

Los Angeles Regional Water Quality Control Board

May 4, 2018

Mr. Sandeep Sharma
Facilities Manager
Shell Oil Products US
20945 South Wilmington Avenue
Carson, CA 90810

Dear Mr. Sharma:

COMMENTS ON THE DRAFT MONITORING AND REPORTING PLAN AND QUALITY ASSURANCE PROJECT PLAN – EQUILON ENTERPRISES LLC DBA SHELL OIL PRODUCTS US, SHELL OIL PRODUCTS US MORMON ISLAND TERMINAL, WILMINGTON, CALIFORNIA (NPDES NO. CA0064637, CI -10297)

Thank you for your submittal dated March 28, 2018, transmitting a Draft Monitoring and Reporting Plan (MRP) and Quality Assurance Project Plan (QAPP) (collectively, the Draft Plans) to the Los Angeles Regional Water Quality Control Board (Regional Water Board). The Draft Plans were submitted per requirements of the waste discharge requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) permit (Order No. R4-2017-0039) for the subject Facility. Section VII.C.2.c of the Waste Discharge Requirements of Order No. R4-2017-0039 required the Discharger to implement a Compliance Monitoring Program at the Los Angeles Inner Harbor in accordance with the *Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants Total Maximum Daily Loads* (Harbor Toxics TMDL). The Regional Water Board reviewed the Draft Plans and provides the following comments:

1. MRP, Section 2.1. Terminal Drainage. Provide a definition and description of function for the API separator mentioned in the first paragraph of this section.
2. MRP, Section 4.0. Monitoring and Reporting Plan: It was stated in the second paragraph of this section that “all monitoring under this MRP shall be implemented in subsequent discharges following the initial discharge for the remainder of the permit term.” Please clarify the language such that monitoring under this MRP shall be implemented beginning from the first discharge from the Facility after the effective date of the permit (instead of discharges subsequent to the initial discharge). Receiving water column sampling (including water samples and total suspended solids (TSS) samples) shall begin during or as soon as possible following the first effluent discharge event. Sediment and fish tissue monitoring must begin within the year of the first effluent discharge event.
3. MRP, Section 4.1. MRP Implementation Schedule: Refer to Comment 2. It was stated in the second paragraph of this section that “if a single discharge occurs, the MRP shall be implemented during subsequent discharges following the initial discharge for the remainder of the permit term.” Please modify the language such that the MRP will be

implemented beginning from the first discharge from the Facility after the effective date of the permit (instead of discharges subsequent to the initial discharge). Receiving water column sampling (including water samples and TSS samples) shall begin during or as soon as possible following the first effluent discharge event. Sediment and fish tissue monitoring must begin within the year of the first effluent discharge event.

4. MRP, Section 4.1. MRP Implementation Schedule: The end of the third paragraph referenced a Figure 5. The Table of Contents indicates the map of Harbor Toxics TMDL Monitoring Stations is included in Figure 3. Please reconcile.
5. MRP, Table 4.1 – Monitoring Stations: Bed sediment samplings (including sediment triad sampling and sediment chemistry sampling) are only required at Station 04 (Main Turning Basin North of Vincent Thomas Bridge) and 06 (Main Channel South of Port O' Call). The full chemical suite as included in Attachment A of the *Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1 Sediment Quality* (SQO Part 1) is required in addition to the parameters currently listed for sediment monitoring (Refer to Comment 6 below). No changes to water column/TSS and fish tissue sampling locations are necessary.
6. MRP, Section 4.3. Sediment Monitoring: The sediment triad sampling event shall be conducted every five years (starting from the year of the first effluent discharge event and every five years subsequently), and the analysis shall include the three lines of evidence as per the SQO Part 1, including: sediment chemistry (at a minimum, the full chemical suite as included in Attachment A of the SQO Part 1); two toxicity tests; and four benthic indices. In addition, the Discharger shall conduct sediment chemistry sampling in between the sediment triad sampling events (ideally halfway between the five-year sampling period for the sediment triad sampling) every five years, and analyze for the full chemical suite as included in Attachment A of the SQO Part 1. The Discharger is required to conduct sediment triad sampling and sediment chemistry sampling at Stations 04 and 06 only (refer to Comment 5).
7. MRP, Section 6.0. Reporting Requirement: The Regional Water Board encourages the submittal of receiving water data onto the California Environmental Data Exchange Network (CEDEN) to promote a centralized location to find and share information on California's waterbodies. Please also include the following language in this section: "All receiving water monitoring data shall also be submitted in accordance with the California Environmental Data Exchange Network (CEDEN). The Discharger shall submit all receiving water monitoring data in accordance with CEDEN, when feasible."
8. QAPP, Section 6.0. Project Task Description: The second paragraph referenced a Figure 5. The Table of Contents indicates the map of Harbor Toxics TMDL Monitoring Stations is included in Figure 3. Please reconcile.
9. QAPP, Section 6.0. Project Task Description: This section indicates that contracted laboratories used by the facility shall be certified by the Environmental Laboratory Accreditation Program (ELAP). Please include the laboratory certification in the Draft Plans.

10. QAPP, Section 6.1. Implementation Schedule: Refer to Comment 2. It was stated in the first paragraph of this section that "implementation of the terminal's MRP and QAPP is to begin during subsequent discharge events following the initial discharge to the permitted NPDES outfall for the remainder of the permit order." Please modify the language such that the MRP and the QAPP will be implemented beginning from the first discharge from the Facility after the effective date of the permit (instead of discharges subsequent to the initial discharge). Receiving water column sampling (including water samples and TSS samples) shall begin during or as soon as possible following the first effluent discharge event. Sediment and fish tissue monitoring must begin within the year of the first effluent discharge event.
11. QAPP, Section 6.1. Implementation Schedule: The third paragraph referenced a Figure 5. The Table of Contents indicates the map of Harbor Toxics TMDL Monitoring Stations is included in Figure 3. Please reconcile.
12. QAPP, Table 6.1. Monitoring Requirement: It is indicated in Table 6.1 that monitoring constituents for the sediment medium includes "copper, lead, zinc, toxicity, benthic community effect" only. Please modify the table to be consistent with the sediment monitoring requirements enumerated in Comment 6. Sediment monitoring consists of sediment chemistry monitoring and sediment triad sampling. The sediment chemistry monitoring requires the full chemical suite as included in SQO Part 1. The sediment triad sampling includes the full chemical suite, two toxicity tests, and four benthic indices. These analyses are required in addition to the listed constituent included in this table (if they are not included already).
13. QAPP, Table 10.0. Sample Stations: Bed sediment samplings (including sediment triad sampling and sediment chemistry sampling) are only required at Station 04 (Main Turning Basin North of Vincent Thomas Bridge) and 06 (Main Channel South of Port O' Call) (Refer to Comment 5). The full chemical suite as included in Attachment A of the SQO Part 1 is required in addition to the parameters currently listed for sediment monitoring (Refer to Comment 6). No change to water column/TSS and fish tissue sampling locations necessary.
14. QAPP, Section 11.2. Sediment Sample Collection: A space is missing; the first sentence to the second paragraph of the section should read: "Sediment samples shall be collected at Stations 02-06_ with the use of a mechanical..."
15. QAPP, Section 12.5. Analytical Information: Please include a list of reporting limits (RLs) and method detection levels (MDLs) of the laboratory analyses chosen for the required testing parameters in each medium (water column (including water samples and TSS samples), sediment, and fish tissue), and the corresponding target concentration for these parameters as included in Attachment A to Resolution No. R11-008.
16. QAPP, Section 14.0. Quality Control: Please include the following to this section: "All monitoring conducted in compliance with the MRP must be comparable with the Quality Assurance requirements of the Surface Water Ambient Monitoring Program (SWAMP)."
17. QAPP, Section 15.0. Instrument/Equipment Maintenance and Calibration: Please analyze an equipment/trip blank, and/or implement procedures (to be specified in the QAPP) to

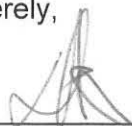
ensure the proper cleaning of sampling equipment and prevention of cross contamination between samples.

18. QAPP, Section 16.0. Data Management: Refer to Comment 7. Please include the following language in this section: "All receiving water monitoring data shall also be submitted in accordance with the California Environmental Data Exchange Network (CEDEN). The Discharger shall submit all receiving water monitoring data in accordance with CEDEN, when feasible."
19. Figures, Figure 3. Monitoring and Sampling Stations: The legend to the figure in this section referred to the figure as "Figure 5." However, the Table of Contents as well as the cover page of this figure referenced the figure as "Figure 3." Please reconcile and make consistent throughout the document.
20. Figures, Figure 3. Monitoring and Sampling Stations: Indicate the Facility location on the map.
21. Appendix A. Sample Containers and Preservation:
 - The information for temperature and dissolved oxygen (DO) analyses are missing.
 - Refer to Comment 6. Sediment monitoring consists of sediment chemistry monitoring and sediment triad sampling. The sediment chemistry monitoring requires the full chemical suite as included in SQO Part 1. The sediment triad sampling includes the full chemical suite, two toxicity tests, and four benthic indices. These analyses are required in addition to the listed constituent included in this table (if they are not included already). Please include information for all parameters included in the full chemical suites as specified in the SQO Part 1 as well.
 - The analytical method(s) for toxicity is/are missing.
 - The analytical method, container type/volume, field sample preservation, and holding time for benthic community effect analyses are missing.

Please modify the Draft Plans in accordance with the comments included herewith and submit a revised Monitoring Plan and Quality Assurance Project Plan (Final Plans) by June 11, 2018. The Final Plans will be posted on the Regional Water Board's website for a 30-day public comment period. The Regional Water Board will provide further instructions on the implementation of the Final Plans depending on whether substantial comments are received.

If you have any questions, please contact Ching Yin To at Ching-Yin.To@waterboards.ca.gov or at (213)576-6696.

Sincerely,



Deborah J. Smith
Executive Officer

Mr. Sandeep Sharma
Equilon Enterprises LLC dba Shell Oil Products US
Shell Oil Products US Mormon Island Terminal

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May 4, 2018

cc: **(Via Email Only)**

Mr. Rick Roper, Shell Oil Products US
Mr. Kawika Tupou, Shell Oil Products US
Ms. Ana Horn, WGR Southwest, Inc.