

**RESPONSE TO COMMENTS
VOPAK TERMINAL LOS ANGELES, INC.
INLAND TERMINAL FACILITY
TENTATIVE ORDER NO. R4-2021-XXXX
NPDES NO. CA0063177**

Comment Letter dated May 19, 2021, from Vopak Terminal Los Angeles, Inc. (Discharger)

No.	Comment	Response	Action Taken
1.	<p>Vopak Inland Terminal is in receipt of the Subject draft Tentative NPDES permit. Vopak has reviewed the Tentative permit and is providing comments regarding Technology-Based Effluent Limitations (TBEL) for Total Petroleum Hydrocarbon (TPH) limits and recent Chronic Toxicity results.</p> <p>The Inland Terminal was designed with a robust stormwater treatment system, representative of technology typically used for a hydrocarbon storage and transfer facility. Each of the four individual tank berm areas (3 store fuel oil and the fourth stores jet fuel) is equipped with an oil-water separator with capability to separate oil and water using overflow/underflow weirs and sufficient residence time. Stormwater is then treated through a 5 bay clarifier, which again utilizes under/overflow weirs to separate oil and water. The final step in the treatment process includes filtration through a 25 micron bag filter followed by treatment through two vertical vessels in series, each containing a bed of activated carbon and metal removing resin.</p> <p>The treatment system has been efficient at meeting permit discharge limits, however, the TPH</p>	<p>The Los Angeles Regional Water Control Board (Los Angeles Water Board) has reevaluated the limit for TPH since:</p> <ul style="list-style-type: none"> • TPH measures a wide range of hydrocarbon compounds with a variety of characteristics, • The influent concentrations to the treatment train are variable and directly impact the treatment train performance and the resulting effluent concentrations, and • The TBEL of 100 µg/L as the sum of the individual components of TPH (i.e., diesel, waste oil, and gasoline) is not indicative of treatment performance. <p>In consideration of these factors, the TPH TBEL has been revised. TPH TBELs are established for the individual TPH components (i.e., diesel, waste oil, and gasoline) based on the maximum effluent concentrations (MECs) during the prior permit term. For diesel, the MEC was 527 ug/L, and for waste oil, 558 ug/L. The TPH gasoline TBEL remains 100 ug/L since all values were non-detect.</p>	<p>Revisions have been made to the Permit.</p>

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Inland Terminal Facility

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	<p>(gasoline/ diesel / oil) concentration limits have been exceeded at times. The TPH limit of 100 ug/l is very low and does not reflect the TBEL for the Inland Terminal treatment system. In 2015, for example, the effluent from the system contained TPH diesel in concentrations of 146, 186 ug/l, in 2017, 182 and 163 ug/l and most recently in 2021, 197 and 527 ug/l. Please note that the 2021 TPH effluent concentrations were treated through activated carbon and resin which was replaced in January 2021. Vopak would like to request an increase of the TPH limit to 1 mg/l to reflect the TBEL of the Inland treatment system.</p>		
2.	<p>With regard to recent chronic toxicity testing in January and March 2021, the results are being evaluated. As noted above, the media vessels were recently recharged. To assist with causation of the failed tests, Vopak plans to sample water from the clarifier that has not been treated through the recharged media and from water that has been circulated through the media. Both water samples will be tested for chronic toxicity and compared for differences. In addition, clarifier sediment samples will be analyzed for priority pollutants, oil and grease, and TPH, at a minimum, to investigate toxicity potential contribution.</p>	Comment noted.	No revisions necessary