

**RESPONSE TO COMMENTS ON THE TENTATIVE NPDES PERMIT**  
**Equilon Enterprises LLC dba Shell Oil Products US**  
**Shell Oil Products US Mormon Island Terminal**  
**NPDES Permit No. CA0064637**

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

Commenter	No.	Comment	Response	Action Taken
<b>Comments received from Equilon Enterprises LLC dba Shell Oil Products US on December 14, 2016</b>				
Equilon Enterprises LLC dba Shell Oil Products US	1	<p>Attachment F, Section IV: <i>“Storm water from the Facility could pick up pollutants that are commonly associated with maritime loading and unloading, and the storage and transfer of petroleum hydrocarbon products and ethanol, such as solids (total suspended solids (TSS), settleable solids, and turbidity), oil and grease, total petroleum hydrocarbons (TPH), metals, volatile organic compounds (VOCs), and constituents contributing to biochemical oxygen demand (BOD).”</i></p> <p>How were pollutants, specifically metals, determined to be associated with maritime loading and unloading activities, and the storage and transfer of petroleum hydrocarbon products? Metals would not commonly be associated with petroleum storage or handling activities.</p>	<p>Due to the nature of products (petroleum hydrocarbon products and ethanol) that are handled at the Facility, the constituents (such as solids, oil and grease, total petroleum hydrocarbons (TPH), metals, volatile organic compounds (VOCs), and biochemical oxygen demand (BOD)) listed in section IV in the Fact Sheet can be indicators of spills within the Facility. In addition, they are pollutants of concern for the Facility as these constituents were identified based on a review of pollutants commonly found in discharges from similar facilities and/or they were historically detected in the Facility’s effluent. Pollutants of concern were also identified based on the impairments of the receiving water as identified by the State’s 2012 303(d) list, and waste load allocations as established in applicable TMDLs for the receiving water. Historical data collected from the Facility during the most recent discharge events from 1998 through 2001 indicated detected level for metals (arsenic, copper, lead, zinc, silver), solids (total suspended solids and turbidity), oil and grease, total organic hydrocarbons (a common indication of the presence for TPH), VOCs (such as benzene, dichlorobromo-methane, chloroform, and chlorodibromo-methane), and BOD. This analysis is completed for the Facility using the reasonable potential analysis protocol contained in the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries (SIP).</p>	None necessary.

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Equilon Enterprises LLC dba Shell Oil Products US	2	Attachment F, Section IV.C.3: <i>"No effluent monitoring data from the term of Order No. R4-2011- 0097 were available for a new RPA."</i>  No effluent monitoring data from the term of Order No. R4-2011-0097 was available for a new RPA because no discharge occurred.	The sentence in Section IV.C.3 of Attachment F has been modified as follows:  <i>"No effluent monitoring data from the term of Order No. R4-2011- 0097 were available for a new RPA <u>as the Facility has not discharged during the term of Order No. R4-2011-0097.</u>"</i>	Revision was made to Section IV.C.3 in Attachment F (Fact Sheet).
Equilon Enterprises LLC dba Shell Oil Products US	3	Attachment F, Section I, Table F-1: <i>"Rick Roper, Operations Supervisor, (310) 816-2307"</i>  Rick Roper's correct title is Terminal Manager.	The following revision was made to Table F-1 of the Fact Sheet:  <i>"Rick Roper, <del>Operations Supervisor</del> Terminal Manager, (310) 816-2307"</i>	Revision was made to Table F-1 in the Fact Sheet.
Equilon Enterprises LLC dba Shell Oil Products US	4	Attachment F, Section II.A: <i>"All process areas of the Facility, including tank farms, pump house, hazardous waste storage area, and area containing aboveground piping manifolds and valves, are bermed."</i>  Not all valves at the facility are in a bermed area and should not be included under such description. There are numerous controls in place for spill controls, containment, and countermeasure; berms are just one of many controls. The Discharger request a revision of the statement.	The sentence in Section II.A of the Fact Sheet is modified as follows:  <i>"All process areas of the Facility, including tank farms, pump house, hazardous waste storage area, and <u>most of the areas containing aboveground piping manifolds and valves, are bermed.</u>"</i>	Revision was made to Section II.A in the Fact Sheet.
Equilon Enterprises LLC dba Shell Oil Products US	5	Attachment F, Section II.A: <i>"The Discharger then has the option to drain the effluent from the oil-water separator (API box) to the Los Angeles Inner Harbor through Discharge Point 001 (which requires the opening of a valve manually), or direct the effluent to tanks M17 and M25 for temporary storage before discharge to the City of Los Angeles sanitary sewer under an industrial wastewater Permit #W-494537, or offsite to the Shell Carson Terminal for subsequent</i>	The sentence in Section II.A of the Fact Sheet is modified as follows:  <i>"The Discharger then has the option to drain the effluent from the oil-water separator (API box) to the Los Angeles Inner Harbor through Discharge Point 001 (which requires the opening of <u>atwo valves manually</u>); <u>the Discharger can also discharge direct the effluent to tanks M17 and M25 for temporary storage before discharge to the effluent directly</u></i>	Revision was made to Section II.A in the Fact Sheet.

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		<p><i>treatment and disposal.</i>"</p> <p>The Discharger request the statement read, "the effluent can be discharged directly into the City of Los Angeles sanitary sewer under an Industrial Wastewater Permit # W-494537 or be pumped to tanks M17 and M25 for temporary storage prior to discharge to the sanitary sewer or transported offsite to the Shell Carson Terminal for subsequent treatment and disposal."</p>	<p><i>into the City of Los Angeles sanitary sewer under an Industrial Wastewater Permit #W-494537, or pump the effluent to Tanks M17 and M25 for temporary storage prior to discharge to the sanitary sewer or transport offsite to the Shell Carson Terminal for subsequent treatment and disposal.</i>"</p>	
Equilon Enterprises LLC dba Shell Oil Products US	6	<p>Attachment F, Section II.A: <i>"The Facility also includes access roads, an office building, and a parking lot."</i></p> <p>The facility request the statement to read, "The facility includes an access roads to the east and west, and office building, and a parking lot."</p>	<p>The sentence in Section II.A of the Fact Sheet is modified as follows:</p> <p><i>"The Facility also includes <u>an access roads to the east and west</u>, an office building, and a parking lot."</i></p>	Revision was made to Section II.A in the Fact Sheet.
Equilon Enterprises LLC dba Shell Oil Products US	7	<p>Attachment F, Section II.A: <i>"Hydrostatic test water is collected in Tank M25 for subsequent discharge to the sanitary sewer or to the Los Angeles Inner Harbor."</i></p> <p>Tank M17, in addition to Tank M25, collects water prior to being discharged and should be incorporated into description. The discharger request the statement read, "Hydrostatic test water is collected in Tank M25 or Tank M17 for subsequent discharge to the sanitary sewer or to the Los Angeles Inner Harbor."</p>	<p>The sentence in Section II.A of the Fact Sheet is modified as follows:</p> <p><i>"Hydrostatic test water is collected in Tank M25 <u>or Tank M17</u> for subsequent discharge to the sanitary sewer or to the Los Angeles Inner Harbor."</i></p>	Revision was made to Section II.A in the Fact Sheet.
Equilon Enterprises LLC dba Shell Oil Products US	8	<p>Attachment F, Section II.A: <i>"Contaminated groundwater, which is the result of the Facility's historic operation, is collected in Tank M17 for discharge to the city sanitary sewer under Permit # W-494537 or it is</i></p>	<p>The sentence in Section II.A of the Fact Sheet is modified as follows:</p> <p><i><u>The Facility historically discharged cContaminated</u></i></p>	Revision was made to Section II.A in the Fact Sheet.

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US		<p><i>transported offsite to the Shell Carson Terminal for treatment and disposal."</i></p> <p>The facility no longer recovers groundwater.</p>	<p><i>groundwater, which is the result of the Facility's historic operation, is collected in Tank M17 for discharge to the city sanitary sewer under Permit # W-494537 or transported <u>it</u> offsite to the Shell Carson Terminal for treatment and disposal <u>during the term of Order No.R4-2011-0097.</u> However, the Facility no longer recovers groundwater at the site."</i></p>	