

MAJOR PERMIT MODIFICATION FOR
ECOELÉCTRICA LNG TERMINAL AND COGENERATION PROJECT
(PR0025984)

Statement of Basis

A modification is being proposed to the NPDES permit for the EcoElectrica LNG Terminal and Cogeneration Project (EcoElectrica) in response to a March 1, 2010 request to EPA from the permittee for a permit modification under the National Pollutant Discharge Elimination System (NPDES) to the EcoElectrica facility in the Municipality of Peñuelas, Puerto Rico. EcoElectrica requested the modification of eliminating Outfalls 001a, 001b and 001c and replacing them with a single Outfall 001 following a change in the physical layout of the facility.

The modifications to this permit address the location for compliance with technology-based effluent limitations as required by 40 CFR Part 423: Effluent Limitation Guidelines for the Steam Electric Point Source Category. No modifications have been made to water-quality based effluent limitations as required by the July 8, 2003 water quality certificate issued by the Puerto Rico Environmental Quality Board (EQB). Treated streams from the neutralization system and oil/water separators are proposed for use as cooling water after going through a filter system. Wastewater from the cooling tower blowdown and blowdown from the heat recovery steam generators will be discharged from a single outfall 001 with a daily maximum of 21.4 MGD.

These modifications are proposed in accordance with 40 CFR §122.62(a)(1), which allows for modifications to NPDES permit where there have been material and substantial alterations or additions to the permitted facility or activity which occurred after permit issuance which justify the application of permit conditions that are different or absent in the current permit. EcoElectrica requested this modification in a letter dated March 1, 2010, which described the changes to the internal wastestreams whereby wastewater that was formerly discharged is now treated and reused in the cooling process. Additionally, EcoElectrica described these modifications in a presentation to EPA on April 23, 2010. This letter and presentation are part of the administrative record for this permit modification.

This modification to the NPDES permit consists of the following:

1. Changing the cover page to provide to specify the effective date of the modified NPDES permit and to provide re-signature of the modified permit.
2. Revising Table A-1 to remove effluent limitation tables for Outfalls 001 a, 001 b and 001 c and replacing with one table for the single Outfall 001. The modified Table A-1 (Modified pages 1-8), will replace Tables A-1, A-1(a), A-1(b), and A-1(c) (Existing Permit pages 1-8). The conditions from the existing permit on pages 1-8 will cease to be in effect upon the effective date of permit modification.