

**RESPONSE TO COMMENTS
 PETRO-DIAMOND TERMINAL COMPANY
 PETRO-DIAMOND MARINE TERMINAL
 TENTATIVE ORDER NO. R4-2019-XXXX
 NPDES PERMIT NO. CA0059358**

Comment Letter dated May 21, 2019, from Petro-Diamond Terminal Company (Discharger)

No.	Comment	Response	Action Taken
1	<p>Attachment E, Table E-1 (page E-5)</p> <p>Monitoring location RSW-001 is described as “At a point at least 50 feet upstream from the point of discharge into the Long Beach Inner Harbor (Channel No. 2).”</p> <p>The physical discharge point into the Long Beach Inner Harbor is located under Berth 83. Monitoring at least 50 feet ‘upstream’ would actually be underground, and inside the drain pipe. Monitoring at the physical discharge into the harbor is virtually inaccessible (under the dock), and unsafe (see attached images). Historically, the sampling location has been permitted to be at the berth/dock edge, directly ‘downstream’ (approximately 70 feet) from the physical discharge point (see attached photo). The facility requests the Regional Board revise the description to state such.</p>	<p>The description for Monitoring Location RSW-001 in Table E-5 has been updated to read as follows:</p> <p>“At the berth/dock edge, directly downstream (approximately 70 feet) from the physical discharge point.”</p>	<p>Revisions were made to the Permit</p>
16	<p>Attachment E, Table E-2 (page E-6)</p> <p>Monitoring Parameter: PCBs as Congeners</p> <p>Petro-Diamond would like to request that the option of analyzing PCBs by USEPA 608 be considered. This would be consistent with a recent NPDES permit for Ultramar Berth 164, and for the Port of Los Angeles New Dock Street Pump Station (response to comments). The language provides the discharger the option to choose between PCBs by Aroclors or PCBs by congeners.</p>	<p>As established in other individual NPDES permits for discharges of stormwater from industrial facilities in the region, results based on USEPA Method 608 will be used to evaluate compliance with the effluent limitation for PCBs. However, because the associated minimum level for Method 608 is higher than the effluent limitation included in the permit, the Regional Water Board requests that in addition to USEPA Method 608, USEPA Method 1668c be used. Therefore, footnote 9 to Table E-2 (page E-7) has been updated for clarification.</p>	<p>Revisions were made to the Permit</p>