RESPONSE TO COMMENTS ON THE TENTATIVE NPDES PERMIT SFPP, L.P. SFPP Norwalk Pump Station NPDES Permit No. CA0063509

This Table describes all significant comments received from interested persons with regard to the above-mentioned tentative permit. Each comment has a corresponding response and action taken.

No.	Comment	Response	Action Taken		
	Comments received from SFPP, L.P. on August 12, 2016				
1.	 Section IIIA, Page 3 – Please change the reference to "soil vapor catalytic oxidizer" to "soil vapor thermal oxidizer". The catalytic portion of the oxidizer is no longer in operation; the unit is operating in thermal mode only. It is anticipated that installation of a new regenerative thermal oxidizer will be installed by late 2016, as previously discussed with the RWQCB. Note that similar references to the above comment are located in Attachment F, Section IB, Page F-3 and Section IV, Page F-14. 		Revisions are made to Section III.A of the Waste Discharge Requirements, Section I.B and Section IV of the Fact Sheet to change all references of "soil vapor catalytic oxidizer" to "soil vapor thermal oxidizer".		
2	Attachment C-2, Page C-2 – The layout of the equipment in the newly installed remediation pad containing the oil water separator has been modified. Please use the attached revised Equipment Layout and Site Drainage Map for inclusion into the permit.		The updated Site Drainage Map is incorporated in Attachment C-2.		

Response to Comments SFPP, L.P. SFPP Norwalk Pump Station

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3	 Attachment E, Section XB3, Table E-5, Page E-16 – As stated in Table E-1 of Section II, Attachment E (Page E-5), provisional flow stream data from Gauging Station F354-R will not be released to the Discharger until up to 2 weeks after each month. To allow sufficient time to incorporate final flow stream data, SFPP requests that the due date for the quarterly Self Monitoring Reports (SMRs) be extended to May 15, August 15, November 15, and February 15. These are the SMR due dates under the current permit. SFPP would also like to confirm that stand-alone semiannual and annual SMRs will not be required. Data collected from semiannual or annual sampling events will be incorporated into the quarterly SMRs, as previously discussed with the RWQCB. 	Staff recognize the variability in the flow stream data availability. The quarterly self-monitoring reports (SMRs) submittal due dates will be modified from May 1 (for the monitoring period January 1 to March 31), August 1 (for the monitoring period April 1 to June 30), November 1 (for the monitoring period July 1 to September 30), and February 1 (for the monitoring period October 1 to December 31) to May 15, August 15, November 15, and February 15, respectively. Monitoring results from the semiannual and annual monitoring events can be incorporated and reported in the corresponding quarterly SMRs as indicated in Table E-5 of the Monitoring and Reporting Program (MRP), Attachment E; no additional semiannual or annual monitoring reports are required.	The quarterly SMRs reporting due dates are changed to May 15, August 15, November 15, and February 15 on Table E-5 of the Monitoring and Reporting Program (MRP), Attachment E.
4	Attachment I – The parameter listed as CTR Number 119 is PCB-1116. A search on the CAS Number 12674112 yields PCB-1016. Please modify Attachment I to reflect this change.	Staff agree with the Discharger.	Change has been made to the Order to reflect the correct PCB number.