

RESPONSE TO WRITTEN COMMENTS

On Tentative Order for Update Waste Discharge Requirements for the Shell Martinez Refinery

The Regional Water Board received written comments from Shell during the public comment period. In general, staff agrees with Shell's comments and has revised the tentative order as follows:

Finding 14: The word "currently" was added to this sentence: "An additional unit identified as the PG&E Sludge Terraces currently undergoes quarterly groundwater monitoring."

Specification B.23: This specification was revised as follows: "Water that accumulates within the AST berms located on top of units B, PS, H, W, and Z' shall be drained of ponded water within 48 hours. Units B, PS, and H are discharged to the WWTP and units W and Z' are discharged to stormwater surface impoundments. The Regional Water Board shall be notified within 24 hours if the ponded water cannot be drained within the 48-hour period. The wetland pond that has been created on a portion of Unit X is exempt from the ponding requirements of this specification. The emergency interim storage of stormwater/wastewater at units B and PS is necessary to prevent flooding and bypassing of the WWTP and is exempt from the ponding requirements of this specification.

Specification B.24: This specification was revised as follows: "The Discharger shall notify the Regional Water Board of any soil contamination, not previously identified in subsurface investigations, discovered during any subsurface investigation or excavation work conducted on refinery property, which may potentially adversely impact water quality."

Provision C.7: The following provision was added to the Revised Tentative Order: "The Discharger shall submit a plan to address the storage, reuse, and/or disposal of non-hazardous contaminated soil. This plan must be acceptable to the Executive Officer.

COMPLIANCE DATE: 30 days after the adoption of this Order."

Provision C.30: The time period for submitting a written report of a triggering seismic event was changed from 72 hours to two weeks.