



**Torrance Refining  
Company LLC**  
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**Via Electronic Submission**

May 13, 2019

Ms. Cassandra D. Owens  
Chief, Industrial Permitting Unit  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, California 90013

Attention: Mr. Mazhar Ali, P.E.

**Torrance Refinery  
Compliance File No. CI 5742 and NPDES No. CA00055387  
Comments on Tentative Waste Discharge Requirements**

Dear Mr. Ali:

Enclosed please find comments from Torrance Refining Company LLC's Torrance Refinery on the tentative waste discharge requirements and NPDES permit dated April 11, 2019. We urge you and the members of the Los Angeles Regional Water Quality Control Board (RWQCB) to review these comments and make the requested changes in the final NPDES permit prior to its adoption.

The Torrance Refinery appreciates your attention to comments and requested changes. Please note that the Torrance Refinery reserves the right to supplement this submission with additional comments and information before and at the hearing on this matter. Thank you for your consideration. Please contact Charles Campbell at 310-212-1766 if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read "Valerie Tse".

Valerie Tse  
Environmental Supervisor

Enclosure

**TORRANCE REFINING COMPANY LLC  
COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS  
FOR TORRANCE REFINERY NPDES NO. CA0055387, CI NO. 5742**

The comments below are listed in the sequence as they appear in the Tentative Order and its attachments.

**III. Discharge Prohibitions**

- C. *“Discharges of water, materials, thermal wastes, elevated temperature wastes, toxic wastes, deleterious substances, or wastes other than those authorized by this Order, to a storm drain system, Torrance Lateral, or other waters of the State and U.S., are prohibited.”***

**Comment 1:** Torrance Refinery believes that there is an error in the placement of a comma which may cause confusion in interpretation of this sentence. Instead, to not cause confusion, the Torrance Refinery believes the sentence should read *“Discharges of water, materials, thermal wastes, elevated temperature wastes, toxic wastes, deleterious substances, or wastes other than those authorized by this Order, to the Torrance Lateral storm drain system or other waters of the State and U.S., are prohibited.”* Torrance Refinery requests this change.

- I. *“The discharge of any product registered under the Federal Insecticide, Fungicide, and Rodenticide Act to any waste stream which may ultimately be released to waters of the United States, is prohibited unless specifically authorized elsewhere in this permit or another NPDES permit. This requirement is not applicable to products used for lawn and agricultural purposes.”***

**Comment 2:** Torrance Refinery contracts with appropriately licensed and certified vendors who apply pesticide or other materials registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Before EPA may register a pesticide under FIFRA, the applicant must show, among other things, that using the pesticide according to specifications "will not generally cause unreasonable adverse effects on the environment." The Torrance Refinery requests that the RWQCB note that insecticides are applied periodically for abatement of mosquitoes, per the Los Angeles County Vector Control program requirements, and other pests of concern. Additionally, herbicides are used onsite periodically for weed control to ensure the integrity of the tank containment system as required in 40 CFR 112. Torrance Refinery requests clarification from the RWQCB that the application of those materials for these purposes is either authorized or exempted from this paragraph.

**IV. Effluent Limitations, Table 4. Effluent Limitations for Discharge Point No. 001**

**Concentration and Mass Limits:**

**Comment 3:** The Tentative Order includes both concentration and mass limits for all regulated contaminants with the exception of *E. coli* (concentration only) and the three metals regulated by the Harbor Toxics TMDL. The Torrance Refinery requests that the concentration limits for the non-conventional pollutant total petroleum hydrocarbons ("TPH") and all priority pollutants (metals and organics) be removed from the Tentative

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Order, because the proposed mass limits are fully protective of water quality as determined by the Harbor Toxics TMDL. The Harbor Toxics TMDL demonstrates that because the Torrance Refinery only discharges during periods of extreme wet weather and consequent runoff, its contribution to the total toxic pollutant loadings is very small and is appropriately regulated with mass limits only.

The Torrance Refinery storm water management system is designed to divert the “first flush” of storm runoff from the process areas to the refinery pretreatment system and thence to the sanitary sewer system and POTW operated by Los Angeles County Sanitation District (LACSD).<sup>1</sup> All other storm water runoff from the refinery and tank farm areas is collected in surface impoundments, tank dikes, and storage tanks. The collected storm water is subsequently discharged into the LACSD sanitary sewer. The discharge of storm water to the Torrance Lateral occurs when the surface impoundments, tank dikes, and tanks are full and flooding of the facility is imminent, an event that last occurred in 2005, over fourteen years ago. Because the Torrance Refinery controls the discharge of all regulated pollutants at Outfall 001 by storing storm water to prevent discharges except during extremely wet periods, it can manage the total mass of pollutants discharged by limiting the quantity of wastewater discharged.

The Refinery manages the concentrations of pollutants in the discharge by application of best management practices (“BMP”) that reduce the exposure of storm water to pollutants and treatment that consists of sedimentation of particulates, skimming of floatable materials, and media filtration at the final outfall. However, these BMPs and treatment methods cannot achieve the proposed concentration limits, but the refinery can achieve the mass limits by controlling the discharge quantity. Mass limits applied to the Torrance Refinery Outfall 001 discharge are protective of water quality in the receiving waters.

The Torrance Refinery requests that the Tentative Order be revised to include mass limits only for TPH and all of the priority pollutants. This approach is consistent with the recommendations of the Harbor Toxics TMDL and is equally applicable to water quality-based effluent limits (“WQBELs”) that are not based on the TMDL.

**VI. Provisions, C. Special Provisions, 1. Reopener Provisions**

**Comment 4:** The Tentative Order removes a reopener provision provided in the earlier version of the Permit (2013 NPDES Permit, Paragraph VI.C.1.e.) that stated: “[t]his Order may be reopened upon submission by the Discharger of adequate information ... to provide for dilution credits or a mixing zone ...”. Such a mixing zone specific to storm water discharges during wet weather to the Dominguez Channel is applicable to the Torrance Refinery, as it only discharges during wet weather events of an extreme nature, as described earlier, and during these events, the Torrance Lateral and Dominguez Channel would also be filled with storm water from the rain event. As described in Comment 3 above, the Torrance Refinery requests that the Tentative Order be revised to include mass limits only, not concentration limits. Should the RWQCB choose to retain concentration limits, then the Torrance Refinery requests that the dilution credits reopener provision be reinstated.

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<sup>1</sup> Refinery process wastewaters are segregated from the storm drain system and discharge only to the LACSD POTW.

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**Attachment E, Monitoring and Reporting Program, II. Monitoring Locations, Table E-1**

**Comment 5:** Table E-1 identifies one Torrance Lateral monitoring station, RSW-001 which is located approximately 50 feet downstream of Outfall 001. As noted in the location description, Outfall 001 is the beginning of the Torrance Lateral. The outfall joins the lateral underground at Van Ness Avenue and 50 feet away, on the other side of Van Ness Avenue, there are no other dischargers to the Torrance Lateral. Therefore, the sampling of RSW-001 is effectively the same sample as Outfall 001. The Torrance Refinery requests that the RSW-001 sampling parameters be pulled at the same location as Outfall 001 (EFF-001).

**Attachment E, Monitoring and Reporting Program, IV. Effluent Monitoring Requirements, Table E-2**

**Comment 6:** TPH as Gasoline (C4-C12) is not included in this table, though it is a required sample with an effluent limitation, listed in *IV. Effluent Limitations and Discharge Specifications, Table 4. Effluent Limitations for Discharge Point No. 001*. Torrance Refinery suggests that perhaps this was an erroneous omission.

**Attachment E, Monitoring and Reporting Program, VII. Receiving Water Monitoring Requirements, Table E-3**

**Comment 7:** There appears to be an error with the footnotes in this table, as currently listed. It appears that items marked as applicable to Footnote 2, appear to be intended as applicable to Footnote 1; items marked as applicable to Footnote 3, appear to also be applicable to Footnote 2. Also, it appears that the items currently marked as applicable to Footnote 1 are missing there intended footnote description. The prior version of the Permit for this Table describes Footnote 1 as "Sampling shall be conducted during discharge events during years in which a discharge occurs...." which seems to be the intended description for items marked as applicable to Footnote 1). The Torrance Refinery requests that the footnotes associated with this table be reviewed to ensure they are applied correctly.

**Attachment F, Fact Sheet, I. Permit Information, Table F-1. Facility Information**

**Comment 8:** The facility address zip code should be 90504, not 90509. Also, the Torrance Refinery requests an update to the Facility Contact from Amy Kim, to "Charles Campbell, Environmental Advisor, 310-212-1766".

**Attachment F, Fact Sheet, II. Facility Description**

**Comment 9:** The first paragraph on page F-5, references the Refinery's LACSD Permit twice, which was recently updated from Permit No. 516, to Permit No. 21899. The Torrance Refinery requests the Permit No. references to be updated.

**Comment 10:** Section A, Item 1. Pioneer Basin on page F-5, states that the City of Torrance has not discharged from Pioneer Basin to the Torrance Refinery drainage system since 2011. The Torrance Refinery requests that this information be updated to state that the City of Torrance last discharged from Pioneer Basin to the Torrance Refinery drainage system in 2017.

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**Comment 11:** Section A, Item 3. Tank Farms on page F-5, states “Each tank has an individual berm. In addition, groups of tanks share a common berm.” The Torrance Refinery requests that the statement be corrected to state “Each tank either has an individual berm or groups of tanks share a common berm.”

**Comment 12:** Section D., Compliance Summary states that there was a requirement to submit a site-specific Harbor Toxics TMDL Water Column Compliance Program developed individually or with a collaborating group. The Torrance Refinery executed a Memorandum of Agreement (MOA) with the South Bay Cities Council of Governments (SBCCOG) to become a member of the Dominguez Channel Watershed Management Group’s Coordinated Integrated Monitoring Program (CIMP), which is administered by the SBCCOG. The term of the above mentioned MOA covers the 2017-18 through 2022-23 CIMP reporting periods. The Torrance Refinery verbally notified RWQCB of this collaboration but failed to formally notify the RWQCB in a letter. A formal notification letter was submitted to the RWQCB on May 10, 2019. The Torrance Refinery requests that the Compliance Summary description be updated to reflect this information.