



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 2**  
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION  
MULTIMEDIA PERMITS AND COMPLIANCE BRANCH

**Industrial Facility**  
**NPDES Compliance Evaluation Inspection**

**OWNER/PERMITTEE**

**PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA)**  
G.P.O. Box 364267, San Juan, Puerto Rico 00936-4267

**FACILITY OPERATOR**

**GENERA PR, LLC**  
954 Ave. Ponce de Leon, Miramar Plaza Suite 201, San Juan, PR 00907

**FACILITY**

**SOUTH COAST POWER PLANT**  
PR-127 Road, Cedros Ward, Guayanilla, Puerto Rico 00751  
Coordinates: 18.000447° N; -66.451020° W

**STATUTE AND REGULATIONS**

Sections 301, 308(b) and 402 of the Clean Water Act

NPDES Regulations: 40 C.F.R. Parts 122 and 423

**NPDES Permit Number: PR0001147**

**Inspection Date: September 30, 2024**

**Participating Personnel:**

**U.S. EPA:**

Jaime López  
Senior Physical Scientist  
Clean Water Act Team

**GENERA:**

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Miguel A. Beauchamp, Plant Manager, Tel. 787-479-4751, Email: [alexis.cruz@genera-pr.com](mailto:alexis.cruz@genera-pr.com)

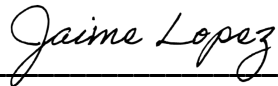
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**Inspection Report Prepared by:**

  
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1-22-2025

Date

**Inspection Report**  
**Approving Officer:**

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Digitally signed by JOSE RIVERA  
Date: 2025.01.22 12:18:10 -04'00'

Date

## 1. **INTRODUCTION**

This Inspection Report is prepared to include findings and observations concerning the National Pollutant Discharge Elimination System (“NPDES”) Compliance Evaluation Inspection (“CEI” or the “Inspection”) conducted by Jaime López, Senior Physical Scientist (the “EPA Inspector”), of the United States Environmental Protection Agency (“EPA”), Region 2, Caribbean Environmental Protection Division (“CEPD”), at the Puerto Rico Electric Power Authority’s (“PREPA”) South Coast Power Plant facility located on PR-127 Road, Cedros Ward, Guayanilla, Puerto Rico (“PREPA South Coast” or the “Facility”), on September 30, 2024.

The purpose of the Inspection was to evaluate Genera PR, LLC’s (“Genera” or the “Operator”) implementation of the terms and conditions of the PREPA South Coast (“NPDES”) Permit Number PR0001147 (the “Permit”), as it relates to the operation and maintenance of the process industrial wastewater treatment facilities (the “IWWTP” or the “Plant”); and operation and maintenance of the storm water collection, conveyance, and discharge system (the “SW System”). The Inspection was also performed to verify the corrective actions taken to address the findings identified in the NPDES Compliance Evaluation Inspection Report, dated July 18, 2022.

Upon showing of credentials to the Genera participants referenced above, the Inspection was performed pursuant to the inspection authority under Section 308(b) of the Federal Water Pollution Control Act (“CWA”). The CEI consisted of an entry meeting to discuss the purpose of the Inspection; a Facility walkthrough to evaluate operational and maintenance conditions of the IWWTP; implementation of Best Management Practices (“BMPs”) for storm water controls including the SW System; a document review; and a closing meeting to discuss preliminary findings, observations, and areas of concern.

## 2. **GENERAL INFORMATION CONCERNING OWNER/PERMITTEE**

The Puerto Rico Electric Power Authority (“PREPA”) is a public corporation of the Government of Puerto Rico created pursuant to Act No. 83 of May 2, 1941, as amended. PREPA owns electric generation, transmission and distribution facilities serving all of Puerto Rico. As the sole electric utility in Puerto Rico, PREPA provides electricity to approximately 1.5 million customers.

## 3. **GENERAL INFORMATION CONCERNING FACILITY OPERATOR**

Genera PR, LLC (“Genera”) is a for-profit corporation organized under the laws of the Commonwealth of Puerto Rico (“PR”). Genera was established on November 10, 2021, and is registered in the Puerto Rico Department of State (“DOS”) under registration number 476191. Genera’s President is Mr. Brannen McElmurray. See information about Genera at <https://rceweb.estado.pr.gov/en/entity-information?c=476191-1511>.

Genera is a subsidiary of the New York-based New Fortress Energy, already a major supplier of liquefied natural gas to Puerto Rico, which won a bid to take over electric power generation from PREPA in early 2023. The company took over electrical generation on July 1, 2023.

#### 4. INFORMATION CONCERNING THE FACILITY AND NPDES PERMIT

##### *Description of the Facility*

PREPA owns and Genera operates the Costa Sur Power Plant consisting of two 410 MW oil and natural gas steam electric generating units, two 85 MW oil-fired electric generating units, and two 22 MW oil-fired combustion turbine units. **Image 1** (below) depicts the Facility's location at southeast of the municipality of Guayanilla, PR. **Figure 1** (next page) depicts Facility's Site Map.

**Image 1<sup>1</sup>**



<sup>1</sup>The source of the photograph is Google Earth, and the photograph is dated March 1, 2024.

Figure 1

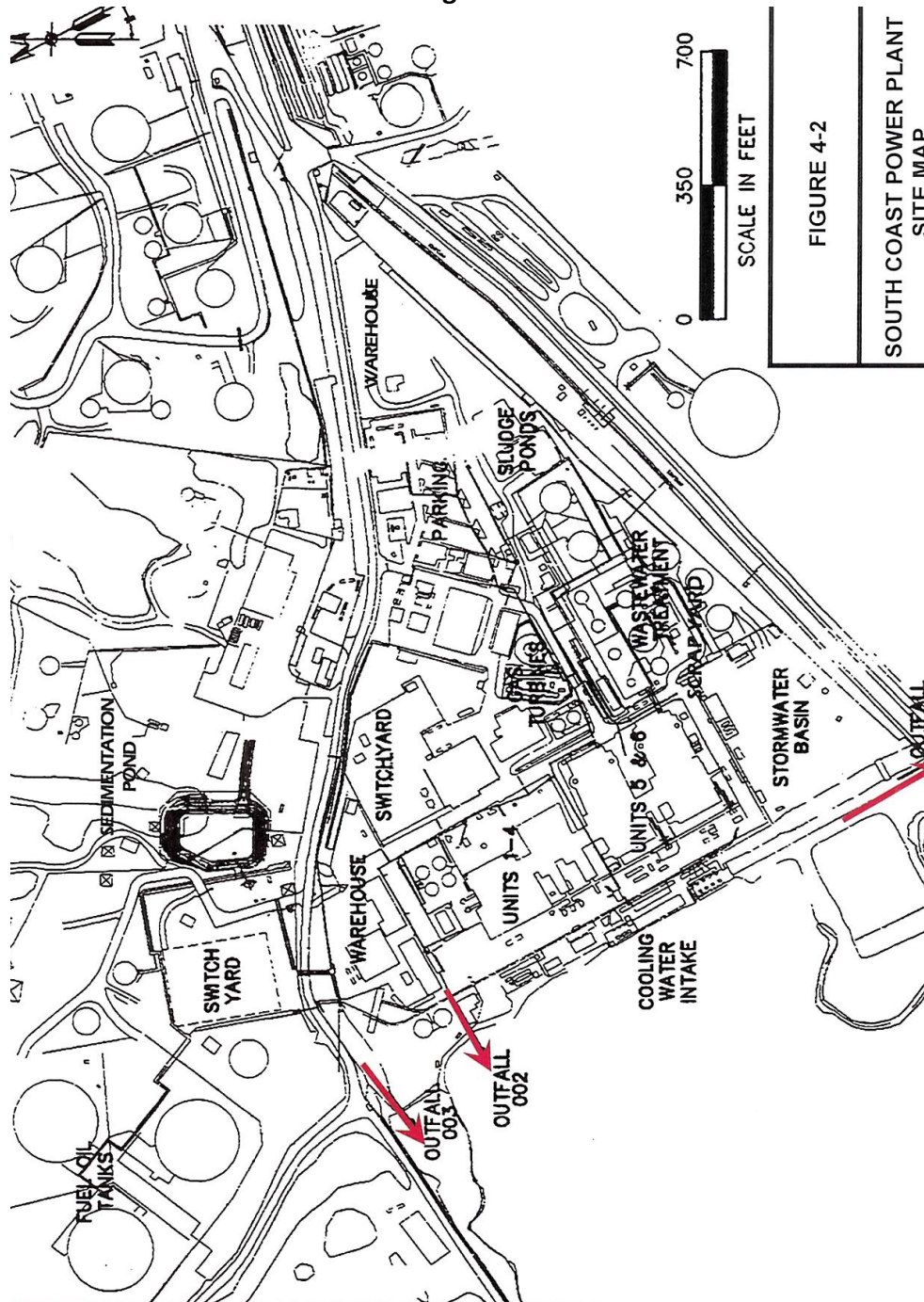


FIGURE 4-2

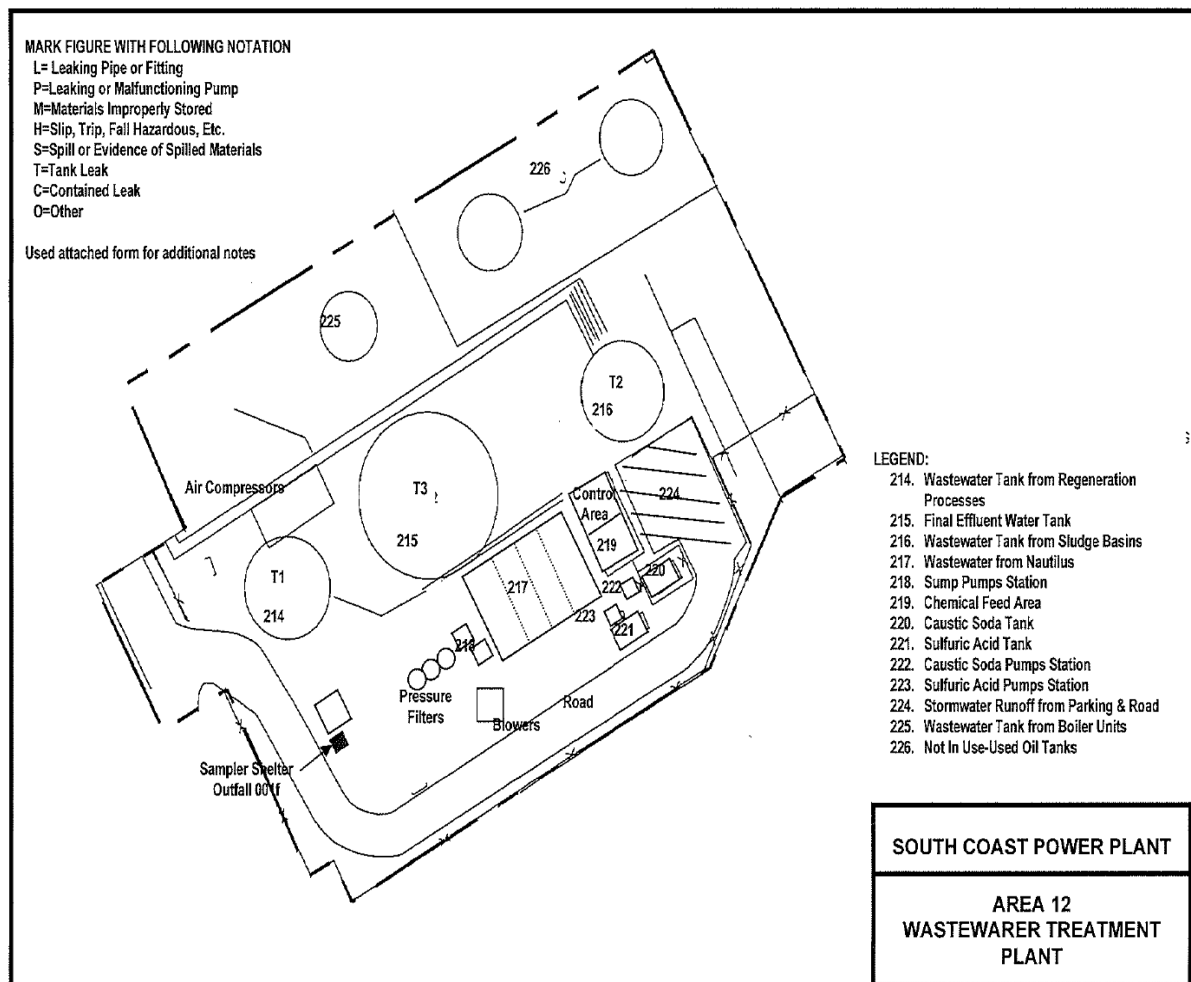
SOUTH COAST POWER PLANT  
SITE MAP

### *Description of the Industrial Wastewater Treatment Plant*

The Facility's onsite wastewater treatment plant provides treatment for the industrial wastewater generated during the power generation process. The wastewater treatment plant consists of three influent equalization tanks, four Nautilus flocculation and clarification units, three polishing filters, and three sludge settling basins. The plant's effluent is discharged into Guayanilla Bay, a navigable water of the United States. Settled sludge from the industrial

wastewater treatment process is hauled to a landfill for disposal. **Figure 2** depicts the schematic flow diagram for the IWWTP.

**Figure 2**



### *Storm Water Collection and Discharge System at the Facility*

The Facility's topography is mainly flat with slight slopes to direct surface runoff towards the Facility's storm sewer collection and discharge system. Stormwater drainage is collected by storm drains throughout the Facility that discharge via subsurface conveyances to six in-ground oil water separators and subsequently to Guayanilla Bay via the Facility's NPDES-permitted outfalls. **Figure 3** (below) depicts the Facility Site Drainage Plan. **Image 2** (page 8) depicts the hydrographic areas near the Facility and the location of the Guayanilla Bay.

Figure 3

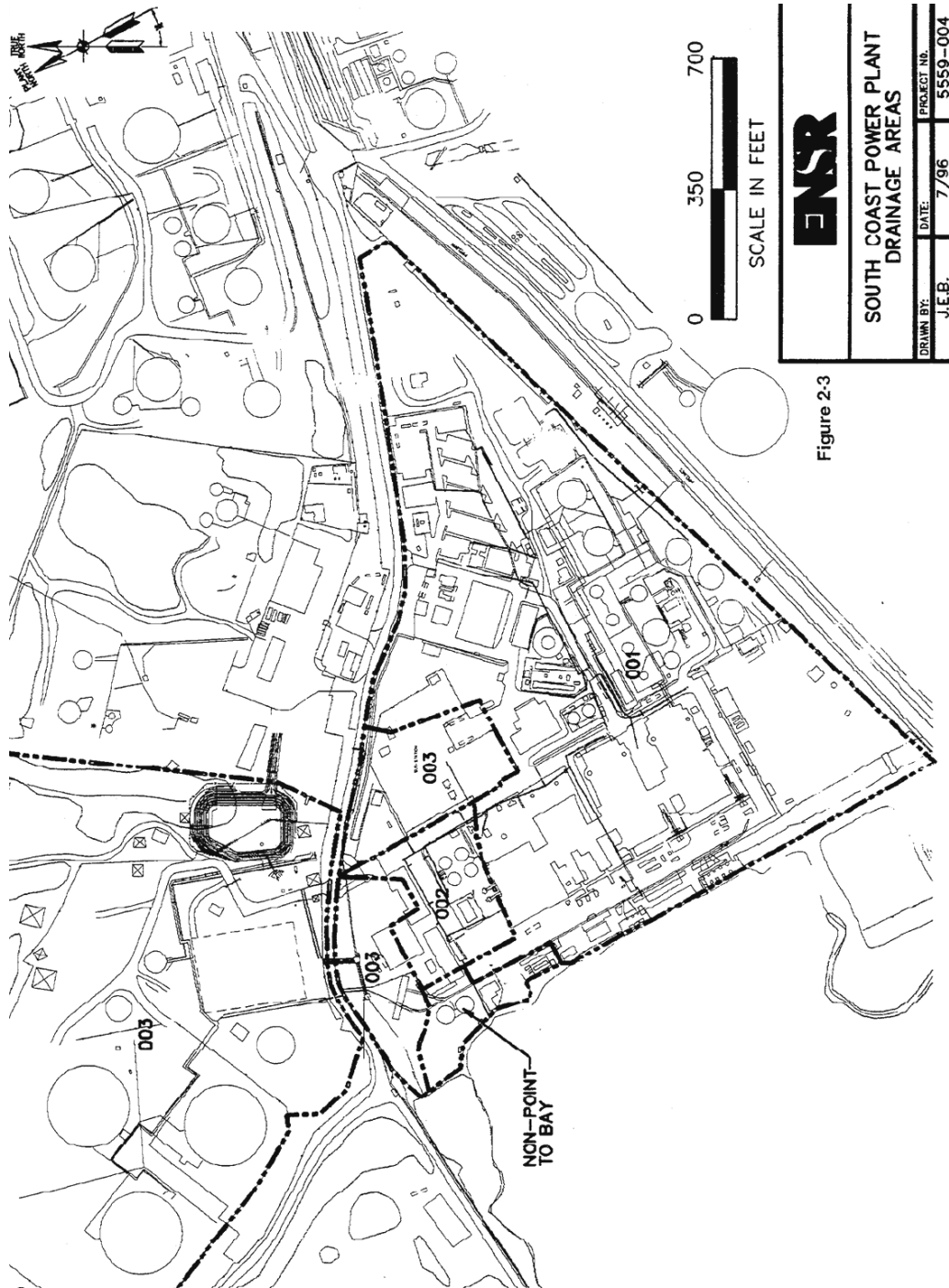


Image 2<sup>2</sup>



### *NPDES Permit*

The Permit became effective on September 1, 2018. The Permit expired on August 31, 2023. On March 6, 2023, PREPA submitted an NPDES permit renewal application. The NPDES Permit has been administratively extended.

The Permit contains effluent limitations for Outfalls 001, 002, and 003, monitoring and reporting requirements, and other conditions for compliance. The Permit authorizes PREPA to discharge the following waste streams to Guayanilla Bay through each outfall:

- **Outfall 001:** Condenser cooling water, cooling tower blowdown, fuel heater system condensate, miscellaneous water use, wastewater treatment plant effluent, stormwater runoff, fire protection system test water and hydrostatic test water.
- **Outfall 002:** Stormwater runoff from machine shop, warehouse, road, and administrative parking lot areas, irrigation water, and hydrostatic test water, all treated in an oil water separator prior to discharge.
- **Outfall 003:** Stormwater runoff from switchyard, sedimentation basin and oil water separator which collects runoff from PREPA property located north of State Road No. 127, and from parking lot/main gate area south of PR-127 Road and hydrostatic test water.

Part II of the Permit includes effluent limitations and monitoring requirements. Part II.A.1 to A5 of the Permit establishes the monitoring data submission requirements (i.e., hard copy form and NetDMR) and the timing of submission of monitoring data. Part III.A of the Permit establishes the requirements for retention of records, implementation and revisions concerning the Storm

<sup>2</sup> Source: Puerto Rico Planning Board GIS Application at [http://gis.otg.pr.gov/apps/pr\\_map/](http://gis.otg.pr.gov/apps/pr_map/).

Water Pollution Prevention Plan (“SWPP Plan”), Best Management Practices (“BMP Plan”), and Preventive Maintenance Plan (“PMP”). Part V.B.3 of the Permit establishes the protocol for monitoring storm water discharges.

## **5. CONSENT DECREE**

On April 1999, PREPA entered in a Consent Decree (“CD”), Civil Action No. 93-2527 CCC, with the United States Department of Justice (“DOJ”) and EPA for violations of the CWA. The CD included injunctive relief and the imposition of civil penalties for violations of the effluent limitations and NPDES requirements under Sections 301 and 402 of the CWA. The EPA Inspector has been monitoring PREPA’s compliance with the conditions of the CD, including inspections of the PREPA South Coast. PREPA submits Quarterly Reports under the CD and has paid stipulated penalties, among others, for reported non-compliance with applicable Permit’s effluent limitations.

## **6. ENTRY MEETING**

The Inspector arrived at the Facility around 12:00 p.m. Upon entry to the Facility, approximately between 12:05 p.m. and 12:20 p.m., the EPA inspector met with the Genera’s representatives referenced above. The EPA Inspector stated that the purpose of the Inspection was to determine Genera’s compliance with the Permit. During the meeting, a presentation mandated by the Health and Safety protocols at PREPA South Coast was provided to the EPA Inspector. Then, the EPA Inspector requested Genera to provide the following documents by October 11, 2024, for off-site review <sup>3</sup>:

- NPDES Permit;
- Discharge Monitoring Reports (“DMRs”), supporting documentation, analytical sampling reports, chain of custody, and rain documentation data collection for the period of July 2022 to August 2024;
- SWPP Plan;
- BMP Plan;
- Calibration records for the flow meters, lab equipment (e.g., Dissolved Oxygen, ph, Temperature, Residual Chlorine), and Turbidity meters;
- Inspections records of routine and comprehensive Facility inspections for the period of July 2022 to August 2024; and
- Corrective Actions Records in response to NPDES Compliance Evaluation Inspection Report, dated July 18, 2022.

## **7. FACILITY WALKTHROUGH**

Approximately between 1:45 p.m. and 3:00 p.m., after lunch, the EPA Inspector proceeded to perform the walkthrough of the IWWTP, Facility’s industrial areas, and Outfall 001, Outfall 002, Outfall 003. The following includes the findings and observations concerning the operation and maintenance of the IWWTP, and the Facility’s walkthrough:

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<sup>3</sup> Genera provided the records requested by email on October 11, 2024.

- a. The IWWTP Nautilus Treatment Units 1, 2, and 3 were actively in operation, while Nautilus Treatment Unit 4 was temporarily out of service for repairs.
- b. The IWWTP's operations room, on-site testing, and review of records, such as calibration of sampling / flow equipment (e.g., pH meter, temperature meter, flow monitoring devices.) were reviewed during the walkthrough. Ms. Magdalena Maldonado provided the record of the pH meter current calibration, which were up to date.
- c. IWWTP Filter 1 was out of service for repair.
- d. The Outfall 001 was discharging at the time of the Inspection. The EPA Inspector did not observe oil sheen, grease, turbidity, floating solids, or color; however, foam was visible.
- e. Outfall 002 was discharging at the time of the Inspection. The EPA Inspector did not observe oil sheen, grease, turbidity, floating solids, foam, or color.
- f. Outfall 003 was not discharging at the time of the Inspection.
- g. At Outfall 001f, a metal box was installed as a sampling point for treated industrial wastewater effluent to ensure the collection of a representative sample.
- h. The southern section of the facility access road, which is near the construction materials staging area, is uncovered and exposed to rainfall. It was noted that this area lacked erosion and sediment control measures.
- i. The housekeeping and implementation of BMPs to control pollutants from storm water runoff discharges associated with industrial activities and materials stored throughout some areas of the Facility need to be improved (e.g., scrap metal staging areas without cover and corrosion stains, roads with sediment on the ground).
- j. Industrial areas in access roads located in the east and north sides of the Facility were neat and clean.
- k. One of the three sludge retention lagoons were observed with enough freeboard overflow level. However, sediments were observed.
- l. The influent intake cooling seawater screen washers was observed without leaks. This area was observed in the May 2022 NPDES inspection leaking and discharging in a non-authorized discharge point into a receiving water.
- m. The location where stormwater runoff from PR-127 Road flows into the Caribbean Sea was observed with what appeared to be oil/fuel, and evidence of aquatic life fatalities

(specifically crabs) was noted. Additionally, oil absorbent materials were found in this area.

- n. The site where the tidal influence of the Caribbean Sea intersects with the Outfall 003 sampling point has been affected by oil and fuel discharges, which in turn has impacted the collection of representative samples of the stormwater discharge from the Facility. An absorbent boom has been deployed at the bottom of the channel.
- o. Genera has not implemented certain corrective actions to address findings detailed in the NPDES Compliance Evaluation Inspection Report, dated July 18, 2022. The findings included among others, implementation of erosion and sediment controls. Ms. Mohip indicated that Genera is in the process of implementing corrective actions, as a request for funding was made to Genera's management.

The Inspector included other observations in the Inspection photo-documentation in **Attachment 1** of this Inspection Report. The EPA Inspector used a personal phone camera (Model T-Mobile, TRRLY, Moto G7) to take 21 photographs to document his observations during the walkthrough of the Site. All 21 photographs were unaltered transferred to F:\INSPDES\INSPDES.24 PREPA South Coast Power Plant/ inspection file, an EPA database.

## **8. EXIT MEETING**

At around 3:00 p.m., after completing the walkthrough of the Facility, the EPA Inspector held an exit meeting with Genera representatives mentioned earlier. During the meeting, the EPA Inspector provided a summary of his observations that were also provided during the walkthrough of the Facility.

The Inspector highlighted the ongoing oil/fuel spill near Outfall 003 and discussed the corrective actions implemented by Genera to manage run-off from a tank farm located upstream of the Facility, which was impacting the Caribbean Sea. The spill appears to affect the end-of-pipe area at that outfall, thereby compromising the ability to collect a representative sample and conduct the necessary monitoring as outlined in the Permit. Ms. Mohip provided the EPA inspector with a letter dated May 16, 2013, documenting the spill incident from March 7, 2013, along with the corrective actions taken at that time.

The meeting also included a discussion of the BMPs that needs to be implemented, which are included as findings in this Inspection Report. At the end of the meeting, the EPA Inspector questioned if the media in the new sand filters will be replaced, and Ms. Mohip indicated that the request for funding has been made.

The meeting ended at 3:30 p.m., and the EPA Inspector left the premises after the conclusion of the Exit Meeting at 3:35 pm.

## 9. POST INSPECTION REVIEW OF RECORDS OFF-SITE

On October 11, 2024, Ms. Mohip provided documents to the EPA Inspector for review. The EPA Inspector reviewed the documents during the period of October 12 and November 30, 2024, and found the following:

### *NPDES Permit*

The information about PREPA included in the cover page of the Permit is accurate.

### *Review of Discharge Monitoring Reports and supporting documentation*

Part II of the Permit includes effluent limitations and monitoring requirements. Part II.A.1 to A5 of the Permit establishes the monitoring data submission requirements of the Permit set forth discharge limitations and monitoring requirements which are to be met by PREPA South Coast. Specifically, Tables A-1 through A-5 establish the measurement frequency and sample type.

A review of DMRs for the monitoring periods from August 2022 through August 2024 submitted to EPA, Region 2, revealed that the Plant effluent discharges exceeded, and continues to exceed certain effluent limitations set out in the Permit during the times and for the parameters evaluated. The parameters most frequently exceeded include, Total Suspended Solids, and Residual Chlorine. The DMRs supporting documentation files were maintained with corresponding laboratory data, including original test results, chains of custody, rain gauges data, and QA/QC data analysis results. The DMRs supporting documents were accurate and consistent with the monitoring requirements for process wastewater and stormwater sampling. Please refer to **Attachment 2** of this Report for findings concerning the review of the DMRs for Outfalls 001, 002, 003.

### *Review of the Storm Water Pollution Prevention Plan*

The EPA Inspector performed a preliminary review of the SWPPP, and found the following:

- a. the document was revised and signed by Mr. Miguel A. Beauchamp, on August 22, 2024.
- b. the document has been revised to update the personnel positions associated with the Stormwater Pollution Prevention Team and the actual changes in industrial equipment as pollutant sources.
- c. The SWPPP identifies Genera's personnel (by name or position) that are part of the Stormwater Pollution Prevention Team, as well as their individual responsibilities, including which members are qualified and responsible for conducting inspections.
- d. The document included the description of the Best Management Practice ("BMPs") selected for the industrial areas.

### *Facility Inspections*

The EPA Inspector reviewed the records for the period of August 2022 September 2024. The Facility inspection reports included observations of deficiencies found through the Facility. The Facility inspections are performed every three months and the comprehensive Facility inspection once a year. Also, qualified General personnel from the PREPA South Coast are responsible to perform the inspections and sign the inspection reports.

### *Corrective Actions*

The corrective actions are documented in the Facility-specific tailored form. Only one corrective action was documented on October 24, 2023. The forms were signed by the authorized representative.

### *Employee Training*

The EPA Inspector reviewed training records and found that the training held on August 21, 2024, was documented, and was signed by the Pollution Prevention Team members.

### **End of Report**

Attachment 1 – Photo Documentation

Attachment 2 – DMR exceedances

ATTACHMENT 1

PREPA South Coast Power Plant  
**Photo Documentation**

September 30, 2024 CEI

ATTACHMENT 2

**PREPA South Coast Exceedances Table  
August 2022 to August 2024**

September 30, 2024 CEI

## PREPA San Juan Power Plant DMRs effluent limits exceedances table for the period of August 2022 to August 2024

|                                                                                                                                           |                                                                               |                                                                                                                                                                                     |                      |                                 |                                  |                                     |  |
|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------|----------------------------------|-------------------------------------|--|
|  <b>ICIS</b><br>Integrated Compliance Information System |                                                                               | <a href="#">FE&amp;C</a> <a href="#">NPDES</a> <a href="#">AIR</a> <a href="#">Admin</a> <a href="#">Reports</a> <a href="#">Help</a> <a href="#">JLOPEZ</a> <a href="#">Logout</a> |                      |                                 |                                  |                                     |  |
| <a href="#">Search Permits</a> <a href="#">Related NPDES Violations</a>                                                                   |                                                                               |                                                                                                                                                                                     |                      |                                 |                                  |                                     |  |
| <a href="#">Facilities</a>                                                                                                                | <a href="#">NPDES Permits</a>                                                 | <a href="#">Compliance Monitoring</a>                                                                                                                                               | <a href="#">DMRs</a> | <a href="#">Program Reports</a> | <a href="#">NPDES Violations</a> | <a href="#">Enforcement Actions</a> |  |
| List of Violations Related to the Permit                                                                                                  |                                                                               |                                                                                                                                                                                     |                      |                                 |                                  |                                     |  |
| Violation Type                                                                                                                            | Violation Information                                                         | Violation Code                                                                                                                                                                      | Violation Date       | RNC Detection Code-Date         | RNC Resolution Code-Date         | Record Numbers 1 to 12              |  |
| <a href="#">DMR Non-Receipt Violation</a>                                                                                                 | 001 G 00530 Solids, total suspended Internal Monitoring Point Season ID 0 C2  | D90                                                                                                                                                                                 | 01/31/2023           | N-03/31/2023                    | 8-03/31/2023                     |                                     |  |
| <a href="#">DMR Non-Receipt Violation</a>                                                                                                 | 001 G 00530 Solids, total suspended Internal Monitoring Point Season ID 0 C3  | D90                                                                                                                                                                                 | 01/31/2023           | K-03/31/2023                    | 8-03/31/2023                     |                                     |  |
| <a href="#">DMR Non-Receipt Violation</a>                                                                                                 | 001 A 00556 Oil & Grease Effluent Gross Season ID 0 C3                        | D80                                                                                                                                                                                 | 07/31/2023           | K-09/28/2023                    | 0-09/28/2024                     |                                     |  |
| <a href="#">Effluent Violation</a>                                                                                                        | 003 A 01042 Copper, total (as Cu) Effluent Gross Season ID 0 C3               | E90                                                                                                                                                                                 | 10/31/2023           |                                 |                                  |                                     |  |
| <a href="#">Effluent Violation</a>                                                                                                        | 001 F 01045 Iron, total (as Fe) Internal Monitoring Point Season ID 0 Q1      | E90                                                                                                                                                                                 | 11/30/2023           |                                 |                                  |                                     |  |
| <a href="#">Effluent Violation</a>                                                                                                        | 001 F 01045 Iron, total (as Fe) Internal Monitoring Point Season ID 0 Q2      | E90                                                                                                                                                                                 | 11/30/2023           |                                 |                                  |                                     |  |
| <a href="#">DMR Non-Receipt Violation</a>                                                                                                 | 001 G 00530 Solids, total suspended Internal Monitoring Point Season ID 0 C2  | D90                                                                                                                                                                                 | 02/29/2024           | N-04/28/2024                    | 1-04/28/2024                     |                                     |  |
| <a href="#">DMR Non-Receipt Violation</a>                                                                                                 | 001 G 00530 Solids, total suspended Internal Monitoring Point Season ID 0 C3  | D90                                                                                                                                                                                 | 02/29/2024           | K-04/28/2024                    | 1-04/28/2024                     |                                     |  |
| <a href="#">Effluent Violation</a>                                                                                                        | 001 G 00530 Solids, total suspended Internal Monitoring Point Season ID 0 C2  | E90                                                                                                                                                                                 | 03/31/2024           |                                 |                                  |                                     |  |
| <a href="#">Effluent Violation</a>                                                                                                        | 001 E 50060 Chlorine, total residual Internal Monitoring Point Season ID 0 C2 | E90                                                                                                                                                                                 | 04/30/2024           |                                 |                                  |                                     |  |
| <a href="#">Effluent Violation</a>                                                                                                        | 001 E 50060 Chlorine, total residual Internal Monitoring Point Season ID 0 C3 | E90                                                                                                                                                                                 | 04/30/2024           |                                 |                                  |                                     |  |
| <a href="#">Effluent Violation</a>                                                                                                        | 001 E 50064 Chlorine, free available Internal Monitoring Point Season ID 0 C2 | E90                                                                                                                                                                                 | 04/30/2024           |                                 |                                  |                                     |  |
|                                                                                                                                           |                                                                               |                                                                                                                                                                                     |                      |                                 |                                  | Record Numbers 1 to 12              |  |
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