

ATTACHMENT I
RESPONSIVENESS SUMMARY AND CHANGES
FOR THE FOLLOWING DRAFT PERMITS

Aibonito WWTP (PR0025461)
Comerio WWTP (PR0025658)
Lajas WWTP (PR0020575)
Orocovis WWTP (PR0020745)
Utuaado WWTP (PR0026603)

On **July 31, 2014**, the United States Environmental Protection Agency (EPA) issued draft National Pollutant Discharge Elimination System (NPDES) permits for Water Treatments Plants (WTP's) and Wastewater Treatment Plants (WWTPs) 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: 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 WQs, 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.

AIBONITO WWTP (PR0025461) COMMENTS

Comment 1: In the header of Page 1 the NPDES # (<PR0025461>) must be corrected. The symbols "<" and ">" must be deleted. The numbering in some pages must be corrected. Some pages indicate that the document has a total of 17 pages, but in others indicate a total of 20 pages.

Response: This was a typographical error. The final permit has been revised.

Comment 2: Rationale for Permit Requirements for Permit- The acronyms TBEL, WQBEL and CFR must be defined before they are used. Also the acronyms used TBELS

and WQBELS do not require to have the "S" at the end. The reference made to "40 CFR Part 122" is incorrect. EPA must use the correct reference in the Code of Federal Regulations (CFR) for the "Secondary Treatment Standards". The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

Response: These were a typographical errors. The final permit has been revised.

Comment 3: Water Quality Certificate: The acronym PR QS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it. The date used ("April 8, 2014") for the Environmental Quality Board's (EQB's) certification corresponds to the Draft Water Quality Certificate (WQC). Therefore, this section must be modified accordingly. In other instances, when the EPA's Final NPDES permit be issued, this section must make reference to the issuance date of the EQB's Final WQC.

Response: The acronym PRQS was revised accordingly, this was a typographical error. The date of the final WQC was revised as needed in the final NPDES permit, September 24, 2014. EPA was waiting on this WQC in order to finalize the permit.

Comment 4: Mixing Zone Dilution Allowance: The statement indicating that "a mixing zone or dilution allowance" has not been approved by EQB is not correct. A Waste Load Allocation (WLA) was performed by EQB, which is a "dilution allowance". Therefore, EPA must correct the statement.

Response: This was a typographical error. The final permit has been revised.

Comment 5: Mixing Zone Dilution Allowance: The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

se: This was a typographical error. The final permit has been revised.

Comment 6: Part II Effluent Limitations and Monitoring Requirements: The Section Header is incomplete. It must be identified as "PART II. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS".

Response: This was a typographical error. The final permit has been revised.

Comment 7: Effluent Limitations Table - Effluent Flow: PRASA's NPDES Permit Renewal Application dated May 30, 2012 in its age 3 of Form 2A (Item A.6.a) clearly indicates that the limit of "1.8 MGD" corresponds to the plant's monthly average design flow rate. Therefore, the 1.8 MGD limit must be moved from the "Maximum daily" column to the "Average monthly" column and establish "Monitor only" in the "Maximum daily" column.

Also, the footnote (1) must be added to this parameter.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above. Footnote (1) was added to this parameter for

clarification purposes.

Comment 8: Effluent Limitations Table - Effluent BOD, 5-day (20°C): The values "45" and "306" corresponding to the concentration (mg/L) and mass loading (kg/day) limitations, respectively, must be moved the "Average weekly" column according to Secondary Treatment Regulation (40 CFR 33.102) definition. Dashes (--) must be added to the "Maximum daily" column.

Also, the "Minimum sampling frequency" for the minimum % removal must be modified to '1/Month'. Since this is a calculation (not a sampling) and it is calculated every month, RASA understands that it must appear as "1/Month" as it is in the TSS-Effluent % removal limitation. The "1/Week" term can be erroneously interpreted that the B00₅ % removal must be calculated weekly.

Response: These were typographical errors. The final permit has been revised accordingly.

Comment 9: Effluent Limitations Table - Effluent TSS: The values "45" and "306" corresponding to the concentration (mg/L) and mass loading (kg/day) limitations, respectively, must be moved to the "Average weekly" column according to Secondary Treatment Regulation (40 CFR 133.102) definition. Dashes (--) must be added to the "Maximum daily" column.

Response: These were typographical errors. The final permit has been revised accordingly.

Comment 10: Effluent Limitations Table - Fecal Coliforms: The 200 value corresponding to the colonies/100mL was moved to the "Average monthly" column in accordance to the footnote (2). Dashes (--) must be added to the "Maximum daily" column.

Response: These were typographical errors. The final permit has been revised accordingly.

Comment 11: Effluent Limitations Table - Chromium VI: PRASA does not understand why footnotes (2) and (3) are applicable to this parameter. EPA must explain or clarify.

Response: These were typographical errors, the footnote were deleted for this parameter. The final permit has been revised accordingly.

Comment 12: Effluent Limitations Table - Cyanide Free: The footnote (4) must be added to this parameter.

Response: This was a typographical errors. The final permit has been revised accordingly.

Comment 13: Effluent Limitations Table - Dissolved Oxygen: The following footnote must be added to clarify the dissolved oxygen limitation: "The Dissolved Oxygen limit is an instantaneous minimum"

The concentration units must be written with the L capital letter (that is, mg/L) as it is written in others applicable parameters.

Response: The note was added in order to clarify the dissolved oxygen limitation. The units for DO were revised accordingly.

Comment 14: Effluent Limitations Table - Suspended Colloidal or Settleable Solids: the units must be corrected to "mL/L". PRASA does not understand why footnotes (1), (2) and (3) are applicable to this parameter. EPA must explain or clarify.

Response: These were typographical errors; footnotes (2) and (3) were deleted from this parameter. The final permit has been revised accordingly.

Comment 15: Effluent Limitations Table - Temperature: the units of Fahrenheit (°F) must be deleted. The limit that appears in the table corresponds to Celsius (°C). Also the symbol "<" and the units of Celsius (°C) next to the limit of 32.2 must be deleted since they are redundant.

Response: These were typographical errors. The final permit has been revised accordingly.

Comment 16: Effluent Limitations Table - Total Ammonia (NH₃): The concentration units must be written with the L capital letter (that is, mg/L) as it is written in others applicable parameters.

Response: This was a typographical error. The final permit has been revised accordingly.

Comment 17: Effluent Limitations Table - TDS: The concentration units must be written with the L capital letter (that is, mg/L) as it is written in others applicable parameters.

Response: These were typographical errors. The final permit has been revised accordingly.

Comment 18: Effluent Limitations Table - Total Phosphorus: The concentration units must be written with the L capital letter (that is mg/L) as it is written in others applicable parameters.

Response: These were typographical errors. The final permit has been revised accordingly.

Comment 19: Effluent Limitations Table – Turbidity: PRASA does not understand why this parameter is still in the permit. The historic data clearly shows that there is no reasonable potential that the applicable water quality standard (WQS) be exceeded. From more than 70 analyses conducted since December 2007 until December 2013, only one (1) exceedance was reported (but it occurred more than six (6) years ago). This demonstrates that the plant consistently comply with the WQS. For these reasons, PRASA requests that this parameter be deleted from the permit. The historic data and the reasonable potential analysis (RPA) are included.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. The final WQC incorporates a less monitoring sampling frequency from Monthly to Quarterly which is now reflected in the final NPDES permit. See response to A., above.

Comment 20: Effluent Limitations Table - Footnote 5: PRASA did not find the compliance schedule established for TRC as indicated in this footnote. EPA must clarify.

Response: This was a typographical error. The final permit has been revised accordingly.

Comment 21: Effluent Limitations Table - Footnote (γ): must be modified to reference the correct Special Conditions. It must read as follows: "(γ) - See Special Conditions 6 and 7."

Response: This was a typographical error. The final permit has been revised accordingly.

Comment 22: Effluent Limitations Table - Footnote (φ): must be modified to reference the correct Special Condition. It must read as follows: "(φ) - See Special Condition 10."

Response: This was a typographical error. The final permit has been revised accordingly.

Comment 23: Effluent Limitations Table - Footnote δ: -must be modified to reference the correct Special Condition. It must read as follows: "(δ) - See Special Condition 11."

Response: This was a typographical error. The final permit has been revised accordingly.

Comment 24: Effluent Limitations Table - A-2. Ambient Monitoring Requirements Waste Load Allocation: The "Notes" column must be deleted. Apparently, it is not necessary since it do not have any information.

Footnote (*) — PRASA does not understand to which parameter this footnote apply. EPA must clarify.

Response: This was a typographical error, the note has been deleted from the final permit.

Comment 25: Effluent Limitations Table - PART III. REPORTING REQUIREMENTS AND COMPLIANCE DETERMINATION: The Section Header is incomplete. It must be identified as "PART III. REPORTING REQUIREMENTS AND COMPLIANCE DETERMINATION".

Response: This was a typographical error. The final permit has been revised accordingly.

Comment 26: Effluent Limitations Table - PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Special Condition 1: Based on our comment for "Effluent Flow" in Part II.A, PRASA requests that the 1.8 MGD flow discharge limitation be referred as monthly average.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 27: Effluent Limitations Table - PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Special Condition 17: It indicates that "a semiannual report shall be submitted to EQB and EPA". However, it does not indicate the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. The final WQC incorporates more specific language to which office to submit Biosolids Reports which is now reflected in the final NPDES permit. See response to A-1 above.

Nevertheless the information was included in the draft permit already in Section 4. Additional Special Conditions, Part B- Biosolid, Biosolids Reporting Requirements, item d., Page 16 of 17 of the final NPDES permit.

B. COMERIO WWTP (PR0025658) COMMENTS

Comment 1: The numbering in some pages must be corrected. Some pages indicate that the document has a total of 17 pages, but in others indicate a total of 20 pages.

Response: This was a typographical error. The final permit has been revised.

Comment 2: Rationale for Permit Requirements for Permit: The acronyms TBEL, QBEL and CFR must be defined before they are used. Also the acronyms used TBELS

and WQBELS do not require to have the "S" at the end. The reference made to "40 CFR Part 122" is incorrect. EPA must use the correct reference in the Code of Federal Regulations (CFR) for the "Secondary Treatment Standards". The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

Response: These were a typographical errors. The final permit has been revised.

Comment 3: Water Quality Certificate: The acronym PR QS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it. The date used ("April 8, 2014") for the Environmental Quality Board's (EQB's) certification corresponds to the Draft Water Quality Certificate (WQC). Therefore, this section must be modified accordingly. In other instances, when the EPA's Final NPDES permit be issued, this section must make reference to the issuance date of the EQB's Final WQC.

Response: The acronym PRQS was revised accordingly, this was a typographical error. The date of the final WQC was revised as needed in the final NPDES permit, September 24, 2014. EPA was waiting on this WQC in order to finalize the permit.

Comment 4: Mixing Zone Dilution Allowance: The statement indicating that "a mixing zone or dilution allowance" has not been approved by EQB is notcorrect. A Waste Load Allocation (WLA) was performed by EQB, which is a "dilution allowance". Therefore, EPA must correct the statement.

Response: This was a typographical error. The final permit has been revised.

Comment 5: Antidegradation and Antibacksliding Requirements: The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

Response: This was a typographical error. The final permit has been revised.

Comment 6: Part II Effluent Limitations: PRASA understands that this section must be labeled as "A-1. Final Effluent Limitations --- Outfall Number 001", since the next section was labeled as "A-2. Ambient Monitoring Requirements Waste Load Allocation".

Response: This was a typographical error. The final permit has been revised.

Comment 7: Effluent Limitations Table – Effluent BOD % Removal: the "Minimum sampling frequency" for the minimum % removal must be modified to '1/Month". Since this is a calculation (not a sampling) and it is calculated every month, PRASA understands that it must appear as "1/Month" as it is in the TSS-Effluent % removal limitation. The "1/Week" term can be erroneously interpreted that the B005 % removal must be calculated weekly.

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

In addition, EPA has revised mass loading limitations for BOD to correct a typographical error and reflect the correct limitation in the final permit.

Comment 8: Effluent Limitations Table: Cadmium: this unit must be corrected to $\mu\text{g/L}$ instead of ug/L .

Response: This was a typographical error. The final permit has been revised.

Comment 9: Effluent Limitations Table: Cyanide Free: this unit must be corrected to $\mu\text{g/L}$ instead of ug/L .

Response: This was a typographical error. The final permit has been revised.

Comment 10: Effluent Limitations Table - Effluent Flow: PRASA's NPDES Permit Renewal Application dated May 30, 2012 in its age 3 of Form 2A (Item A.6.a) clearly indicates that the limit of "1.8 MGD" corresponds to the plant's monthly average design flow rate. Therefore, the 1.8 MGD limit must be moved from the "Maximum daily" column to the "Average monthly" column and establish "Monitor only" in the "Maximum daily" column.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 11: Effluent Limitations Table: Mercury: this unit must be corrected to $\mu\text{g/L}$ instead of ug/L .

Response: This was a typographical error. The final permit has been revised.

Comment 12: Effluent Limitations Table: Nitrate plus Nitrite: this unit must be corrected to $\mu\text{g/L}$ instead of ug/L .

Response: This was a typographical error. The final permit has been revised.

Comment 13: Effluent Limitations Table: Oil and Grease: Dashes (--) must be added to the "Average monthly" and "Average weekly" columns. Also, the phrase "Monitor only" must be added to the "Maximum daily" column.

Response: This was a typographical error. The final permit has been revised.

Comment 14: Effluent Limitations Table: Fecal Coliforms: This parameter is regulated ONLY in two (2) instances; the Geometric Mean and in the % Exceeding 400. The 400 value is not a daily maximum limit. Therefore, dashes (--) must be included in the "Maximum daily" column", instead of the 400 value.

Response: These were typographical errors. The final permit has been revised accordingly.

Comment 15: Silver: this unit must be corrected to $\mu\text{g/L}$ instead of ug/L .

Response: This was a typographical error. The final permit has been revised.

Comment 16: Effluent Limitations Table: Sulfates: Dashes (--) must be added to the "Average monthly" and "Average Column.

Response: This was a typographical error. The final permit has been revised.

Comment 17: Effluent Limitations Table: Sulfide: EPA must clarify if this parameter refers to "Total Sulfide" or "undissociated S". Also, the units must be corrected to $\mu\text{g/L}$ instead of ug/L , and dashes (--) must be added to the "Average monthly" and "Average weekly" columns.

Response: The final permit has been revised to clarified that the parameter is "undissociated S". The units and dashes were also revised.

Comment 18: Effluent Limitations Table: Surfactants: the units must be corrected to pg/L instead of ug/L . Also, dashes (--) must be added to the "Average monthly" and "Average weekly" columns.

Response: This was a typographical error. The final permit has been revised.

Comment 19: Effluent Limitations Table: "Suspended, Colloidal or Settleable Solids" - Dashes (--) must be added to the "Average monthly" and "Average weekly" columns. Also, the phrase "Monitor only" must be added to the "Maximum daily" column.

Response: This was a typographical error. The final permit has been revised.

Comment 20: Effluent Limitations Table: Temperature: Dashes (--) must be added to the "Average monthly" and "Average weekly" columns.

Response: This was a typographical error. The final permit has been revised.

Comment 21: Effluent Limitations Table: Total Coliforms: PRASA does not understand why this parameter is still in the permit. The historic data clearly shows that there is no reasonable potential that the applicable water quality standard (WQS) be exceeded. From more than 70 analyses conducted since December 2007 until December 2013, only one (1) exceedance was reported (but it occurred more than five (5) years

ago). This demonstrates that the plant consistently comply with the WQS. For these reasons, PRASA requests that this parameter be deleted from the permit. The historic data and the reasonable potential analysis (RPA) are included.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. The final WQC incorporates a less monitoring sampling frequency from Monthly to Quarterly which is now reflected in the final NPDES permit. See response to A., above.

Comment 22: Effluent Limitations Table: Effluent TSS: The "Minimum sampling frequency" for the minimum % removal must be modified to "1/Month". Since this is a calculation (not a sampling) and it is calculated every month, PRASA understands that it must appear as "1/Month". The "1/Week" term can be erroneously interpreted to calculate the % removal weekly.

Response: This was a typographical error. The final permit has been revised.

Comment 23: Effluent Limitations Table: Turbidity: PRASA does not understand why this parameter is still in the permit. The historic data clearly shows that there is no reasonable potential that the applicable water quality standard (WQS) be exceeded. From more than 70 analyses conducted since December 2007 until December 2013, there is NO exceedance reported in more than six (6) years ago. This demonstrates that the plant consistently comply with the WQS. For these reasons, PRASA requests that this parameter be deleted from the permit. The historic data and the reasonable potential analysis (RPA) are included.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. The final WQC incorporates a less monitoring sampling frequency from Monthly to Quarterly which is now reflected in the final NPDES permit. See response to A., above.

Comment 24: Effluent Limitations Table: Footnote 5: PRASA did not find the compliance schedule established for TRC as indicated in this footnote. EPA must clarify.

Response: This was a typographical error. The final permit has been revised.

Comment 25: Effluent Limitations Table - Footnote (φ): must be modified to reference the correct Special Condition. It must read as follows: "(φ) - See Special Condition 10."

Response: This was a typographical error. The final permit has been revised.

Comment 26: Effluent Limitations Table - Footnote δ: must be modified to reference the correct Special Condition. It must read as follows: "(δ) - See Special Condition 11."

Response: This was a typographical error. The final permit has been revised.

Comment 27: Ambient Monitoring Requirements Waste Load Allocation: The "Notes" column must be deleted. The only footnote (Ω) that appears is redundant since it also appears next to the parameter "Hardness (as CaCO3)".

Response: This was a typographical error, the symbol Ω has been placed in the Notes Column.

Comment 28: Effluent Limitations Table - PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Special Condition 1: Based on our comment for "Effluent Flow" in Part II.A, PRASA requests that the 1.0 MGD flow discharge limitation be referred as monthly average.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 29: Effluent Limitations Table - PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Pager 11 of 17: in this page there are two (2) special conditions that were not numbered. They correspond to Special Condition 14 (related to the license required to the "Potable Water and Wastewaters Treatment Plants Operators Examining Board of the Commonwealth of Puerto Rico" and Special Condition 15 (related to the acute toxicity tests).

Response: This was a typographical error. The final permit has been revised.

Comment 30: Effluent Limitations Table - PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Pager 12 of 17: in this page there is a special condition that was not numbered. It corresponds to Special Condition 16 (related to the solid waste generated at the plant). Also, this special condition requires that "a semiannual report shall be submitted to EQB and EPA". However, it does not indicate the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Based on the comments above related to the lack of numbering in various special conditions, EPA must also re-numbered the conditions that follows.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. The final WQC incorporates more specific language to which office to submit Biosolids Reports which is now reflected in the final NPDES permit. See response to A-1 above.

Nevertheless the information was included in the draft permit already in Section 4. Additional Special Conditions, Part B- Biosolid, Biosolids Reporting Requirements, item d., Page 16 of 17 of the final NPDES permit.

C. LAJAS WWTP (PR0020575) COMMETS

Comment 1: Rationale for Permit Requirements for Permit: The acronyms TBEL, WQBEL and CFR must be defined before they are used. Also the acronyms used TBELS and WQBELS do not require to have the "S" at the end. The reference made to "40 CFR Part 122" is incorrect. EPA must use the correct reference in the Code of Federal Regulations (CFR) for the "Secondary Treatment Standards". The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

Response: These were a typographical errors. The final permit has been revised.

Comment 2: Water Quality Certificate: The acronym PR QS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it. The date used ("April 8, 2014") for the Environmental Quality Board's (EQB's) certification corresponds to the Draft Water Quality Certificate (WQC). Therefore, this section must be modified accordingly. In other instances, when the EPA's Final NPDES permit be issued, this section must make reference to the issuance date of the EQB's Final WQC.

Response: The acronym PRQS was revised accordingly, this was a typographical error. The date of the final WQC was revised as needed in the final NPDES permit, September 24, 2014. EPA was waiting on this WQC in order to finalize the permit.

Comment 3: Antidegradation and Antibacksliding Requirements: The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

Response: This was a typographical error. The final permit has been revised.

Comment 4: Effluent Limitations Table - Effluent BOD, 5-day (20°C): The "Minimum sampling frequency" for the minimum % removal must be modified to '1/Month'. Since this is a calculation (not a sampling) and it is calculated every month, PRASA understands that it must appear as "1/Month" as it is in the TSS-Effluent % removal limitation. The "1/Week" term can be erroneously interpreted that the B005 % removal must be calculated weekly.

Response: This was a typographical error. The final permit has been revised.

Comment 5: Effluent Limitations Table - Fecal Coliforms: This parameter is regulated ONLY in two instances; the Geometric Mean and in the % Exceeding 400. The 400 values is not a daily maximum limit. Therefore, dashes (--) must be included in the "Maximum daily" column, instead of the 400 value.

Response: This was a typographical error. The final permit has been revised.

Comment 6: Effluent Limitations Table - Effluent Flow: PRASA's NPDES Permit Renewal Application dated May 30, 2012 indicates that this value corresponds to the plant's Monthly Average design flow rate. Also, plant's design data received from our South Region indicates that the plant was designed for a Daily Maximum Flow of 3.6 MGD. Therefore, PRASA requests that the flow limitation be revised accordingly.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 7: Effluent Limitations Table: Nitrate plus Nitrite: PRASA does not understand why this parameter is still in the permit. The historic data clearly shows that there is no reasonable potential that the applicable water quality standard (WQS) be exceeded. From more than 70 analyses conducted since December 2007 until December 2013, there is NO exceedance reported in more than six (6) years ago. This demonstrates that the plant consistently comply with the WQS. For these reasons, PRASA requests that this parameter be deleted from the permit. The historic data and the reasonable potential analysis (RPA) are included.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 8: Effluent Limitations Table: Sulfates: the footnote (α) that appears next to the parameter must be moved to the "Notes" Column.

Response: This was a typographical error. The final permit has been revised.

Comment 9: Effluent Limitations Table: Sulfide: EPA must clarify if this parameter refers to "Total Sulfide" or "undissociated S".

Response: The final permit has been revised to clarified that the parameter is "undissociated S".

Comment 10: Effluent Limitations Table: Footnote 5: PRASA did not find the compliance schedule established for TRC as indicated in this footnote. EPA must clarify.

Response: This was a typographical error, the footnote was deleted from the final permit.

Comment 11: PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Special Condition 1: Based on our comment for 'Effluent Flow' in Part II.A, PRASA requests that the 1.2 MGD flow discharge limitation be referred as monthly average.

Response: This was a typographical error. The final permit has been revised.

Comment 12: PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Special Condition 12: It indicates that "a semiannual report shall be submitted to EQB and EPA". However, it does not indicate the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. The final WQC incorporates more specific language to which office to submit Biosolids Reports which is now reflected in the final NPDES permit. See response to A-1 above.

Nevertheless the information was included in the draft permit already in Section 4. Additional Special Conditions, Part B- Biosolid, Biosolids Reporting Requirements, item d., Pages 16 & 17 of 17 of the final NPDES permit.

OROCOVIS WWTP (PR0020745) COMMENTS

Comment 1: The numbering in some pages must be corrected. Some pages indicate that the document has a total of 16 pages, but in others indicate a total of 20 pages.

Response: This was a typographical error. The final permit has been revised.

Comment 2: Rationale for Permit Requirements for Permit: The acronyms TBEL, WQBEL and CFR must be defined before they are used. Also the acronyms used TBELS and WQBELS do not require to have the "S" at the end. The reference made to "40 CFR Part 122" is incorrect. EPA must use the correct reference in the Code of Federal Regulations (CFR) for the "Secondary Treatment Standards". The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

Response: These were a typographical errors. The final permit has been revised.

Comment 3: Water Quality Certificate: The acronym PR QS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it. The date used ("April 8, 2014") for the Environmental Quality Board's (EQB's) certification corresponds to the Draft Water Quality Certificate (WQC). Therefore, this section must be modified accordingly. In other instances, when the EPA's Final NPDES permit be issued, this section must make reference to the issuance date of the EQB's Final WQC.

Response: The acronym PRQS was revised accordingly, this was a typographical error. The date of the final WQC was revised as needed in the final NPDES permit, September 24, 2014. EPA was waiting on this WQC in order to finalize the permit.

Comment 4: Mixing Zone Dilution Allowance: The statement indicating that "a mixing zone or dilution allowance" has not been approved by EQB is not correct. A Waste Load Allocation (WLA) was performed by EQB, which is a "dilution allowance". Therefore, EPA must correct the statement.

Response: This was a typographical error. The final permit has been revised.

Comment 5: Antidegradation and Antibacksliding Requirements: The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

Response: This was a typographical error. The final permit has been revised.

Comment 6: Part II Effluent Limitations and Monitoring Requirements: PRASA understands that this section must be labeled as "A-1. Final Effluent Limitations --- Outfall Number 001", since the next sections were labeled as "A-2. Ambient Monitoring Requirements Waste Load Allocation" and A-3 Model Calibration Monitoring Requirements."

Response: This was a typographical error. The final permit has been revised.

Comment 7: Effluent Limitations Table - Effluent Flow: PRASA's NPDES Permit Renewal Application dated May 30, 2012 indicates that the limit of 0.5 MGD corresponds to the plant's Monthly Average design flow rate. Therefore, the 0.5 MGD limit must be moved from the "Maximum daily" column to the Average Monthly" column and establish "Monitor only" in the "Maximum Daily Column".

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 8: Effluent Limitations Table - Effluent BOD, 5-day (20°C): The "Minimum sampling frequency" for the minimum % removal must be modified to "1/Month". Since this is a calculation (not a sampling) and it is calculated every month, RASA understands that it must appear as "1/Month" as it is in the TSS-Effluent % removal limitation. The "1/Week" term can be erroneously interpreted that the BOD₅ % removal must be calculated weekly.

Response: This was a typographical error. The final permit has been revised.

In addition, EPA has revised mass loading limitations for BOD to correct a typographical error and reflect the correct limitation in the final permit.

Comment 9: Effluent Limitations Table: Copper: Dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 10: Effluent Limitations Table: Dissolved Oxygen: Dashes (--) must be added to the Average Monthly and Average Weekly.

Response: This was a typographical error. The final permit has been revised.

Comment 11: Effluent Limitations Table: Mercury: Dashes (--) must be added to the Average Monthly and Average Weekly columns.

Response: This was a typographical error. The final permit has been revised.

Comment 12: Effluent Limitations Table: Nitrate plus Nitrite (as N): Dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 13: Effluent Limitations Table: Oil and Grease: PRASA does not understand the correlation between "Note 5" and this parameter. EPA must clarify. Also, dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error, Note 5 has been deleted in the final permit.

Comment 14: Effluent Limitations Table: Residual Chlorine: Dashes (--) must be added to the Average Monthly and Average weekly column.

Response: This was a typographical error. The final permit has been revised.

Comment 15: Effluent Limitations Table: Fecal Coliform: Dashes (--) must be added to the Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 16: Effluent Limitations Table: Free Cyanide (CN): Dashes (--) must be added to the Average Weekly and Maximum Daily columns.

Response: This was a typographical error. The final permit has been revised.

Comment 17: Effluent Limitations Table: Sulfates (SO₄): Dashes (--) must be added to the Average Weekly and Average Monthly columns.

Response: This was a typographical error. The final permit has been revised.

Comment 18: Effluent Limitations Table: Sulfide (undissociated H₂S): Dashes (--)

must be added to the Average Weekly and Maximum daily columns. Also, the footnote (ξ) included in the Notes column must be deleted since it makes reference to Special Condition 10 which is related to Mercury. Instead the footnote that makes reference to Special Condition 11 must be added.

Response: This was a typographical error. The final permit has been revised.

Comment 19: Effluent Limitations Table: Surfactants (as MBAS): Dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 20: Effluent Limitations Table: Turbidity (as N): Dashes (--) must be added to the Average Weekly and Maximum daily columns.

Response: This was a typographical error. The final permit has been revised.

Comment 21: Effluent Limitations Table: Suspended Colloidal or Settleable Solids: PRASA does not understand the correlation between Note 1 and this parameter. EPA must clarify. Also, dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 22: Effluent Limitations Table: Temperature: PRASA does not understand the correlation between Note 2 and this parameter. EPA must clarify. Dashes (--) must be added to the Average Weekly and Maximum daily columns.

Response: This was a typographical error. The final permit has been revised.

Comment 23: Effluent Limitations Table: Zinc: PRASA does not understand why this parameter is still in the permit. The historic data clearly shows that there is no reasonable potential that the applicable water quality standard (WQS) be exceeded. From more than 70 analyses conducted since December 2007 until December 2013, there is NO exceedance reported in more than six (6) years ago. This demonstrates that the plant consistently comply with the WQS. For these reasons, PRASA requests that this parameter be deleted from the permit. The historic data and the reasonable potential analysis (RPA) are included.

Response: EPA has deleted pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 24: Effluent Limitations Table: Total Ammonia NH₃ (as N): Dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 25: Effluent Limitations Table: Total Coliforms: Dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 26: Effluent Limitations Table: Total Phosphorus: Dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 27: Effluent Limitations Table: Total Suspended Solids: Apparently there are two limitations in the Average Monthly column. EPA must explain. Also, dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 28: Effluent Limitations Table: Lead (Pb): PRASA does not understand why this parameter is still in the permit. The historic data clearly shows that there is no reasonable potential that the applicable water quality standard (WQS) be exceeded. From more than 70 analyses conducted since December 2007 until December 2013, there is NO exceedance reported in more than six (6) years ago. This demonstrates that the plant consistently comply with the WQS. For these reasons, PRASA requests that this parameter be deleted from the permit. The historic data and the reasonable potential analysis (RPA) are included.

Response: EPA has deleted pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 29: Effluent Limitations Table: Total Dissolved Solids: Dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 30: Effluent Limitations Table: Chromium VI (CR⁺⁶): Dashes (--) must be added to the Average Weekly and Maximum daily column.

Response: This was a typographical error. The final permit has been revised.

Comment 31: Effluent Limitations Table - A-2. Ambient Monitoring

Requirements Waste Load Allocation: The "Notes" column must be deleted. The only footnote (Ω) that appears is redundant since it also appears next to the parameter Hardness (as CaCO₃).

Response: This was a typographical error, the symbol Ω has been placed in the Notes Column.

Comment 32: PART IV. STANDARD AND SPECIAL CONDITIONS B. Special

Conditions, Special Condition 1: Based on our comment for "Effluent Flow" in Part II.A, PRASA requests that the 0.5 MGD flow discharge limitation be referred as monthly average.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 33: PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Special Condition 16: It indicates that "a semiannual report shall be submitted to EQB and EPA". However, it does not indicate the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. The final WQC incorporates more specific language to which office to submit Biosolids Reports which is now reflected in the final NPDES permit. See response to A-1 above.

Nevertheless the information was included in the draft permit already in Section 4. Additional Special Conditions, Part B- Biosolid, Biosolids Reporting Requirements, item d., Pages 16 & 17 of 17 of the final NPDES permit.

D. UTUADO WWTP (PR0026603) COMMENTS

Comment 1: The numbering in some pages must be corrected. Some pages indicate that the document has a total of 16 pages, but in others indicate a total of 20 pages.

Response: This was a typographical error. The final permit has been revised.

Comment 2: Rationale for Permit Requirements for Permit: The acronyms TBEL, WQBEL and CFR must be defined before they are used. Also the acronyms used TBELS and WQBELS do not require to have the "S" at the end. The reference made to "40 CFR Part 122" is incorrect. EPA must use the correct reference in the Code of Federal Regulations (CFR) for the "Secondary Treatment Standards". The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

Response: These were a typographical errors. The final permit has been revised.

Comment 3: Water Quality Certificate: The acronym PR QS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it. The date used ("April 8, 2014") for the Environmental Quality Board's (EQB's) certification corresponds to the Draft Water Quality Certificate (WQC). Therefore, this section must be modified accordingly. In other instances, when the EPA's Final NPDES permit be issued, this section must make reference to the issuance date of the EQB's Final WQC.

Response: The acronym PRQS was revised accordingly, this was a typographical error. The date of the final WQC was revised as needed in the final NPDES permit, September 24, 2014. EPA was waiting on this WQC in order to finalize the permit.

Comment 4: Mixing Zone Dilution Allowance: The statement indicating that "a mixing zone or dilution allowance" has not been approved by EQB is not correct. A Waste Load Allocation (WLA) was performed by EQB, which is a "dilution allowance". Therefore, EPA must correct the statement.

Response: This was a typographical error. The final permit has been revised.

Comment 5: Antidegradation and Antibacksliding Requirements: The acronym PRWQS used for the "Water Quality Standards Regulation" is incomplete. EPA must correct it.

Response: This was a typographical error. The final permit has been revised.

Comment 6: Part II Effluent Limitations and Monitoring Requirements: PRASA understands that this section must be labeled as "A-1. Final Effluent Limitations --- Outfall Number 001", since the next sections were labeled as "A-2. Ambient Monitoring Requirements Waste Load Allocation" and A-3 Model Calibration Monitoring Requirements."

Response: This was a typographical error. The final permit has been revised.

Comment 7: Effluent Limitations Table - Effluent Flow: PRASA's NPDES Permit Renewal Application dated May 30, 2012 in its age 3 of Form 2A (Item A.6.a) clearly indicates that the limit of "2.0 MGD" corresponds to the plant's monthly average design flow rate. Therefore, the 2.0 MGD limit must be moved from the "Maximum daily" column to the "Average monthly" column and establish "Monitor only" in the "Maximum daily" column.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 8: Effluent Limitations Table: Effluent TSS: The "Minimum sampling frequency" for the minimum % removal must be modified to "1/Month". Since this is a calculation (not a sampling) and it is calculated every month, PRASA understands that it must appear as "1/Month". The "1/Week" term can be erroneously interpreted to calculate the % removal weekly.

Response: This was a typographical error. The final permit has been revised.

Comment 9: Effluent Limitations Table: Fecal Coliforms: This parameter is regulated ONLY in two (2) instances; the Geometric Mean and in the % Exceeding 400. The 400 value is not a daily maximum limit. Therefore, dashes (--) must be included in the "Maximum daily" column, instead of the 400 value.

Response: This was a typographical error. The final permit has been revised.

Comment 10: Effluent Limitations Table: Fluoride: PRASA does not understand why this parameter is still in the permit. The historic data clearly shows that there is no reasonable potential that the applicable water quality standard (WQS) be exceeded. From more than 50 analyses conducted since July 2009 until December 2013, there is NO exceedance reported in more than 4 years. This demonstrates that the plant consistently comply with the WQS. For these reasons, PRASA requests that this parameter be deleted from the permit. The historic data and the reasonable potential analysis (RPA) are included.

Response: EPA has deleted pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 11: Effluent Limitations Table: Residual Chlorine: This parameter includes the footnote (γ). However, PRASA does not understand its application specifically to residual chlorine. EPA must clarify the intention to include this footnote for this parameter only.

Response: This was a typographical error. Reference to the footnote was deleted in the final permit.

Comment 12: Effluent Limitations Table: Sulfide: EPA must clarify if this parameter refers to "Total Sulfide" or "undissociated S".

Response: The final permit has been revised to clarified that the parameter is "undissociated S".

Comment 13: Effluent Limitations Table – Total Dissolved Solids: PRASA does not understand why this parameter is still in the permit. The historic data clearly shows that there is no reasonable potential that the applicable water quality standard (WQS) be exceeded. From more than 70 analyses conducted since July 2009 until December 2007 until December 2013, only one (1) exceedance was reported (but it occurred more than six (6) years ago). This demonstrates that the plant consistently comply with the WQS. For these reasons, PRASA requests that this parameter be deleted from the permit. The historic data and the reasonable potential analysis (RPA) are included.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 14: Effluent Limitations Table - Total Phosphorus: On May 12, 2014, PRASA commented on EQB's Draft WQC that the WLA limit was reduced significantly (from 8.2 to 1.86). This, in spite of that the data collected in the background station included in the WLA application showed the following values; 0.119, 0.158 7 0.127 mg/L, which are well below the applicable standard (1 mg/L). For that reason PRASA requested EQB that the calculations be re-evaluated.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 15: Effluent Limitations Table - Footnote 5: PRASA did not find the compliance schedule established for TRC as indicated in this footnote. EPA must clarify.

Response: This was a typographical error. Footnote has been deleted from the final permit.

Comment 16: Effluent Limitations Table - Footnote (y): As indicated above, PRASA does not understand this footnote and its application specifically to residual chlorine.

Response: This was a typographical error. Footnote has been deleted from the final permit.

Comment 17: Ambient Monitoring Requirements Waste Load Allocation- Free Cyanide (CN), Lead (Pb), Nitrate plus Nitrite (as N), Total Phosphorus (P) and Surfactants (as MBAS): These parameters include the Notes (1, 2, 3). PRASA does not understand what are these notes? Where are the references? EPA must clarify.

Response: This was a typographical error. Notes have been deleted from the final permit.

Comment 18: PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Special Condition 1: Based on our comment for "Effluent Flow" in Part II.A, PRASA requests that the 0.5 MGD flow discharge limitation be referred as monthly average.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. See response to A., above.

Comment 19: PART IV. STANDARD AND SPECIAL CONDITIONS B. Special Conditions, Special Condition 16: It indicates that "a semiannual report shall be submitted to EQB and EPA". However, it does not indicate the person or the specific office from both agencies that PRASA must report. EPA must be more specific.

Response: EPA has incorporated this limit pursuant to the final WQC mandated by EQB. The final WQC incorporates more specific language to which office to submit

Biosolids Reports which is now reflected in the final NPDES permit. See response to A-1 above.

Nevertheless the information was included in the draft permit already in Section 4. Additional Special Conditions, Part B- Biosolid, Biosolids Reporting Requirements, item d., Page 16 of 16 of the final NPDES permit.