 24, 2010

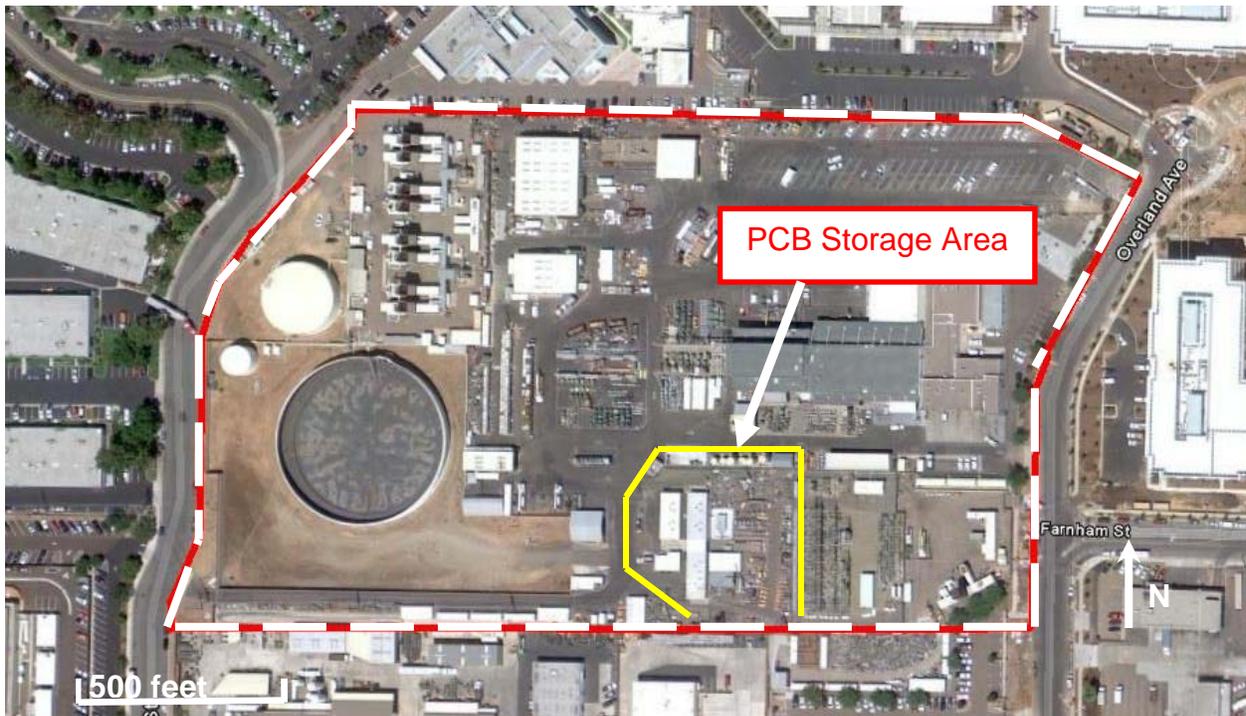


Figure 2: PCB Storage Area

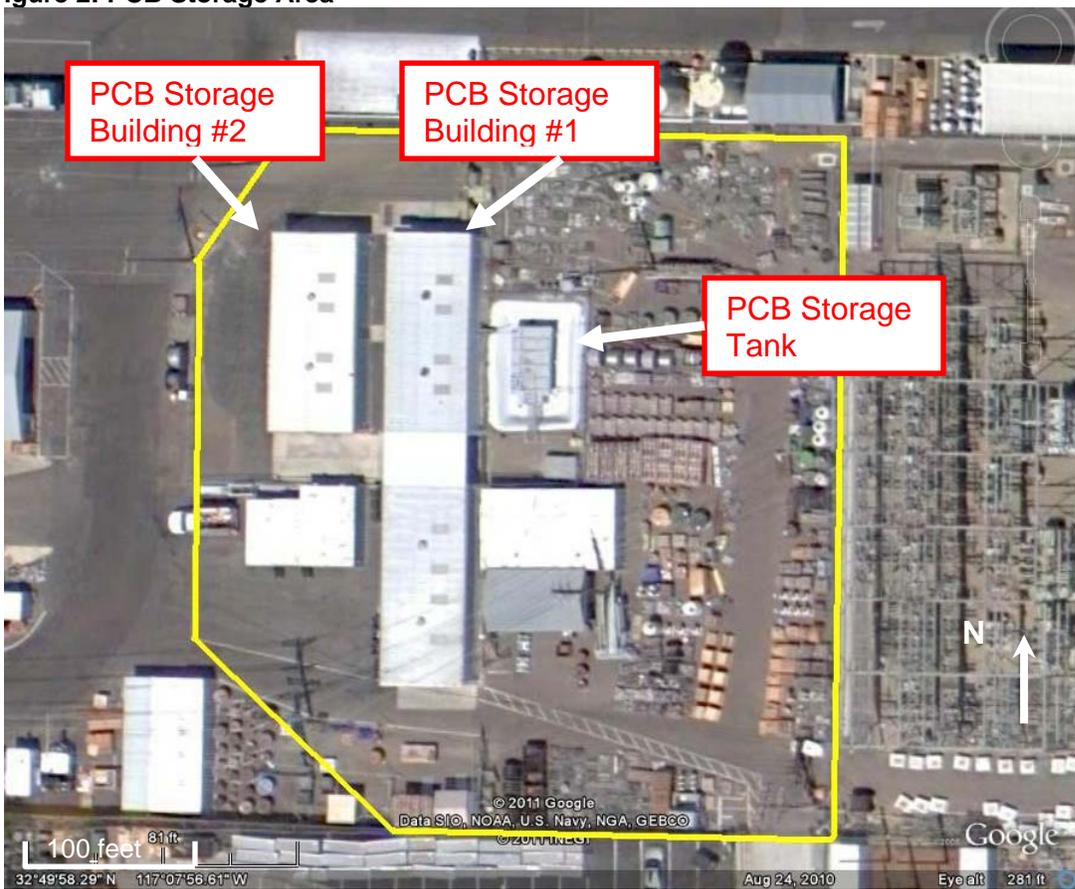


Figure 3: PCB Storage Units