



April 17, 2019

Shell Oil Products US

20945 South Wilmington Ave.
Carson, CA 90810

California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS – GENERAL PERMIT FOR DISCHARGES OF LOW THREAT HYDROSTATIC TEST WATER TO SURFACE WATERS IN COASTAL WATERSHEDS OF LOS ANGELES AND VENTURA COUNTIES (GENERAL NPDES PERMIT NO. CAG674001)

To Whom It May Concern:

Shell Oil Products US is submitting comments on the Tentative Waste Discharge Requirements included in the National Pollutant Discharge Elimination System (NPDES) General Permit No. CAG674001 regulating Low Threat Discharges of Hydrostatic Test Water to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties due by April 19, 2019. Comments for consideration by the Los Angeles Regional Water Quality Control Board are included in the attached document.

If you have any questions, please contact Christopher Sherman at (661) 394 - 2413.

Sincerely,

A handwritten signature in cursive script that reads "Christopher Sherman".

Christopher Sherman
Environmental Advisor
Shell Oil Products US

Attachment A: Shell Oil Products US - Order No. R4-2019-XXXX, NPDES No. CAG674001

Permit Section	Permit Stipulation	Facility Comment
Section II.A.2.c	"Prepare and submit a pollution prevention plan including best management practices (BMPs) to ensure that the Testing Vessels are free of pollutants prior to filling with test water. The purpose of the BMPs plan is to (1) to control and abate the discharge of pollutants from the facility to surface water; (2) achieve compliance with Best Available Technology economically achievable (BAT) or Best Conventional Pollutant Control Technology (BCT) requirement; and (3) achieve compliance with applicable water quality standards. In addition, a Discharger must provide mitigation measures that will be implemented if the hydrostatic testing process causes pollutants to be introduced in test water, and appropriate measures to prevent detrimental effects on the receiving water."	The Facility requests guidance on the layout of the pollution prevention plan required under this stipulation to ensure required components are included in such plan.
Section V.A.1 - Table 2	TPH average monthly effluent limitation is established as 100 ug/L with NA as the maximum daily effluent limitation.	Table F-3 of the General Permit Fact Sheet establishes the average monthly limitation for TPH as NA and the maximum daily effluent limitation as 100 ug/L. The facility requests the Regional Board to reconcile the effluent limitations for TPH.

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Section V.A.2	"The temperature of the discharge shall not alter the natural receiving water temperature unless it can be demonstrated to the satisfaction of the Regional Water Board that such alteration in temperature does not adversely affect beneficial uses. For discharges to inland waters designated WARM, water temperature shall not be altered by more than 5F above the natural temperature. At no time shall the waste discharge result in WARM-designated waters to be raised above 80F. For inland waters designated COLD, water temperature shall not be altered by more than 5F above the natural temperature...The maximum temperature of waste discharges shall not exceed the natural temperature of the receiving waters by more than 20F. Additionally, for discharges to estuaries and coastal waters, no discharge shall cause a surface water temperature rise greater than 4F above the natural temperature of the receiving waters at any time or place."	Without sampling the receiving water, facilities covered under the General Permit do not know what the conditions of the receiving water are. Therefore, the facility requests clarification from the Regional Board on how a discharger is expected to know whether receiving water conditions have been altered above the specifications noted in this stipulation.
Section VII.J.1	"Accelerated weekly monitoring will be required for constituent(s) detected above the screening levels and/or MCLs, whichever one is higher. If the results of two additional consecutive samples collected pursuant to the accelerated monitoring program exceed the screening level(s) and/or MCLs in Attachment E, the Order requires the Discharger to cease discharging and to notify the Regional Water Board to determine a further course of action."	The facility requests that a footnote is added to clarify that accelerated monitoring shall occur during periods of discharge. Adding this footnote will clarify that compliance with accelerated monitoring requirements is contingent upon the duration of the discharge.
Fact Sheet, Table F-3	Table F-3 establishes an average monthly effluent limitation for TPH as NA and a maximum daily as 100 ug/L.	Table 2 in the General Permit Order is not consistent with Table F-3 of the Fact Sheet. Table 2 lists the TPH maximum daily effluent limitation as 100 ug/L and an average monthly effluent limitation of NA. The facility request that the effluent limitation for TPH is reconciled to remain consistent throughout the General Permit Order and its attachments.

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Fact Sheet, Table F-4	Table F-4 establishes the average monthly effluent limitation for TPH as 100 ug/L and the maximum daily effluent limitations as NA. In addition, the footnote to Table F-4 defines TPH as the sum of TPH gasoline (C4-C12).	Table 2 of the General Permit Order and Table F-3 of the Fact Sheet define the TPH effluent limitations in the reverse order from this table and the footnote to each table defines TPH as the sum of gasoline, diesel and oil carbon ranges. The facility requests that the effluent limitations and definition of TPH is reconciled to remain consistent in the General Permit Order and its attachments.
Attachment G		The Regional Board provides a sample Monitoring and Reporting Program (MRP) as part of the tentative General Permit Order making it difficult to assess how the provisions will differ for a specific discharger actually covered under the permit Will a discharger applying for permit coverage be issued a tentative MRP that allows for review and comments to be submitted to the Regional Board for consideration?