United States Environmental Protection Agency
Region 2
Clean Water Division
290 Broadway
New York, New York 10007

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PEÑUELAS TECHNOLOGY PARK, LLC PERMIT No. PR0000418

This Fact Sheet sets forth the principle facts and technical rationale that serve as the legal basis for the requirements of the accompanying draft permit. The draft permit has been prepared in accordance with Clean Water Act (CWA) section 402 and its implementing regulations at Title 40 of the *Code of Federal Regulations* (CFR), Parts 122 through 124, and the final Water Quality Certificate (WQC) issued by the Puerto Rico Environmental Quality Board (EQB) pursuant to CWA section 401 requirements.

Pursuant to 40 CFR 124.53, the Commonwealth of Puerto Rico must either grant a certification pursuant to CWA section 401 or waive this certification before the U.S. Environmental Protection Agency (EPA) may issue a final permit. On August 7, 2018, EQB provided in the WQC that the allowed discharge will not cause violations to the applicable water quality standards at the receiving water body if the limitations and monitoring requirements in the WQC are met. In accordance with CWA section 401, EPA has incorporated the conditions of final WQC into the draft permit. The WQC conditions are discussed in this Fact Sheet and are no less stringent than allowed by federal requirements. Additional requirements might apply to comply with other sections of the CWA. Review and appeals of limitations and conditions attributable to the WQC were made through the applicable procedures of the Commonwealth of Puerto Rico and not through EPA procedures.

PART I. BACKGROUND

A. Permittee and Facility Description

The Peñuelas Technology Park, LLC (referred to throughout as the Permittee) has applied for renewal of its National Pollutant Discharge Elimination System (NPDES) permit. The Permittee is discharging pursuant to NPDES Permit No. PR0000418**.** The Permittee submitted Application Form 1 and 2E, dated February 23, 2017 and applied for an NPDES permit to discharge treated wastewater from the Peñuelas Technology Park, LLC in Peñuelas, Puerto Rico, called the facility. The facility is classified as a major discharger by EPA in accordance with the EPA rating criteria.

The Permittee owns and operates the former petrochemical manufacturing facility. Attachment A of this Fact Sheet provides a map of the area around the facility and a flow schematic of the facility.

The influent to the groundwater treatment system consists solely of impacted groundwater extracted by the groundwater recovery systems at the closed industrial landfill. The groundwater treatment system consists of pretreatment system (including coagulation, flocculation, and settling), an oil/water separator, clay filters, air stripper, granular activated carbon, and ion-exchange. Dripolene oil recovered from the settling tank of the pretreatment system and oil/water separator is transferred to the recovered oil separation tank for additional gravity separation of the dripolene oil, with decant water from the separation tank routed back to the head of the groundwater treatment system.

Summary of Permittee and Facility Information

Permittee	Peñuelas Technology Park, LLC
Facility contact, title, phone	Mr. Timothy King, President
Permittee (mailing) address	683 State Road No. 337, Peñuelas, PR 00624
Facility (location) address	683 State Road No. 337, Km 1.1, Peñuelas, PR 00624
Type of facility	Former petrochemical manufacturing site (industrial)
Pretreatment program	N/A
Facility monthly average flow	0.021 MGD
Facility design flow	N/A
Facility classification	Major

B. Discharge Points and Receiving Water Information

Wastewater is discharged from Outfall 001 to Guayanilla Bay, a water of the United States.

The draft permit authorizes the discharge from the following discharge point(s):

Outfall	Effluent description	Outfall latitude	Outfall longitude	Receiving water name and classification
001	Treated wastewater from the groundwater treatment system	17.00°, 28.00', 56.00" N	66.00°, 45.00', 48.00" W	Guayanilla Bay, Class SC

As indicated in the Puerto Rico Water Quality Standards (PRWQS) Regulations, the designated uses for Class SC receiving waters are as follows:

> Coastal waters intended for primary contact recreation use from the zone subject to ebb and flow of tides (mean sea level) to 3 miles seaward, and secondary contact recreation from 3 miles seaward to 10.35 miles seaward, and for the propagation and preservation of desirable species, including threatened or endangered species.

CWA section 303(d) requires the Commonwealth of Puerto Rico to develop a list of impaired waters, establish priority rankings for waters on the list, and develop TMDLs for those waters. The receiving water has been determined to be impaired for pH, turbidity and, oil and grease.

C. Mixing Zone/Dilution Allowance

A mixing zone or dilution allowance has not been authorized for the discharger.

D. Compliance Orders/Consent Decrees

The Permittee does not have any compliance orders or consent decrees.

E. Summary of Basis for Effluent Limitations and Permit Conditions - General

The effluent limitations and permit conditions in the permit have been developed to ensure compliance with the following, as applicable:

- Puerto Rico Water Quality Standards (April 2016)
- NPDES regulations (40 CFR Part 122)
- Clean Water Act §401 Certification
- Puerto Rico Environmental Public Policy Act of September 22, 2004, Act No. 416.

PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

CWA section 301(b) and 40 CFR 122.44(d) require that permits include limitations more stringent than applicable technology-based requirements where necessary to achieve applicable water quality standards. In addition,

40 CFR 122.44(d)(1)(i) requires that permits include effluent limitations for all pollutants that are or may be discharged at levels that cause, have the reasonable potential to cause, or contribute to an exceedance of a water quality criterion, including a narrative criterion. The process for determining reasonable potential and calculating water quality-based effluent limits (WQBELs) is intended to protect the designated uses of the receiving water, and achieve applicable water quality criteria. Where reasonable potential has been established for a pollutant, but there is no numeric criterion for the pollutant, WQBELs must be established using (1) EPA criteria guidance under CWA section 304(a), supplemented where necessary by other relevant information; (2) an indicator parameter for the pollutant of concern; or (3) a calculated numeric water quality criterion, such as a proposed state criterion or policy interpreting the state's narrative criterion, supplemented with other relevant information, as provided in 40 CFR 122.44(d)(1)(vi).

The effluent limitations and permit conditions in the permit have been developed to ensure compliance with all federal and state regulations, including PRWQS. The basis for each limitation or condition is discussed below.

A. Effluent Limitations

The permit establishes WQBELs for several pollutants and the basis for these limitations are discussed below**.** EPA reviewed the Effluent Limitation Guidelines for the Landfills Point Source Category at 40 CFR Part 445 which states that the provision of the ELG do not apply to discharges of contaminated groundwater or wastewater recovery pumping wells (40 CFR Part 455.1). Therefore, EPA determined no TBELs are applicable to the facility's discharge through Outfall 001.

1. **Benzo(a)Anthracene.** The effluent limitation for benzo(a)anthracene is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(J)(5) of the PRWQS and the WQC.
2. **Benzo(k)Flouranthene.** The effluent limitation for benzo(k)fluoranthene is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(J)(5) of the PRWQS and the WQC.
3. **5-Day Biochemical Oxygen Demand (BOD_5).** The effluent concentration and percent removal limitations are based on the water quality criterion for Class SC waters at Rule 1303.1(F) of the PRWQS and the WQC.
4. **Chrysene.** The effluent limitation for chrysene is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(J)(5) of the PRWQS and the WQC.
5. **Color.** The narrative effluent limitation for color is based on the water quality criterion for Class SC waters as specified in Rule 1303.2(C)(2)(e) of the PRWQS and the WQC.
6. **Copper.** The effluent limitation for copper is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(J)(1) of the PRWQS and the WQC.
7. **Cyanide, Free.** The effluent limitation for free cyanide is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(J)(1) of the PRWQS and the WQC.
8. **Dissolved Oxygen.** The effluent limitation for dissolved oxygen is based on the water quality criterion for Class SC waters as specified in Rule 1303.2(C)(2)(a) of the PRWQS and the WQC.
9. **Flow**. An effluent limitation for flow has been established in the permit. Monitoring conditions are applied pursuant to 40 CFR 122.21(j)(4)(ii) and the WQC.
10. **Pentachlorophenol**. The effluent limitation for pentachlorophenol is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(J)(2)(a) of the PRWQS and the WQC.
11. **pH**. The effluent limitation for pH is based on the water quality criterion for Class SC waters as specified in Rule 1303.2(C)(2)(d) of the PRWQS and the WQC**.**
12. **Solids and Other Matter**. The narrative effluent limitation for solids and other matter is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(A) of the PRWQS and the WQC.
13. **Suspended, Colloidal, or Settleable Solids.** The narrative effluent limitation for suspended, colloidal, or settleable solids is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(E) of the PRWQS and the WQC.
14. **Taste and Odor Producing Substances**. The narrative effluent limitation for taste and odor producing substances is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(B) of the PRWQS and the WQC.

15. **Temperature**. The effluent limitation for temperature is based on the water quality criterion for Class SC waters as specified in Rule 1303.1(D)(1) of the PRWQS and the WQC.

16. **Whole Effluent Toxicity (WET):** CWA section 101(a) establishes a national policy of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters. Specifically, CWA section 101(a)(3) and PRWQS Rule 1303(I) prohibit the discharge of toxic pollutants in toxic amounts. Federal regulations at 40 CFR 122.44(d) also require that where the permitting authority determines, through the analysis of site-specific WET data, that a discharge causes, shows a reasonable potential to cause, or contributes to an excursion above a water quality standard, including a narrative water quality criterion, the permitting authority must establish effluent limits for WET. To satisfy the requirements of the CWA, its implementing regulations, and the PRWQS, a reasonable potential analysis for WET was conducted for this discharge.

    PRWQS do not provide a numeric criterion for toxicity. Therefore, consistent with the recommendations of section 2.3.3 of EPA's *Technical Support Document* (TSD) *for Water Quality-Based Toxics Control* (EPA-505-2-90-001), values of 0.3 acute toxic unit (TU_a) and 1.0 chronic toxic unit (TU_c) were used to interpret the narrative water quality criteria for WET established in PRWQS Rule 1303(I). The permit establishes monitoring requirements for WET that came be activated upon notice from PREQB.

    In addition, the permit establishes a requirement for the Permittee to conduct accelerated testing and develop a Toxicity Reduction Evaluation (TRE) Workplan as Special Conditions. These requirements are necessary to ensure that the Permittee has a process for addressing effluent toxicity if toxicity is observed.

B. Effluent Limitations Summary Table

Outfall Number 001

Parameter	Units	Effluent limitations					
		Averaging period	Highest Reported Value (1)	Existing limits	Interim limits	Final limits	Basis
2,4,6-Trichlorophenol	ug/l	Daily maximum	0.66	2.4 ug/l	--	--	Limit removed. See discussion in Section D below.
Benzo(a)Anthracene	ug/l	Daily maximum	0.18	0.18	--	0.18	WQBEL
Benzo(k)Flouranthene	ug/l	Daily maximum	0.17	0.18	--	0.18	WQBEL
Bis(2-Ethylhexyl)Phthalate	ug/l	Daily maximum	--	--	--	--	Limit removed. See discussion in Section D below.
BOD_5	mg/l	Monthly average Daily maximum	<5	30.0 --	-- --	-- 30.0	WQBEL
Chrysene	ug/l	Daily maximum	0.17	0.18	--	0.18	WQBEL
Color	Pt-Co	Continuous	30	Shall not be altered except by natural causes.	--	Shall not be altered by other than natural phenomena except when it can be proven that such change in color is harmless to biota and aesthetically acceptable.	WQBEL
Copper	ug/l	Daily maximum	2.7	3.73	--	3.73	WQBEL
Cyanide, Free	ug/l	Monthly average Daily maximum	55 --	M/R --	-- --	-- 1.0	WQBEL

Parameter	Units	Effluent limitations					
		Averaging period	Highest Reported Value (1)	Existing limits	Interim limits	Final limits	Basis
Dissolved Oxygen	mg/l	Continuous	4.03 (lowest reported value)	Shall not be less than 4.0	--	Shall not be less than 4.0	WQBEL
Enterococci	--	Continuous	--	Enterococci density in terms of geometric mean of at least 5 samples of the waters taken sequentially in a given instance	--	.--	Limit removed. See discussion in Section D below.
Flow	m^3/day MGD	Daily maximum Daily maximum	-- 0.0308	237.67 0.062	-- --	273.73 0.062	WQBEL
Lead	ug/l	Daily maximum	0.65	8.52	--	--	Limit removed. See discussion in Section D below.
Mercury	ug/l	Daily maximum	0.022	0.025	--	--	
Nickel	ug/l	Daily maximum	4.7	8.28	--	--	
Oil and Grease	--	Twice per month	1500	The waters of Puerto Rico shall be substantially free from floating non-petroleum oils and greases as well as petroleum derived oils and greases.	--	--	
Pentachlorophenol	ug/l	Daily maximum	2.8	7.9	--	7.9	WQBEL
pH	SU	Instantaneous	7.35 - 8.43	Shall always lie between 7.3 and 8.5	--	Shall always lie between 7.3 and 8.5	WQBEL
Silver	ug/l	Daily maximum	0.59	2.24	--	--	Limit removed. See discussion in Section D below.
Solids and Other Matter	--	Continuous	--	The waters of Puerto Rico shall not contain floating debris, scum or other floating materials attributable to the discharge in amounts sufficient to be unsightly or deleterious to the existing or designated uses of the water body.	--	The waters of Puerto Rico shall not contain floating debris, scum or other floating materials attributable to the discharge in amounts sufficient to be unsightly or deleterious to the existing or designated uses of the water body.	WQBEL

Parameter	Units	Effluent limitations					
		Averaging period	Highest Reported Value (1)	Existing limits	Interim limits	Final limits	Basis
Suspended, Colloidal, or Settleable Solids	--	Continuous	--	Solids from wastewater sources shall not cause deposition in or be deleterious to the existing or designated uses of the water body.	--	Solids from wastewater sources shall not cause deposition in or be deleterious to the existing or designated uses of the water body.	WQBEL
Taste and Odor Producing Substances	--	Continuous	--	Shall not be present in amounts that will interfere with the use for potable water supply, or will render any undesirable taste or odor to edible aquatic life.	--	Shall not be present in amounts that will interfere with the use for potable water supply, or will render any undesirable taste or odor to edible aquatic life.	WQBEL
Temperature	°F (°C)	Continuous	30.4	Except by natural causes, no heat may be added to the waters of Puerto Rico, which would cause the temperature of any site to exceed 90°F (32.2°C)	--	Except by natural causes, no heat may be added to the waters of Puerto Rico, which would cause the temperature of any site to exceed 90°F (32.2°C)	WQBEL

Notes, Footnotes and Abbreviations

Note: Dashes (--) indicate there are no effluent data, no limitations, or no monitoring requirements for this parameter.
(1) Wastewater data from DMRs dated July 1, 2015 through June 30, 2018.

C. Monitoring Requirements

NPDES regulations at 40 CFR 122.48 require that all permits specify requirements for recording and reporting monitoring results. The Part III of the Permit establishes monitoring and reporting requirements to implement federal and state requirements. The following provides the rationale for the monitoring and reporting requirements for this facility.

1. **Influent Monitoring Requirements**

   This facility is not subject to influent monitoring requirements.

2. **Effluent Monitoring Requirements**

   Effluent monitoring frequency and sample type have been established in accordance with the requirements of 40 CFR 122.44(i) and recommendations in EPA's TSD. Consistent with 40 CFR Part 136 monitoring data for toxic metals must be expressed as total recoverable metal.

D. Compliance with Federal Anti-Backsliding Requirements and Puerto Rico's Anti-Degradation Policy

Federal regulations at 40 CFR 131.12 require that state water quality standards include an anti-degradation policy consistent with the federal policy. The discharge is consistent with the anti-degradation provision of 40 CFR 131.12, 72 Federal Register 238 (December 12, 2007, pages 70517-70526) and EQB's *Anti-Degradation Policy Implementation Procedure* in Attachment A of PRWQS. In addition, CWA sections 402(o)(2) and 303(d)(4) and federal regulations at 40 CFR 122.44(l) prohibit backsliding in NPDES permits. Further, the Region 2 Antibacksliding Policy provides guidance regarding relaxation of effluent limitations based on water quality for Puerto Rico NPDES permits. These anti-backsliding provisions require effluent limitations in a reissued permit to

be as stringent as those in the previous permit with some exceptions where limitations may be relaxed. The effluent limitations in the permit are at least as stringent as the effluent limitations in the existing permit, with the exception of effluent limitations for the pollutants listed below. The effluent limitations for these pollutants are less stringent that those in the existing permit. This relaxation of effluent limitations is consistent with the anti-backsliding requirements of CWA section 401(o), 40 CFR 122.44(l), EPA Region 2's Anti-backsliding Policy dated August 10, 1993, and Puerto Rico's Anti-Degradation Policy Implementation Procedure established in PRWQS.

- **2,4,6-Trichlorophenol**, **Bis(2-Ethylhexyl)Phthalate, Enterococci, Lead, Mercury, Nickel, Oil and Grease, and Silver.** PREQB's analysis of the existing effluent data did not indicate reasonable potential or that an effluent limitation is needed to ensure that applicable water quality standards are met in the receiving water. This new information is a sufficient basis to relax these requirements based on the R2 Anti-Backsliding Policy.

PART III. RATIONALE FOR STANDARD AND SPECIAL CONDITIONS

A. Standard Conditions

In accordance with 40 CFR 122.41, standard conditions that apply to all NPDES permits have been incorporated by reference in Part IV.A.1 of the permit and expressly in Attachment B of the permit. The Permittee must comply with all standard conditions and with those additional conditions that are applicable to specified categories of permits under 40 CFR 122.42 and specified in Part IV.A.2 of the Permit.

B. Special Conditions

In accordance with 40 CFR 122.42 and other regulations cited below, special conditions have been incorporated into the permit. This section addresses the justification for special studies, additional monitoring requirements, Best Management Practices, Compliance Schedules, and/or special provisions for POTWs as needed. The special conditions for this facility are as follows:

1. **Special Conditions from the Water Quality Certificate**

   In accordance with 40 CFR 124.55, EPA has established Special Conditions from the WQC in the permit that EQB determined were necessary to meet PRWQS. The Special Conditions established in this section are only those conditions from the WQC that have not been established in other parts of the permit.

2. **Best Management Practices (BMP) Plan**

   In accordance with 40 CFR 122.2 and 122.44(k), BMPs are schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution to waters of the United States. The Permittee is required to develop a BMP Plan in Part IV.B.3.a of the permit to control or abate the discharge of pollutants.

3. **Compliance Schedules**

   A compliance schedule has not been authorized for any pollutant or parameter in the permit on the basis of 40 CFR 122.47

PART IV. COMPLIANCE WITH APPLICABLE PROVISIONS OF OTHER FEDERAL LAWS OR EXECUTIVE ORDERS

A. Coastal Zone Management Act

Under 40 CFR 122.49(d), and in accordance with the Coastal Zone Management Act of 1972, as amended, 16 *United States Code* (U.S.C.) 1451 *et seq.* section 307(c) of the act and its implementing regulations (15 CFR Part 930), EPA may not issue an NPDES permit that affects land or water use in the coastal zone until the Permittee certifies that the proposed activity complies with the Coastal Zone Management Program in Puerto Rico, and that the discharge is certified by the Commonwealth of Puerto Rico to be consistent with the Commonwealth's Coastal Zone Management Program. The Permittee has indicated that the outfall is in a coastal area managed by the Commonwealth's Coastal Zone Management Program. On June 13, 2012, the Puerto Rico Planning Board issued a consistency certification for the discharge that provides that the discharge complies with its Coastal Zone Management Plan. As this discharge has been permitted in the past, a reopener clause has

been established that allows the permit to be modified or revoked based on a consistency determination requested by the permittee as part of this renewal process.

B. Endangered Species Act

Under 40 CFR 122.49(c), EPA is required pursuant to section 7 of the Endangered Species Act (ESA), 16 U.S.C. 1531 *et seq*. and its implementing regulations (50 CFR Part 402) to ensure, in consultation with the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS) that the discharge authorized by the permit is not likely to jeopardize the continued existence of any endangered or threatened species or adversely affect its critical habitat.

The ESA requires the Regional Administrator to ensure, in consultation with the Secretary of the Interior or Commerce, that any action authorized by EPA is not likely to jeopardize the continued existence of any endangered or threatened species or adversely affect its critical habitat.

In a May 2000 memo to the Regions, EPA Headquarters provided guidance to the Regions in making a determination as to whether a final permit may be issued while waiting for consultation to be concluded. As part of this permit action, if consultation has not been completed by final permit issuance and EPA has concluded that permit issuance is consistent with section 7 prior to the conclusion of consultation, EPA will re-issue the final permit before consultation is concluded and will document this decision in the Administrative Record. At the time consultation is completed, EPA may decide that changes to the permit are warranted after permit issuance based on the results of the consultation. Therefore, a reopener provision to this effect has been included in the Permit Part IV.A.1.b. EPA initiated consultation on October 3, 2018.

C. Environmental Justice

EPA has performed an Environmental Justice (EJ) Analysis for the discharge in accordance with Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Population and Low-Income Populations*, and EPA's Plan EJ 2014. EJ is the right to a safe, healthy, productive and sustainable environment for all, where "environment" is considered in its totality to include the ecological, physical, social, political, aesthetic and economic environments. In the NPDES permitting program, the public participation process provides opportunities to address EJ concerns by providing appropriate avenues for public participation, seeking out and facilitating involvement of those potentially affected, and including public notices in more than one language where appropriate. EPA has assumed that the facility is in an area characterized as a Community of Concern and is therefore subject to the EJ requirements. As a result, EPA has taken steps to minimize the impacts on the community impacted by the discharge. These steps include:

1) Providing public notice in both English and Spanish of the availability of the draft permit for public comment,
2) Ensuring that all supporting documents will be available in a repository accessible at the EPA Caribbean Environmental Protection Division in San Juan, Puerto Rico,
3) If a public hearing is held, bi-lingual EPA staff will be made available to meet with the community before and after the public meeting,
4) If determined necessary, EPA will have simultaneous translation at the public hearing and public availability session to facilitate the participation of both English and Spanish speaking participants.

EPA is committed to taking all necessary actions to minimize potential adverse effects on the community from the facility.

F. National Historic Preservation Act

Under 40 CFR 122.49(b), EPA is required to assess the impact of the discharge authorized by the permit on any properties listed or eligible for listing in the National Register of Historic Places (NRHP) and mitigate any adverse effects when necessary in accordance with the National Historic Preservation Act, 16 U.S.C. 470 et seq. EPA's analysis indicates that no new soil disturbing or construction-related activities are being authorized by approval of this permit; accordingly, adverse effects to resources on or eligible for inclusion in the NHRP are not anticipated as part of this permitted action.

G. Magnuson-Stevens Fishery Conservation and Management Act

Under 40 CFR 122.49, EPA is required to ensure that the discharge authorized by the permit will not adversely affect Essential Fish Habitat (EFH) as specified in section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), 16 U.S.C. 1801 *et seq*. EPA is currently in the process of

initiating a discussion/consultation with National Marine Fisheries Service regarding this permit action. Therefore, a reopener provision to this effect has been included in the NPDES permit.

PART V. PUBLIC PARTICIPATION

The procedures for reaching a final decision on the draft permit are set forth in 40 CFR Part 124 and are described in the public notice for the draft permit, which is published in *El Vocero.* Included in the public notice are requirements for the submission of comments by a specified date, procedures for requesting a hearing and the nature of the hearing, and other procedures for participation in the final agency decision. EPA will consider and respond in writing to all significant comments received during the public comment period in reaching a final decision on the draft permit. Requests for information or questions regarding the draft permit should be directed to

Ms. Sieglinde Pylypchuk
EPA Region 2, Clean Water Division
Permit Writer Phone: 212-637-4133
Permit Writer Email: pylypchuk.sieglinde@epa.gov

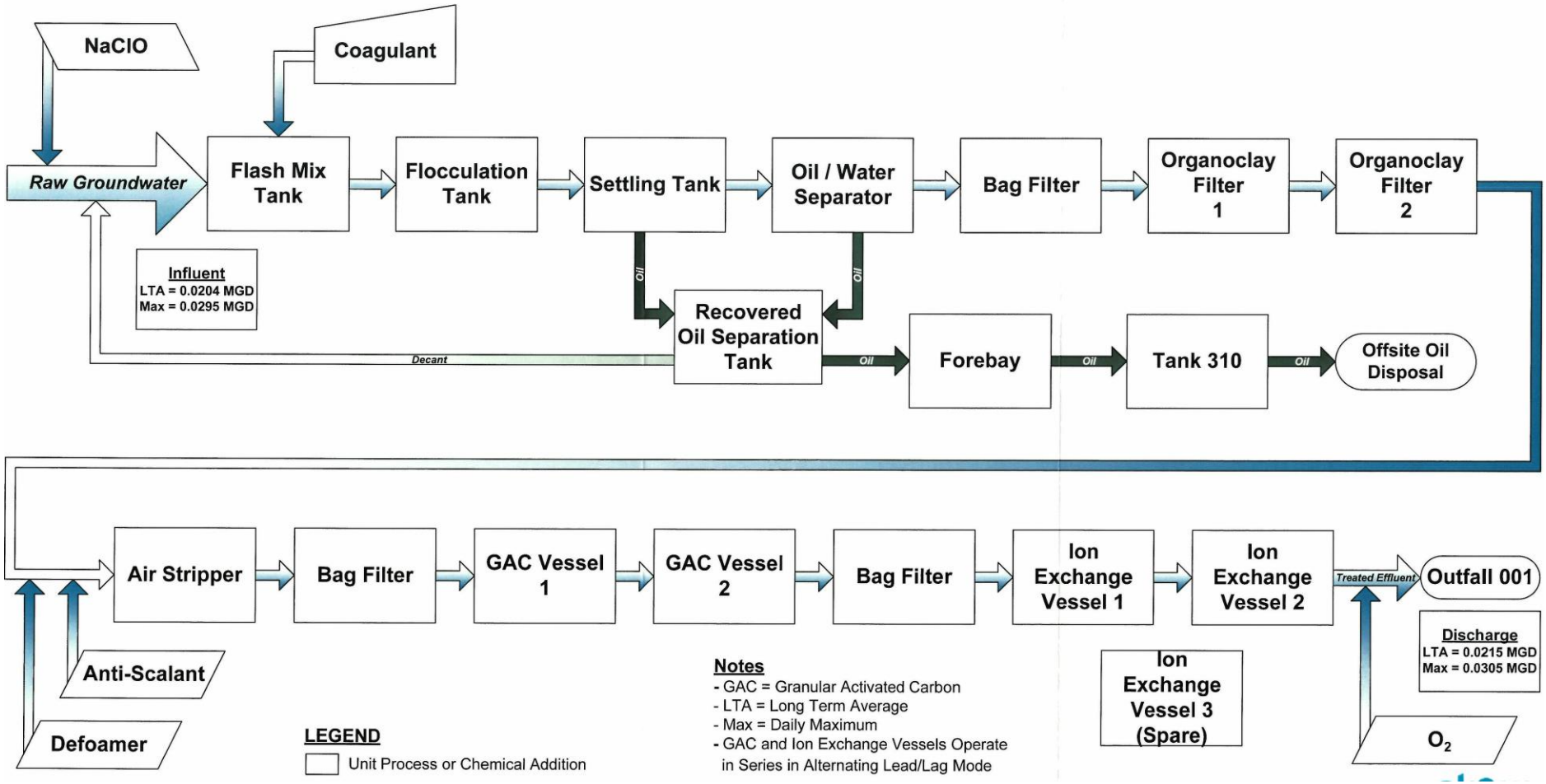
A copy of the draft permit is also available on EPA's website at:
https://www.epa.gov/npdes-permits/puerto-rico-npdes-permits

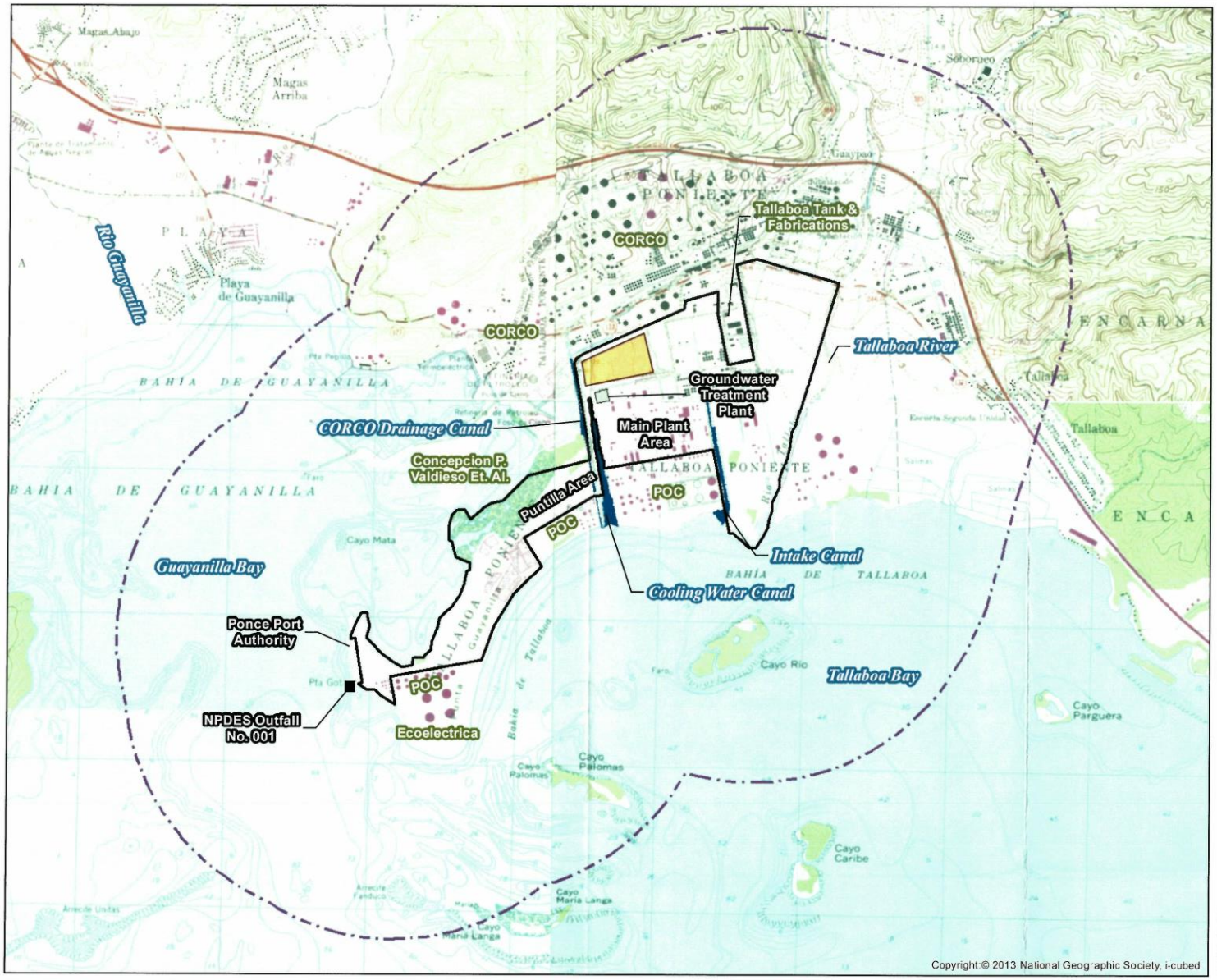
ATTACHMENT A — FACILITY MAP AND FLOW SCHEMATIC

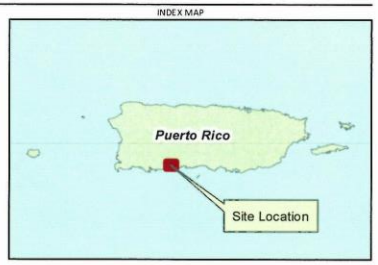
The facility map and flow schematic are attached as provided by the discharger in the application.

GWTS Process Flow Diagram - PR0000418

NPDES Permit Renewal Application
Peñuelas Technology Park, LLC







LEGEND

- Permitted Outfalls
- Groundwater Treatment Plant
- Canal
- Property Boundary
- Facility Boundary 1 Mi. Buffer
- Closed Industrial Landfill Area

Note:

1. *Canals* were digitized from aerial imagery obtained from University of Puerto Rico, Río Piedras (2010).
2. The *Groundwater Treatment Plant* and associated structures are derived from CH2M HILL CAD drawings of construction plan.
3. CORCO = Commonwealth Oil Refining Co.
4. POC = Peerless Oil & Chemicals Inc.
5. SWMU = Solid Waste Management Unit

Topographic Map Source:
Yauco quadrangle, 1982, 7.5 Minute Series
Peñuela quadrangle, 1982, 7.5 Minute Series
Punta Verraco quadrangle, 1982, 7.5 Minute Series
Punta Cuchara quadrangle, 1982, 7.5 Minute Series

0 1,125 2,250
Feet

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FIGURE 1-1
Facility Location Map
NPDES Permit Renewal Application, PR0000418
Peñuelas Technology Park LLC
Peñuelas, Puerto Rico