



## Shell Oil Products US

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### Via Electronic Mail

April 18, 2012

California Regional Water Quality Control Board  
San Francisco Bay Region  
ATTN: Mr. Robert Schlipf  
1515 Clay Street, #1400  
Oakland, CA 94612

Subject: **March 19, 2012, Tentative Order for Shell Oil Products US and Equilon Enterprises LLC, Shell Martinez Refinery, NPDES Permit No. CA 0005789**

Dear Mr. Schlipf:

We have reviewed your Tentative Order dated March 19, 2012, for the proposed renewal of the NPDES permit for the Shell Martinez Refinery and understand the Board will consider this tentative order during its June 13, 2012, public hearing.

Shell appreciates the opportunity to work with Board staff on the development of this tentative order, and the substance of the Order is acceptable to Shell. Shell does offer the following editorial comments and proposes modified language to the sections/tables listed below which either update provisions carried over from the previous order or more accurately reflect the Shells operations and circumstances.

#### **Item III.C on Page 9:**

*III.C. The bypass of untreated or partially-treated process wastewater to waters of the United States is prohibited, except as provided for in sections I.G.2 and I.G.4 of Attachment D to this Order and as noted in ~~Finding B~~ Fact Sheet paragraph II.A. As described in ~~Finding B~~ Fact Sheet paragraph II.A, bypasses of GAC adsorption units are permitted only if all of the following conditions are met: ...*

#### **Item IV.A.3 on Page F-12:**

*IV.A.3. As described in ~~Finding B~~ Fact Sheet paragraph II.A, bypassing the Granular Activated Carbon (GAC) adsorption units with a portion of biologically treated wastewater is permitted only when a significant storm event causes a high flow condition to exist (effluent discharge rate of 8.6 mgd [5,972 gpm] or higher).*

Table E-4 on pages E-4 and E-5:

**Table E-4. Schedule of Sampling, Analyses, and Observations for Stormwater**

<i>Parameter</i>	<i>Units</i>	<i>Sample Type</i>	<i>Minimum Sampling Frequency<sup>[1]</sup></i>	<i>Outfalls</i>
<i>Oil and Grease</i>	<i>mg/L</i>	<i>Grab<sup>[2]</sup></i>	<i>Each Discharge Event</i>	<i>All<sup>[3]</sup></i>
<i>pH</i>	<i>s.u.</i>	<i>Grab<sup>[2]</sup></i>	<i>Each Discharge Event</i>	<i>All<sup>[3]</sup></i>
<i>TOC</i>	<i>mg/L</i>	<i>Grab<sup>[2]</sup></i>	<i>Each Discharge Event</i>	<i>All<sup>[3]</sup></i>
<i>TSS</i>	<i>mg/L</i>	<i>Grab<sup>[2]</sup></i>	<i>Each Discharge Event</i>	<i>All<sup>[3]</sup></i>
<i>Specific Conductance</i>	<i>µmhos/cm</i>	<i>Grab<sup>[2]</sup></i>	<i>Each Discharge Event</i>	<i>All<sup>[3]</sup></i>
<i>Standard Observations</i>	<i>--</i>	<i>Visual</i>	<i>Each Discharge Event</i>	<i>All<sup>[3]</sup></i>
<i>BOD<sub>5</sub></i>	<i>mg/L</i>	<i>Grab<sup>[2]</sup></i>	<i>Daily during storm event</i> <i>Each discharge event</i>	<i><sup>[3]</sup></i>
<i>COD</i>	<i>mg/L</i>	<i>Grab<sup>[2]</sup></i>	<i>Daily during storm event</i> <i>Each discharge event</i>	<i><sup>[3]</sup></i>
<i>Phenolic Compounds</i>	<i>mg/L</i>	<i>Grab<sup>[2]</sup></i>	<i>Daily during storm event</i> <i>Each discharge event</i>	<i><sup>[3]</sup></i>
<i>Total Chromium</i>	<i>mg/L</i>	<i>Grab<sup>[2]</sup></i>	<i>Daily during storm event</i> <i>Each discharge event</i>	<i><sup>[3]</sup></i>
<i>Hexavalent Chromium</i>	<i>mg/L</i>	<i>Grab<sup>[2]</sup></i>	<i>Daily during storm event</i> <i>Each discharge event</i>	<i><sup>[3]</sup></i>

<sup>[1]</sup> For E-008 and E-009 the minimum sampling frequency shall be twice per year. Sampling for storm runoff discharges that do not drain to basins (i.e., E-008 and E-009) shall be during periods when the laboratory is normally staffed

<sup>[2]</sup> For E-008 and E-009 at least one grab sample shall be collected within the first 30 minutes of significant flow during a storm event.

<sup>[3]</sup> If and when the supplemental effluent limitations in Table 9 of this Order become effective in accordance with section IV.B.2 of this Order, monitoring shall begin at the outfalls where the limitations are in effect and be increased to daily during each storm event. The monitoring frequency for stormwater impoundments (i.e. E-002, E-004, E-005, and E-007) shall be during each discharge event while the monitoring frequency for E-008 and E-009 shall be daily during each storm event.

Shell believes that this change is necessary because discharges from stormwater impoundments only occur during a release event and not necessarily during each storm event.

Fact Sheet Paragraph IV.D on page F-38:

Parameter	Influent I-001 & I-002	Effluent E-001	Effluent E-001D	Effluent E-002 thru 009	Receiving Water
Flow	{1}	Cont			
pH		Cont		Each discharge {2}	
Temperature		Cont			
COD		1/Month		Daily each storm Each discharge {4}	
BOD <sub>5</sub>		1/Month		Daily each storm Each discharge {4}	
TSS		1/Month		Each discharge {2}	
Specific conductance				Each discharge {2}	
Total Organic Carbon				Each discharge {2}	
Oil and Grease		1/Month		Each discharge {2}	
Phenolic Compounds		1/Month		Daily each storm Each discharge {4}	
Chromium, Total and VI		1/Month		Daily each storm Each discharge {4}	
Sulfide		1/Month			
Ammonia total as N	{1}	1/Month			
Total Coliform			1/Week		
Enterococci			1/Month		
Acute Toxicity		1/Week			Support RMP
Chronic Toxicity		1/Quarter			Support RMP
Copper	{1}	1/Month			Support RMP
Nickel	{1}	1/Month			Support RMP
Selenium	{1}	1/Week			Support RMP
Cyanide	{1}	1/Month			Support RMP
Dioxins and Furans	{1}	2/Year			Support RMP
All other priority pollutants		2/Year		{3}	Support RMP
Standard Observations				Each discharge {2}	

{1} For discharge limit adjustments only.

{2} For E-008 and E-009, the minimum sampling frequency is twice per year.

{3} For E-004, the minimum sampling frequency is twice during the permit term.

*{4} If and when the supplemental effluent limitations in Table 9 of this Order become effective, monitoring frequency for stormwater impoundments (i.e. E-002, E-004, E-005, and E-007) shall be during each discharge event while the monitoring frequency for E-008 and E-009 shall be daily during each storm event.*

Shell believes that this change is necessary because discharges from stormwater impoundments only occur during a release event and not necessarily during each storm event.

Fact Sheet paragraph II.F.1 on page F-9.

***F. Planned Changes***

1. ***Addition of third Biotreater.*** *The Discharger plans to add a third biotreater in 2013 to ensure that it has adequate redundancy. This is because the biotreater the Discharger constructed in 1995 will be due for a mandatory inspection under the American Petroleum Institute standard 653.*

Shell requests this change to more correctly reference the American Petroleum Institute inspection requirement.

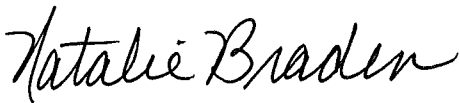
**Finding II.B on page 4.**

***II.B Facility Description.*** *The Discharger owns and operates a petroleum refinery that from June 2007 through May 2008 had has a crude-run throughput of approximately 149,200 barrels per day (bbls/day).*

Shell requests that this update to reference the time frame within which the throughput was obtained.

We appreciate your consideration of these comments. If you have any questions, please contact Mike Armour at (925) 313-3886.

Very truly yours,



Natalie A. Braden, Manager  
Environmental Affairs