

1. Introduction and summary

- A. Briefly describe EO 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” etc.

The U.S. Environmental Protection Agency (EPA), Region 2, has performed an Environmental Justice (EJ) analysis in accordance with the President’s Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Population and Low-Income Populations” following the Regional Policy. Environmental Justice is the right to a safe, healthy, productive and sustainable environment for all, where “environment” is considered in its totality to include the ecological, physical, social, political, aesthetic and economic environments.

Executive Order 12898 (the “Order”) was signed by President Clinton on February 11, 1994, to focus federal attention on the environmental and human health conditions of minority and low-income populations with the goal of achieving environmental protection for all communities. The Order directed federal agencies to develop environmental justice strategies to help federal agencies identify and address disproportionately high and adverse human health or environmental effects of their programs, policies and activities on minority and low-income populations. The Order is also intended to promote nondiscrimination in federal programs substantially affecting human health and the environment, and to provide minority and low-income communities’ access to public information in matters relating to human health. The Order underscores certain provisions of existing law that can help ensure that all communities and persons across the nation live in a safe and healthful environment.

It is important to note that the major tenet of environmental justice is the fair treatment and meaningful involvement of the affected community in carrying out the Agency’s and the Region’s programs, policies and activities. Fair treatment and meaningful involvement should not be understood to mean preferential treatment for certain communities. Rather, these principles should be understood to mean the Agency and Region will continue to provide equal protection and access to information to all served communities. Fair treatment and meaningful involvement may include, but not be limited to ensuring to the extent possible and practicable, the following:

- that notices about public meetings are disseminated in local media used by the community, and that such notices are translated into appropriate languages other than English, if a community is largely non-English speaking;
- that environmental laws are enforced equally in all communities;
- that Regional managers and their staff understand and are aware of cultural differences and unique dependence some communities, such as tribal nations and indigenous peoples, have upon their land for subsistence fishing and hunting; and
- that communities have access to accurate, timely and reliable information.

B. Summarize the factual conclusions of the EJ analysis and any linkages to proposed permit terms or other permit outcomes

Based on a review of demographic and environmental data in EJSCREEN and other sources, the community around the facility is an area with potential EJ concerns.

2. Proposed permitted activity and regulatory framework (Worksheet section)

A. Describe the requested permit action (e.g., new permit or renewal), the facility and the applicable regulatory framework (e.g., CAA/PSD, CWA/NPDES, SDWA/UIC, RCRA, TSCA)

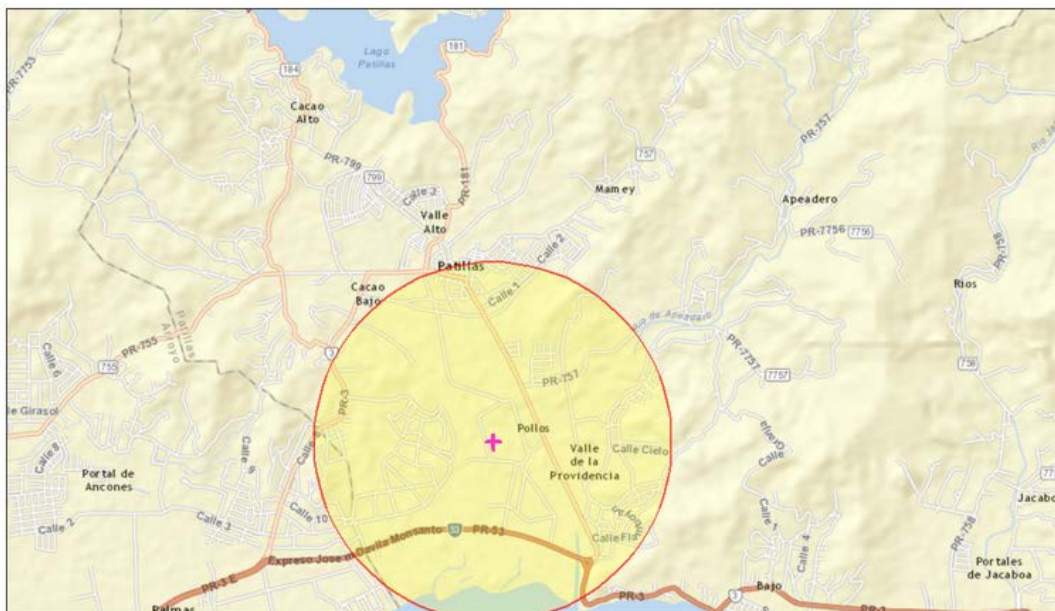
CWA / NPDES PRASA Permit Renewal.

B. Note other types of permits required by EPA statutes (e.g., PSD, NNSR, NPDES, UIC, RCRA, TSCA) that are in place or are being sought for the same facility, and the agency responsible for issuing that permit or identified by the permit applicant (e.g., EPA, state or local agency), as indicated by EPA's ECHO database [<https://echo.epa.gov>, select "Single Facility Search"]

No other permits; however, the Permittee has a Consent Decree with the Agency **Civil Action No 3:15-CV-02283(JAG)** in which the facility is included. This consent decree does not affect this permit action.

3. Geographic area(s) identified by screening step per Regional Implementation Plan

A. Identify area(s) (with maps, if practicable) near the facility that the EJ in Permitting screening process has prioritized for EJ analysis.



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Yellow Buffer Area
Pink + Digitized Point

0 0.3 0.6 1.2 mi
0 0.5 1 2 km
Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NANJING, Esri, Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (The Land), MapInfo India, NGCC, © OpenStreetMap contributors, and the GIS User Community



Map sources: EJSCREEN (upper); ECHO (lower).

B. Explain how the area(s) were identified (e.g., use of EJSCREEN; information contained in the permit application or developed by the permitting program indicating areas of pollution impacts/plumes)

Satellite maps were found using the facility information in ECHO. EJSCREEN was used to assess the demographics of the area within a one-mile radius around the facility. Based on the images above, we can conclude that the area surrounding the water treatment plant is residential.

4. Description of communities identified by screening step (Worksheet section 4)

A. Social Demographics. This information, in conjunction with the health information below, may help identify a community's potential vulnerabilities.

Sites reporting to EPA

Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0
National Pollutant Discharge Elimination System (NPDES)	1

Selected Variables	Value	State Average	Percentile in State	EPA Region Average	Percentile in EPA Region	USA Average	Percentile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m³)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ozone (ppb)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NATA* Diesel PM (µg/m³)	0.0978	0.761	6	N/A	N/A	N/A	N/A
NATA* Air Toxics Cancer Risk (risk per MM)	26	34	3	N/A	N/A	N/A	N/A
NATA* Respiratory Hazard Index	0.57	1.1	6	N/A	N/A	N/A	N/A
Traffic Proximity and Volume (daily traffic count/distance to road)	94	140	68	N/A	N/A	N/A	N/A
Lead Paint Indicator (% pre-1960s housing)	0.1	0.15	54	N/A	N/A	N/A	N/A
Superfund Proximity (site count/km distance)	0.094	0.15	58	N/A	N/A	N/A	N/A
RMP Proximity (facility count/km distance)	0.52	0.51	72	N/A	N/A	N/A	N/A
Hazardous Waste Proximity (facility count/km distance)*	0.062	0.06	78	N/A	N/A	N/A	N/A
Water Discharger Proximity (count/km)	1	0.41	91	N/A	N/A	N/A	N/A
Demographic Indicators							
Demographic Index	93%	86%	74	N/A	N/A	N/A	N/A
Minority Population	100%	99%	35	N/A	N/A	N/A	N/A
Low Income Population	86%	73%	73	N/A	N/A	N/A	N/A
Linguistically Isolated Population	77%	70%	62	N/A	N/A	N/A	N/A
Population with Less Than High School Education	25%	28%	40	N/A	N/A	N/A	N/A
Population under Age 5	5%	6%	50	N/A	N/A	N/A	N/A
Population over Age 64	17%	16%	61	N/A	N/A	N/A	N/A

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risk to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

*The hazardous waste environmental indicator and the corresponding EJ index will appear as N/A if there are no hazardous waste facilities within 50 km of a selected location.

According to EJSCREEN, the area around PRASA Patillas WTP includes a 100% minority population, a low income population of 86%, and a linguistically isolated population of 77%. There are no schools or hospitals within a one-mile radius of the facility.

B. Environment/Land Use Information. This information can help determine whether a community may be considered overburdened from other sources of pollution not directly related to the action being permitted and also identify potential pathways for exposure.

Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA* Diesel PM	56	N/A	N/A
EJ Index for NATA* Air Toxics Cancer Risk	77	N/A	N/A
EJ Index for NATA* Respiratory Hazard Index	70	N/A	N/A
EJ Index for Traffic Proximity and Volume	87	N/A	N/A
EJ Index for Lead Paint Indicator	79	N/A	N/A
EJ Index for Superfund Proximity	84	N/A	N/A
EJ Index for RMP Proximity	88	N/A	N/A
EJ Index for Hazardous Waste Proximity*	88	N/A	N/A
EJ Index for Water Discharger Proximity	97	N/A	N/A

Reviewing the EJ indexes from EJSCREEN, we see that Traffic Proximity and Volume (87%), Superfund Proximity (84%), RMP Proximity (88%), Hazardous Waste Proximity (88%) and Water Discharger Proximity (97%), when compared to the rest of Puerto Rico, exceed the 80th percentile, indicating that these in particular are potential EJ concerns in this community.

C. Health Information

This information, in conjunction with the demographic information above, may help identify a community's potential vulnerabilities.

Provide a narrative description of the health concerns of the community, including the information listed in Section 4.C. of the instructions that are readily available and relevant to understanding the potential impact of the facility's proposed pollutant releases or the communities' general health status and health concerns.

For information about community health concerns:

- Ask your EJ Coordinator;
- Do a Google News Search on the health concerns of the community;
- Some information for some areas of the country may be available from www.CommunityCommons.org , or www.communityhealthrankings.org;

No information available.