

## Response to Comments

**Plains West Coast Terminals LLC, Dominguez Hills Tank Farm  
Tentative Order No. R4-2016-XXXX  
NPDES Permit No. CA0052949, CI No. 5841**

#	Comment Summary	Response	Action Taken
Plain West Coast Terminals – Letter dated March 16, 2014			
1	<p>Section III.A. Wastes discharged at Discharge Point 001 shall each be limited to a maximum of 0.91 million gallons per day (MGD) of treated storm water, and hydrostatic test water at Discharge Point 001.</p> <p>Plains concurs that discharge ought to be limited to 0.91 MGD. The discharge rate of 4.32 MGD was not representative of site operations or expected (or monitored) discharge.</p> <p>It should be noted that during the 2010-2015 permit period, no hydrostatic water was tested. Discharge from monitoring location EFF-001 consisted exclusively of captured stormwater runoff during heavy rainfall events when the reservoir storage capacity of 9.75 million gallons was exceeded. Stormwater is drained to the surge reservoir, visually inspected for oil sheen, and treated with absorbent booms, if necessary. Stormwater is then released to the primary retention. Water can be released back into the surge reservoir where it is processed through the wastewater treatment system, as needed, and disposed off-site.</p>	<p>Regional Board staff acknowledges that no hydrostatic water discharges occurred from the facility in the last permit cycle. Per Discharger's request, the permitted flow in the proposed permit has been reduced to 0.91 MGD. During the March 18, 2016, site visit, the Discharger indicated the intention to obtain a separate NPDES General permit to cover the hydrostatic test water discharge from the facility. Until such time hydrostatic test water discharges are covered along with storm water discharges under this permit. Once enrolled under the General NPDES permit for hydrostatic test water, the Discharger may request to revise this permit to remove the hydrostatic test water discharge.</p>	No action required.
2	<p>Section VII.C.1, Attachment F and Attachment J.</p> <p>Accuracy of the data used in the Tentative Permit for the Reasonable Potential Analysis (RPA) and development of effluent limitations.</p> <p>Some of the data used in the RPA appear to be inaccurate. Monitoring data are submitted to the LARWQCB in multiple formats (e.g., annual reports, laboratory reports, electronic</p>	<p>LARWQB revisited the laboratory reports for monitoring data and used those data extracted from these reports and conducted the RPA to prescribe effluent limitations.</p>	<p>Based on revised RPA calculations, appropriate changes were made to the effluent limitations in the Order including deleting limitations for PCBs and TCDD equivalents.</p>

#	Comment Summary	Response	Action Taken																
	<p>database, and the ROWD). Data submitted into California Integrated Water Quality System (CIWQS) requires compilation of electronic data deliverables (EDDs) from several laboratories.. Therefore, Plains requests that the LARWQCB review the data used in the RPA for accuracy, completeness, and analytical methodology.</p> <p>As requested by the LARWQCB on March 18, 2016, Plains has re-submitted a compilation of the annual monitoring data for the 2010-2015 period, including analytical reporting limits (RLs) and method detection limits (MDLs).</p>																		
3	<p>Section IV.A.1.a Calculation and reporting errors observed for several of the proposed mass effluent limitations.</p> <p>The mass loading effluent limits presented in the Tentative Permit and the Fact Sheet contain inconsistencies and/or errors. Plains used the following equation to confirm the calculations and have identified the errors in the tables that follow.</p> <p>Mass limitation for a pollutant (lbs/day) = flow rate {0.91 MGD} x effluent limitation (mg/L) x 8.34</p> <p>It is likely the inconsistencies/errors are in reporting the units for the effluent limitation (µg/L rather than mg/L), which has resulted in the observed discrepancies. Plains requests that LARWQCB staff confirm the accuracy of all units and calculations in the Tentative Permit, and ensures that the effluent limits are accurate and consistently presented.</p> <table border="1" data-bbox="352 1166 1083 1416"> <thead> <tr> <th colspan="4">Proposed Average Monthly Effluent Limits (lbs/day)</th> </tr> <tr> <th>Parameter</th> <th>Table 4</th> <th>Table F-8</th> <th>Plains Calculation</th> </tr> </thead> <tbody> <tr> <td>Ammonia Nitrogen, Total (as N)</td> <td>13</td> <td>13</td> <td>13.7</td> </tr> <tr> <td>PCBs</td> <td>0.00034</td> <td>1.3x10<sup>-6</sup></td> <td>See Plains' comment</td> </tr> </tbody> </table>	Proposed Average Monthly Effluent Limits (lbs/day)				Parameter	Table 4	Table F-8	Plains Calculation	Ammonia Nitrogen, Total (as N)	13	13	13.7	PCBs	0.00034	1.3x10 <sup>-6</sup>	See Plains' comment	<p><u>Ammonia Nitrogen Total:</u> Agrees with the Discharger. Lbs/day limit for ammonia Nitrogen Total is 13.7.</p> <p><u>PCBs:</u> Since PCBs were not detected and there is no reasonable potential exist for PCBs to cause or contribute to an excursion above any applicable priority pollutant criterion or objectives, the effluent limitation has been removed.</p> <p><u>Benzene:</u> Typographical error in Table F-8 for benzene mass based limit will be revised to reflect the correct limit of 0.0076 lbs/day.</p> <p><u>Sulfides:</u> Unit for the sulfides limit is mg/L. The mass based limit shown in the permit is correct and no change is required.</p> <p><u>Total Petroleum Hydrocarbons (TPH):</u> TPH mass based limits will be changes to 0.8 lbs/day.</p> <p><u>Xylene:</u> Xylene mass based limit will be changed to 13 lbs/day.</p>	<p>The permit will be revised and the mass based limits for the pollutants discussed here will be revised to reflect the correct limits.</p> <p>The permit will be revised and the effluent limitation for PCBs will be removed. Annual monitoring is required.</p>
Proposed Average Monthly Effluent Limits (lbs/day)																			
Parameter	Table 4	Table F-8	Plains Calculation																
Ammonia Nitrogen, Total (as N)	13	13	13.7																
PCBs	0.00034	1.3x10 <sup>-6</sup>	See Plains' comment																

#	Comment Summary	Response	Action Taken																																				
	<table border="1" data-bbox="352 212 1087 626"> <tr> <td data-bbox="352 212 600 245"></td> <td data-bbox="600 212 751 245"></td> <td data-bbox="751 212 905 245"></td> <td data-bbox="905 212 1087 245">#3</td> </tr> <tr> <td colspan="4" data-bbox="352 277 1087 310">Proposed Maximum Daily Effluent Limits (lbs/day)</td> </tr> <tr> <td data-bbox="352 310 600 342">Parameter</td> <td data-bbox="600 310 751 342">Table 4</td> <td data-bbox="751 310 905 342">Table F-8</td> <td data-bbox="905 310 1087 342">Plains Calculation</td> </tr> <tr> <td data-bbox="352 342 600 375">Benzene</td> <td data-bbox="600 342 751 375">0.0076</td> <td data-bbox="751 342 905 375">7.59</td> <td data-bbox="905 342 1087 375">0.0076</td> </tr> <tr> <td data-bbox="352 375 600 407">Ethylbenzene</td> <td data-bbox="600 375 751 407">5.2</td> <td data-bbox="751 375 905 407">5,160.79</td> <td data-bbox="905 375 1087 407">5.2</td> </tr> <tr> <td data-bbox="352 407 600 440">Sulfides</td> <td data-bbox="600 407 751 440">7.6</td> <td data-bbox="751 407 905 440">7.6</td> <td data-bbox="905 407 1087 440">0.0076</td> </tr> <tr> <td data-bbox="352 440 600 505">Total Petroleum Hydrocarbons</td> <td data-bbox="600 440 751 505">0.8</td> <td data-bbox="751 440 905 505">759</td> <td data-bbox="905 440 1087 505">0.8</td> </tr> <tr> <td data-bbox="352 505 600 570">PCBs</td> <td data-bbox="600 505 751 570">0.0026</td> <td data-bbox="751 505 905 570">2.6x10<sup>-6</sup></td> <td data-bbox="905 505 1087 570">See Plains' comment #3</td> </tr> <tr> <td data-bbox="352 570 600 626">Xylene</td> <td data-bbox="600 570 751 626">13</td> <td data-bbox="751 570 905 626">13,281</td> <td data-bbox="905 570 1087 626">13</td> </tr> </table>				#3	Proposed Maximum Daily Effluent Limits (lbs/day)				Parameter	Table 4	Table F-8	Plains Calculation	Benzene	0.0076	7.59	0.0076	Ethylbenzene	5.2	5,160.79	5.2	Sulfides	7.6	7.6	0.0076	Total Petroleum Hydrocarbons	0.8	759	0.8	PCBs	0.0026	2.6x10 <sup>-6</sup>	See Plains' comment #3	Xylene	13	13,281	13		
			#3																																				
Proposed Maximum Daily Effluent Limits (lbs/day)																																							
Parameter	Table 4	Table F-8	Plains Calculation																																				
Benzene	0.0076	7.59	0.0076																																				
Ethylbenzene	5.2	5,160.79	5.2																																				
Sulfides	7.6	7.6	0.0076																																				
Total Petroleum Hydrocarbons	0.8	759	0.8																																				
PCBs	0.0026	2.6x10 <sup>-6</sup>	See Plains' comment #3																																				
Xylene	13	13,281	13																																				
4	<p data-bbox="352 626 1119 659">Section IV.A.1.a, Attach. F, Attach. J</p> <p data-bbox="352 691 1119 756">Addition of Polychlorinated Biphenyls (PCBs) as a priority pollutant to the Discharge Point 001 monitoring program.</p> <p data-bbox="352 789 1119 854">Plains does not believe that PCBs are a priority pollutant group for the Dominguez Hills Tank Farm for the following reasons:</p> <ul data-bbox="352 854 1119 1032" style="list-style-type: none"> <li data-bbox="373 854 1119 935">• Plains is a storage and transportation facility for crude, fuel oil, and displacement oil. PCBs are not a material used as part of facility operations.</li> <li data-bbox="373 935 1119 1032">• Plains' review of the historical data from the 2010-2015 permit period show that PCB monitoring results were 100% non-detect (ND).</li> </ul> <p data-bbox="352 1049 1119 1162">The outcome of the RPA analysis for PCBs suggests that Plains is a potential contributor of PCBs in spite of the 2010-2015 data. Plains questions this analysis and the proposed effluent limitations as follows:</p> <ul data-bbox="352 1162 1119 1406" style="list-style-type: none"> <li data-bbox="373 1162 1119 1292">• The method detection limit (MDL) for the PCB ND results ranged from &lt;0.23 µg/L to &lt;0.24 µg/L. The PCB minimum level (e.g., reporting limit) was 0.5 µg/L, as stipulated in Order No. R4-2010-0160.</li> <li data-bbox="373 1292 1119 1406">• The calculations shown on Page F-19 and in Attachment J of the Tentative Permit indicate the facility Maximum Effluent Concentration (MEC) was 0.382 µg/L. In Attachment J, the maximum concentration detected (B)</li> </ul>	<p data-bbox="1129 626 1671 870">Review of the effluent monitoring data for Polychlorinated Bi-phenyles (PCBs) confirmed that all data were non-detect (ND). Since there is no reasonable potential to exceed California Toxic Rule (CTR) criterion for PCBs, the PCBs effluent limitations has been removed from the proposed Order.</p>	<p data-bbox="1682 626 1957 789">Order has been revised and the effluent limitations for the PCBs has been removed.</p>																																				

#	Comment Summary	Response	Action Taken
	<p>was rounded up to 0.4 µg/L. Plains questions the accuracy of MEC and B values used in the RPA and requests the LARWQCB revisit these calculations. Plains also requests the LARWQCB provide supporting calculations for the analysis presented in the Tentative Permit.</p> <ul style="list-style-type: none"> <li>EPA Method 8082 for PCBs by gas chromatography represents the technical state of the science for the quantification of aroclor-type PCBs in water. The MDLs (reported above) are 1000x greater than the purported <u>effluent limitations</u> specified in the draft Order. This means that Plains is unable to demonstrate compliance with water column effluent limitations using historical data. Basing the RPA analysis on non-detect results is fundamentally flawed. Therefore, Plains proposes the effluent limitations are removed from the Tentative Permit until better data is available.</li> </ul> <p>Plains recognize the importance of demonstrating that the Dominguez Hills Tank Farm is not contributing PCBs to the receiving water. Plains requests that the LARWQCB provide guidance how to collect data at monitoring location EFF-001 in a way that addresses the identified MDL issues so that an appropriate RPA and WQBEL analysis may be conducted in the future.</p>		
5	<p>Section IV.A.1.a, Attach. E, Attach. F, Attach. J</p> <p>Addition of Tetrachlorodibenzo-p-dioxin (TCDD) equivalents as a priority pollutant to the Discharge Point 001 monitoring program.</p> <p>Plains does not believe that TCDDs are a priority pollutant group for the Dominguez Hills Tank Farm for the following reasons:</p> <ul style="list-style-type: none"> <li>Plains is a storage and transportation facility for crude, fuel oil, and displacement oil. TCDD congeners are not a material used as part of facility operations.</li> <li>Plains' review of the historical data from the 2010-2015 permit period show that all TCDD equivalent monitoring</li> </ul>	<p>Review of the effluent water quality data for TCDD equivalents shows that all congeners are either non detect (ND) or detected, but not quantified (DNQ) (with J flag, below the Reporting Limit). According to the reporting protocol for TCDD equivalents, all NDs or DNQs shall be set to zero for the calculation of TCDD equivalents. Therefore, the value of TCDD equivalents shall be reported as zero (0). As a result, there is no reasonable potential to exceed CTR criterion for TCDD equivalents or cause impairment in the receiving waters, the TCDD equivalents effluent limitations have been removed from</p>	<p>Order has been revised and the effluent limitations for the TCDD has been removed. Annual monitoring is required.</p>

#	Comment Summary	Response	Action Taken
	<p>results were below the minimum level (ML) required by the permit, with one exception. Although the TCDD congener OctaCDD was detected in effluent on March 24, 2014, this result is suspect. The concentration reported for the sample (110 pg/L) is lower than the concentration detected in the method blank (170 pg/L).</p> <p>The outcome of the RPA analysis for TCDDs suggests that Plains is a potential contributor of TCDDs in spite of the 2010-2015 data. Plains questions this analysis and the proposed effluent limitations as follows:</p> <ul style="list-style-type: none"> <li>• As requested by the LARWQCB on March 18, 2016, Plains has re-submitted a compilation of the PCB monitoring data for the 2010-2015 period, including laboratory estimated detection limits (EDLs), which are one to two orders of magnitude less than the MLs stipulated in Order No. R4-2010-0160.</li> <li>• Order No. R4-2010-0160 and the Tentative Permit stipulate that results less than the ML are calculated as zero. The only result about the ML is likely due to laboratory error and should be considered the same as a ND, or thrown out of the analysis. Therefore Plains proposes that all the total TCDD equivalent result is zero.</li> <li>• The calculations shown on in Attachment J of the Tentative Permit indicate the facility Maximum Effluent Concentration (MEC) was 6.157E-06 µg/L. Plains questions the accuracy of MEC value used in the RPA and requests the LARWQCB revisit these calculations along with the submitted monitoring data. Plains requests the LARWQCB provide supporting calculations for the revised analysis.</li> </ul> <p>Therefore, Plains proposes that the LARWQCB:</p> <ul style="list-style-type: none"> <li>• Remove the effluent limitations for TCDD equivalents from the Tentative Permit.</li> <li>• Remove TCDD equivalents from the list of pollutants with reasonable potential from the Tentative Permit.</li> </ul> <p>The Tentative Permit has also modified the method for</p>	<p>the proposed Order. The monitoring frequency for TCDD equivalents has been changed to once per year.</p>	

#	Comment Summary	Response	Action Taken
	calculating TCDD equivalents (e.g., omitting the former bioaccumulation equivalency factors (BEFs) from the calculation). Plains requests that the LARWQCB provide guidance and justification for the new method of analysis.		
6	<p>VII.B, Attach. E</p> <p>Monitoring frequency specified for toxicity testing.</p> <p>Footnote 4: Monitoring requirements for pollutants with effluent limitations are once per discharge event, but not more than once per week.</p> <p>During the prior permit term toxicity was tested annually, during the first discharge of the year. The Tentative Permit specifies toxicity testing for each discharge event and weekly thereafter. Plains believes this high frequency of toxicity testing is unnecessary for the following reasons:</p> <ul style="list-style-type: none"> <li>• Stormwater runoff at Dominguez Hills is captured in the concrete lined surge reservoir and stormwater impounding basin. (No hydrostatic test water was generated during this period). Discharge only occurs when necessary. Dominguez Hills did not discharge in 2013. Dominguez Hills discharged in 2011 (three events), 2012 (two events), 2014 (one event) and 2015 (one event). In 2014 and 2015, all event discharge, receiving water and priority pollutant monitoring requirements were during the first and only discharge event of the year.</li> <li>• All contact water is treated using best available technology (BAT) / best practicable treatment (BPT) (e.g., sand filtration, media filtration, activated carbon treatment, vessels, and ion exchange) prior to discharge.</li> <li>• Monitoring data for 2010-2015 provides substantial evidence BAT / BPT in place at this facility provide sufficient effluent waters that comply with CTR, TMDL</li> </ul>	<p>An acute toxicity test is conducted over a short time period and measures mortality. A chronic toxicity test is conducted over a longer period of time and may measure mortality, reproduction, and growth. Since a chronic toxicity test is 1) capable of measuring both sublethal and lethal effects and it is 2) more stringent than the acute toxicity test, a chronic toxicity effluent limitation is imposed in this permit to replace the acute toxicity effluent limitation.</p> <p>Regional Board staff agrees to reduce the chronic toxicity monitoring frequency to annually at the first discharge of the year. The chronic toxicity limitations in Table 4 have been revised to include the specified average monthly and maximum daily limitations.</p> <p>With respect to the monitoring requirements for the MMEL's in section V.5.b, if the chronic toxicity testing results in "Fail", additional chronic toxicity monitoring is required when other discharge events occur during the same month. Up to three chronic toxicity tests shall be conducted during the month.</p>	<p>The chronic toxicity monitoring frequency has been reduced to annually.</p>

#	Comment Summary	Response	Action Taken
	<p>and WQBEL's. Samples had 100% survival for all toxicity tests.</p> <p>Plains requests that the LARWQCB reduce the frequency of toxicity testing to once per discharge event.</p>		
7	<p>VII.B, Attach. E</p> <p>Monitoring frequency specified for TCDD equivalents.</p> <p>Footnote 7: Annual samples and the first of the semi-annual samples shall be collected during the first hour of discharge from the first storm event of the wet season (October 1 – May 30). If no discharge occurs, no monitoring is required.</p> <p>During the prior permit term TCDD equivalents were sampled annually. Plains believes semiannual sampling is unnecessary for the following reasons:</p> <ul style="list-style-type: none"> <li>• Semiannual sampling is only proposed for TCDD equivalents. Sampling one parameter during one additional event per year provides potential for confusion in sampling protocols.</li> <li>• All of the BAT / BPT reasons presented in comment 6.</li> <li>• The purpose of the increased frequency of TCDD equivalent sampling appears to be to characterize discharge from the first storm event of the wet season. In 2014 and 2015, all event discharge, receiving water and priority pollutant monitoring requirements were during the first and only discharge event of the year.</li> <li>• Plains proposes to continue conducting annual sampling of priority pollutants during the first discharge event of the year. Semiannual sampling is unnecessary.</li> </ul> <p>Plains requests for the LARWQCB to reduce semiannual monitoring for TCDD equivalents to annual monitoring.</p>	Refer to response to comment # 5	The monitoring frequency for TCDD equivalents has been changed to once per year.
8	<p>VII.B, Attach. E</p> <p>Footnote 4: Monitoring requirements for pollutants with effluent limitations are once per discharge event, but not more than once per week.</p>	Sampling for the Long Beach Generating Station is established based on the continuous discharge of treated dewatered groundwater. The collected storm water is routinely sent through the treatment system and discharged along with the treated	No action required.

#	Comment Summary	Response	Action Taken
	<p>Plains agrees that it is appropriate to collect samples at least once per discharge event, during years when discharge occurs. Plains requests the LARWQCB revise the frequency of monitoring during discharge to “not more than monthly” for all parameters for the following reasons:</p> <p>All of the BAT / BPT reasons presented in comment 6. The precedent for sample collection no more than monthly is established in the waste discharge requirements for the Long Beach Generating Station (NPDES No. CA0001171), which is owned and operated by NRG Energy, Inc.</p>	<p>dewatered groundwater. When the amount of storm water runoff generated exceeds the capacity, the facility bypass the treatment system with a portion of the storm water. The permit Order R4-2016-0121 for Long Beach Generating Station includes monitoring of the storm water bypass once per discharge event. During a prolonged emergency bypass discharge that occurs continuously or intermittently for more than a week, only one sample per week is required.</p> <p>The once per discharge event sampling frequency included in the tentative requirements for Plains West Coast Terminals, LLC, is consistent with the requirements stipulated for other discharges of storm water runoff in the region.</p>	
9	<p>As required in the Harbor Toxics TMDL, Los Angeles River Watershed responsible parties identified in the effective Los Angeles River Metals TMDLs are responsible for conducting water and sediment monitoring above the Los Angeles River Estuary to determine the River’s contribution to the impairments in the Greater Harbor waters. The Discharger is a “responsible party” because it is an “Individual Industrial Permittee”. As such, either individually or with a collaborating group, the Discharger shall develop a monitoring and reporting plan (Monitoring Plan) and quality assurance project plan (QAPP) for the water column, and sediment above the Los Angeles River Estuary. Since the effective date of this Order exceeds the deadline for the Monitoring Plan and QAPP, the Discharger shall join a group already formed or develop a site-specific monitoring plan.</p> <p>Plains does not agree with the determination that they are a contributor or a TMDL permittee. This interpretation of “responsible party” assigns TMDL status without consideration of the historical record, facility operations, or likelihood of</p>	<p>As per definition of the “responsible party” defined in the Los Angeles Harbor TMDL (Resolution No. R11-008), all those Dischargers who discharge within its watershed and contribute to the Los Angeles River are responsible to comply with the water and sediment monitoring requirements. The Compton Creek is a tributary to Los Angeles River and therefore, you are one of responsible parties. All Dischargers who discharge to Los Angeles River Watershed are required to conduct water and sediment monitoring as per the TMDL.</p> <p>As specified in the permit you may choose to join a collaborative group to complete the required sampling or you may develop a site specific monitoring plan and quality assurance plan.</p>	No action required.

#	Comment Summary	Response	Action Taken
	possible pollutant sources on-site. As discussed in comment #3, the RPA analysis for PCBs is based on ND results. Plains is not a likely source of PCBs based on operations and materials stored on site. Historical monitoring data also demonstrates that Plains is not a significant contributing source of sediment (the common source of PCB pollution). Therefore, Plains requests that Section VII.C.2(b) be removed from the Tentative Permit.		
10	ATTACHMENT I  CTR Number 119 – PCB 1116 Per footnote 8 to Table E-2, Plains the parameter ought to be PCB 1016 not 1116.	Regional Board staff agrees with the Discharger	Change has been made to the Order to reflect the correct PCB number.