

ATTACHMENT I

RESPONSIVENESS SUMMARY AND CHANGES FOR THE FOLLOWING DRAFT PERMITS

Aguadilla (Montaña) WTP (PR0022918)
Aibonito WTP (PR0022489)
Comerio-Rio Hondo WTP (PR0026573)
Culebras-Cayey WTP (PR0026352)
Fajardo Regional WTP (PR0026379)
Hatillo WTP (PR0024163)
Lares Urbano WTP (PR0026450)
Maunabo Lizas WTP (PR0026654)
Morovis Sur WTP (PR0024198)
Santa Isabel WWTP (PR0023761)
Sergio Cuevas WTP (PR0022411)
Tibes WTP (PR0025801)
Utua WTP (PR0024155)

On **August 5, 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 WQCs, 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. AGUADILLA (MONTAÑA) WTP COMMENTS (PR0022918)

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

The correct outfall complete location is:

Outfall latitude	Outfall longitude
18°, 26', 48.94" N	67°, 08', 40.33" W

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

2) Comment 2, Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations --- Outfall Number 001--- Effluent Limitations Table, "BOD₅"

Reference to footnote (5) 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, "Cyanide Free (CN)"

This parameter was identified incorrectly. Based on DNER's Final WQC of July 15, 2019, this parameter must be identified as "Total Cyanide" (CN)".

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

4) Comment 4: 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.

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

The Greek Symbol β next to the parameter must be deleted. Also, reference to footnote (4) must be added.

Response: The final permit includes footnote (4).

6) Comment 6: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, Effluent Limitations Table, “Sulfide”

Reference footnote (4) that applies to mercury must be deleted. PRASA suggests that a new footnote be added to make reference to Special Condition k, which is related to Sulfide (undissociated H₂S).

Response: These were typographical errors; 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 BOD₅, minimum % removal”: “Zinc (Zn)”

Reference to footnote (5) related to the “No Net Addition Limitation” condition must be added.

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

8) Comment 8: 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 f and g of this permit”.

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

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

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.

C. AIBONITO WTP COMMENTS (PR0022489)

1) Comment 1: 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 (\geq) according to footnote (7).

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

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

3) Comment 3: Part II Effluent Limitations and Monitoring Requirements, Final Effluent Limitations - Outfall Number 001, “Taste and odor Producing Substances”

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.

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

4) Comment 4: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations –Footnotes (3)

Footnote (3) – The reference to part IV is incomplete. This footnote must be corrected to read as follows) (corrections highlighted in **bold**):

(3) “See Part IV.B.1 Special Condition e and f 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. COMERIO-RIO HONDO WTP COMMENTS (PR0026573)

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: 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.

3) Comment 3: Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations - Outfall Number 001- Effluent Limitations Table, Enterococci

Reference to footnote (5), related to the “No Net Addition Limitation” condition, must be added.

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

4) Comment 4: 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.

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, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Total Phosphorus”:

This parameter was limited incorrectly. EPA included an effluent limitation of 150µg/L, which is lower than the applicable water quality standard, PRASA requests that the effluent limitation be corrected to 160 µg/L according to DNER’s final WQC.

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

8) Comment 8, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Zinc”:

This parameter was limited incorrectly. EPA included an effluent limitation of 132.16µg/L, which is lower than the applicable water quality standard, PRASA requests that the effluent limitation be corrected to 132.18 µg/L according to DNER’s final WQC. Also, reference to footnote (5) related to the “No Net Addition Limitation” condition must be added.

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

9) Comment 9: 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.

10) Comment 10: 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.

11) Comment 11: 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.

E. CULEBRAS-CAYEY WTP COMMENTS (PR0026352)

1) Comment 1, Permit Cover Page; Facility (Location address): According to the facility’s permit renewal application dated December 21, 2018, the complete physical address is as follows:

State Road 7741, Km 6.9, Intersection with Road 738
(Panoramic Route) **Culebras Alto Ward**
Cayey, PR 00736

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

2) Comment 2, Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations --- Outfall Number 001--- Effluent Limitations Table, “BOD₅”

Reference to footnote (5) 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 (6).

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

4) Comment 4, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, "Mercury":

This parameter was limited incorrectly. EPA included an effluent limitation of 6.9 µg/L, which is lower than the applicable water quality standard, PRASA requests that the effluent limitation be corrected to 0.50 µg/L according to DNER's final WQC.

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, "Taste and Odor Producing Substances"

This parameter can be deleted from Table A.

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

6) Comment 6, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, "Total Dissolved Solids (TDS)":

This parameter was limited incorrectly. EPA included an effluent limitation of 160 µg/L, which is lower than the applicable water quality standard, PRASA requests that the effluent limitation be corrected to 500 µg/L according to DNER's final WQC.

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

7) Comment 7; 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 e and f of this permit”.

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

Response: These were a typographical error; 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 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.

F. FAJARDO Regional WTP COMMENTS (PR00264379)

1) Comment 1, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Copper (Cu)”:

This parameter was limited incorrectly. EPA included an effluent limitation of 15.4 µg/L, which is lower than the applicable water quality standard, PRASA requests that the effluent limitation be corrected to 3.86 µg/L according to DNER’s final WQC.

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, 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.

3) Comment 3, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Sulfates (SO₄)”:

According to DNER's Final WQC, this parameter has a footnote that requires to implement a monthly monitoring program for one-year period. Draft permit lacks such footnote.

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, "Footnotes"

Footnotes (3) & (4) – These footnotes make reference to Special Conditions that apparently were listed incorrectly. EPA must revise the lettering of the special conditions.

Response: These were 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 "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.

G. HATILLO WTP COMMENTS (PR0024163)

1) Comment 1, Permit Cover Page; Facility (Location address): According to the facility's permit renewal application dated December 21, 2018, the complete physical address is as follows:

State Road 4491, Km 1.0, **Rio Abajo Ward**
Hatillo, PR 00659

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

2) Comment 2, Background; Water Quality Certificate:

The reference date of the DNER's Final WQC must be corrected.

Response: The address 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: “Dissolved Oxygen (DO)”

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

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

4) Comment 4, Part I. Effluent Limitations and Monitoring Requirements, A. Final Effluent Limitations --- Outfall Number 001--- Effluent Limitations Table, “Temperature”

This parameter was limited incorrectly. EPA included an effluent limitation of 32.2°C. PRASA requests that the effluent limitation be corrected to 30°C according to DNER’s final WQC.

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

5) Comment 5, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Total Ammonia Nitrogen (TAN)”

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

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

6) Comment 6; Part I, 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. The footnote must be corrected to read as follows:

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

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

7) Comment 7, 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.

8) Comment 8, 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. LARES URBANA WTP COMMENTS (PR0026450)

1) Comment 1, Permit Cover Page; Facility (Location address): According to the facility’s permit renewal application dated December 21, 2018, the complete physical address is as follows:

State Road 128 Interior
Acueductos Street, Buenos Aires Ward
Lares, PR 00669

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: “Dissolved Oxygen (DO)”

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

Response: This was a 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, “Temperature”

This parameter was limited incorrectly. EPA included an effluent limitation of 32.2°C. PRASA requests that the effluent limitation be corrected to 30°C according to DNER’s final WQC.

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

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).

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.

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.

I. MAUNABO (LIZAS) WTP COMMENTS (PR0026654)

1) Comment 1, Permit Cover Page; Facility (Location address): According to the facility’s permit renewal application dated December 21, 2018, the complete physical address is as follows:

State Road 758, Km 0.58 Interior

Lizas Ward

Maunabo, PR 00707

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

2) Comment 2: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “BOD₅”.

Reference to footnote (6) must be changed to footnote (5).

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

3) Comment 3: Part II Effluent Limitation and Monitoring Requirements, Final

Effluent limitations – Outfall Number 001, “Copper (Cu)”.

The asterisk next to the effluent limitation must be deleted. Reference to footnote (6) must be changed to footnote (5).

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

4) Comment 4: 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.

5) Comment 5: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “Silver (Ag)”.

Reference to footnote (6) must be changed to footnote (5).

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

6) Comment 6: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “Sulfide (undissociated H₂S)”.

The correct limitation according to DNER’s WQC is 2.0 µg/L and the minimum sampling frequency must be corrected to 1/Quarter.

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

7) Comment 7: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “Total Phosphorus (P)”.

Reference to footnote (6) must be changed to footnote (5).

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

8) Comment 8: 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 e and f of this permit”;
- (4) “See Part IV.B.1 Special Condition i of this permit”.

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

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 typographical error(s); the final permit was revised.

10) Comment 10: 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. MOROVIS SUR WTP COMMENTS (PR0024198)

1) Comment 1, Permit Cover Page; Facility (Location address): According to the facility’s permit renewal application dated December 21, 2018, the complete physical address is as follows:

State Road 618, Km 0.3
Morovis Sur Ward
Morovis, PR 00687

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

2) Comment 2: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “Arsenic”.

This parameter was limited incorrectly. The correct limitation according to DNER’s final WQC is 10 µg/L not 10.0 µg/L.

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

3) Comment 3: Part II Effluent Limitation and Monitoring Requirements, Final Effluent limitations – Outfall Number 001, “Color”.

This parameter was limited incorrectly. The correct limitation according to DNER’s final WQC is 15 µg/L not 15.0 µg/L.

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

4) Comment 4: 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 (5).

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

5) Comment 5: 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 **f** and **g** of this permit”;

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

Response: This was 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 “C” not “B”.

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

7) Comment 7: 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.

K. SANTA ISABEL WWTP COMMENTS (PR0023761)

1) **Comment 1, Part I. Background, B. Water Quality Certificate:** The reference to date of the EQB’s Final Water Quality Certificate (WQC) must be corrected to July 15, 2019.

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

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 H₂S” must be added to read as “Sulfide (undissociated H₂S)” In order to avoid confusion with “Sulfide Total”

Response: This was a typographical error; 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 (5), (6) & (7).

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

- (5) “See Part IV.B.1 Special Condition f and g of this permit”.
- (6) “See Part IV.B.1 Special Condition j this permit”.
- (7) “See Part IV.B.1 Special Condition k this permit”.

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

4) Comment 4, C. Part IV Standard and Special Conditions. B. Special Conditions; 5. Additional Special Conditions; a. Pretreatment Requirements.

1. 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 is in compliance with the requirement established in the previous format of NPDES permits.

Pretreatment Report- In the same terms as the previous paragraph, 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.

6) CHANGE:

EPA eliminated the toxicity condition on “Section B.1. Special Conditions from the Water Quality Certificate” because toxicity is already address in “Section B.2 Whole Effluent Toxicity” of the final permit.

L. SERGIO CUEVAS WTP COMMENTS (PR0022411)

1) Comment 1, Permit Cover Page; Facility (Location address): According to the facility’s permit renewal application dated December 21, 2018, the complete physical address is as follows:

State Road 181, Km 30
Las Cuevas Ward
Trujillo Alto, PR 00977

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: “Dissolved Oxygen (DO)”

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

Response: This was a 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, “Mercury (Hg)”

Reference to footnote (5) must be added.

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

4) Comment 4, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Total Ammonia Nitrogen (TAN)”

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

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

5) Comment 5, Part I Effluent Limitations and Monitoring Requirements, Final Effluent Limitations --- Outfall Number 001, Effluent Limitations Table, “Zinc (Zn)”

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. Also, reference to footnote (5) related to the “No Net Addition Limitation” condition must be added.

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

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

Response: This was a typographical error; 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.

M. TIBES WTP COMMENTS (PR0025801)

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 503, Km 12.3,
Tibes Ward
Ponce, PR 00731

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

2) Comment 2: 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.

3) Comment 3: 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.

N. UTUADO WTP COMMENTS (PR0024155)

1) 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.

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

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

2) Comment 2: 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.

3) Comment 3: 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.