SAN DIEGO GAS & ELECTRIC

MIRAMAR
WASTE MANAGEMENT
FACILITY

OPERATIONS PLAN

(PART B)
(APPLICATION RENEWAL)

OCTOBER 2006

PART B CERTIFICATION

SDG&E Miramar Waste Management Facility
6875 Consolidated Way
San Diego, CA 92121-2602

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

DONALD A. WALLER ENV. SVCS. MGR

Print: Donald A. Waller – Environmental Services Manager

Donald A Waller

Signature: Donald A. Waller – Environmental Services Manager

10/12/06

Date

San Diego Gas & Electric Company

Miramar
Waste Management Facility

OPERATIONS PLAN

6875 Consolidated Way
San Diego, California 92121

OCTOBER, 2006

San Diego Gas & Electric
Miramar Waste Management Facility
OPERATIONS PLAN

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EXHIBITS

EXHIBITS (Continued)

San Diego Gas & Electric
Miramar Waste Management Facility

OPERATIONS PLAN

I. General Information Requirements

A. San Diego Gas & Electric Company (SDG&E) Miramar Waste Management Facility (Facility):

1. EPA Identification Number:
   CAD 981168107

2. Name:
   San Diego Gas & Electric Company
   Miramar Waste Management Facility (Facility)

3. Type of Facility:
   This existing Facility will be used exclusively for wastes generated by SDG&E in the course of conducting its regular business. SDG&E is an investor owned combination gas and electric public utility. Most wastes will be stored in DOT approved fifty-five gallon drums. Some out-of-date product may be temporarily stored in its original carton. Other containers for wastes will be DOT approved poly containers ranging in size from five gallons to eighty-five gallons.

   This Facility is located inside an existing SDG&E operational site, which is accessed through an on-site material store yard. Access to the material store yard is controlled by a chain link fence enclosing the entire area and through a card-activated gate. Other gates to the enclosure are closed and locked.

   This Facility is fenced apart from a separately owned and operated turbine yard with a chain link fence. Drums with hazardous waste will be delivered by SDG&E flat bed trucks or tractor-trailers that are registered hazardous waste haulers. Drum handling will be accomplished by forklift, boom truck, or hand dolly.

   Drums will be stored on pallets, four drums to a pallet, two pallets high (maximum) for solid waste, and one pallet high for liquid wastes. When a truckload, or other economical disposal quantity of material is accumulated, and all other requirements have been met, the drums will be manifested to the appropriate treatment or permanent disposal sites via SDG&E trucks or commercial haulers.

   All operations will be conducted in accordance with this Operations Plan. Waste analyses are conducted by State of California licensed laboratories.

4. Mailing address:
   101 Ash Street - Environmental & Safety
   San Diego, CA 92101
   Attention: W.G. Brull

5. Location:
   6875 Consolidated Way
   San Diego, CA 92121

6. Telephone Number:
(619) 696-2417

7. SIC Codes (in descending order of significance):
4911 Electric service
4923 Gas Service

8. NAICS Codes:
Note: The North American Industry Classification System (NAICS) replaces the U. S. Standard Industry Classification system.
237120 Oil and Gas Pipeline and Related Structures Construction
237130 Power and Communication Line and Related Structures Construction

B. Operator Identification:

1. Name of business who legally controls operation of the Facility:
San Diego Gas & Electric

2. Mailing address:
8330 Century Park
San Diego, CA 92123

3. Telephone Number:
(858) 650-6100

C. Owner Identification:

1. Name:
San Diego Gas & Electric

2. Mailing address:
8330 Century Park
San Diego, CA 92123

3. Telephone number:
(858) 650-6100

D. Contact Person:

1. Name:
Willis G. Brull

2. Title:
Senior Environmental Specialist

3. Work Telephone Number:
(619) 696-2417

4. Name and address of company:
Sempra Energy
101 Ash Street
San Diego, CA 92101

E. Preparer Identification:

1. Firm:
   Sempra Energy
   101 Ash Street
   San Diego, CA 92101

2. Name of person:
   Willis G. Brull

3. Title:
   Senior Environmental Specialist

4. Work telephone number:
   (619) 696-2417

F. Date of DTSC instructions used to prepare plan:
   January 14, 2001

II. Maps of Facility and Surroundings: Associated Information

A. Exhibit 1 is a United States Geological Survey topographic map delineating:

1. Area extending one mile beyond property boundaries of the Facility.

2. Property boundaries of the Facility.

3. There are no intake and discharge structures at this Facility.

4. There is no underground injection of fluids at this Facility.

5. The location (on site and within one mile) of each of the following, if known:

   a. There are no known wells.

   b. There are no known springs.

   c. There is one pond on the United States Marine Corps Air Station Miramar south of the Facility within one mile; it is shown on the map.

   d. There are no known drinking water wells.

   e. There are no aqueducts. Public water supply systems are City of San Diego water mains and services in city streets and rights of way.

B. Exhibit 2 provides detailed topographic maps having the following:

1. The map layout showing:

   a. Scale
      (1) One inch represents 200 feet.
      (2) Consistent with contour intervals described in II.B.2.a.

   b. North arrow.

c. Date map completed: 6-20-01

d. The property boundaries plus surroundings extending 2,000 feet beyond the perimeter of the Facility.

e. Location of the Facility
   (1) Latitude 32° 52' 34" N
   (2) Longitude 117° 09' 57" W
   (3) Township 15 South
   (4) Range 3 West
   (5) Section 11
   (6) Principal Meridian: San Bernardino
   Longitude 116° 55' 48" W
   (7) Assessors Parcel Numbers: #343-050-62, 63, 67, 68
   (8) The location of the Facility (there is only one Facility) used for hazardous waste:
      (a) Treatment
      (b) Storage
      (c) Disposal – there is no disposal at this Facility.

2. Land characteristics showing:

   a. Existing contours and elevations; contour intervals are 2 feet, as relief is greater than 20 feet.

   b. Proposed final contours and elevations of the completed facility are the same as the existing contours and elevations.

   c. Area of the 100-year flood plain.

   d. There are no surface waters or intermittent streams within 2000 feet of the Facility.

   e. Prevailing wind speed and direction is shown by a Windrose Map included as part of Exhibit 2A.

   f. Exhibit 2B shows land uses in the 200 feet radius are light industrial and zoning is M1-A. The United States Marine Corps Air Station Miramar is a military air station.

3. Facility characteristics, showing the following, are part of Exhibit 3 (4 Sheets):

   a. Legal boundaries of the Facility for which clear title and lease is held.

   b. Locations of permanent access roads.

   c. Locations of permanent internal roads.

   d. Traffic associated with the Facility on the off-site.
      (1) *Pattern:*
      Access to the Facility is via Miramar Road, both from the east and from the west, then via Milch Road and across Consolidated Way. Miramar Road accommodates six lanes of traffic.

(2) Control is effected by standard City of San Diego traffic signals and signs. Left turn lanes are present on Miramar Road. Stacking lanes expressly for the Facility are not appropriate.

(3) Locations of Control Signals:
Traffic lights with left turn signals and left turn lanes on Miramar Road control traffic at the intersection of Miramar Road and Milch Road.

(4) Type of surface and/or bearing capacity of access roads:
Public streets are City of San Diego asphaltic concrete. Company property roadways are concrete for the Miramar Storeyard portion of the site, and gravel for the separately owned and operated gas turbine yard portion of the site. Company property roadways are built to specification of the American Association of State Highway and Transportation Officials "H-20" which will accommodate trucks loaded for legal travel on California highways.

e. Security Fencing

(1) Security fencing is shown surrounding Miramar Storeyard, the separately owned and operated gas turbine yard, and the storage and treatment Facility.

(2) All existing fencing is 8-foot chain link. At the Miramar Storeyard, it is topped with a coil of concertina wire. At the gas turbine yard, it is topped with two to four rows of barbed wire.

f. Access Control

(1) A 40-foot gate is provided at Milch Road and Consolidated Way. Two 12-foot gates (see Exhibit 10) provide drive-through access to the Facility.

(2) Types:
When any of the facilities are not manned, the gates are locked.

g. Names, locations and dimensions of the Facility.

(1) Treatment Facility:
Treatment is strictly limited to combining of like wastes and the addition of absorbent to top off partially filled drums.
The San Diego Gas & Electric Waste Management Facility location and dimensions can be seen in detail on Exhibit 10.

(2) Storage Facility:
The San Diego Gas & Electric Management Waste Facility for the Storage Facility is one and the same with the Treatment Facility.

(3) Loading and unloading is accomplished in the drive-through area seen on Exhibit 10. Since most material at the site is containerized in drums, loading and unloading at the Facility mainly consists of using a forklift or a boom truck.

(4) Exhibit 10 shows specific locations and identity of containers. Incompatible wastes are separated by the 6-foot high concrete block wall. There are no tanks.

(5) There are no equipment and container cleaning areas. These functions are not performed.

(6) Exhibits 3, 3A, 3B and Exhibit 10 shows plans of existing buildings on the property used for purposes other than hazardous waste, and the hazardous waste storage building.

(7) Containment structures are the 12-inch high containment wall built around and as part of the Facility, shown on Exhibit 10. Also shown is the 6-foot high concrete block wall separating incompatible wastes.

(8) Buffer zone:
Exhibit 3C shows the 50-foot buffer zone from property line to satisfy the setback requirements for locations of containers holding ignitable or reactive wastes.

(9) Other structures:
Storm drains (2 locations along the storm drain easement) can be seen on the Miramar Storeyard Lot Plan, Exhibit 3C. There are no sanitary and process sewerage systems other than City of San Diego sewer lines to all manned facilities.

h. Other locations and types of facilities on the site:
(1) There are no environmental monitoring stations, as all storage is in drums or plastic containers on concrete, bermed areas.
(2) Surface drainage onto the property from the north is diverted by a brow ditch running the length of the north edge of the property. The terrain of the property is basically flat, with runoff to the south, eventually into Rose Canyon. Since the elevation of the containment wall of the facility is higher than the unrestricted drainage of the property, no further facilities for controlling surface or subsurface drainage are required.
(3) There are no injection and withdrawal wells, either:
(a) Onsite.
(b) Offsite.

i. Other locations and types of facilities through the site:
(1) Power Lines - the SDG&E transmission line corridor is shown on the west side of Exhibit 3C.
(2) Pipelines - there are no pipelines through this site.
(3) Easements - easements through this site are shown on Exhibit 3C. Note there are no easements through the Facility itself, only through the surrounding property for which clear title or lease is held.

C. The following information associated with the maps is provided:

1. Exhibit 4 is a written legal description of the property occupied by the Facility for which clear title is held. It also includes the legal description of the lease held on contiguous property.

2. Estimated volume of traffic associated with the Facility:

a. Ten deliveries entering per week. Three shipments for treatment or disposal leaving per month.

b. Vehicles consist of tractor-trailer, flatbed truck or tanker truck.

3. Characteristics of permanent access roads:

a. Public streets are City of San Diego asphaltic concrete. Company property roadways are concrete for the Miramar Store yard portion of the site, and gravel for the separately owned and operated gas turbine portion of the site.

b. Load-bearing capacity
Company property roadways are built to specification of the American Association of State Highway and Transportation Officials "H-20" which will accommodate trucks loaded for legal travel on California highway

4. There are no other existing hazardous waste facilities at this site.

III. Geology of the Site

A. The geologic information is provided below for this Facility.

B. No portion of the Facility is located within 200 feet of a fault with a displacement in Holocene time, nor is the site located in an Alquist - Priolo Special Studies Zone.

Exhibit 5, Earthquake Shaking and Fault Rupture in San Diego county, a report to the San Diego County Earthquake Preparedness Committee by Philip Kern of The Department of Geological Sciences, San Diego State University, is cited as one basis for this determination.

Exhibit 5A provides information on the location of the closest fault in the Elsinore fault. The exhibit is abstracted from the CalTrans, Office of Earthquake Engineering, "California Seismic Hazard Map", 1996.

Exhibit 5B presents one map combined from Geology of the La Jolla and Geology of the Del Mar quadrangles, which show known earthquake fault lines in the area. As can be seen on these maps, no known fault lines are in the area of United States Marine Corps Air Station Miramar or Miramar Road east of Highway 805.

C. A 1971 boring at the site encountered no groundwater at a depth of 35 feet. The closest site where actual groundwater depth could be determined is in the vicinity of 9840 Miramar Rd. Depth at that location is 75 feet (data provided by the Regional Water Quality Control Board).

D. Article 9, Section 25200, of the Health and Safety code states in part, "The department shall issue hazardous waste facilities permits to use and operate facilities which in the judgment of the department meet the building standards published in the State Building Standards Code relating to hazardous waste facilities and the other standards and requirements adopted pursuant to this Chapter." Exhibit 5C presents six pages of specifications and maps of the typical foundation plans and specifications used for this Facility. Seismic standards required of the State Building Standards Code were calculated at the time building design was completed.

IV. Relationship of the Facility to the 100-year Flood Plain

A. This Facility does not lie within a 100-year Flood Plain.

1. The source of this data is SanGIS Flood Plain Map (Exhibit 6) and an estimate of flood plain levels from the City of San Diego general guidelines. The property immediately south of the proposed site is the United States Marine Corps Air Station Miramar for which no flood plain data exists.

2. Copies of:

a. The SanGIS Map is included as Exhibit 6.

b. Other calculations or maps are not provided.

3. The 100-year Flood Plain level, including the City of San Diego estimate, is plotted on Exhibit 6. Additionally, Exhibit 6A, the large-scale elevation map of the Facility plot, shows a rapid decrease in elevation on the east side of property to 385 feet. This 385 feet elevation can be traced to a further decline to 315 feet and lower by referring to Exhibit 2 where the estimated 100 year Flood Zone is plotted at approximately 330 feet. This differential of 75 feet from the estimated flood zone level to the 405 feet elevation of the site precludes any possibility of location in the 100-year Flood Plain.

B. The Facility does not lie within the 100-year Flood Plain, so no more information is provided.

V. Characteristics of Hazardous Wastes Handled at the Facility

A. Identity of Each Hazardous Waste Handled

Exhibit 7 provides complete descriptions of all the waste streams anticipated for storage at the Facility. If a new waste stream requiring modification of the Plan is identified at some future time, then we will have the Plan modified, with DTSC approval, to accurately reflect any changes.

B. Methods for Identification of Hazardous Wastes

1. The methods spelled out the Article II, Title 22 of the California Administrative Code for identification and testing of hazardous and extremely hazardous wastes are followed. See V.C. for details of methods used.

2. The level of analysis required to adequately identify wastes is of sufficient detail to ensure compliance with Chapter 6.5, Division 20, Health and Safety Code, and with Chapter 30, Division 4, Title 22, California Administrative Code. See V.C. for details.

C. Waste Analysis Plan

This Waste Analysis Plan is written to ensure that wastes handled at the Facility are properly analyzed chemically and physically. The Facility is used exclusively for wastes generated by SDG&E in the course of conducting its regular business. Most wastes will be stored in DOT approved fifty-five gallon drums. Some out-of-date product may be temporarily stored in its original carton. Other containers for wastes will be DOT approved poly containers ranging in size from five gallons to eighty-five gallons.

Wastes will be delivered to the Facility from SDG&E 90-day generator sites and from spill cleanup sites throughout the SDG&E service territory. Each generator site will determine if the waste to be shipped is restricted from land disposal according to 40 CFR 268. If it is, and it does not meet the applicable treatment standards set forth in Subpart D of 40 CFR 268 or exceeds the applicable prohibition levels set forth in 268.32 or RCRA 3004(d), with each shipment of waste to the Facility the generator site will notify the Facility in writing of the appropriate treatment standards set forth in Subpart D of 40 CFR 268 and any applicable prohibition levels set forth in 268.32 or RCRA 3004(d). The notice must include:

(1) EPA Hazardous Waste Number
(2) The corresponding treatment standards and all applicable prohibitions set forth in 268.32 or RCRA section 3004(d).

(3) The manifest number associated with the shipment of the waste; and
(4) Waste analysis data, where applicable

If the generator site determines that it is managing a restricted waste under Part 268, and determines that the waste can be land disposed without further treatment, then each shipment of waste must submit to the Facility a notice and a certification statement that the waste meets the applicable treatment standards set forth in Subpart D of 40 CFR 268.22 or RCRA section 3004(d). The notice must include the following information.

(1) EPA Hazardous Waste Number.
(2) The corresponding treatment standards and all applicable prohibitions set forth in 268.32 or RCRA section 3004(d).
(3) The manifest number associated with the shipment of the waste; and
(4) Waste analysis data, where applicable.

The certificate must be signed by an authorized representative and must state the following:

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 and RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

Drums are stored on pallets, four drums to a pallet, two pallets high (maximum) for solid waste, and one pallet high for liquid waste. When a truckload or other economical disposal quantity of material is accumulated, and all other requirements have been met, the wastes will be manifested to the appropriate treatment or disposal sites via SDG&E trucks or commercial haulers. When the wastes are manifested to treatment and disposal facilities, the land disposal restriction information presented by each generator site, as described above, will be forwarded along with the wastes. Copies of this documentation will be kept at the facility.

D. Methods of Identification of Hazardous Waste

SDG&E has a discrete number of operations and activities that generate hazardous wastes. Initial generation of a waste triggers a comprehensive analysis to provide the information necessary to properly manage the waste. SDG&E laboratory personnel evaluate each new waste situation, and based upon information available and known conditions, prepare a plan to properly describe the waste. Provisions of Article 11 of Title 22 are followed to get complete analyses for proper management of the wastes. Later sections of this Plan provide details of actual test methodology.

Once wastes have been carefully defined, subsequent analyses are called for to ensure proper categorization of the waste and to ensure descriptions provided by operational personnel have been properly supplied. The test procedures used are spelled out in Tables 2 and 3. Tests are also conducted as agreed to with commercial treatment and disposal centers to verify the characteristics of the wastes they are being sent.

All sampling and testing is done by, or under the supervision of, the SDG&E Environmental Analysis Laboratory. The SDG&E Environmental Analysis Laboratory

(Lab) is licensed by the State of California, Department of Health Services. The QA/QC Plan for the Lab is provided as Exhibit 8 to the Operation Plan.

The following boundary condition is practiced by this Facility:
Wastes from oil spills in the field are screened for polychlorinated biphenyls (PCBs) before drums are moved. Other wastes that potentially could contain PCBs are also screened for PCBs. PCBs are not stored at this Facility. If verification has not been provided that PCBs are not present, either through laboratory tests or operational procedures (e.g. "< 2 ppm PCBs" nameplates on equipment), wastes will not be delivered to the Facility. SDG&E has a totally separate permitted hazardous waste facility at another geographic location for storing and handling PCB contaminated wastes.

1. On-Site Facilities

   The SDG&E Miramar Waste Management Facility is clearly an off-site facility. This waste analysis plan contains procedures in V.C.2 which adequately describe operations for off-site facilities' waste analysis. However, since only SDG&E wastes are managed by the SDG&E Miramar Waste Management Facility, waste analysis plan procedures in this Section (V.C.1) for on-site facilities provides additional logical control methods needed for proper management of wastes. SDG&E Facility personnel are also the people who pick up and transport all the waste to the Facility or they are responsible for having it done by licensed haulers. This provides an additional level of control for the wastes going into the Facility.

   a. The parameters for which the wastes will be analyzed are shown in Table 1.

   b. The reasons why those parameters were selected for analysis are also shown in Table 1.

   c. The methods to be used for analyzing the waste are shown in Table 2. Table 3 shows which tests are used for each SDG&E waste profile. Tests to be conducted are carefully selected based upon what knowledge SDG&E and lab personnel have about the operation that created the waste, whether or not the waste is a liquid, if the waste is a spill, whether or not PCBs could possibly be present, if solvents have been used, and from MSDSs for original materials. Lab personnel gather this information from questioning operating people and from their personal experiences of working on investigations of SDG&E hazardous wastes.

   d. The sampling methods prescribed by the lab to be used for obtaining a representative sample of the waste are all described by "Test Methods for Evaluation Solid Waste, Physical/Chemical Methods, " SW-846, 2nd Edition, U.S. Environmental Protection Agency, 1982 or equivalent. Actual methods used for each type of waste at SDG&E are shown in Table 4.

      Liquid wastes (oily waters and contaminated waters, lube oils, etc) are collected and stored in DOT Specification drums. These drums have bung openings, limiting access to the contained wastes. Composite samples are taken with a coliwasa to get all layers. These wastes have no horizontal stratification. Enough samples are collected to obtain an adequate volume for analysis.

      Most SDG&E solid wastes are heterogeneous, requiring individualized sampling approaches relative to the drum contents. For example, a drum

containing oil contaminated rags, absorbent, dirt, filters, and debris would be sampled in a manner to obtain the worst possible contaminated conditions to protect SDG&E from future liability after disposal. A trowel or shovel would be used to collect the most contaminated dirt. Scissors would be used to snip off pieces of the most oily rags. A quasi-grid approach would be used to collect from representative drum areas.

e. The frequency with which the waste analysis will be repeated or reviewed for accuracy and timeliness may vary as described below.

The initial testing to characterize a new waste, referred to above and detailed in Table 3 are repeated when there is reason to believe basic assumptions have changed, or when necessary to satisfy inquiries from commercial disposal or treatment centers used by SDG&E. At a minimum, the tests described for a waste in column A of Table 3 are conducted at two-year intervals to maintain an accurate analysis and a timely description of the wastes. In the meantime, lab personnel obtain knowledge of potential changes in several ways - examination of physical properties of the waste, feedback from SDG&E personnel, and knowledge of SDG&E operations.
In addition to samples and analysis described above, Table 3 lists those wastes sampled at the Facility prior to shipment for treatment or disposal.

Lab tests to be conducted on these samples are based upon several factors: physical examination of the waste, information from operating personnel on where the waste came from, whether or not PCBs could reasonably be present, whether solvents have been used in a cleanup, agreements with treatment and disposal facilities, etc. Table 3 represents the tests conducted on SDG&E wastes prior to shipment.

f. The methods to be used for ensuring compatibility of wastes with handling methods.

Wastes entering the facility generally are in 55-gallon steel drums, sometimes in its original carton, or other DOT approved poly containers ranging in size from five gallons to eighty-five gallons as described in the Operations Plan. Processes generating the wastes and the initial tests conducted by the Lab are examined to ensure wastes are compatible with the containers used at this facility. Steel drums with ignitable or potentially ignitable wastes are grounded. Original containers for out-of-date or off-spec product were originally selected for compatibility. If overpack drums are needed for acid or caustic wastes leaking from plastic or lined drums, polyethylene lined steel salvage drums or polyethylene salvage drums will be used.

Careful analysis of wastes being handled has determined the compatibility of wastes with the handling methods. Wastes are compatible with the drums which contain them, and the boom truck, flatbed trucks and forklift are configured for safe handling and transporting of drums. Any changes are carefully studied to result in increased safety to the public and the environment.

TABLE 1

WASTE	BASIS FOR HAZARD LISTING	PARAMETERS ANALYZED	RATIONALE FOR SELECTING PARAMETERS
Metals:			
SDG&E Profile E71916 sandblast grit from sandblasting painted and/or rusted surfaces.	Toxic	Total Metals	This is solid waste from known sources.
SDG&E Profile E93053 Wastewater filtercake from heavy metal removal from power plant wastewater.	Toxic	Total Metals pH Moisture grease & oil PCB	Repeated analyses from boiler cleanings have established hazardous properties of this waste.
SDG&E Profile F96153 Boiler Fireside debris from residual fuel oil/natural gas combustion.	Toxic	Total Metals pH	Repeated analyses have established hazardous properties of this waste.
SDG&E Profile F96552 Chromium treated water from disposal of cooling water, service water.	Toxic	Total Metals pH	Repeated analyses have established hazardous properties of this waste.
SDG&E Profile F97572 Paints, coatings and absorbent from painting equipment and buildings, outdated product.	Toxic	Total Metals pH Flashpoint	This waste is from known sources and known processes with a long history of analysis.
SDG&E Profile H04964 Oil, water, debris (Liquid) from cleanup of power plant trenches and electric vaults.	Toxic	Total Metals pH Flashpoint Moisture Grease & oil, PCB	This waste is from known sources with a long history of analysis.
Oils and Solvents:			
SDG&E Profile F97576 Pipeline trap oil from natural gas pipeline.	Ignitable	Flashpoint PCB Gas odor	Material is exclusively from traps in natural gas pipelines.
SDG&E Profile GO2549 Oil-contaminated rags, absorbent, dirt, filters, debris from power plant cleanup and spill cleanup in the service territory.	Toxic	PCB Metals Solvents Flashpoint	Waste is from known sources with a long history of analysis.

TABLE 1 (Cont.)

WASTE	BASIS FOR HAZARD LISTING	PARAMETERS ANALYZED	RATIONALE FOR SELECTING PARAMETERS
Oils and Solvents:			
SDG&E Profile G78758 Solvent, oil and water from cleaning mechanical parts.	Ignitable Toxic	PCB pH Flashpoint	Oil mixture
SDG&E Profile H04902 Synthetic oil and water from gas turbine maintenance.	EPA: None Calif. 223	pH Flashpoint PCB	Known to be oil; determine flashpoint for profile; test liquid for PCB.
SDG&E Profile H04909 Solvent, oil and water from cleaning mechanical parts.	Toxic	pH	Known to be oil and solvents; determine flashpoint for profile; test liquid for PCB.
SDG&E Profile H04910 Solvent, oil and water from cleaning mechanical parts.	Ignitable	pH	Known to be oil and solvents; determine flashpoint for profile; test liquid for PCB.
SDG&E Profile H04967 Pipeline oil, water and chromates from cleaning of gas lines and cooling water systems.	Toxic	pH Flashpoint PCB Chromium	PCBs and chromate have been known to be present. Determine flashpoint for profile.
SDG&E Profile H04969 Solvent, oil and water from cleaning mechanical parts and from laboratory solvents.	Ignitable	pH Flashpoint Solvent PCB	Known to contain solvents. Determine flashpoint for profile; test liquid for PCB.
SDG&E Profile H04970 Soil contaminated with gasoline, diesel and water from removal of underground tanks and core drilling.	EP Toxicity	pH Lead PCB Flashpoint	Known source of waste contains gasoline or diesel. PCB test to determine hazard.
SDG&E Profile H04972 Oil, solvent and water from cleaning mechanical parts.	Ignitable Toxic	pH Flashpoint Solvent	Known to contain solvents. Determine flashpoint for profile; test liquid for PCB.

TABLE 1 (Cont.)

WASTE	BASIS FOR HAZARD LISTING	PARAMETERS ANALYZED	RATIONALE FOR SELECTING PARAMETERS
Oil and Solvents:			
SDG&E Profile H57809 Solids contaminated with solvents and oil from spill cleanup and solvent recovery.	Toxic EP Toxic	PCB Solvent	Known waste stream (where source of material is known).
Asbestos:			
SDG&E Profile F93706 Dirt contaminated with asbestos insulation from removal of immolation around underground lines.	Asbestos	Asbestos	Some SDG&E lines are known by operating personnel to be wrapped with asbestos.
SDG&E Profile F97568 Asbestos insulation and tiles from underground electric cable repair and facility maintenance.	Asbestos Lead	Asbestos	Some SDG&E underground cables are wrapped with Pb and asbestos.
Outdated. Off-Spec Product:			
SDG&E Profile E71917 Outdated sodium dichromate (Solid); outdated or off-spec water additive product.	EP Toxic Oxidizer	No analysis. MSDS is available.	Waste characteristics are known from MSDS.
SDG&E Profile F97565 Outdated products fuel and water additives	Combustible	No analysis. MSDS is available.	Waste characteristics are known from MSDS.
SDG&E Profile H04960 Outdated product, mineral seal oil.	Not hazardous	No analysis. MSDS is available.	Waste characteristics are known from MSDS.
SDG&E Profile H04971 Outdated product, NALCO 721 1, water additives.	Not hazardous	No analysis. MSDS is available.	Waste characteristics are known from MSDS.

TABLE 1 (Cont.)

WASTE	BASIS FOR HAZARD LISTING	PARAMETERS ANALYZED	RATIONALE FOR SELECTING PARAMETERS
Outdated, Off-Spec Product:			
SDG&E Profile H57735 Empty containers formerly containing solvents. Air dried.	EPA: None Calif. 513	No analysis. MSDS is available.	Waste characteristics are known from MSDS.
SDG&E Profile H57811 Empty plastic drums from water treatment chemicals.	Corrosive	No analysis. MSDS is available.	Waste characteristics are known from MSDS.
SDG&E Profile H57812 Outdated or off-spec product, Chevron Multimotive Grease Z.	Not hazardous	No analysis. MSDS is available.	Waste characteristics are known from MSDS.
SDG&E Profile F93055 Crushed glass from reagent bottles used in laboratory operations.	Non-hazardous	No analysis. Non-hazardous.	MSDS's of product show no Hazard.

TABLE 2
WASTE ANALYSIS METHODS

Test #	PARAMETER	METHOD	COMMENTS
1	Ignitability	Setaflash Closed -Cup	1-1020A
2	Residue, Total	Total Residual by drying oven.	2-160.3
3	NHexane Extractable Material (HEM: Oil and Grease)	Extraction and Gravimetry	2-1664A
4	Specific Gravity Density	Weight/Wolume comparison - Solids and Liquids	ASTM D 287 ASTM C 128
5	Corrosivity – pH Determination	pH indicator	1-9040B

ORGANIC TESTING

Test #	PARAMETER	METHOD	COMMENTS
6	Polychlorinated Biphenyls (PCB)	Gas Chromatography	1-8082
7	Phenols	Gas Chromatography	1-8270C

INORGANIC TESTING

Test #	PARAMETER	METHOD	COMMENTS
8	Antimony	ICAP GFAA ICP-MS	1-6010B 1-7041 1-6020
9	Arsenic	GFAA ICAP GFAA, gaseous hydride method ICP-MS	1 -7060A 1 -7061 1-7061A 1-6020
10	Barium	ICAP GFAA ICP-MS	1-6010B 1-7081 1-6020
11	Beryllium	ICAP GFAA ICP-MS	1-6010B 1-7091 1-6020
12	Cadmium	ICAP GFAA ICP-MS	1-6010B 1-7131A 1-6020
13	Chromium (VI)	Colormetric	1-7196A
14	Chromium (Total)	ICAP GFAA ICP-MS	1-6010B 1-7191 1-6020

TABLE 2
WASTE ANALYSIS METHODS (Cont.)

Test #	PARAMETER	METHOD	COMMENTS
15	Cobalt	ICAP GFAA ICP-MS	1-6010B 1-7201 1-6020
16	Copper	ICAP, AA GFAA ICP-MS	1-601 0 1-7210 1-721 1 1-6020
17	Lead	ICAP, AA graphite furnace AA ICP-MS	1-6010B 1-7421 1-6020
18	Mercury	In liquid waste (manual cold-vapor technique). In solid waste (manual cold-vapor technique). ICP-MS	1-7470A 1-7471A 1-6020A
19	Molybdenum	ICAP GFAA ICP-MS	1-6010B 1-7481 1-6020
20	Nickel	ICAP GFAA ICP-MS	1-6010B 1-7521 1-6020
21	Selenium	ICAP GFAA gaseous hydride ICP-MS GFAA	1-6010B 1-7741A 1-6020 1-7740
22	Silver	ICAP GFAA ICP-MS	1-6010B 1-7761 1-6020
23	Thallium	ICAP GFAA ICP-MS	1-6010B 1-7841 1-6020
24	Vanadium	ICAP GFAA ICP-MS	1-6010B 1-7911 1-6020
25	Zinc	ICAP ICP-MS GFAA	1-6010B 1-6020 1-7951
26	Cyanide	Colorimetric	1-9010B
27	MSDS Known Product		MSDS is used for residual hazardous characteristics.

TABLE 2
WASTE ANALYSIS METHODS (Cont.)

The above referenced methods are described in the following publications. The first digit of the reference numbers above are keyed to the numbers shown below.

1. "Test Methods for Evaluating Solid Waste," SW-846. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, D.C. 20406, 2nd edition, 1982.

2. "EPA Methods for Chemical Analysis of Water and Wastes," EPA 600 Revised March, 1983.

TABLE 3
SDG&E WASTE PROFILE

TEST	E71916		F93053		F93153		F96552		F97572		H04964		F96560		F97576		G02549		G78758	
NO.	[2]A	[3]B	A	B	A	B	A	B	A	B	A	B	A	B	A	B	A	B	A	B
1			X		X		X	X	X		X	X	X		X	X	X		X	X
2			X																	
3			X				X				X									
4							X		X		X		X		X				X	
5			X		X		X	X	X		X	X			X	X			X	X
6	X	X	X		X		X	X	X	X	X	X	X	X	X	X	X	X	X	X
7									X											
8																				
9	X		X		X		X		X		X	X	X		X		X		X	
10	X		X		X		X		X		X	X	X		X		X		X	
11																				
12	X		X		X		X		X		X	X	X		X		X		X	
13	X		X		X		X	X												
14	X		X		X		X	X	X		X	X	X		X		X		X	
15																				
16	X		X		X		X		X		X	X	X		X		X		X	
17	X		X		X		X		X		X	X	X		X		X		X	
18	X		X		X		X		X		X	X	X		X		X		X	
19																				
20	X		X		X		X		X		X	X	X		X		X		X	
21	X		X		X		X		X		X	X	X		X		X		X	
22	X		X		X		X		X		X	X	X		X		X		X	
23	X		X		X		X		X		X	X	X		X		X		X	
24			X		X		X		X		X	X	X		X		X		X	
25	X		X		X		X		X		X	X	X		X		X		X	
26			X		X		X	X	X		X		X		X		X		X	
27																				

1. Test # From Table 2.

2. Column A is initial establishment of waste characteristics.

3. Column B is subsequent testing prior to disposal or treatment.

TABLE 3 (CONTINUED)
SDG&E WASTE PROFILE

TEST	H04902		H04909		H04910		H04967		H04969		H04970		H04972		H57736		H57809		F93076	
NO.	A[2]	B[3]	A	B	A	B	A	B	A	B	A	B	A	B	A	B	A	B	A	B
1	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
2																				
3																				
4	X		X		X				X				X		X					
5	X	X	X	X	X	X	X	X	X	X	X		X	X	X	X				
6	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
7																				
8																				
9			X		X				X		X		X		X		X			
10			X		X				X		X		X		X		X			
11																				
12			X		X				X		X		X		X		X			
13																				
14	X		X		X		X	X	X		X		X		X		X			
15																				
16	X		X		X				X		X		X		X		X			
17	X		X		X				X		X	X	X		X		X			
18			X		X				X		X		X		X		X			
19																				
20	X		X		X				X		X		X		X		X			
21			X		X				X		X		X		X		X			
22			X		X				X		X		X		X		X			
23			X		X				X		X		X		X		X			
24	X		X		X				X		X		X		X		X			
25	X		X		X				X		X		X		X		X			
26																				
27																				

1. Test # From Table 2.

2. Column A is initial establishment of waste characteristics.

3. Column B is subsequent testing prior to disposal or treatment.

TABLE 3(CONTINUED)
SDG&E WASTE PROFILE

TEST	F97568		F71917		F97565		H04960		H04971		H57735		H57811		H57812		F93055	
NO.[1]	A[2]	B[3]	A	B	A	B	A	B	A	B	A	B	A	B	A	B	A	B
1							X	X	X	X								
2																		
3																		
4							X		X									
5									X	X								
6							X	X										
7																		
8																		
9																		
10																		
11																		
12																		
13											N	N					N	N
14											O	O					O	O
15											N	N					N	N
16											E	E					E	E
17	X	X																
18																		
19																		
20																		
21																		
22																		
23																		
24																		
25																		
26																		
27			X	X	X	X	X	X	X	X			X	X	X	X		

Notes: 1. Test # From Table 2.

2. Column A is initial establishment of waste characteristics.

3. Column B is subsequent testing prior to disposal or treatment.

TABLE 4
SAMPLING METHODS AND EQUIPMENT

MATERIAL	METHOD	EQUIPMENT
Extremely viscous liquid	ASTM DI 40-70	Tubing or thief
Crushed or powdered material	ASTM D346-78	Tubing, trier, scoop, or shovel
Soil or rock-like material	ASTM 0420-69	Tubing, trier, auger, scoop, or shovel
Soil-like material	ASTM D 1452-80	Tubing, trier, auger, scoop, or shovel
Fly ash-like material	ASTM D2234-82	Tubing, trier, auger, scoop, or shovel
Containerized liquids	SW-846	Coliwasa, tubing, weighted bottle or bomb sampler

Footnote for above methods:
American Society for Testing Materials, "Annual Book of ASTM Standards," Philadelphia, PA, 1982 (or latest revision).

Liquids in impoundments	SW-846	Bomb sampler, tubing, weighted bottle, and/or dipper sampler

Footnote for above method:
U.S. Environmental Protection Agency, "Test Methods for Evaluating Solid Waste," SW-846, Office of Water and Waste Management, Washington, D.C. April, 1984.

2. Off-Site Facilities

All wastes at this Facility were generated only by SDG&E. Procedures described in V.C.1 above for on-site facilities augment the procedures described for off-site facilities and ensure the proper management of the wastes that arrive at this Facility from various SDG&E generator sites. These instructions for off-site facilities are provided below, and must be used in conjunction with above instruction for on-site facilities.

a. The waste analyses that hazardous waste generators have agreed to supply.

Since the generators and the operators are the same Company, analyses have been defined in V.C.1.

b. The procedures to be used to inspect each load of hazardous waste received to ensure that it matches the waste identified on the manifest.

Cleanups of major spills throughout the SDG&E service territory are conducted by the same people that operate the Facility. Some of these drums are delivered directly to the Facility. Each drum is labeled with a "Hazardous Waste" label (Exhibit 9) and an SDG&E "Hazardous Waste Inventory" label (Exhibit 18). These are placed on the drums by the Facility operators at the time of the waste generation. The generator enters the appropriate information on the labels to properly describe the waste.

Facility operators and/or SDG&E approved hazardous waste haulers will pick up hazardous waste from SDG&E generator sites for delivery to the Facility. All drums at the generator sites are labeled with an SDG&E "Hazardous Waste Inventory" label (Exhibit 18), containing information placed there by the generator to describe the waste contents. Each drum will be examined by the Facility operators to ensure the description on the label matches the contents of the drums. For drums containing solid wastes, the lid will be removed for visual inspection. For drums containing liquid wastes, a glass tube will be used to draw a sample. The glass tube will be disposed of in the drum. The sample will be examined for odor, color, and viscosity to ensure the contents match the label description. For the types of wastes generated by SDG&E, odor, color and viscosity are adequate for verifying that the waste came from processes that would produce the waste. New waste streams would be characterized by laboratory analysis, as previously described.

c. The procedures to be used to screen for the composition of each load of hazardous waste received.

The wastes are picked up at generator sites and delivered to the Facility using the manifest system. See V.C.2.b. for a description of the employees' verification of wastes to be delivered. The land disposal restriction information described on pages 8 and 9 must accompany the wastes.

d. The procedures to be used to obtain a representative sample of waste if sampling is part of Item V.C.2.c.

The wastes described in V.C.1.d and V.C.1.e are the same wastes delivered to the facility. Wastes in the drums are matched with label descriptions as defined in V.C.2.b. Sampling at this point is not a part of Item V.C.2.c.

e. The method to be used for ensuring compatibility with handling methods.

See V.C.1.f. Handling methods are designed for drum handling efficiency and safety. Careful analysis has resulted in selection of compatible drum handling methods.

3. Facility Methods for Ensuring the Waste Analysis Plan Is Up To Date.

The Supervisor of the Environmental Analysis Laboratory is responsible for the updating of this Waste Analysis Plan. In addition to receiving feedback from laboratory personnel on changing conditions, the Manager of the Environmental Department and the Hazardous Waste Coordinator of the Facility will also provide information on changing conditions.

VI. Major Waste Management Devices Used at the Facility

A. Containers used for storage of hazardous waste.

1. Description on containers

a. Containers generally used for storage at this Facility are 55-gallon steel drums. Sometimes wastes will be stored in its original carton, or other DOT approved poly containers ranging in size from five gallons to eighty-five gallons.

b. Composition and design standard of containers:
Wastes stored at this facility are stored in DOT Specification UN1A2/X400/S/99, UN1A1/1.4/300/01, UN1A2/400/S/01, and UN1A2/1.4/150/01 steel drums. And in DOT Specification UN1H1/1.8/100/98, USA/M-4602/2.2, UN1H2/X300/S/98, UN1H2/Y250/S/98, USA/M-4148/2.2MM, USA/M-4148/2.2MM, UN1H1/Y1.8/100/93, USA/M-44603/2.2MM, UN1H2/Y180/S/00, UN1H2/Y1.2/30/01, UN1H2/X295/S/95, and USA/M-4339 poly containers. Drum linings and coatings are not used.

c. Solid wastes are generally stored in DOT Specification UN1A2/X400/S/99 and UN1A2/400/S/01 open top steel drums. Liquid wastes are generally stored in DOT Specification UN1A1/1.4/300/01 and UN1A2/1.4/150/01 closed top steel drums.

d. Absorbent materials are used to pick up spilled oil and water materials from hard surfaces, and to top-off drums to provide full drums for landfills. Exhibit 8a provides the MSDS for a typical product used, which verifies that the material is compatible with the wastes handled at the facility. SDG&E shall use overpacking

materials that will not react with, and is otherwise compatible with the hazardous waste stored at the facility.

e. Lab analysis will be completed to classify wastes and data to insure wastes are compatible with the drums and overpacking materials. SDG&E shall use a container made of or lined with materials which will not react with, and otherwise be incompatible with, the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired. No corrosive materials are stored except in original vendor-provided drums or other DOT specified and approved containers.

f. Exhibit 9 is the label used on all drums to identify the contents of each container.

2. Description of containment system

a. Containment design

The Facility will have the capacity to store 280 55-gallon drums, one drum high. Company experience has shown the need to store a maximum of 140 solid waste drums (40 waste drums will be 2-high which equals a total of 80 drums waste drums double-stacked). Absorbent materials and empty drums will be stored in a roofed area. See Exhibit 10 for a plan view of the Facility. The design construction characteristics, which make the base impervious to the waste stored, are described in Exhibit 5C.

The drums will be stored on pallets in a concrete area approximately 40' x 44'. This containment area is sloped 1% from back to front to allow collection of spills in a concrete channel. The channel runs the length of the containment area, but it is separated at the block wall for incompatible wastes, and has the capacity to contain more than 10% of the liquids stored (approximately 880 gallons). The entire storage area is covered by a roof.

b. How design promotes drainage and prevents contact.

The surface area surrounding the storage area will be sloped 1% or more away from the storage area to prevent rainwater from entering the area under normal weather conditions. The slope of the actual storage area toward the concrete channel promotes drainage of spills away from the drums. In addition, drums are stored on pallets, 4 inches high, preventing drum contact with spills.

c. Capacity of containment system

Containment for this Facility was calculated in three phases. First, containment under the roofed area for the actual storage of the waste material. Second, containment for the loading and unloading area, requiring containment of 100% of the largest load. And third, containment of the largest load plus a 24-hour, 25-year storm on the uncovered area of the Facility.

First, containment under the roofed area where actual storage takes place provides for containment in two sections. A capacity of 220

gallons (10% of 40 55-gallon drums) is provided in the concrete channel on the small side of the concrete block wall. Capacity of more than 660 gallons (10% of 120 55-gallon drums) is provided in the concrete channel of large part of the storage area. A minimum of 120 of the 280 drums stored in the TSDF will contain solid wastes.

Second, containment in the loading and unloading area provides for a capacity of over 5000 gallons. This is the volume of the largest container, a tanker truck picking up oily wastes for recycling.

Third, containment capacity for a 24-hour, 25-year storm (3 1/2 inches of rain), plus 5000 gallons maximum load, plus 330 gallons (10% of liquid wastes) were designed. This is achieved by allowing spillover into the entire area surrounded by the 12-inch high concrete berm. This is shown on Exhibit 10 as the outer perimeter of the Facility.

d. Provisions for preventing or managing run-on.

The storage area will have a 12-inch high concrete containment wall on four sides to ensure containment of spillage and to ensure that rainwater will not run into the area. The roof keeps rain off the actual drum storage area, and existing elevations around the Facility drain run-on and rainfall away from the Facility.

e. How accumulated liquids can be analyzed and removed in time to prevent overflow of the system.

There are potentially two types of accumulated liquids in the containment system. Uncontaminated rainwater will be the most frequent occurrence. This would accumulate from rainfall on the loading and unloading area and the parking area. Since this operation plan requires operation in a dry and clean mode, and since daily inspections are required when in use, the prevalent condition will be uncontaminated water. This will be verified by visual inspection before draining off the accumulated water. Once verification is made that no leakage from drums has occurred, the valves in the berm will be unlocked and opened to allow water to drain off.

The second potential condition is the accumulation of contaminated liquids in either the drum storage area or the loading and unloading area. If liquids have the appearance of contamination (such as an oily sheen) of know spillage or leakage has occurred, liquids will be pumped into drums or into a vacuum truck. Appropriate sampling would be done from the drums or vacuum tank to verify contamination. Normal procedures for handling hazardous wastes would be followed. Cleanup procedures, once liquids have been collected, are described elsewhere in this Operations Plan.

3. Containment System for Ignitable/Reactive/Incompatible Wastes

a. All hazardous waste storage at this site is within the one Facility. Exhibit 3C shows the location of the Facility more than 50 feet from

the legal boundaries of the property, providing the appropriate buffer zone.

b. Incompatible wastes will be located on opposite sides of the 6-inch wide, 6 feet high, reinforced, grouted concrete block wall, as shown on the plan view, Exhibit 10.

4. There will be no PCBs stored at this Facility.

5. Engineering Certification
Certification of the design has been provided by Craig Riker, Registered Professional Civil Engineer in the State of California, registration number 32108 (Exhibit 10).

B. There will be no tanks used for storage or treatment at this Facility.

C. There will be no underground tanks at this Facility.

1. Chemical Treatment:
There will be no chemical treatment at this Facility. This includes all the examples listed in the instructions, items a through f.

2. Physical Treatment:

a. There will be no dewatering/drying.

b. There will be no distillation.

c. There will be no evaporation.

d. There will be no filtration.

e. There will be no fixation.

f. There will be no separation.

g. There will be no sizing/blending.

h. There will be no thickening.

i. Other:
Treatment at this Facility is limited to simple combining of like solid wastes in drums to achieve minimization of wastes, and economies from shipping and disposal. Actual treatment to be performed at the Facility is limited to physical treatment of solid wastes. Liquid wastes will not be treated.

Disposal facilities' fees include per drum charges, while transportation equipment has limited capacity for volume as well as weight. Disposal facilities also charge to fill partially full drums before land disposal.

Deliveries to this Facility come from several SDG&E 90-day generator sites. The result is many partially full drums of like

materials are delivered to the Facility. These like materials will be combined, and absorbent will be added so only full drums will be presented to the disposal facility. Before materials are combined, waste analyses described in Section V must have been conducted, and SDG&E waste profiles established. Disposal volume at the disposal facility is reduced, as fewer drums will be disposed of, while per drum and transportation fees are likewise reduced. Emptied drums at the Facility are handled as hazardous waste and sent to a recycling facility.

3. Biological treatment:

There is no biological treatment at this Facility.

VII. Facility Equipment and Devices

A. Waste Handling Equipment

1. Equipment

a. There are no dozers at this Facility.

b. There are no scrapers at this Facility.

c. The truck used at this facility will be a boom truck meeting DOT and CHP requirements. It will have a gross vehicle weight of 46,500 pounds and a weight carrying capacity of 9,780 pounds. Specifications for the boom call for a maximum lifting capacity of 20,000 pounds. When fully extended (48 feet from the center line of the truck), lifting capacity is 1,700 pounds.

d. The forklift selected for use at this facility will have a minimum capacity of 4,000 pounds.

e. There are no pumps at this Facility.

f. There are no pipelines at this Facility.

g. Other:
A hand-operated barrel dolly has been purchased for use at this Facility.

2. Safety Features

a. Vehicles that are required by the CHP and DOT to have safety windshields are equipped with safety windshields.

b. The boom truck and forklift are quipped with spark arresters.

c. The forklift is equipped with a roof-over protection cage.

d. There is no artificial fresh air supply. The open-air design of the storage building (only three sides walled) precludes the need to bring in air.

e. There is no monitoring equipment, either for the area or for personnel. Drums are inspected weekly for deterioration and corrosion. Loading and unloading areas are inspected daily when in use. Exposure to undetected toxics is unlikely due to the visibility of all contained material. Acutely toxic wastes are not present. Monitoring equipment is not warranted.

f. Other:
All hauling equipment is registered as waste-handling equipment inspected annually by the CHP. Wheel chocks are regularly used on hauling equipment. The forklift and the boom truck are equipped with backup bell and horn.

B. Equipment for Safe Unloading and Handling of Containers of Hazardous Wastes from Vehicles.

1. Types of equipment:

a. Lifts - There are no lifts, other than the boom truck previously described, at this Facility.

b. Exhibit 10 portrays locations of ramp-up and ramp-down for straight-through ingress and egress at this Facility.

c. Lines - The boom truck is equipped with lift lines adequate for the design capacity of the boom.

d. Other:
Barrel slings meeting OSHA specifications are used for boom truck handling of drums. Drums are on pallets for easy handling. Individual drums are handled with a barrel grabber attachment on the forklift, which allows for picking up and rotating drums.

2. The above-named equipment is provided and used as part of the standard and safe operating procedures.

3. This equipment is provided, tested, maintained and replaced by SDG&E, Facility operator and owner.

C. Safety and Emergency Equipment

1. Safety Equipment

All safety equipment will be stored in the 12 ft. by 12 ft. storage and files room which is part of the hazardous waste management building. Included are:

a. Full-face air -purifying respirators - two.
For handling open containers or responding to releases where air contaminants are identified, less than 50 time the Permissible Exposure Limit (PEL) and may be irritating or corrosive to eyes. Disposable cartridges provided will be:

(1) combination high –efficiency particulate/acid gas-organic vapor,

(2) high-efficiency particulate, and,
(3) organic vapor.

Half-face air-purifying respirators - two.
For handling open containers or responding to releases where air contaminants are identified, less than 10 times the PEL and are not irritating or corrosive to eyes. Disposable cartridges provided will be as identified above.

b. Self-contained breathing apparatus (SCBA) – two.
For handling open containers or responding to releases of highly toxic, unidentified, reacting or burning waste.

c. Chemical goggles – two.
For handling open containers or responding to releases where full-face respirators are not worn. To be disposed of after contacting waste.

Face shields, hart hat-mounted – two.
For handling open containers or responding to releases of corrosive, highly irritating or highly toxic waste. To be worn with chemical goggles. To be decontaminated or disposed of after contacting waste.

d. Neoprene rubber boots, 10-inch over-the-shoe – two pair.
For handling open containers or responding to releases. To be decontaminated or disposed of after contacting waste.

e. Hooded chemical protective suits – two.
For handling open containers or responding to releases of corrosive, highly irritating, or highly toxic liquid or solid waste. To be decontaminated or disposed of after contacting waste.

Hooded light-duty protective suits, Tyvek or equal – six.
For handling open containers or responding to releases of asbestos or dry solid waste. To be disposed of after use.

Rubber aprons – two.
For handling open containers or responding to releases of irritating or toxic waste. To be decontaminated or disposed of after contacting waste.

f. Nitrile latex gloves - box of 12 pair.
For handling or opening containers or responding to releases. To be disposed of after contacting waste.
Leather gloves - six pair.
For handling new (empty) or sealed hazardous waste containers. To be disposed of if contacted by hazardous waste.

g. *Material Safety Data Sheets* (MSDS) on wastes.
Exhibit 11 contains a copy of all the MSDS's for wastes of out-of-date or off-spec product which would be stored at the Facility. As new wastes are approved for the Facility, the Hazardous Waste Coordinator will obtain the new MSDS's for the inclusion in this Plan.

h. There is no monitoring equipment.

2. Emergency Equipment

a. Telephone for summoning aid. Emergency phone numbers available.

b. There are two manually operated loud horns for use as a warning or alarm. Leakage from failed containers is prevented from escape by the containment system. Failures and emergencies are observable by employees when on the site, and the telephone can be used to summon aid. Although occasionally unmanned, the possibility of a container failure is remote. Section 67121, Article 19, Title 22, allows DTSC to make a determination that such equipment is not required.

c. Safety shower.

d. Eyewash

e. Twenty-unit first aid kit with SDG&E logo (Exhibit 12).

f. Fire extinguishers must comply with type, size and location requirements of City of San Diego regulations, and meet National Fire Protection Association guidelines.

3. Testing and Maintenance Schedule for Safety and Emergency Equipment.

a. Fire extinguishers are checked annually for pressure and content as part of a Company program. Fire extinguishers are inspected weekly for presence and assurance of serviceable condition (Exhibit 13).

b. All safety and emergency equipment is checked weekly. This includes the telephone, which can be used for summoning aid. Packaged, single-use equipment is checked to see that it is present. Reusable equipment is checked for cleanliness and condition (Exhibit 13). No other equipment is required by DTSC. Reusable equipment is cleaned after each use.

D. Security Measures

1. Access Control Measures

The entire Waste Management Facility is located within an existing fenced operational SDG&E compound. The Facility perimeter is entirely surrounded by 7-foot chain link fence on the 12-inch high (minimum) concrete containment perimeter wall. Gates to the Waste Management Facility are closed and locked when the Facility is unattended. When attended, only authorized personnel are allowed in to the Facility.

2. Other Access Control Measures

a. The main gate to the Miramar Storeyard is a card activated gate only allowing select SDG&E personnel access.

b. There is no full-time attendant stationed at the Miramar Storeyard gate.

3. Barriers to Unauthorized Entry

a. Types
(1) Man proof fencing
The TSDF is surrounded by 8' cyclone fence with coiled barbed on top and the entire Miramar Storeyard and gas turbine facility (separately owned and operated) is surrounded by an eight-foot chain link fence topped by concertina and/or barbed wire. Access is through a main gate which is a card activated gate only allowing selected SDG&E personnel access.
(2) There are no natural barriers

b. Locations
The location does not lend itself to natural protection from unauthorized entry.

4. Warning Signs

a. Posted on the perimeter fences.
Warning signs are posted on the perimeter fence of the gas turbine facility at appropriate intervals. This is the perimeter fence where trespassers might enter the compound

b. There are no portions of this Facility, or the private access roads, which are open to the public therefore no access road warning signs are required

c. Warning signs are posed on the fence surrounding the Facility

d. The warning signs referred to in "a" and "c" above are legible from 25 feet and have the following characteristics:
(1) Locations
The warning signs referred to in "a" and "c" above are posted on the fences on all four sides of the perimeter of the Waste Management Facility and at the entrance and at appropriate intervals on the eight-foot fence surrounding the gas turbine facility.
(2) Sizes
A letter size of one inch has been used. Letter style is block.
(3) Wording
English wording on these warning signs is "Danger - Hazardous Waste Area -- Unauthorized Personnel Keep Out."
The wording in Spanish on the same sign is "Cuidado! Zona de Residuos Peligrosos. Prohibida La entrada A Personas No Autoizadas."

E. Lighting

The Facility is not normally operated during hours of darkness. Dusk-to-dawn perimeter lighting does exist for security purposes.

1. Types of artificial lighting.

   Interior lighting in the storage area is explosion proof according to National Fire Protection Association standards, and is adequate for operational purposes should emergency operations be required at night. Additional lighting provided in the unloading and loading area consists of standard exterior 150W floodlights.

2. Locations

   Interior lights will be located over each aisle inside the Facility; there are three light fixtures per aisle. Outside lighting in the unloading and loading area is placed at each corner of the fence. There are two outdoor lights.

F. Water Supply

Water is supplied to the Facility by the City of San Diego.

1. The amount of water provided by the City of San Diego is adequate for fighting fires and cleaning equipment. Dust control is not required.

2. There will be no onsite water supply that is not approved for drinking. Signs are not required.

G. Water Supply Protection - N/A

VIII. Operational Procedures

A. Use of Manifest

1. Procedures for Deliveries to the Facility

   a. Deliveries to the Facility from generator sites are made by SDG&E employees who have hazardous waste management training. Drivers insure each load is accompanied by properly completed manifests.

   b. Driver training insures manifests for waste delivered to the Facility are signed and dated before filing.

   c. Drivers are trained to check drums being loaded and unloaded for piece count, obvious weight discrepancies, and content. Deliveries are logged in at the Facility, and information is backed up by the filed manifest. Hazardous wastes restricted from land disposal according to 40 CFR 268, or RCRA section 3004, and identified as restricted wastes by the generator sites as described in Part V.C. of this Operations Plan, will be stored at the Facility in drums solely for the purpose of accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal. Each container so identified by the generator will be clearly marked to identify its contents and the date each period of accumulation begins. If this restricted hazardous waste is the be stored for more than one year, the Facility will provide documentation proving that such storage was solely for the purpose of accumulation of such

quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal.

d. SDG&E drivers routinely file a signed copy of the delivery manifest at the Facility.

e. At time of delivery, a copy of the signed manifest is returned to the SDG&E generator site. In no case are they returned later than 30 days after delivery.

f. A signed copy of the manifest for deliveries from generator sites is sent to DTSC within 30 days after receipt.

g. Office files and space has been provided where copies of manifests are filed and retained for three years.

h. There are no manifest discrepancies since the driver corrects any misinformation at time of loading, and again at time of unloading at the Facility. Any failure to reconcile a discrepancy must be reported to DHS within 15 days after receiving the waste at the Facility.

i. Emergency cleanup of spills.
Accidents and other unexpected events throughout the SDG&E service territory requiring the services of SDG&E hazardous waste registered vehicles, which are known to be non-PCB wastes, will be delivered directly from the site of the incident to the Waste Management Facility. Direct deliveries will be entered into the Facility Operating Record - see XII.A.1.c. California Health & Safety Code Section 25163.3 authorizes transportation for emergency response in remote areas of non-RCRA hazardous wastes without the benefit of a Uniformed Hazardous Waste Manifest under prescribed limits. Those limits are 2,500 pounds of a solid non-RCRA hazardous waste or 500 gallons of a liquid non-RCRA hazardous waste. All other direct deliveries from the field to this Facility will use a Uniformed Hazardous Waste Manifest.

2. Sampling and Testing Procedures

a. Generator sites are generating known wastes from known operations. These waste streams have previously been sampled and tested, and profile sheets written to describe them. Waste drums at SDG&E are labeled with the Hazardous Waste Inventory label (Exhibit 18) describing composition of the wastes in the drum. Drums are also labeled with the Hazardous Waste label (Exhibit 9) meeting DOT requirements. Comparing labels with the manifest insures a known waste. Also, the Waste Analysis Plan (see Section V.C.) requires Facility operators to visually inspect the contents of each drum to ensure the contents match the description on the label. Facility personnel match the received waste with the list of approved waste in this Operations Plan to ensure the waste may be received at the Facility.

b. Laboratories have previously analyzed and identified known incompatible waste streams from SDG&E generator sites. Haulers

are trained in proper procedures. Unknown wastes are analyzed before being moved from the generator sites.

c. Laboratory tests have determined SDG&E waste profiles. Operators are trained in properly allowed treatment procedures, and in storage locations for ignitable and/or incompatible wastes.

3. This Facility is not open to the public. All operations are handled by and/or are under the direction of trained SDG&E operators.

B. Control of Hazardous Wastes - General

1. Operational Procedures

a. SDG&E hazardous waste haulers and Facility employees are one and the same. All have been trained in proper placement of wastes within the Facility.

Employees are instructed that all deliveries are unloaded in the concrete bermed unloading area. All drums are placed on pallets, 4 drums to a pallet. Solid wastes are placed in the row reserved for final sampling of solids by the Lab. Solid wastes cleared for shipment are placed in the row next to the wall. Drums are stored two high in a row that is cleared for shipment, with both bottom and top levels of the drums resting on pallets. Storage proceeds from back to front, stacking two high as you go.

Drums of liquid wastes are placed on pallets in the marshalling area for new drums awaiting final Lab sampling. Drums of combustibles are placed together against the 6-foot high block wall and grounded with the grounding straps provided.

All drums awaiting sampling are stacked one high only, with clear and easy access being maintained for sampling purposes. New waste streams identified by the Lab as incompatible with the existing waste streams are placed on the west side of the 6-foot high wall, and grounded if they are ignitable.

All pallets are standard design 4 ft. by 4 ft. commercial and/or industrial barrel pallets. Pallet specifications require hardwood construction with seven top boards (1" x 6") and three bottom boards (1" x 6"), and 4 stringers (2" x 4"). This design provides for a static load capacity of 5,000 to 8,000 pounds. Maximum load with four drums would be 2,000 pounds, a safety factor large enough to allow forklift handling of loaded pallets.

b. All employees are trained in hazardous waste management. Safety equipment is available and all employees know how and when to use it.

c. Except for brief periods of treatment, previously described, lids are always tightly secured to the drums to prevent dispersal of wastes.

d. There is not treatment other than previously described, and there is no storage in any type of tanks at the Facility. All wastes are

continually stored in tightly sealed steel drums. This precludes the production of any hazardous gases, mists or vapors that would escape to the atmosphere. The front of the building is entirely open to the atmosphere, minimizing and chance for accumulation of mists, fumes, dusts or gases. All shipments to and from this Facility are by licensed hazardous waste haulers who are required to comply with Title 49 regulations. Haulers are not allowed to introduce other companies' waste into the Facility, providing additional precaution against undesirable unknown reactions.

e. Spills of solid wastes will be placed back in original drum. Brooms, shovels, dustpans, and absorbent required to pick up spilled material is placed in the drum along with the hazardous material. New 55-gallon drums are used, if required. Small liquid spills are contained with absorbent, picked up with broom and dustpan, and placed in a new drum. Liquid spills of one drum or more are picked up with a commercial vacuum truck. The surface is wiped clean with rags and detergents, which is disposed of as a hazardous waste. Since the spill surface is a smooth sealed surface, wipe samples are taken, at direction of the lab, to verify complete cleanup. Should other equipment (forklift, hand dolly) become contaminated, it is to be wipe-cleaned with detergent and rags. Cleaning will take place in the loading/unloading area. All materials and supplies used for cleanup will be disposed of in a hazardous waste drum.

f. Aisle space will be maintained to allow the unobstructed movement of personal, fire protection equipment, spill control equipment, and decontamination equipment to any area of the Facility operations in an emergency. Aisles shall be arranged so that rows of drums are separated from each other by a minimum of three feet, six inches. Aisles shall be provided so that no container is more than 12 feet from an aisle. There are no main aisles. All aisles are equal.

Aisle space is maintained at a minimum of three feet, six inches to allow room for personnel for sampling and inspection. There is unobstructed height to the ceiling. Handling of material is planned for by using a forklift, moving from back to front for stacking and front to back when removing for transportation away from the Facility. In emergencies, the boom truck, using a barrel sling, can remove a drum from any location in the Facility. Unobstructed ceiling height of the Facility is 14 feet minimum.

2. Equipment is decontaminated using rags, absorbent, solvent or detergent. No water is used. Normal washing of vehicles, where decontamination is not an issue, is done away from the Facility under normal vehicle maintenance management policy.

3. The concrete block wall included in the Facility description separates incompatible wastes. All lighting fixtures are explosion proof. There will be no exposed power lines in the storage area that could potentially break. The front of the building is totally open, minimizing accumulation of vapors. Personnel are trained in safe operation of equipment, thereby minimizing any potential for fire or explosion. The forklift used at the Facility has spark arresters. If pumps are used, they must be intrinsically safe.

Drums containing ignitable liquids will be grounded. No explosive materials will be kept at the Facility. "No smoking" signs are placed in the waste storage and handling areas. No open flames are allowed at the Facility. No hot work is conducted within the confines of the Facility. The building design and container storage requirements of the National Fire Codes of the National Fire Protection Agency are met by this Operations Plan. This includes basic storage requirements for palletized storage, separation and aisles and mixed storage as it relates to flammables and combustibles.

C. Control of Hazardous Wastes - Specific

1. Containers

a. Should any poor or leaking containers be discovered at the time of regular inspections, either the drum will be placed within a salvage drum, or if the waste is solid, the material transferred to a new drum. Emptied drums will be treated as a hazardous waste.

b. The steel containers used are mostly compatible with wastes being stored. Drum specifications are contained in Section VI.A. New waste streams are characterized by the Lab, including drum storage requirements. It has been determined that most wastes are compatible with the steel drums. Very few corrosives are stored at this Facility, mainly out-of-date or off-spec product in containers supplied by the manufacturer. Containers arriving at the Facility in manufacturer supplied original containers will be inspected to verify they are in good condition for storage.

c. Standard operating procedures require that drum lids be in place except during brief periods of treatment or sampling.

d. Rough handling causing leakage of material from containers is minimized by the use of barrel slings for the boom truck, a barrel grabber for the fork lift, and by handling the majority of drums on pallets. Equipment operators are trained in proper operating procedures.

e. The inspection schedule requires weekly inspection of containers for evidence of deterioration.

f. All hazardous waste containers are stored inside the Facility, which is more than 50 feet from the property line.

g. Personnel at SDG&E generator sites are trained in hazardous waste management. Standard procedures call for placing only like wastes in a single container. Unlike wastes are not mixed, insuring incompatible wastes are not placed in the same container.

h. SDG&E procedures require used containers to be recycled. Re-use prior to recycling is allowed for compatible wastes only and if the drum is in satisfactory condition and if a liner was used inside the drum. SDG&E does prevent placement of waste in unwashed containers that had previously held an incompatible waste.

i. Any incompatible waste identified for this Facility are separated by the concrete block wall included in the facility description (Exhibit 10).

j. Empty containers in unsatisfactory condition that had contained a hazardous waste are processed by reconditioners before re-use. Drums not suitable for reconditioning or re-use are treated as hazardous waste.

k. All drums containing hazardous wastes are stored under the roofed area. New drums stored for future disposal use are also stored under a roofed area to prevent deterioration from the weather.

2. There are no PCBs stored at this Facility. SDG&E does have another permitted facility at a different location for PCB storage.

3. There are no tanks at this Facility for storage of wastes.

D. Facility Inspection

1. General Inspection - Checklist and Schedule (Exhibit 13).

a. On every Monday, the following equipment is to be inspected:
(1) There is no monitoring equipment to inspect.
(2) Safety Equipment
(3) Emergency response equipment
(4) Security devices and security control measures, such as fences, gates and signs are inspected.
(5) Structural equipment and containment systems
(6) Operating equipment:
(7) Unloading and loading area is inspected with each usage.

b. Problems to be inspected for (Exhibit 13):
(1) Containment system is free of cracks and is clean and dry.
(2) Equipment and security systems are present; intact and in working order.
(3) Drums are free of rust, corrosion and leaks, and stored on pallets and lids are in place.
(4) Material is stored in proper locations.

c. Weekly inspections are adequate, considering the probability of deterioration and/or malfunctions. The loading and unloading area is inspected on a daily basis when in use.

2. Additional procedures

a. Employees are instructed to institute immediate remedial action where deterioration or malfunction presents a hazard. Actions to correct less imminent threats are determined in consultation with the supervisor and logged on the Inspection Report.

b. Upon completion of the weekly and daily Inspection Reports, the forms are filed for a three-year retention.

c. The Inspection Report will contain the following information (Exhibit 13)
   (1) Date of inspection.
   (2) Time of inspection.
   (3) Name and title of inspector.
   (4) A record of observations made.
   (5) When repairs or remedies are made, this information will be entered on the Inspection Report.
   (6) The nature of the repairs of remedies will be entered on the Inspection Report.

3. There are no tanks at this Facility, therefore there are no required tank inspections.

IX. Personnel

A. Hazardous Waste Management Training Program

1. Outline of training programs.

   a. Introductory program
   The introductory program consisted of 24 hours of classroom training designed to comply with Federal OSHA, 29 CFR 1910.120 standards for hazardous waste storage, disposal and treatment facilities. The outline of this training program is included (Exhibit 14).

   b. Continuing program
   The continuing program consists of 8 hours of classroom training designed to comply with Federal OSHA, 29 CFR 1910.120 for hazardous waste storage, disposal and treatment facilities. The outline of this training program is included (Exhibit 15).

2. Information on each program

   a. Type of training
      (1) Classroom
      Both the 24-hour and the 8-hour training programs are conducted in an offsite, classroom setting.
      (2) On-the-Job
      There is no formal on-the-job training program.

   b. Training qualifications
   Training at SDG&E for hazardous materials and hazardous waste management is under the direction of qualified instructor who has as a minimum a Certificate in Hazardous Waste Management from an accredited university.

   The 24-hour Introductory and the 8-hour Continuing Programs are conducted offsite by selected professional training companies who present classes specifically designed to meet the requirements of 29 CFR 1910.120 and the needs of the workers at the Facility. These trainers will have received a level of training higher than and

including the subject matter of the level of instruction they are providing.

B. Content of the Training Program

Each program contains, among other things, the following elements:

1. Training in hazardous waste management procedures, including contingency plan implementation, relevant to the employees' positions.

2. The Facility employees are taught to recognize potentially hazardous wastes. Field test for identification of hazardous wastes (e.g. for pH and flammability) are conducted by SDG&E's laboratory personnel. SDG&E's lab is a State of California certified lab licensed to conduct hazardous waste identification testing.

3. Training in emergency procedures for equipment and systems includes:

   a. Procedures for using, inspecting, repairing, and replacing emergency equipment. There is no monitoring equipment at this Facility.

   b. There are no automatic waste feed systems at this Facility. No training is received on automatic feed systems.

   c. Communications systems (telephone)

   d. Proper response to fire or explosions.

   e. Proper response to spills or incidents that could potentially cause surface or groundwater contamination.

   f. Shut down of the Facility operations (ceasing receipt of drums).

   g. Accident prevention.

   h. Respiratory protection.

   i. Confined space procedures.

4. Training for each job title

   a. Introductory training
      (1) The introductory classroom training explained in IX.A.1.a. is provided to all employees at this Facility.
      (2) This introductory training consists of 24 hours in the classroom.

   b. Continuing training
      (1) The continuing training explained in IX.A.1.b. is provided to all employees at this Facility.
      (2) This continuing training consists of 8 hours in the classroom and is provided once per year.

c. How training will be designed to meet actual job tasks
Job tasks at the Facility are the basic handling, storage, and maintenance tasks common to any hazardous waste management facility, and covered in all commercially available training classes. In addition our environmental training activities insures special operational training needs, if any, are met and changes from revised and new regulations are incorporated into the training.

5. Implementation of the training program

a. This Operations Plan requires that all Facility personnel complete the 24-hour training described in IX.A.1.a within 6 months after date of employment at the Facility.

b. This Operations Plan requires that until employees have successfully completed the 24-hour training, they will work only in supervised positions.

c. This Operations Plan requires all Facility personnel to participate in the 8-hour continuing program described in IX.A.1.b. on an annual basis.

6. Training Records kept at the Facility

a. Hazardous Waste Facility Personnel.
For each position at the Facility, a file will be maintained showing:
(1) The job title
(2) The names of the employees currently filling each job.
(3) Written job descriptions for each position, including:
(a) Skill and education qualifications required
(b) Duties assigned.

b. Each hazardous waste Facility personnel file described in IX.A.5.a. will contain a Training Acknowledgment record form filled out and signed by the employee, and signed by the instructor providing the training.

7. Hazardous Waste Management Training Record Retention:

a. All training records on current personnel are maintained until the Facility closes.

b. Copies of Records concerning employees no longer at the Facility are retained for at least three years.

B. Employees required to operate the Facility.

1. A minimum of four people will be associated with operating the Facility. Their duties also include pick-up and delivery to the Facility and other SDG&E hazardous waste hauling and cleanup activities.

2. Deployment of facility personnel:

a. Facility Supervisor
One management employee will serve as the Facility Supervisor, or with some other reasonable title, supervising operations at the Facility. This person will supervise field cleanup activities, hauling activities and supervise the arrangement for pick-up of wastes at the Facility for delivery to permanent disposal facilities. This person will also supervise the arrangement for contractor help for some cleanup activities.

b. Vehicle Operator A (two employees)
These employees operate equipment for handling and delivery of wastes. These employees conducts field cleanup activities or provide oversight of contractor cleanup activities. These employees may conducts hauling activities and prepare manifests for wastes sent for treatment or disposal. These employees unload and store drums at the Facility and may be required to conduct operating day inspections.

c. Helper (one employee)
This employee moves drums with the hand dolly and is responsible for keeping the Facility clean. This employee helps with field cleanup activities and helps with hauling activities. This employee conducts weekly inspections, fills out Inspection Report and files the Inspection Report.

X. Emergency Procedures

A. Description of Contingency Plan (Exhibit 16)

1. The content of the Contingency Plan includes:

a. Descriptions of actions to be taken by facility personnel in response to:
(1) Fires
(2) Explosions
(3) Any unplanned sudden or non-sudden release of waste or constituents to:
(a) Air
(b) Soil
(c) Surface water

b. Descriptions of arrangements agreed to by the following authorities to coordinate emergency services:
(1) Local Police department
(2) Fire department
(3) Hospitals
(4) There are no arrangements made with contractors.
(5) Local emergency response teams
(6) State emergency response teams

c. Information about all persons qualified to act as emergency coordinator, including:
   (1) Names
   (2) More than one name is provided. The primary person is identified, and the others are identified in sequence to become primary person.
   (3) Both the Company and Home addresses are provided.
   (4) Telephone numbers
      (a) Office number is provided.
      (b) Home numbers are provided.

d. List of all equipment available at the Facility, which is used in conjunction with this emergency response plan, such as:
   (1) Fire extinguishing system
   (2) Spill control equipment, including portable pumps, sorbent materials, barriers, containment system, etc. There are no tank trucks used in conjunction with this emergency response plan.
   (3) Communication equipment
      (a) Internal
      (b) External
   (4) Alarm systems
      (a) Internal
      (b) External
   (5) Decontamination equipment

e. For each item of listed emergency equipment, the following is included:
   (1) Location
   (2) Physical description
   (3) Capabilities

f. Evacuation plan for personnel, including:
   (1) signals to indicate start of evacuation will come from the Emergency Coordinator.
   (2) Evacuation routes.
   (3) Alternate routes if other routes could be blocked.

2. By signing the Contingency Plan, the Emergency Coordinator and the Alternate Emergency Coordinator(s) are agreeing to the following actions:

a. To keep the plan up to date.

b. To keep a copy of the plan on site.

c. To submit a copy of all plan revisions to holders of the plan.
   (1) Police Department
   (2) Fire Department
   (3) Emergency Hospital
   (4) San Diego County Department of Environmental Health
   (5) State emergency response teams.
   (6) Emergency Coordinator and Alternate Emergency Coordinator(s).

3. By signing the Contingency Plan, the Emergency Coordinator is agreeing to ensure the Plan is amended if:

   a. The Facility permit is revised.

   b. The Plan fails in an emergency.

   c. The Facility changes substantially in design or construction.

   d. The list of emergency coordinators changes.

   e. The list of emergency equipment changes.

   f. Applicable regulations are revised.

B. Emergency Coordinator

The responsibilities of the Emergency Coordinator are spelled out in the Contingency Plan (Exhibit 16), and include:

1. Availability at all times:

   a. Onsite or

   b. On call

2. Responsibilities in an emergency such as:

   a. Notification of facility personnel and appropriate state and local agencies, if needed.

   b. Identification of the following regarding released materials:
      (1) Character
      (2) Source
      (3) Amount
      (4) Extent

   c. Assessment of health effects of released materials and agents used to control released materials:
      (1) Direct effects
      (2) Indirect effects

   d. If emergency could threaten health offsite, reporting findings as follows:
      (1) If evacuation of areas outside the Facility is required, notify local authorities; and
      (2) Notify the SDG&E department responsible for environmental issues. If the Emergency Coordinator is unable to reach the SDG&E department responsible for environmental issues then the Emergency Coordinator must immediately notify a designate local official and the State Office of Emergency Service of the following:
         (a) Name of reporter.
         (b) Telephone number of reporter.
         (c) Name of Facility.

(d) Address of Facility.
(e) Time of incident.
(f) Type of incident (e.g. fire).
(g) Name of material(s) involved.
(h) Quantity of materials(s) involved.
(i) Extent of injuries, if any.
(j) Possible hazards to health or environment outside Facility.

e. Prevention of spread or recurrence of emergency incident.

f. If Facility operations stopped, monitoring for leaks, etc.

g. Provision immediately for treatment, storage, or disposal of:
(1) Recovered waste.
(2) Contaminated soil.
(3) Contaminated surface water.

h. Ensure that cleanup is complete before incompatible waste is handled.

i. Ensure that all emergency equipment is clean and ready for use before Facility resumes normal operations.

C. Responsibilities of the Facility Operator

1. If any incident causes the use of the Contingency Plan, the Emergency Coordinator will have the SDG&E department responsible for environmental issues notify DTSC and other appropriate authorities that cleanup is complete before normal operations at the Facility resume.

2. If any incident causes the use of the Contingency Plan, the Emergency Coordinator will enter the following in the Facility operating record:

a. Date

b. Time

c. Details of the incident

3. Within 15 days of an accident, the SDG&E department responsible for environmental issues will submit a report to the DTSC including:

a. Identification of SDG&E as the owner/operator, and provide telephone number and company address.

b. Name, address and telephone number of the Facility.

c. Date, time and type of incident.

d. Name and quantity of material(s) involved.

e. Extent of injuries, if any.

f. Assessment of actual or potential health or environmental hazards, if applicable.

g. Estimated quantity and disposition of recovered material resulting from the incident

XI. Environment Control Permits

A. This Facility was issued a conditional use permit from the City of San Diego. Guidelines in the City of San Diego Hazardous Waste Facility Siting Manual were followed.

B. No regional or local Air Pollution Control District or Air Quality Management District permits relating to hazardous waste facilities were required.

C. No Regional Water Quality Control Board waste discharge permits are required since there are no discharges or no disposal at this Facility.

D. The remaining required ministerial permits such as building permits were properly acquired and processed upon receipt of Facility operating and site permits.

E. The TSDF is located inside an SDG&E facility with a surface that is entirely covered with concrete and asphalt. There has not been any endangered or threatened species.

XII. Records and Reports

A. The following instructions spell out the responsibilities for producing records and reports, and submitting them to DTSC

1. The Facility Supervisor will keep an Operating Record meeting the following criteria:

a. It will be a written record

b. It will be maintained until closure of the Facility

c. It will contain:

(1) For each load of wastes delivered to the Facility that are the result of a SDG&E field cleanup, the following information will be entered. For wastes delivered to the Facility from SDG&E generator 90-day sites, reference in the Operating Record to the manifests will serve as the required record.

(a) Where waste was produced
- i responsible SDG&E department
- ii Address of cleanup activity
- iii Telephone numbers for this information is either non-existent or irrelevant

(b) Name of equipment operator making the delivery if the hauler is SDG&E. If a contractor hauler is used, record the following:
- i Name
- ii Address
- iii Telephone

(c) There will be no wastes received at the Facility from processors

(d) Facility operator
- i Name
- ii Address

iii. Telephone

(2) For each load of waste received, the following information:
  (a) Source or reason waste was generated
  (b) Identity of the waste
  (c) Composition of waste
  (d) Volume of waste
  (e) Type of container that the waste is stored in along with the SDG&E 'Hazardous Waste Inventory' label serial number (Exhibit 18).

(3) For each load of waste received, the processing or disposal method used, if appropriate. There will be no disposal at this Facility, and processing, or treatment is limited to physical treatment described in VI.D.2.

(4) For each load of waste received for storage, the date of receipt. Note: For waste delivered to the Facility from generator 90-day sites, copies of completed manifests may serve as required records for Items XII.A.1.c.(1)-(4).

(5) The location of each waste in the Facility and quantity at each location.

(6) Records and results of waste analyses conducted in accordance with the waste analysis plan.

(7) Summary reports of incidents involving contingency plan implementation.

(8) Results of inspections

(9) Results of monitoring, testing or analytical data.

(10) There will be no notices to waste generators informing them that Facility can accept their wastes as the Facility is for SDG&E-generated wastes only.

2. Accidents which could result in a hazard to public health and safety, domestic livestock or wildlife, or result in a discharge of hazardous waste outside the area designated in the Operations Plan will be reported by the SDG&E department responsible for environmental issues to DTSC within 24 hours after occurrence. It is the responsibility of the Emergency Coordinator or the Facility Supervisor to notify the SDG&E department responsible for environmental issues.

3. If unmanifested waste from the SDG&E generator site cannot be resolved, a report will be sent to the DTSC within 15 days of receipt of this waste. The Facility Supervisor will notify the SDG&E department responsible for environmental issues of the deficiency. The SDG&E department responsible for environmental issues will report the following to the DTSC within 15 days of the receipt of the waste.

   a. EPA identification number, name and address of the Facility.

   b. Date the Facility received the waste.

   c. EPA identification number, name and address of the generator site.

   d. EPA identification number, name and address of the hauler.

   e. Description and quantity of each unmanifested hazardous waste received.

f. Method of treatment, storage or disposal for each hazardous waste.

g. Certification signed by Manager of the SDG&E department responsible for environmental issues.

h. Brief explanation of why waste was not manifested, if known.

4. The SDG&E department responsible for environmental issues will submit an Annual Report to DTSC by March 1 of each year consisting of:

a. EPA identification number, name and address of the facility

b. Calendar year covered by the report.

c. The EPA identification number of each hazardous waste generator site from which waste was received and the address and description of each cleanup site from which waste was received.

d. Description and quantity of each hazardous waste stored, treated or received during the previous year (arranged by EPA identification number of producer).

e. Method of treatment, storage, or disposal of each waste.

f. Certification signed by a responsible corporate officer.

B. The Facility Supervisor will ensure required records are available for inspection by the DTSC or any other regulatory agency at all reasonable times.

1. The required records will be available, along with all amendments, revisions, and modifications thereof, at the Facility so as to be available at all times to operating personnel and for inspection by DTSC, State Water Resources Control Board, the Regional Water Quality Control Board or any other regulatory agency.

a. Operating record

b. Training records for current employees.

c. Training records for former employees.

d. Hazardous Waste Facility permit.

e. Operation Plan

f. Waste Analysis Plan

g. Contingency Plan

h. Closure Plan

I. Closure Cost Estimate

j. Inspection Records

k. Copies of each manifest received.

2. All records will be maintained at the Facility until closure is completed and certified by an independent engineer registered in California, except for the following records, which will be kept for at least three years.

a. Inspection records

b. Training records for former employees

XIII. Closure

A. A copy of the closure plan is included in as Exhibit 19. It indicates the following:

1. How and when the Facility will ultimately be closed. The Facility will not be partially closed:

2. The maximum extent of the Facility which will remain open during the life of the Facility;

3. How the need for maintenance after closure will be minimized;

4. How escape of the following to ground water, surface water, or the atmosphere after closure will be controlled, minimized, or eliminated to protect health and the environment:

a. Hazardous waste;

b. Hazardous waste constituents;

c. Leachate;

d. Contaminated rainfall;

e. Waste decomposition products;

There is no disposal at this Facility. The closure plan calls for total cleanup upon cessation of use, leaving none of the above, a. – e. on-site.

5. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the Facility;

6. The steps required to decontaminate facility equipment during closure;

7. A schedule for final closure, including:

a. Anticipated date when wastes will no longer be received.

b. Anticipated date when final closure will be complete.

c. Intervening milestone dates which will allow tracking of the progress of closure.

8. An estimate of what it will cost to implement this closure plan, as described in Section 67002, Title 22, California Administrative Code.

B. Whenever changes in the Facility design or Facility operations occur, the Facility Supervisor will report such to the SDG&E department responsible for environmental issues. The Manager of the SDG&E department responsible for environmental issues will amend the closure plan and notify DTSC.

C. At least 180 days prior to the expected date of closure, the Manager of the SDG&E department responsible for environmental issues will notify DTSC.

D. When a determination is made that the Facility should be closed, the Manager of the SDG&E department responsible for environmental issues will ensure that, at closure, all hazardous waste containers at the Facility are shipped to designated disposal areas. Appurtenant structures and equipment will then be decontaminated or removed in accordance with the Closure Plan.
This includes the following:

1. All hazardous wastes will be removed from container storage areas.

2. There is no storage in tanks at this Facility.

E. The Manager of the SDG&E department responsible for environmental issues is responsible for ensuring that at closure, all contaminated concrete and soils have been sampled, analyzed and removed, if necessary, as described in the Closure Plan.

F. When closure is complete, the Closure Plan calls for the Manager-Environmental Department to submit a certification of same to the DTSC. The Manager of the SDG&E department responsible for environmental issues will also engage the services of an independent engineer registered in California to certify that the Facility has been closed in accordance with the specifications in the approved Closure Plan.

XIV. Financial Responsibility

Exhibit 20 is the financial assurance mechanism adopted for closure.

A. San Diego Gas & Electric has elected to demonstrate financial assurance by use of the financial test and corporate guarantee. Exhibit 20 is an originally signed duplicate adopted for closure in accordance with Article 17, Title 22, California Administrative Code.

B. Also part of Exhibit 20 is compliance with liability requirements for sudden accidental occurrences spelled out in 67027, Title 22, California Administrative Code. Since this is not a surface impoundment as defined in Section 66200, a landfill, as defined in Section 66123, nor a land treatment facility as defined in Section 66125, compliance with 67028 is not required. SDG&E opted for coverage in accordance with 67030 to demonstrate both assurance for closure and/or post-closure care, as specified by Section

67009 and 67021, and liability coverage, as specified in Section 67027.

XV. Corrective Action Plan

No known contamination presently exists at this Facility. There is no known soil or groundwater contamination outside of the Facility boundary. There are no solid waste management units now, nor have there ever been, at the Facility that have not already been described in Part B of the application. No corrective action plan is required.