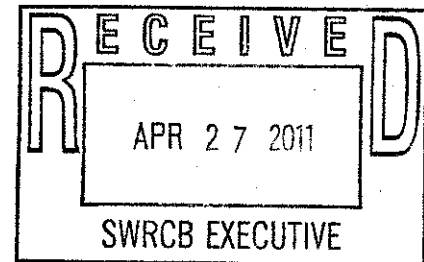




## OXBOW CARBON & MINERALS LLC

April 26, 2011

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



RE: Comment Letter - Draft Industrial General Permit

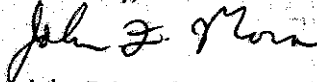
Oxbow Carbon & Minerals LLC, owns and operates petroleum coke handling facilities on Pier G in the Port of Long Beach. Coke is stored in a series of five barns, with the material received by trucks, and sent to ships by means of a conveyor system. The coke is wet when it is received and the runoff from these barns is routed to a settling tank which allows most of the coke solids to separate from the water prior to discharge to the Metro system via a series of ten discharge points (two per barn). Uncontaminated storm water is routed to the Metro system via a separate discharge point.

While we understand that EPA has a mandate to protect water quality throughout the USA, Oxbow would like to make several points for EPA's consideration over their plans for the Port of Long Beach:

1. As noted above, Oxbow has ten locations where discharge water from the five storage barns is routed to the Metro system for treatment. If the final design requires that all industries at the Port would be required to meet the new discharge standards we would either have to install ten separate water treatment systems or combine those ten discharge streams into a single stream with a new water treatment system. In either case, the expense would be considerable. A more efficient system would be to allow Oxbow to operate as it currently operates, i.e., where our discharge water is routed to Metro who then treat our discharge water along with several other companies' discharge streams in one large water treatment system. Only one permit would then be necessary for the Port. **Oxbow recommends** that the Port be allowed to operate with a single NPDES permit, as at present.
2. The proposed new design storm (10-year, 24-hour rainfall of 4.1 inches) represents almost a threefold increase in the volume of storm water that would have to be treated. This would require a significant upgrade to the existing water treatment system but there is no proof that such a change would result in any significant improvement in water quality in the Port. **Oxbow recommends** that the current design storm be retained.
3. There is considerable influx of seawater into the Port on a daily basis. Seawater has a much higher specific conductance than fresh water, and the proposed specific conductance limit does not reflect the influence of seawater on water quality in the Port. **Oxbow recommends** that the proposed specific conductance limit be revised upwards to account for the impact of seawater on water quality in the harbor.
4. EPA has unequivocally stated before that benchmark concentrations are not effluent limits; however, if concentrations in the harbor exceed the benchmark levels (even despite the best efforts of industry to control their discharges) the course of action outlined by EPA clearly describes a procedure whereby the benchmark concentrations become effluent limits. **Oxbow recommends** that EPA develops effluent limits that are based on available technology.

If you have any questions about our comments please contact John Mora at [john.mora@oxbow.com](mailto:john.mora@oxbow.com) or by telephone at 562-624-2163.

Sincerely,

A handwritten signature in black ink that reads "John F. Mora". The signature is written in a cursive style with a large initial "J".

John F. Mora  
Manager of Health, Safety &  
Environment  
Oxbow Carbon & Minerals LLC