

**RESPONSE TO COMMENTS ON DRAFT NPDES PERMIT FOR
PUERTO RICO ELECTRIC POWER AUTHORITY
COSTA SUR POWER PLANT (PR0001147)**

On April 9, 2018, the United States Environmental Protection Agency (EPA) issued a draft National Pollutant Discharge Elimination System (NPDES) permit (PR0001147) to the Puerto Rico Electric Power Authority for its Costa Sur Power Plant facility, an oil-fired steam electric power generating station in Guayanilla, Puerto Rico. Public notice of the draft permit was provided in the *El Vocero* newspaper on April 9, 2018. The public comment period for the draft NPDES permit expired on May 9, 2018.

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.

A comments on behalf of PREPA was received in an email dated April 24, 2017 from Ruperto Berrios, Head of the Environmental Protection and Quality Assurance Division at PREPA. In addition to this comment, PREPA provided detail and diagrams of the Hydrolox Screen technology and Floating Barriers referenced in the 316(b) Decision Document.

All comments received have been reviewed and considered in this final permit decision. A discussion and response to the comments received are included below. Additional revisions to the permit were made to include issuance and expiration dates in place of the Effective Date of Permit (EDP).

PREPA Comment:

This e-mail serves as a written confirmation, as requested, to include the RO rejected water as was integrated in Section 7 (Improvements) of PREPA's March 2014 Permit Renewal Application.

Also, the AO CWA-02-2014-3104 emitted by EPA's Caribbean Office requested the proper sampling and analyses for RO's rejected water as a pilot test plan. PREPA's March 3, 2016 letter to Ms. Joan Leary Matthews summarized the pilot test period sampling and analyses performed. The results showed compliance with Outfall's 001 water quality standards.

Enclosed please find electronic copies of Section 7 NPDES Renewal Permit Application, the AO CWA-02-2014-3104 and PREPA's March 3, 2016 letter to Ms. Joan Leary Matthews.

EPA Response:

The EPA has reviewed documentation provided as an attachment to this comment, as well as relevant sections of the March 2014 NPDES permit application, and analytical results included in compliance with AO CWA-02-2014-3104. The EPA agrees that the Reverse Osmosis treatment system reject water should be authorized for discharge through Outfall 001, which includes reject water from the Multi Media Filter Units and the Electrodeionization System, which may also be recirculated through the system.

We note that this contribution is not expected to cause exceedances of permit limits or water quality standards in Outfall 001, based on review of previous analytical results. While the applicant suggested a new internal wastestream 001I, at this time we are including the wastestream contribution as authorized through Outfall 001. EPA may choose to establish monitoring requirements or effluent limits for this wastestream in future permit renewals, however, we are not establishing an internal monitoring point at this time as there is not an applicable technology based standard for this internal wastestream.