

## ATTACHMENT I

### RESPONSIVENESS SUMMARY AND CHANGES FOR THE FOLLOWING DRAFT PERMITS

**Cedro Arriba WTP (PR0022659)**  
**Ceiba Sur WTP (PR0025119)**  
**Farallon WTP (PR0026077)**  
**Guayama WWTP (PR0025445)**  
**Guayanes WTP (PR0026409)**  
**Guilarte WTP (PR0026191)**  
**Guzman Arriba WTP (PR0022471)**  
**La Plata WTP (PR0025755)**  
**Luquillo WTP (PR0022802)**  
**Maricao WTP (PR0022969)**  
**Morovis-Rio Grande WTP (PR0026611)**  
**Parcelas Borinquen WWTP (PR0025101)**  
**Rio Blanco WTP (PR0022845)**  
**Rio Prieto WTP (PR0025411)**  
**Roncador WTP (PR0026271)**  
**Superacueducto (Norte) (PR0026085)**

On **June 12, 2019**, the United States Environmental Protection Agency (EPA) issued draft National Pollutant Discharge Elimination System (NPDES) permits for Water Treatments Plants (WTP's) and a Wastewater Treatment Plant (WWTP) owned by the Puerto Rico Aqueduct and Sewer Authority (PRASA) listed above.

According to 40 Code of Federal Regulations (CFR) §124.17, at the time that any final permit decision is issued under §124.15, EPA shall issue a response to comments. This response shall (1) specify which provisions, if any, of the draft permit have been changed in the final permit decision and the reasons for the change; and (2) briefly describe and respond to all significant comments on the draft permit raised during the public comment period, or during any hearing.

Comments on behalf of PRASA were received from the following addresses:

Puerto Rico Aqueduct and Sewer Authority  
PO Box 7066  
Barrio Obrero Station  
San Juan, PR 00916

All the comments received have been reviewed and considered in this final permit decision. A summary of and response to the comments received follows:

**A. GENERAL COMMENT**

In its comment letter PRASA has raised a number of issues, many of which address inclusion in the permit of conditions contained in the Water Quality Certificate (WQC) issued by EQB.

Response 1:

EPA is providing a generalized response to PRASA's comments which relate to requirements in EQB's WQCs.

Section 301(b)(1)(C) of the Clean Water Act (CWA) requires that there be achieved effluent limitations necessary to assure that a discharge will meet Water Quality Standards (WQS) of the applicable State and Federal laws and regulations where those effluent limitations are more stringent than the technology-based effluent limitations required by Section 301(b)(1)(A) of the CWA. Section 401(a)(1) of the CWA requires that the State certify that the discharge will comply with the applicable provisions of sections 301, 302, 303, 306 and 307 of the CWA. Pursuant to Section 401(d) of the CWA any certification shall set forth any effluent limitations and other limitations, and monitoring requirements necessary to assure that any applicant for a Federal permit will comply with any applicable effluent limitations and other limitations under section 301 or 302 of the CWA, and with any other appropriate requirement of State law set forth in such certification. Also, 40 C.F.R. 122.44(d) requires that each NPDES permit shall include requirements which conform to the conditions of a State Certification under Section 401 of the CWA that meets the requirements of 40 C.F.R. 124.53. Similarly, 40 C.F.R. 124.55 requires that no final NPDES permit shall be issued unless the final permit incorporates the requirements specified in the certification under '124.53. Concerning the certification requirements in 40 C.F.R. 124.53(e)(1), they specify that all Section 401(a)(1) State certifications must contain conditions which are necessary to assure compliance with the applicable provisions of CWA sections 208(e), 301, 302, 303, 306, and 307 and with appropriate requirements of State law.

EQB issued final WQCs certifying that pursuant to Section 401(a)(1) of the CWA, after due consideration of the applicable provisions established under Sections 208(e), 301, 302, 303, 304(e), 306 and 307 of the CWA concerning water quality requirements, there is reasonable assurance that the discharge will not cause violations to the applicable WQSs, provided that the effluent limitations set forth in the WQCs are met by the above facility.

The effluent limitations (where more stringent than technology-based effluent limitations), monitoring requirements and other appropriate requirements of State law (including footnotes, Special Conditions, etc.) specified in the final WQC issued by the EQB were incorporated by EPA into the NPDES permit as required by Section 301(b)(1)(C) and 401(d) of the CWA and the applicable regulations. Therefore, concerns and comments regarding the WQC must be directed to EQB or to the Superior Court.

Also, in the event that EPA receives a revised or modified WQC, we would consider modification of this permit, subject to all applicable federal requirements, to include revised WQC requirements and conditions.

**B. CEDRO ARRIBA WTP COMMENTS (PR0022659)**

**1) Comment 1: Part I. Background; Receiving Water Name.**

The receiving water body should be corrected as “Stormwater sewer tributary to Frío River”

**Response:** These were typographical errors; the final permit was revised.

**2) Comment 2: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table.**

“Dissolved Oxygen (DO)”:- The symbol of less than (<) in the effluent limitation must be changed by the symbol of greater than or equal ( $\geq$ ) according to the footnote (7).

**Response:** This was typographical errors; the final permit was revised.

**3) Comment 3: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, Mercury (Hg).**

Reference footnote (4) must be added.

**Response:** The final permit includes footnote (4).

**4) Comment 4: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, Notes, Footnotes and Abbreviations; “Footnote (3),(4) &(5).**

The reference to Part IV is incomplete. Should read as follow:

(3) “See Part IV.B.1 Special Condition g and h of this permit”.

(4) “See Part IV.B.1 Special Condition k of this permit”.

Footnote (5)- Should be deleted.

**Response:** These were typographical errors; the final permit was revised.

**5) Comment 5: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “C” not B.

**Response:** This was a typographical error; the final permit was revised.

**6) Comment 6: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “D” not C.

**Response:** This was a typographical error; the final permit was revised.

**C. CEIBA SUR WTP COMMENTS (PR0022659)**

**1) Comment 1: Permit Cover Page, Receiving water name.** PRASA states and recommends that according to the Environmental Quality Board’s (EQB’) Final Water Quality Certificate (WQC) of April 11, 2019, the complete name of the receiving Water body is “Natural drainage tributary to Valenciano River”.

**Response:** EPA added “Natural drainage tributary to Valenciano river” as found in the April 11, 2019 EQB’s WQC.

**2) Comment 2: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “Dissolved Oxygen (DO)”.**

The symbol of less than (<) in the effluent limitation must be changed by the symbol of greater than or equal (≥) according to footnote (7).

**Response:** This was typographical error(s); the final permit was revised.

**3) Comment 3: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “Effluent Flow”.** The maximum daily limitation in MGD must be corrected from 0.01 to 0.1. Please verify EQB’s WQC of April 11, 2019.

**Response:** This was typographical error(s); the final permit was revised.

**4) Comment 4: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, Notes, Footnotes and Abbreviations.**

Footnotes (3) and (4) – The reference to part IV is incorrect. These footnotes must be corrected to read as follows) (corrections highlighted in **bold**): (3) “See Part IV.B.1 Special Condition **g** and **h** of this permit”. (4) “See Part IV.B.1 Special Condition **k** of this permit”.

**Response:** This was typographical error(s); the final permit was revised.

**5) Comment 5: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “C” not “B”.

**Response:** This was typographical error(s); the final permit was revised.

**6) Comment 6: Monitoring Locations.**

EPA must also correct the letter assigned to this section. It corresponds to the letter “D” not “C”.

**Response:** This was typographical error(s); the final permit was revised.

**D. FARALLON WTP COMMENTS (PR0026077)**

**1) Comment 1: Permit Cover Page, Receiving water name.** According to the Environmental Quality Board’s (EQB’) Final Water Quality Certificate (WQC) of February 1, 2019, the complete\_name of the receiving Water body is “Unnamed creek tributary to Quebrada Grande”.

**Response:** EPA added “Unnamed creek tributary to Quebrada Grande” as found in the February 1, 2019 EQB’s WQC

**2) Comment 2: Part 1. Background, B. Water Quality Certificate.**

The reference to the date of the EQB’s Final WQC must be corrected from April 11, 2019 to February 1, 2019;

**Response:** This was typographical error; the final permit was revised.

**3) Comment 3, Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations --- Outfall Number 001--- Effluent Limitations Table, “BOD<sub>5</sub>”**

**Reference to footnote (6) related to the “No Net Addition” condition must be added.**

**Response:** This was a typographical error; final permit was modified.

**4) Comment 4: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, Dissolved Oxygen (DO)**

The symbol of less than (<)” – in the effluent limitation must be changed by symbol of greater than (≥) according to footnote (7).

**Response:** This was a typographical error; final permit was modified.

**5) Comment 5: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, Mercury (Hg)**

Based on EQB’s final WQC this parameter must be included in the table.

**Response:** This was a typographical error; final permit was modified.

**6) Comment 6: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, “Footnotes”**

The footnotes must be corrected to read as follows:

(3) See Part IV. B.1 Special Condition e and f of this permit.

Footnote (4) must be deleted.

**Response:** These were typographical errors; final permit was modified.

**7) Comment 7: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “C” not B.

**Response:** This was a typographical error; the final permit was revised.

**8) Comment 8: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “D” not C.

**Response:** This was a typographical error; the final permit was revised.

**9) Comment 9: B. Special Conditions; 1. Special Conditions from the Water Quality Certificate; k. Special Condition IV.B.1.k is repeated.** PRASA believes it must correspond to Special Condition 11 included in EQB’s Final WQC of February 1, 2019.

E. **GUAYAMA WWTP COMMENTS (PR0025445)**

**1) Comment 1: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, "Other Pathogenic Organisms".**

PRASA recommends that the word "Monitor" in the Maximum daily column be deleted. It brings confusion since there is no units, sample type and frequency.

**Response:** PRASA's petition is not granted. This is a requirement of the Water Quality Certificate issued by the Puerto Rico Department of Natural and Environmental Resources (DNER).

**2) Comment 2: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, "Solids and Other Matter".**

This parameter can be deleted from Table A. Usually in the NPDES permits, it is not included here (in Table A) since it is included in Part II.B/3. Also, it makes reference to footnote (13) which does not exist.

**Response:** The final permit was revised.

**3) Comment 3: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, Notes, Footnotes and Abbreviations; "Footnote (3),(4) & (7).**

The reference to Part IV is incomplete. Should read as follow:

(3) "See Part IV.B.1 Special Condition g and h of this permit".

(4) "See Part IV.B.1 Special Condition k of this permit".

(7) "See Part IV.B.1 Special Condition k of this permit".

**Response:** These were typographical errors; the final permit was revised.

**4) Comment 4: Part IV Standard and Special Conditions. B. Special Conditions**  
**5. Additional Special Conditions. Pretreatment Requirements.**

Pretreatment Implementation. The term "SIU" must be defined previous to its use (e.g., Significant Industrial User (SIU)).

**Response:** The Special Condition was modified in the final permit accordingly.

**5) Comment 5: Part IV Standard and Special Conditions. B. Special Conditions**

**5. Additional Special Conditions. Pretreatment Requirements. Pretreatment Evaluation.**

The due date of 120 days after identifying an SIU is not sufficient to complete the entire evaluation to develop specific local limits and have them in place in the industrial user's final discharge permit. PRASA requests a modification of this condition to provide a schedule of twelve (12) months (365 days) after identifying an SIU to adequately complete the local limits process. PRASA has previously confronted many difficulties with the local limits implementation due to the lack of an adequate time to comply with the due process requirements of the Law No. 170 of the Commonwealth of Puerto Rico. PRASA's experience is that 240 days is not an adequate time frame to complete the technical analysis and comply with all the legal and public participation requirements to establish enforceable local limits. The 365 days I sin compliance with the requirement established in the previous format of NPDES permits.

**Response:** After careful consideration, EPA has decided to modify in the final the time needed to evaluate specific local limits as well as the timeframe to submit a progress report with the written notice of compliance or non-compliance. Final permit has been modified to give **240** days for the Pretreatment Evaluation and **256** for the Pretreatment Report.

**6) Comment 6: Part IV Standard and Special Conditions. B. Special Conditions 5. Additional Special Conditions. Pretreatment Requirements. Pretreatment Report.**

In the same terms as the previous comment, PRASA requests a modification of this condition to change the due date from 134 days to **380 days** to submit a progress report and a written notice of compliance or noncompliance with Part IV(B)(5)(a)(2).

**Response:** After careful consideration, EPA has decided to modify in the final the time needed to evaluate specific local limits as well as the timeframe to submit a progress report with the written notice of compliance or non-compliance. Final permit has been modified to give **240** days for the Pretreatment Evaluation and **256** for the Pretreatment Report.

**F. GUAYANES WTP COMMENTS (PR0026409)**

**1) Comment 1, Permit Cover Page; Cover Page – Address**

**Response:** This was a typographical error; final permit was modified.

**2) Comment 2, Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations --- Outfall Number 001--- Effluent Limitations Table, "BOD<sub>5</sub>"**

**Reference to footnote (6) related to the "No Net Addition" condition must be added.**

**Response:** This was a typographical error; final permit was modified.



**3) Comment 3: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, Dissolved Oxygen (DO)**

The symbol of less than (<)" – in the effluent limitation must be changed by symbol of greater than (≥) according to footnote (7).

**Response**: This was a typographical error; final permit was modified.

**4) Comment 4: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, "Solids and Other Matter - This parameter usually appears in the permit without the narrative.**

**Response**: The narrative was deleted in the final permit to be consistent with the other NPDES permits.

**5) Comment 5: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, "Suspended Solids, Colloidal or Settleable Solids" - This parameter usually appears in the permit without the narrative.**

**Response**: The narrative was deleted in the final permit to be consistent with the other NPDES permits.

**6) Comment 6: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, "Taste and Odor Producing Substances"**

This parameter can be deleted from Table A.

**Response**: This was a typographical error; final permit was modified.

**7) Comment 7: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, "Footnotes"**

The footnotes must be corrected to read as follows:

(3) See Part IV. B.1 Special Condition e and f of this permit.

Footnote (4) must be deleted.

**Response**: These were typographical errors; final permit was modified.

**8) Comment 8: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “C” not B.

**Response:** This was a typographical error; the final permit was revised.

**9) Comment 9: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “D” not C.

**Response:** This was a typographical error; the final permit was revised.

**G. GUILARTE WTP COMMENTS (PR0026191)**

**1) Comment 1; Permit Cover Page; Outfall Location**

The correct outfall complete location is:

<b>Outfall latitude</b>	<b>Outfall longitude</b>
18°, 10', 20.5" N	66°, 46', 17.1" W

**Response:** These were typographical errors; the final permit was revised.

**2) Comment 2; Part I, Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table: “BOD<sub>5</sub>”**

Dashes (--) needs to be included in the “Average monthly” and “Average weekly” columns according to the first footnote that establishes that “Dashes (--) indicate there are no effluent limitations or monitoring requirements for this parameter.”

**Response:** The Dashes were included in Average monthly and Average weekly columns; the final permit was revised.

**3) Comment 3; Part I, Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table: “Copper (Cu)”**

The maximum daily limitation must be corrected from 7.0 to **8.04**. Please refers to effluent limitations of monitoring requirements for this parameter.

**Response:** EPA will use the EQBs' Final WQC of February 1, 2019 as the maximum daily limitation; the final permit was revised.

**4) Comment 4; Part I, Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table: “Dissolved Oxygen (DO)”**

The symbol of greater than (>) in the effluent limitation must be changed by the symbol of greater than or equal (≥) according to footnote (7).

**Response:** This was a typographical error; the final permit was revised.

**5) Comment 5; Part I, Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table: Notes, Footnotes and Abbreviations**

Footnotes (3) & (4) – The reference to Part IV is incomplete. These footnotes must be corrected to read as follows:

(3) “See Part IV.B.1 Special Condition f and g of this permit”.

(4) “See Part IV.B.1 Special Condition j of this permit”.

**Response:** These were a typographical error; the final permit was revised.

**6) Comment 6, C. Monitoring Requirements**

EPA must correct the letter assigned to this section. It corresponds to the letter “C” not “B”.

**Response:** This was a typographical error; the final permit was revised.

**7) Comment 7, D. Monitoring Locations**

EPA must also correct the letter assigned to this section. It corresponds to the letter “D” not “C”.

**Response:** This was a typographical error; the final permit was revised.

**H. GUZMAN ARRIBA WTP COMMENTS (PR0022471)**

**1) Comment 1: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table.**

“Dissolved Oxygen (DO)”:- The symbol of less than (<) in the effluent limitation must be changed by the symbol of greater than or equal (≥) according to the footnote (7).

**Response:** This was typographical errors; the final permit was revised.

**2) Comment 2: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, Notes, Footnotes and Abbreviations; “Footnote (3).**

The reference to Part IV is incomplete. Should read as follow:  
(3) “See Part IV.B.1 Special Condition g and h of this permit”.

**Response:** This was typographical errors; the final permit was revised.

**3) Comment 3: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “C” not B.

**Response:** This was a typographical error; the final permit was revised.

**4) Comment 4: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “D” not C.

**Response:** This was a typographical error; the final permit was revised.

**I. LA PLATA WTP COMMENTS (PR0025755)**

**1) Comment 1: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “BOD<sub>5</sub>”.**

Reference to footnote (6) related to the “No Net Addition Limitation” condition must be added. See EQB Draft and Final WQC dated December 20, 2018 and February 1, 2019 respectively.

**Response:** This was typographical error(s); the final permit was revised.

**2) Comment 2: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “Dissolved Oxygen (DO)”**

The symbol of less than (<) in the effluent limitation must be changed by the symbol of greater than or equal (≥) according to footnote (7).

**Response:** This was typographical error(s); the final permit was revised.

**3) Comment 3: Notes, Footnotes and Abbreviations, Footnotes (3) & (4)**

The reference to part IV is incorrect. These footnotes must be corrected to read as follows (corrections highlighted in **bold**):

(3) "See Part IV.B.1 Special Condition **g** and **h** of this permit";

(4) "See Part IV.B.1 Special Condition **j** of this permit".

Footnote (5)- This footnote must be deleted since it does not apply to any parameters included in the table.

**Response:** This was typographical error(s); the final permit was revised.

**4) Comment 4: Monitoring Requirements**

EPA must correct the letter assigned to this section . It corresponds to the letter "C" not "B".

**Response:** This was typographical error(s); the final permit was revised.

**5) Comment 5: Monitoring Locations**

EPA must correct the letter assigned to this section . It corresponds to the letter "D" not "C".

**Response:** This was typographical error(s); the final permit was revised.

**J. LUQUILLO WTP COMMENTS (PR0022802)**

**1) Comment 1: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, Notes, Footnotes and Abbreviations; Footnote (3).**

The reference to Part IV is incomplete. Should read as follow:

(3) "See Part IV.B.1 Special Condition **g** and **h** of this permit".

**Response:** This was a typographical error; the final permit was revised.

**K. MARICAO WTP COMMENTS (PR0022969)**

**1) Comment 1: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, Notes, Footnotes and Abbreviations, Footnote (3) & (4).**

The reference to Part IV is incorrect. Should read as follow:

(3) "See Part IV.B.1 Special Condition **g** and **h** of this permit".

(4) "See Part IV.B.1 Special Condition **k** this permit".

**Response:** These were typographical errors; the final permit was revised.

L. **MOROVIS -RIO GRANDE WTP COMMENTS (PR0026611)**

1) **Comment 1, Permit Cover Page; Cover Page – Effluent Description** – There is typographical error in the word “backwasher”.

**Response:** This was a typographical error; final permit was modified.

2) **Comment 2, Permit Cover Page; Facility (Coordinates):** Outfall Location must be corrected to 18°, 18’, 47”, N; 65°, 49’, 43” W.

**Response:** This was a typographical error; final permit was modified.

3) **Comment 3, Part I. Background, B. Water Quality Certificate:** The reference to date of the EQB’s Final Water Quality Certificate (WQC) must be corrected to April 11, 2019.

**Response:** This was a typographical error; final permit was modified.

4) **Comment 4, Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations --- Outfall Number 001--- Effluent Limitations Table, “BOD<sub>5</sub>”**

Reference to footnote (6) related to the “No Net Addition” condition must be added.

**Response:** This was a typographical error; final permit was modified.

5) **Comment 5: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, Dissolved Oxygen (DO)**

The symbol of less than (<)” – in the effluent limitation must be changed by symbol of greater than (≥) according to footnote (7).

**Response:** This was a typographical error; final permit was modified.

6) **Comment 6: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, “Solids and Other Matter - This parameter usually appears in the permit without the narrative.**

**Response:** The narrative was deleted in the final permit to be consistent with the other NPDES permits.

**7) Comment 7: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, "Taste and Odor Producing Substances"**

This parameter can be deleted from Table A.

**Response:** This was a typographical error; final permit was modified.

**8) Comment 8: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, "Footnotes"**

The footnotes must be corrected to read as follows:

(3) See Part IV. B.1 Special Condition g and h of this permit.

(4) See Part IV. B.1 Special Condition k of this permit.

**Response:** This was a typographical error; final permit was modified.

**9) Comment 9: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter "C" not B.

**Response:** This was a typographical error; the final permit was revised.

**10) Comment 10: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter "D" not C.

**Response:** This was a typographical error; the final permit was revised.

**M. PARCELAS BORINQUEN WWTP COMMENTS (PR0025101)**

**1) Comment 1, Permit Cover Page; Facility (Location address):** According to the facility's permit renewal application dated April 30, 2018, the complete physical address is as follows:

State Road 765, Km 2.9, **Borinquen Ward**  
Caguas, PR 00725

**Response:** The address was corrected; the final permit was revised.

**2) Comment 2, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, Sulfide**

The name of this parameter is incomplete, the phrase "undissociated H<sub>2</sub>S" must be added to read as "Sulfide (undissociated H<sub>2</sub>S)" In order to avoid confusion with "Sulfide Total"

**Response:** This was a typographical error; the final permit was revised

**3) Comment 3, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, "Total Phosphorus"**

Dashes (--) needs to be included in the "Average Monthly" and Average weekly " columns according to the first footnote that establishes that dashes (--) indicate there are no effluent limitations or monitoring requirements for this parameter..

**Response:** This was a typographical error; the final permit was revised.

**4) Comment 4, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, Notes, Footnotes and Abbreviations**

Footnote (5) & (6) – The reference to Part IV is incomplete. This footnote must be corrected to read as follows (correction highlighted in bold).

(5) "See Part IV.B.1 Special Condition **f** and **g** of this permit".

(6) "See Part IV.B.1 Special Condition **j** of this permit".

**Response:** The reference to Part IV were corrected; the final permit was revised.

**5) Comment 5, C. Part IV Standard and Special Conditions. B. Special Conditions 5. Additional Special Conditions. Pretreatment Requirements.**

Pretreatment Implementation. The term "SIU" must be defined previous to its use (e.g., Significant Industrial User (SIU)).



**Response:** The Special Condition was modified in the final permit accordingly.

**6) Comment 6: Part IV Standard and Special Conditions. B. Special Conditions  
5. Additional Special Conditions. Pretreatment Requirements. Pretreatment Evaluation.**

The due date of 120 days after identifying an SIU is not sufficient to complete the entire evaluation to develop specific local limits and have them in place in the industrial user's final discharge permit. PRASA requests a modification of this condition to provide a schedule of twelve (12) months (365 days) after identifying an SIU to adequately complete the local limits process. PRASA has previously confronted many difficulties with the local limits implementation due to the lack of an adequate time to comply with the due process requirements of the Law No. 170 of the Commonwealth of Puerto Rico. PRASA's experience is that 240 days is not an adequate time frame to complete the technical analysis and comply with all the legal and public participation requirements to establish enforceable local limits. The 365 days I sin compliance with the requirement established in the previous format of NPDES permits.

**Response:** After careful consideration, EPA has decided to modify in the final the time needed to evaluate specific local limits as well as the timeframe to submit a progress report with the written notice of compliance or non-compliance. Final permit has been modified to give **240** days for the Pretreatment Evaluation and **256** for the Pretreatment Report.

**N. RIO BLANCO WTP COMMENTS (PR0026271)**

**1) Comment 1, Permit Cover Page; Facility (Location address):** According to the facility's permit renewal application dated April 30, 2018, the complete physical address is as follows:

State Road 31, Km 9.9, **Río Blanco Ward**  
Naguabo, PR 00718

**Response:** The address was corrected; the final permit was revised.

**2) Comment 2, Permit Cover Page; Receiving water name:** The name of the receiving water body is written in "Spanglish". It must be corrected to read in English (i.e., "Blanco River") or in Spanish (i.e., "Río Blanco").

**Response:** The name of the receiving water and the facility name is in Spanish, Río Blanco and was corrected; the final permit was revised.

**3) Comment 3, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Effluent TSS and BOD<sub>5</sub>, minimum % removal”: “BOD<sub>5</sub>”**

Reference to footnote (5) related to the “No Net Addition Limitation” condition must be added. See the Environmental Quality Board’s Draft and Final Water Quality Certificates dated December 20, 2018 and February 01, 2019 respectively.

**Response:** The reference to footnote (5) was added to BOD<sub>5</sub>; the final permit was revised.

**4) Comment 4, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Effluent TSS and BOD<sub>5</sub>, minimum % removal”: “Dissolve Oxygen (DO)”**

The symbol of greater than (>) in the effluent limitation must be changed by the symbol of greater than or equal (≥) according to footnote (7).

**Response:** This was a typographical error; the final permit was revised.

**5) Comment 5, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Effluent TSS and BOD<sub>5</sub>, minimum % removal”: “Total Ammonia Nitrogen (TAN)”**

The dashes (--) in the “Maximum daily” column must to be substituted by the word “Monitor”.

**Response:** petition not granted.

**6) Comment 6, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Effluent TSS and BOD<sub>5</sub>, minimum % removal”: “Zinc (Zn)”**

Reference to footnote (5) related to the “No Net Addition Limitation” condition must be added. See the Environmental Quality Board’s Draft and Final Water Quality Certificates dated December 20, 2018 and February 01, 2019 respectively.

**Response:** The reference to footnote (5) was added to Zinc parameter; the final permit was revised.

**7) Comment 7, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Effluent TSS and BOD<sub>5</sub>, minimum % removal”: Notes, Footnotes and Abbreviations**

Footnote (3) – The reference to Part IV is incomplete. This footnote must be corrected to read as follows (correction highlighted in bold).

(3) “See Part IV.B.1 Special Condition f and g of this permit”.

**Response:** The reference to Part IV was completed; the final permit was revised.

**8) Comment 8, C. Monitoring Requirements:** EPA must correct the letter assigned to this section. It corresponds to the letter “C” not “B”.

**Response:** This was a typographical error; the final permit was revised.

**9) Comment 9, D. Monitoring Locations:** EPA must correct the letter assigned to this section. It corresponds to the letter “D” not “C”.

**Response:** This was a typographical error; the final permit was revised.

**O. RIO PRIETO WTP COMMENTS (PR0025411)**

**1) Comment 1, PERMIT COVER PAGE, Receiving Water Name:** The name of the receiving water body is written in “Spanglish”. It must be corrected to read in English (i.e., “Prieto River”) or in Spanish (i.e., “Río Prieto”).

**Response:** The receiving water name was replaced for “Rio Prieto”, as requested.

**2) Comment 2, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, “Total Phosphorus (P)”:** The reference to footnote (6) related to the “No Net Addition Limitation” condition is incorrect. It must be corrected to make reference to footnote (5).

**Response:** This was a typographical error; the final permit was revised.

**3) Comment 3, Footnotes (3) & (4):** The reference to Part IV is incomplete. These footnotes must be corrected to read as follows (correction highlighted in **bold**):

(3) See Part IV. B.1 Special Conditions g and h of this permit.

(4) See Part IV. B.1 Special Condition k of this permit.

**Response:** These were typographical errors; the final permit was revised.

**4) Comment 4, Monitoring Requirements:** EPA must correct the letter assigned to the section. It corresponds to the letter “C” not “B”.

**Response:** This was a typographical error; the final permit was revised.

**5) Comment 5, Monitoring Locations:** EPA must also correct the letter assigned to this section. It corresponds to the letter “D” not “C”.

**Response:** This was a typographical error; the final permit was revised.

**P. RONCADOR WTP COMMENTS (PR0026271)**

**1) Comment 1: Water Quality Certificate**

The reference to the date of the EQB’s Final WQC must be corrected from April 11, 2019 to February 1, 2019.

**Response:** The date has been corrected in the final permit.

**2) Comment 2: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table.**

“Dissolved Oxygen (DO)”:- The symbol of less than (<) in the effluent limitation must be changed by the symbol of greater than or equal ( $\geq$ ) according to the footnote (7).

**Response:** This was typographical errors; the final permit was revised.

**3) Comment 3: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, Notes, Footnotes and Abbreviations; “Footnote (3) & (4).**

The reference to Part IV is incomplete. Should read as follow:

- (3) “See Part IV.B.1 Special Condition g and h of this permit”
- (4) “See Part IV.B.1 Special Condition k of this permit”.

**Response:** These were typographical errors; the final permit was revised.

**4) Comment 4: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “C” not B.

**Response:** This was a typographical error; the final permit was revised.

**5) Comment 5: Monitoring Requirements.**

EPA must correct the letter assigned to this section. It corresponds to the letter “D” not C.

**Response:** This was a typographical error; the final permit was revised.

Q. **SUPERACUEDUCTO WTP COMMETNS (PR0026085)**

**1) Comment 1, Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, "Residual Chlorine":** The draft NPDES permit establishes a new limitation for total residual chlorine (TRC) that reduces the acceptable maximum value from 500 µg/L to 11 µg/L. PRASA notes that at this new level, the current discharge would be continually out of compliance for TRC. Therefore, PRASA requests that EPA request EQB to reopen the Water Quality Certificate and establish a compliance plan that will allow PRASA the time necessary to determine how to control TRC values in its discharges.

**Response:** EPA has incorporated this limitation pursuant to the final WQC mandated by EQB and the PR Water Quality Standards. See response to A, above.

**2) Comment 2, Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, Notes, Footnotes and Abbreviations: Footnotes (3) & (4):** The reference to Part IV is incomplete. These footnotes must be corrected to read as follows (correction highlighted in **bold**):

(3) See Part IV. B.1 Special Conditions g and h of this permit.

(4) See Part IV. B.1 Special Condition k of this permit.

**Response:** These were typographical errors; the final permit was revised.

**3 Comment 3, Monitoring Requirements:** EPA must correct the letter assigned to the section. It corresponds to the letter "C" not "B".

**Response:** This was a typographical error; the final permit was revised.

**4) Comment 4, Monitoring Locations:** EPA must also correct the letter assigned to this section. It corresponds to the letter "D" not "C".

**Response:** This was a typographical error; the final permit was revised.