

ATTACHMENT C
RESPONSIVENESS SUMMARY
FOR THE FOLLOWING WTP DRAFT PERMITS

Barranquitas WTP (PR0022497)
Barrancas WTP (PR0022501)
Guayabota WTP (PR0022799)
Juncos (Quebrada Grande) WTP (PR0022811)
Miradero WTP (PR0023990)
Sabana Grande WTP (PR0024007)
Morovis Norte WTP (PR0024112)
Apeadero WTP (PR0024686)
Las Delicias WTP (PR0025216)
Lares WWTP (PR0025879)
Santa Isabel-Utuado WTP (PR0026182)
Matrullas WTP (PR0026808)
Maizales WTP (PR0026905)

On July 8, 2025, the United States Environmental Protection Agency (EPA) issued draft National Pollutant Discharge Elimination System (NPDES) permits for Water Treatments Plants (WTPs) and one 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 the following commenters were received:

Puerto Rico Department of Natural and Environmental Resources (PRDNER)
San José Industrial Park
1375 ave. Ponce de León
San Juan, PR 00926

All comments were received were just for Las Delicias WTP (PR0025216); Barrancas WTP (PR0022501); and Maizales WTP (PR0026905). These permits have been reviewed and considered in this final permit decision. A summary of and response to the comments received follows:

A. Las Delicias WTP (PR0025216)

1. Comment: Part II.A – Effluent Limitations Table:

- a. Sulfates have a “No Net Limitation” disposition in the WQC, but this parameter does not have the reference to footnote (5) regarding this in the Draft NPDES.
- b. The phrase: "...treated in a sludge treatment system prior to be discharged", as part of the discharge 001's description (at the header of the Table) in the WQC, was not included in the Draft NPDES.
- c. Please revise the maximum daily limitation for Dissolved Oxygen and consider to change the mathematical sign of this limit for " \geq " instead of "<" .
- d. Monitoring frequency for Turbidity is **Monthly** in the Water Quality Certificate (WQC) instead of Quarterly.

Response:

- a. This is a typographical error; the referenced footnote has been added according to WQC.
- b. This is a typographical error; the referenced phrase (at the header of the Table) has been modified according to WQC.
- c. This is a typographical error; the referenced maximum daily limitation for Dissolved Oxygen has been modified according to WQC.
- d. This is a typographical error; the referenced monitoring frequency for Turbidity has been modified according to WQC.

B. Barrancas WTP (PR0022501)

1. Comment: Part II.A – Effluent Limitations Table:

- a. The phrase: "...treated in a sludge treatment system prior to be discharged", as part of the discharge 001's description (at the header of the Table) and in the effluent's description in the footnote (4) of the Table in the WQC, was not included in the Draft NPDES.
- b. Monitoring frequency for Turbidity is Monthly in the Water Quality Certificate (WQC) instead of Quarterly.

Response:

- a. This is a typographical error; the referenced phrase (at the header of the Table) has been modified according to WQC.
- b. The referenced monitoring frequency for Turbidity has been modified according to WQC.

C. Maizales WTP (PR0026905)

1. Comment: Part II.A – Effluent Limitations Table:

- a. The description of discharge 001 (at the header of the Table) in the Draft NPDES does not include the f007Alocculators as in the WQC.
- b. Footnote (3) for Residual Chlorine, must refer to special conditions "e" and "f" (instead of "f" and "g").

Response:

- a. This is a typographical error; the description of discharge 001 (at the header of the Table) has been modified according to WQC.
- b. This is a typographical error; the referenced footnote has been modified.

2. Comment: Part IV.B.1 - Special Conditions from the Water Quality Certificate:

- a. Special Condition “b” does not include the flocculators in the description of the discharge as in the WQC.

Response:

- a. This is a typographical error; the special condition “b” has been modified according to WQC.