

ADDENDUM TO THE PREQB'S PROPOSED 2006 303(d) LIST

In response to the comments issued by EPA on March 1, 2007 on the proposed 2006 303(d) List, we are submitting the current addendum.

All comments and responses provided here have been previously discussed in various conference call with the corresponding EPA representatives. Attached to this Addendum are revised sub-lists for lakes, rivers and the San Juan Bay Estuary. These revised lists address the issues pertaining to the status of specific pollutants in particular assessment units.

Issue pertaining to segmentation: This issue has been addressed and confirmed in the conference calls. The assessment units used for inland waters (river, stream, lakes) in the 2006 305(b) / 303(d) assessment and listing cycle are composed of the sub-watersheds identified in the Integrated Report.

Issue pertaining to assessment units of San Juan Bay: This issue has been addressed and confirmed in conference calls. The new larger assessment units are composed of multiple units, which previously were considered as separate and individual assessment units.

Issues pertaining to absence of old ID PRES0002b_00, PRES0002z9_00, PRSS0003x_00 and PRSS0003z5_00 from new inland waters segmentation system: These segments are not inland waters. These segment constitute part of the coastal shoreline, which was not considered in the new segmentation system for inland waters. The coastal shoreline is being considered in a different segmentation system. With respect to the particular concern raised by EPA pertaining the pollutants identified for these segments, it would be required that they be included under Category 5. However, this determination will be revisited again during the 2008 cycle.

With respect to Lago Matrullas (Rio Grande de Manati) concerning low DO and Rio La Plata concerning copper and selenium, the issues were addressed in the corresponding attached revised 303(d) lists (Lakes list for Matrullas, Rivers list for La Plata).

Issues pertaining to "change in impairment terminology": The issues pertaining to Lago Loiza and Quebrada Blasina were addressed in the corresponding attached 303(d) lists (Lakes list for Loiza and San Juan Bay Estuary list for Blasina).

With respect to the issues pertaining to surfactants and MBAS, we believe these were addressed by the clarification provided with the definition of MBAS as established under Article 1 of the Puerto Rico Water Quality Standards and EPA's use of the terms MBAS and non-priority organics. The terms MBAS, non-priority organics and surfactants (anionic) all refer to the same group of compounds.

Issue pertaining to possible de-listing of particular segments and/or pollutants as result of the PRASA Stewardship findings. At this moment PREQB has not initiated a de-listing process. This process will be initiated in the FY-08 cycle in the basin that have been monitored in accordance with the new segmentation system.

Issue pertaining to Jobos Bay: The field visit we performed to the various stations located in the Jobos Bay Reserve Estuary confirmed many of the concerns PREQB had with respect to the inclusion of the coastal segment in question into Category 5 and thus the 303(d) List. Direct field observations of station 9, which is the station for which EPA presented concerns is affected by a natural salt marsh subject to the tidal levels. During high tide this marsh is flooded and at low tide the flow of oxygen depleted hyper-saline water from the marsh flows directly into the enclosed area where station 9 is located. The sonde that is used to monitor dissolved oxygen and other physical-chemical parameters is located at one foot from the bottom and the overall depth of the site is barely four feet at high tide. We consider that an adequate determination concerning the current water quality status of this segment cannot be made with the available data gathered from this segment up to date. This segment should be considered as Category 3, subject to future water quality data and historical land use data gathering. All photos of Jobos Bay submitted previously concerning the issue of station 9 is made part of this addendum by reference.

Issue pertaining to Category 4B waters: The segments identified under this concern need to be adequately justified in order to remain under Category 4B. PREQB acknowledges this requirement. Although adequate justification can be provided, it will require fieldwork and lengthy documentation that will require a significant time period in order to achieve. Due to the present time constraints, these segments are now considered to be under Category 5 but this determination will be revisited during the FY-08 cycle. At that time we understand that the required supplementary information to support a Category 4B determination will be available.

We understand that issues pertaining to the identification codes for Lake Guajataca and Laguna Tortuguero under the new inland waters segmentation system were adequately addressed previously.

The purpose of this Addendum is to address the remaining issues required complete the submittal / review / approval process of the FY-06 Cycle of the 303(d) List. Attached to this Addendum are revised sub-lists for specific water body groups. The revised lists address the concerns pertaining to the omission of specific pollutants and the identification of particular segments.

Attachments: 2006 Cycle 303(d) List for Lakes (revised)
2006 Cycle 303(d) List for Rivers (revised)
2006 Cycle 303(d) List for San Juan Bay Estuary (revised)