ATTACHMENT E

RESPONSIVENESS SUMMARY

FOR

DRAFT PERMTS

BAYAMON RWWTP (NPDES PERMIT NO. PR0023728)

PUERTO NUEVO RWWTP (NPDES PERMIT NO. PR0021555)

On June 2, 2021, the United States Environmental Protection Agency (EPA) public noticed the draft National Pollutant Discharge Elimination System (NPDES) permits for the above-mentioned facilities owned by the Puerto Rico Aqueduct and Sewer Authority (PRASA). The public comment period for the draft NPDES permits expired on **July 2, 2021**.

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:

JACOBS
Metro Office Park
17 St. 2, Suite 400
Guaynabo, Puerto Rico 00968

All comments received have been reviewed and considered in this final permit decision. A discussion and response to the comments received is found below. Unless otherwise noted, the comments common to both permits are responded to jointly.

A. COMMENTS FOR BOTH DRAFT PERMITS (BAYAMÓN RWWTP & PUERTO NUEVO RWWTP)

1) Outfall Location.

***Comment*:** Based on best available data, the outfall location is slightly different than that shown: Latitude: 18° 29’ 13’’ N, Longitude: 66° 08’ 21’’ W. PRASA suggests update the coordinates as follows: Latitude: 18° 29’ 5.5’’ N, Longitude: 66° 08’ 20.8’’ W.

***Response*:** Outfall location was updated.

2) PART II. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

a) *Comment*: Reference - Effluent Limitations Table; page 4.
The calculated value shown in the Effluent Limitations Table for the Whole Effluent Toxicity (WET) – Chronic Effects is based on a dilution of 102:1, which is the dilution used for the current permit. For the new permit, it should be based on a dilution of 150:1 per the 2016 Mixing Zone Application and subsequent WQC issued by DNER on March 5, 2021; and stated in Part I-D of the draft NPDES permit. PRASA suggests the recalculation of the allowable NOEC based on a dilution of 150:1 and correct the value shown in the Effluent Limitations Table to ≥ 0.81% based on the 150:1 dilution.

***Response*:** The Calculation has been corrected based on the updated dilution ratio of 150:1. The effluent limitation shall be all NOEC % results shall be greater than or equal to 0.81 %.

b) *Comment*: Reference – A, Effluent Limitations Table; page 4.
Table note (6). The DO limit is an instantaneous minimum. The result must be greater than or equal to 5.0 mg/L. The DO limit is "Monitor only" – this footnote applies to receiving water, not to effluent. PRASA suggests deleting this table note and to renumber the subsequent table notes.

***Response*:** Table note (6) was revised as follows: "DO is an instantaneous minimum".

c) *Comment*: Reference - A-4. Effluent Limitations and Monitoring Requirements; page 8. (1) See Part IV. B.1 Special Condition v.2 of the permit.
Table note (1) is not referenced in the stipulated table. PRASA suggests inserting the identifier for the table note in the body of the table next to table note (2).

***Response*:** Note (1) is included in the language describing Table A-4. Note (1) will remain in Table A-4, as it was stated in the WQC.

d) *Comment*: Reference - A-5. Effluent Limitations and Monitoring Requirements; page 9. See Part IV. B.1 Special Condition v.2 of this permit.
(1) Table note (1) is not referenced in the stipulated table. PRASA suggests inserting the identifier for the table note in the body of the table next to table note (2).

***Response*:** Note (1) is included in the language describing Table A-4. Note (1) will remain in Table A-4, as it was stated in the WQC.

3) PART III. REPORTING REQUIREMENTS AND COMPLIANCE DETERMINATION

a) *Comment*: PRASA requests that the pages referenced at the end of paragraph G.a of Part I be corrected.

***Response*: 1-9 pages number x of 27; for Bayamon RWWTP permit. 1-9 pages number x of 33; for Puerto Nuevo RWWTP permit.**

b) *Comment*: Reference - A.5. Bacterial Monitoring; page 12.
For bacterial monitoring, the Permittee must report on the DMR the calculated geometric mean and the percentage of individual samples that exceeded the single-sample maximum criterion. The geometric mean must be calculated on the basis of five grab samples taken within the calendar month and as described in Attachment A. Definitions of this permit. The Permittee must report on an attachment to the DMR the analytical results of each of the five individual sample measurements, the calculated geometric means using these individual samples, and the percentage of individual samples that exceed the single sample maximum criterion. This does not reflect the current PRWQSR bacterial monitoring criteria.

***Response*:** Bacterial Monitoring language was modified as follows: "For bacterial monitoring, the Permittee must report on the DMR the calculated geometric mean and the 90th percentile value of individual samples. The enterococci geometric mean and the 90th percentile shall be calculated on a monthly basis beginning on EDP+90 days, using the 6-points data set obtained during the previous 90-days interval as described in Attachment A. Definitions of this permit. The Permittee must report on an attachment to the DMR the analytical results of each of the six individual sample measurements for the 90-day period, the calculated geometric means using these individual samples, and the 90th percentile of individual samples."

4) PART IV. STANDARD AND SPECIAL CONDITIONS

a) *Comment*: Reference - B.1.k.; page 14.
The samples taken for the analysis of cyanide and mercury shall be analyzed using the analytic method approved by the EPA with the lowest possible detection level, in accordance with Rule 1306.8 of the Puerto Rico Water Quality Standards Regulation (PRWQSR), as amended. The WQC stipulates "free cyanide".

***Response*:** The cyanide reference was revised as established in the WQC to read "free cyanide."

b) *Comment*: Reference - Special Condition 2. Whole Effluent Toxicity Testing, 2.a.1) Monitoring Frequency and Sample Type; page 21.
An effluent limitation of a minimum NOEC % effluent of ≥1.2% has been included based on reasonable potential to cause or contribute to an exceedance of the chronic toxicity

water quality criterion of 1.0 TUc at the edge of the mixing zone. This is based on the old dilution of 102:1, not the current dilution of 150:1 that is referenced in Part I.D of the fact sheet for Bayamón and Puerto Nuevo RWWTPs permits.

***Response*:** The Calculation has been corrected based on the updated dilution ratio of 150:1. The effluent limitation shall be all NOEC % results shall be greater than or equal to 0.81 %.

c) *Comment*: Reference - Special Condition 2. Whole Effluent Toxicity Testing, 2.a.1) Monitoring Frequency and Sample Type; page 21.
Chronic toxicity tests will be conducted quarterly to determine compliance with the effluent limitation and whether accelerated testing and toxicity reduction activities should be initiated. This exceeds the toxicity testing requirements of the WQC.

***Response*:** PART IV. STANDARD AND SPECIAL CONDITIONS B.2 was modified from the requirement imposed in the water quality certificate issued by the Puerto Rico DNER. EPA has imposed the quarterly testing requirement to collect data necessary to determine whether this discharge has the reasonable potential to cause or contribute to an exceedance of Puerto Rico's water quality standards for toxicity, pursuant to water quality based permitting requirements at 40 CFR 122.44(d)(1), which requires EPA and delegated states to evaluate each National Pollutant Discharge Elimination System (NPDES) permit for the potential to exceed state numeric or narrative water quality standards, including those for toxics, and to establish effluent limitations for those facilities with the "reasonable potential" to exceed those standards. These federal regulations require both chemical specific limits, based on the state numeric water quality standards or other criteria developed by EPA, and whole effluent toxicity effluent limits.

PART IV. STANDARD AND SPECIAL CONDITIONS B.2 was also modified to clarify the right of EPA to reopen this permit to include additional toxicity requirements if warranted.

d) ***Comment*: Reference - Special Condition 2. Whole Effluent Toxicity Testing, 2.c Accelerated Toxicity Testing and TRE Initiation; page 21.**
If the discharge displays an acute or chronic toxicity result that exceeds the effluent limitation or trigger, the Permittee must conduct 6 additional toxicity tests of the discharge using the same species and test method as that of the observed toxicity, every two weeks, over a 12-week period. It is not clear if this is referencing an individual plant discharge, or the flow-weighted 24-hour composite sample referenced in Special Condition 2. Whole Effluent Toxicity Testing, 2.a.1) above.

***Response*:** Accelerated testing applies to the combined discharge results. The Special Condition language will be reviewed to clarify that this applies to the flow-weighted composite of the combined discharge.

B. SPECIFIC COMMENTS FOR BAYAMON RWWTP DRAFT PERMIT

1) ***Comment*: Reference - B.1. u.1); page 16 of 26.**
The diffuser configuration is of linear type of six hundred sixty-six (666) feet long and a diameter of seventy-two (72) inches. A total of fourteen (14) active risers (each riser consists of a port and a 2 cm inch vent) along the diffuser shall be opened, beginning with the end port and the next thirteen (13) risers, running consecutively toward shore. These two sentences are an apparent cut-and-paste from another permit. The remaining description of the outfall is correct.

***Response*:** As requested, referenced sentences were deleted.

2) ***Comment*: Reference - B.1.u.5); page 17 of 26.**
Not applicable. Surfactants is included as a mixing zone parameter in Part II, Tables A-2 and A-3. Surfactants should be added to the list of parameters for which a mixing zone is defined.

***Response*:** As requested, Surfactants was added to the list of parameters for the mixing zone.

C. COMMENTS FOR BOTH FACT SHEEFTS (BAYAMÓN RWWTP & PUERTO NUEVO RWWTP)

1) **PART I. BACKGROUND, A. Permittee and Facility Description; page A-2.**

***Comment*: "**Then, sludge is filtered-pressed and it is finally sent to the Puerto Nuevo RWWTP for incineration." The incinerator is not operational; solids are sent to an approved landfill. PRASA suggests modifying the text to delete reference to sludge incineration.

***Response*:** Text was modified as follows: "Then, sludge is filtered-pressed, and it is finally sent to an approved landfill."

2) **PART I. BACKGROUND, B. Discharge Point and Receiving Water Information; page A-2.**

***Comment*:** Based on best available data, the outfall location is slightly different than that shown: Latitude: 18° 29' 13'' N, Longitude: 66° 08' 21'' W. PRASA suggests updating coordinates as follows: Latitude: 18° 29' 5.5'' N, Longitude: 66° 08' 20.8'' W.

***Response*:** Outfall location was updated.

3) PART I. BACKGROUND, D. Mixing Zone/Dilution Allowance; page A-3.

***Comment*:** "In 2019, PRASA submitted an application for a mixing zone to the DNER." More correctly, the application for a WQC and definition of mixing zones was submitted to EQB (copied to EPA) on July 29, 2016, updated on June 18, 2019 (for updated effluent data) and submitted to DNER (copied to EPA), and updated again on September 18, 2020 (for total nitrogen) and submitted to DNER (copied to EPA). The DNER Intent to Issue an Interim Water Quality Certificate (IIWQC) and the final WQC were both based on these submittals.

***Response*:** Text was revised as: "On September 18, 2020, PRASA submitted a final revised application for a mixing zone to DNER."

4) PART I. BACKGROUND, D. Mixing Zone/Dilution Allowance; page A-3.

***Comment*:** "The overall mixing zone shape, size, and distance from the diffuser to the EOMZ remains the same as in the existing WQC and NPDES permit." It is essentially the same, although with minor differences based on the updated diffuser apex coordinates noted above.

***Response*:** As requested, in such sentence, "remains the same" will be replaced by "is essentially the same."

5) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, A. Effluent Limitations, 2. 5-Day Biochemical Oxygen Demand; page A-4. (Limits will change according to the specific facility.)

***Comment*:** "A mass-based limitation of 33,346 kg/day has been established based an average monthly design flow of 88 MGD, as established in DNER's final WQC." The 33,346 kg/day value is the average weekly value. The average monthly value is 19,688 kg/day, based on 100 mg/L. Additionally, the 88 mgd value is the permitted maximum daily flow. The average monthly design flow is 52 mgd.

***Response*:** The language was revised as: "A mass-based limitation of 19,688 kg/day has been established based on an average monthly design flow of 52 MGD, as established in DNER's final WQC."

6) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, A. Effluent Limitations, 3. Total Suspended Solids (TSS); page A-5. (Limits will change according to the specific facility.)

***Comment*:** "A mass-based limitation of 11,673 kg/day has been established based on an average monthly design flow of 88 MGD, as established in DNER's final WQC." This is the average monthly value based on 58 mg/L. The average weekly value is 19,783 kg/day.

***Response*: Granted. A mass-based limitation of 11,673 kg/day has been established based on an average monthly design flow of 52 MGD, as established in DNER's final WQC.**

7) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, A. Effluent Limitations, 4. pH; page A-5.

***Comment*:** "Therefore, the exiting permit established effluent limitations for pH…"
The word "exiting" is a typographical error. It should be "existing".

***Response*:** This was a typographical error; the word was corrected to read "existing".

8) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, A. Effluent Limitations, 6. Enterococci Density; page A-5.

***Comment*:** "A compliance schedule was granted to this parameter." A compliance schedule for TRC has been incorporated in the draft permit – but there is NOT one for enterococci.

***Response*:** EPA agrees there is no Compliance Schedule for Enterococci. Reference to an Enterococci compliance schedule was deleted from the language in page A-5**.**

9) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, A. Effluent Limitations, Cadmium, Copper, Nickel, Silver, Free Cyanide, Sulfide, Thallium, Lead, Mercury, and Zinc; page A-6.

***Comment*:** "The effluent limitation is based on the water quality standards as specified in Rule 1303.1.I.1 of PRWQSR, Rule 1305 Mixing Zones, and the WQC."
This reference should be to 1303.1.J.1.

***Response*:** Granted. As requested, reference was replaced by Rule 1303.1.J.1.

10) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, B. Effluent Limitations Summary Table; page A-6.

***Comment*:** "Enterococci Density, Interim Limits, MR."
There are no interim limits for enterococci in the draft permit.

***Response*:** The MR reference for Enterococci Density, Interim Limits, was deleted from the above-mentioned table.

11) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, B. Effluent Limitations Summary Table; page A-6.

***Comment*:** "Enterococci Density, Final Limits, MR, ≤ 35/100 mL."
This is for the geomean – there is also a criterion for the 90th percentile that must be met.

***Response*:** Table was modified to reflect current Enterococci limitations.

12) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, B. Effluent Limitations Summary Table; page A-6.

***Comment*:** "Flow, MGD, Existing Limits, Average Monthly, 52."
There is no limitation in the draft permit for monthly average – it is "Monitor only."

***Response*:** Limitation for Average Monthly was revised to read as "Monitor only" for the Flow parameter**.**

13) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, D. Compliance with Federal Anti-Backsliding Requirements and Puerto Rico's Anti-Degradation Policy; page A-8.

***Comment*:** "Existing effluent limitations for Fecal Coliforms and Nitrogen have been removed…"
Dissolved inorganic nitrogen (DIN) has been removed and replaced with total nitrogen (TN) per the PRWQSR.

***Response*:** Total Nitrogen is a new parameter; Nitrogen was removed. Total Nitrogen includes NO3, NO2 and TKN.

14) PART III. RATIONALE FOR STANDARD AND SPECIAL CONDITIONS; B. Special Conditions, 3. Compliance Schedules; page A-9.

***Comment*:** "The Permittee's effluent data indicate that the facility might not be able to consistently comply with the final effluent limitation for Enterococci and TRC; therefore, a schedule of compliance has been authorized in the permit in accordance with 40 CFR 122.47 and Special Condition 1.u (under PART IV.B) of the WQC, …"
A compliance schedule for TRC has been incorporated in the draft permit – but there is NOT one for enterococci. An enterococci compliance schedule should be added to the final permit.

***Response*:** EPA agrees there is no Compliance Schedule for Enterococci. Reference has been deleted.

15) PART IV. COMPLIANCE WITH APPLICABLE PROVISIONS OF OTHER FEDERAL LAWS OR EXECUTIVE ORDERS, D. Coral Reef Protection; page A-10.

***Comment*:** "Corals or coral ecosystems are in the vicinity of the discharge."

PRASA suggests delete this sentence or modify the text to indicate that there are NO corals or coral ecosystems in the vicinity of the discharge.

***Response*:** Sentence was deleted from the fact sheet. Page 2-3 of the 2021 Bayamon / Puerto Nuevo, 301h Waiver Decision Document dated 12/22/2020, which states that "The outfall is located in an area where there are no coral reefs or other environmentally sensitive habitats. It was designed to maximize dilution and minimize impact on the marine environment and recreational activities."

16) PART IV. COMPLIANCE WITH APPLICABLE PROVISIONS OF OTHER FEDERAL LAWS OR EXECUTIVE ORDERS, D. Coral Reef Protection; page A-10.

***Comment*:** "Therefore, the continued operation of the outfalls will have no effect in the species." The word "outfalls" is an apparent typographical error, as there is only a single outfall in question.

***Response*:** Text was modified to reference as a single outfall.

17) ATTACHMENT B — WHOLE EFFLUENT TOXICITY REQUIREMENTS; page B-1, paragraph 1.

***Comment*:** "Rule 1303.1(I) of PRWQS provides that all waters of Puerto Rico shall not contain any substance at such concentration which, either alone or as result of synergistic effects with other substances is toxic or produces undesirable physiological responses in human, fish or other fauna or flora." The reference is incorrect; it should be to 1303.1(J) (2019, PRWQSR).

***Response*:** Reference was replaced by Rule 1303.1.J.1.

18) ATTACHMENT B — WHOLE EFFLUENT TOXICITY REQUIREMENTS; page B-1, paragraph 1.

***Comment*:** "PRWQS do not provide a numeric criterion for toxicity." The statement is incorrect. Numeric WQS criteria are presented in the Mixing Zone and Bioassay Guidelines (MZBG), which is incorporated into the PRWQSR by reference.

Response: Karen. The PRWQS 1303.1 J identify specific substances for which numeric water qualtiy standards have been established. See also response to comments A.2.4) c).

19) ATTACHMENT B — WHOLE EFFLUENT TOXICITY REQUIREMENTS; page B-1, paragraph 2.

***Comment*:** "PRASA has conducts acute WET monitoring for the combined effluent using the mysid shrimp (Mysidopsis bahia) and sheepshead minnow (Cyprinidon variegates)…" There is an incorrect tense and an incorrect spelling of the scientific name of the sheepshead minnow.

Response: Typographical error was corrected.

20) ATTACHMENT B — WHOLE EFFLUENT TOXICITY REQUIREMENTS; page B-1, paragraph 3.

***Comment*:** "To assess WET test data, PRWQS definitions at Rule 1301.1 include a criterion maximum concentration (CMC) of 0.3 TUa and criterion continuous concentration (CCC) of 1.0 TUc be used to ensure aquatic life protection against toxicity in the receiving water…"
This contradicts the first part of the paragraph and is not correct. Rule 1301.1 (DEFINITIONS) does not include these criteria; rather, they are in the MZBG.

***Response*:** Puerto Rico Water Quality Standards include the narrative toxicity criterion of "The waters Puerto Rico shall not contain any substance at such concentration which either alone or as a result of synergistic effects with other substances is toxic or produces undesirable physiological responses in human, fish or other fauna or flora." Whole effluent toxicity one measure of such synergistic effects. EPA considers this narrative criterion to be the water quality standard for whole effluent toxicity for all waters of Puerto Rico. The definitions section of the PRWQS which include the criterion maximum concentration (CMC) and the criterion continuous concentration (CCC), which are the numeric interpretation of toxics in toxic amounts, as well as the Mixing Zone and Bioassay Guidelines, are integral components of the PRWQS and implement the narrative toxicity criterion.

21) ATTACHMENT B — WHOLE EFFLUENT TOXICITY REQUIREMENTS; page B-1, paragraph 6.

***Comment*:** "With consideration of dilution, EPA has proposed a maximum daily effluent limitation of 83.32 TUc , expressed as any combined discharge chronic test result greater than or equal to 1.2% effluent in the draft modified permits for the Bayamón RWWTP, Puerto Nuevo RWWTP, and Bacardí WWTP."

The 83.32 TUc value is the waste load allocation (WLA) used in the current permits and is based on a dilution of 102:1. This value should be updated to reflect the updated dilution of 150:1 as referenced in Part I.D of the fact sheet for Bayamón and Puerto Nuevo. Further, the 1.2% effluent value needs to be recalculated based on the correct

dilution. Note that Part 1.C of the Bacardí fact sheet states 102:1, in error, as the appropriate dilution allowance.

***Response*:** The Calculation has been corrected based on the updated dilution ratio of 150:1. The effluent limitation shall be all NOEC % results shall be greater than or equal to 0.81 %. The corrected calculation is included below:

Calculation of Waste Load Allocation (WLA)

The WLA is used to determine the level of effluent concentration that will comply with water quality standards in receiving waters. Using the information available for dilution, WLAs were calculated for WET using the complete mix equation, which simplifies to

WLA = Cr x Dilution Ratio

where Cr = the water quality criterion concentration. In Puerto Rico, a criterion continuous concentration of 1.0 TUc, and a criterion maximum concentration (CMC) of 0.3 TUa is used as the numeric interpretation of the water quality standard for toxicity.

Using a critical initial dilution (CID) ratio of 102:1, the chronic WLA would be

WLAc = Crx 150 = 1.0 x 150 = 150.0 TUc

WLAa = 0.3 × 150 = 45.0 TUa

WLAa,c = WLAa × ACR = 45.0 × 10 = 450 TU a,c

Calculate Long-term Averages (LTAs).

To calculate the long-term average (LTA):

LTA = WLA × e[0.05F2 ! zF]

LTA a,c = 450 × 0.321 = 144.45 TU where:

0.321 is the acute WLA multiplier for Cv = 0.6 at the 99th percentile (from Table 5-1, pg. 102 of the TSD)

LTAc = WLAc × e[0.5σ42 - zσ4]

LTAc = 150 × 0.527 = 79.05 where:

0.527 is the chronic WLA multiplier at the 99th percentile (from Table 5-1, pg. 102 of the TSD)

Select the minimum LTA.
The LTA based on the chronic WLA more limiting and will be used to develop permit limits.

Limit Calculation:
Using the 95th percentile and monthly sampling, the effluent limit is calculated as:

LTA × e[zFn ! 0.5Fn2] where e[zFn - 0.5Fn2]= AML LTA multiplier
z = 1.645 for the 95th percentile occurrence probability for the AML is recommended
n = number of samples/month (the TSD recommends that a minimum n of 4 be used, even if monitoring is less frequent).

From Table 5-2, on pg. 102 of the TSD, for Cv = 0.6 and n=4,

AML = 79.05 × 1.55 = 122.53 TUc
100/122.53 = 0.81 % Effluent

In order to simplify DMR reporting the exact result indicated on the laboratory results, EPA has begun expressing WET limits as minimum percentages in Table A-1. The limit will be expressed as any chronic whole effluent toxicity test result on the combined discharge with a NOEC result of greater than or equal to 0.81%. While this limitation is less stringent than that of the previous permit, such relaxation of an effluent limitation is allowable under NPDES Regulations and EPA Region 2 Antibacksliding Policy because it is calculated based on updated information that was not available at the time of the last permit issuance.

22) ATTACHMENT B — WHOLE EFFLUENT TOXICITY REQUIREMENTS; page B-1, paragraph 7.

***Comment*:** "Such monitoring is also required by the draft Water Quality Certificate issued by the Puerto Rico Department of Natural and Environmental Resources." PRASA comments on the draft WQC indicated that only the combined flow is appropriate and DNER agreed. The Final WQC did NOT require testing of individual waste streams.

Response: The text has been modified to remove the individual testing reference.

D. SPECIFIC COMMENTS FOR PUERTO NUEVO RWWTP FACT SHEET

1) PART II. RATIONALE FOR EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, A. Effluent Limitations, Cadmium, Copper, Nickel, Silver, Free Cyanide, Sulfide, Thallium, Lead, Mercury, and Zinc; page 6.

***Comment*:** "The effluent limitation is based on the water quality standards as specified in Rule 1303.1.I.1 of PRWQSR, Rule 1305 Mixing Zones, and the WQC."
This reference should be to 1303.1.J.1.

***Response*:** As requested, reference was replaced by Rule 1303.1.J.1.

E) CHANGES TO BAYAMON AND PUERTO NUEVO RWWTPS FINAL PERMITS

1) EDP was changed to 11/1/2021.

2) 1st DMR due date is 12/28/2021.

3) Pretreatment Requirements, Special Condition IV. 6. B
Condition was modified to address the updated Pretreatment Program Requirements. EPA confirmed with PRASA this revision on 8/31/2021 and they had no issues with the modification.