

Response to Comments Received during Second Public Comment Period of Bacardi Corporation Draft NPDES Permit Noticed on August 16, 2021

Comments were received on the August 16, 2021 noticed Draft National Pollutant Discharge Elimination System permit for the Bacardi Corporation from the applicant, Bacardi Corporation, by letter dated September 15, 2021.

Comment #1 : First page NPDES Permit – Outfall Latitude and Longitude Description

The outfall coordinates should be corrected as follows to reflect the diffuser apex.

Latitude: 18° 29' 5.46"

Longitude: 66° 8' 20.82"

EPA Response 1:

EPA has made the correction.

Comment #2 : PART II - Table A-1 Final Effluent Limitations - Outfall # 001-Suspended Colloidal or Settleable Solids

Footnote "8" is listed for Suspended, Colloidal or Settleable Solids within the table. The list of footnotes was corrected, but the footnote reference should be deleted from the table row listing this parameter.

EPA Response 2:

EPA has made the correction.

Comment #3: PART II. Table A-2 Mixing Zone Monitoring Stations

Columns labeled "Effluent Limitations" should be labeled "Edge of MZ Limitations" to be consistent with the WQC.

EPA Response 3:

EPA has made the correction.

Comment #4: PART II. Table A-3 Monitoring Requirements Background Sampling Station

Columns labeled "Effluent Limitations" are not applicable in this table and should be removed to be consistent with the WQC

EPA Response 4:

EPA removed the header labels for the effluent limits columns for Table A-3.

Comment #5: PART II. Table A-4 Effluent Limitations and Monitoring at the edge of the Mixing Zone

Columns labeled "Effluent Limitations" are not applicable in this table and should be removed to be consistent with the WQC.

EPA Response 5:

EPA revised the header for Table A-4 to "Gross Discharge Limitations" to be consistent with the WQC.

Comment #6: PART II. Table A-5 Effluent Limitations and Monitoring Requirements at the Background Sampling Station

Columns labeled "Effluent Limitations" are not applicable in this table and should be removed to be consistent with the WQCC.

EPA Response 6:

EPA removed the header labels for the effluent limits columns for Table A-5.

Comment #7: PART II - Table A-6: Technology Based requirements at Internal Outfall 002

There are two (2) sets of footnotes, one in the first column and one in the last column. The footnotes in the first column no longer correspond to the footnote text and should be removed. The heading for the last column is missing and should be "Footnote".

EPA Response 7:

EPA has made the corrections.

Comment #8: PART IV. Standard and Special Conditions - Section B.2 a. 1) Whole Effluent Toxicity Testing

The second line of the requirement should specify that the NOEC % effluent limitation is greater than 0.81, instead of 1.2. Likewise, the last sentence should be modified to read as follows: "Chronic toxicity tests will be conducted quarterly on the combined discharge to determine compliance with the effluent limitation and whether accelerated testing and toxicity reduction activities should be initiated".

EPA Response 8:

EPA has made the corrections.

**Comment #9: PART IV. Standard and Special Conditions - Section B.2 a. 3)
Whole Effluent Toxicity Testing**

The second sentence of the second paragraph of the requirement should be modified to read as follows: "The effluent samples for the toxicity tests shall be used in or before 36 hours after being collected unless an alternate agreement is made, in writing, with EPA."

EPA Response 9:

EPA has made the correction.

**Comment #10: PART IV. Standard and Special Conditions - Section B.2 a. 4)
Whole Effluent Toxicity Testing**

In the third sentence the word "*punctualata*" should be replaced with "*punctulata*".

EPA Response 10:

EPA has made the corrections.

**Comment #11: PART IV. Standard and Special Conditions - Section B.2 c.
Reporting of Toxicity Monitoring results and d. Reopener Clause for Toxicity**

Letter "c" should be replaced with letter "d" and letter "d" should be replaced with letter "e"

EPA Response 11:

EPA has made the corrections.

FACT SHEET COMMENTS

**Comment #12: FACT SHEET - PART II. BACKGROUND, B. Discharge Points
and Receiving Water Information**

The outfall coordinates should be corrected as follows to reflect the diffuser apex.

Latitude: 18° 29' 5.46"

Longitude: 66° 8' 20.82"

EPA Response 12:

EPA has made the correction.

Comment #13: FACT SHEET - PART I. ADMINISTRATIVE HISTORY

The item: "September 30, 2020 PR DNER issued an Interim Water Quality Certificate, requested by EPA on December 16, 2016." Should state "September 30, 2020 PR DNER issued an Intent to Issue a Water Quality Certificate, requested by EPA on December 16, 2016."

EPA Response 13:

EPA has made the corrections.

Comment #14: FACT SHEET - Part IV.B.2 – Whole Effluent Toxicity, second paragraph

In the second sentence the word "Cyprinidon" should be replaced with "Cyprinodon"

EPA Response 14:

EPA has made the correction.