

**ATTACHMENT**  
RESPONSE TO COMMENTS ON  
DRAFT NPDES PERMIT MODIFICATION FOR  
ECOELÉCTRICA LNG TERMINAL AND COGENERATION FACILITY  
(PR0025984)

On June 11, 2010, the United States Environmental Protection Agency (EPA) issued a draft National Pollutant Discharge Elimination System (NPDES) permit modification (PR0025984) to Ecoeléctrica, LP for its Liquefied Natural Gas (LNG) Terminal And Cogeneration Facility in Peñuelas, Puerto Rico. Public notice of the draft permit modification was provided in the *Puerto Rico Daily Sun* newspaper on June 11, 2010. The public comment period for the draft NPDES permit expired on July 12, 2010.

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.

One comment was received on behalf of the applicant from the following party:

**Karín G. Díaz-Toro**  
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**Attorneys and Counselors at Law**  
**Environmental, Natural Resources, and Land Use**  
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All comments received have been reviewed and considered in this final permit decision. A discussion and response to the comments received are included below.

All references to the Effective Date of Permit Modification (EDPM) have been changed to November 1, 2010. The expiration date of this permit (October 31, 2011) will remain the same. The changed pages included in this permit modification will replace pages 1- 8 of the existing permit.

**Table A-1 Description of Discharges**

The proposed revised description of Discharge 001 should be revised as follows, in order to accurately reflect all facility streams:

During the period beginning on EDPM and lasting through October 31, 2011, the permittee is authorized to discharge from outfall serial number 001 ~~treated~~ cooling tower blowdown (~~streams from neutralization system and oil/water separators~~) and ~~treated sanitary wastewater~~ [cooling tower blowdown; heat recovery steam generator blowdown; desalinization plant brine blowdown; backwash water from the remineralization system (demineralizer wastewater, laboratory drains (wastewaters from sample analysis equipment and glassware cleaning), tank washed and chemical dike drains, and demineralizer backwash); and treated stream from the oil/water separators (oily water from plant floor drains and equipment drain lines, and remineralizer drains)]. Such discharge shall be limited and monitored by the permittee. . .

**EPA Response:**

*The purpose of this permit modification is to address changes to the facility that have resulted in recycling and treatment of wastestreams prior to discharge. EPA has revised the discharge description to include the wastestreams as listed in this comment.*