



ELECTRONIC TRANSMITTAL VIA EMAIL

May 21, 2019

Ms. Cassandra Owens, Chief
Industrial Permitting Unit
California Regional Water Quality Control Board
Los Angeles Region
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Subject: Discharger Comments on the Tentative Waste Discharge for National Pollutant Discharge Elimination System (NPDES) Permit Renewal - Petro-Diamond Terminal Company (NPDES NO. CA0059358, CI NO. 6677)

Ms. Owens,

Petro-Diamond has reviewed Tentative Order No. R4-2019-XXXX, NPDES No. CA0059358 and have several comments for the Regional Board's consideration. The comments are included as Attachment A.

I can be reached at (949) 553-0112 if you have any questions or require additional information.

Sincerely,

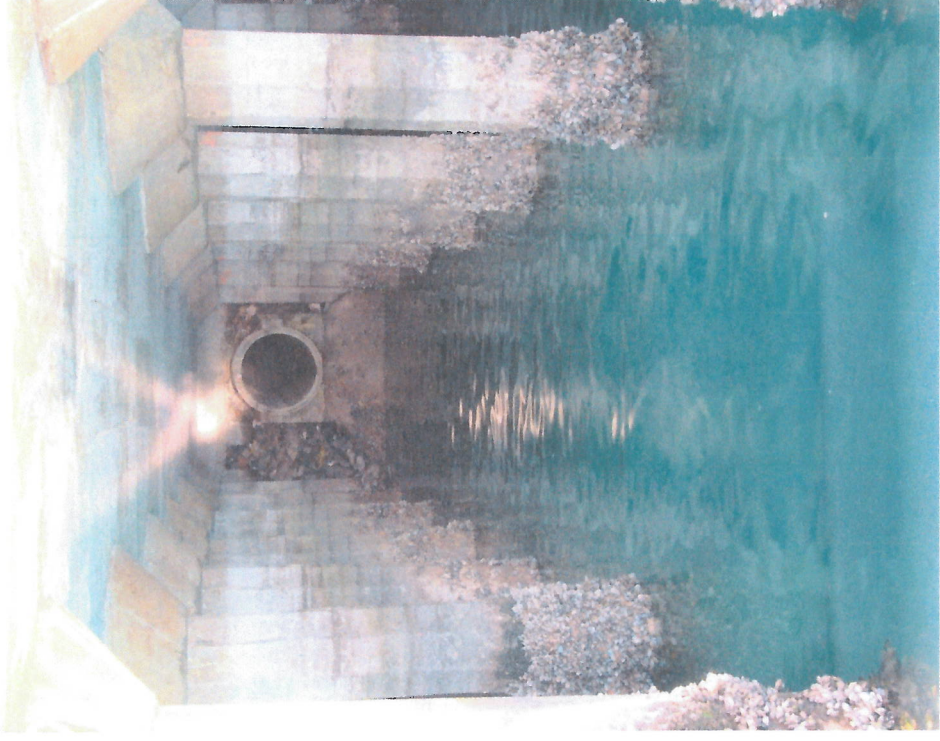
Eric J. Conard
Manager, Environmental

Attachment

Attachment A: Petro-Diamond Terminal Company Order No. R4-2019-XXXX, NPDES no. CA0059358

Permit Section	Permit Stipulation	Facility Comment
Attachment E, Table E-1, (page E-5)	Monitoring location RSW-001 is described as "At a point at least 50 upstream from the point of discharge into the Long Beach Inner Harbor (Channel No. 2)."	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 storm drain pipe. Monitoring at the physical discharge point 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.
Attachment E, Table E-2 (page E-6)	Monitoring Parameter: PCBs as Congeners ⁹	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.

RSW-001 Discharge point into Long Beach inner Harbor.



Storm Drain Map

