



Republic of the Philippines
Department of Environment and Natural Resources
Visayas Avenue, Diliman, Quezon City
Tel Nos. 929-6626 to 29; 929-6633 to 35
929-7041 to 43; 929-6252; 929-1669
Website: <http://www.denr.gov.ph> / E-mail: web@denr.gov.ph

MEMORANDUM

FOR/TO : THE UNDERSECRETARY
Field Operations and Environment

THE DIRECTOR
Environmental Management Bureau

THE ASSISTANT SECRETARY
Finance, Information Systems and Mining Concerns

ATTENTION : THE REGIONAL DIRECTORS
DENR Regions 2, 4-B, 5, 8 and CARAGA

FROM : THE UNDERSECRETARY
Finance, Information Systems, and Climate Change

SUBJECT : **CONCERNS OF NATIONAL POWER CORPORATION (NPC)
ON EMB REQUIREMENTS ON DOMESTIC WASTEWATER
TREATMENT FACILITIES OF SPUG POWER PLANTS**

DATE : 6 July 2021

This refers to the letter dated 8 June 2021 of the late Mr. Pio J. Benavidez, President and CEO, National Power Corporation (NPC), requesting for assistance on the requirements set by the EMB on wastewater treatment facilities (septic tanks) of Small Power Utilities Group (SPUG) power plants.

As the Designated Alternate of the Secretary of the DENR on the National Power Board, this Office convened a meeting last 1 July 2021 with EMB and NPC representatives to discuss the following requests of NPC:

1. Consider Compliance Action Plan for the construction of water-tight septic tank.
2. Exemption from the submission of the Certificate of Desludging and Treatment of septic tanks until an accredited DOH service provider operates in the area.

Regions 2, 4-B, 5, 8 and CARAGA do not have desludging facilities with Environmental Sanitation Clearance from DOH.

3. Exemption from the required effluent analysis for leaching-type septic tanks and power plants/ facilities that couldn't meet the required holding time for the sample to be analyzed due to its location.

May we request your Office for a virtual meeting on Wednesday, July 14, 2021 from 1:30 PM to 2:30 PM to further discuss the matter. Below is the link for the said meeting:

Topic: Meeting with Usec Teh re: concerns of NPC
Time: Jul 14, 2021 01:30 PM

Join Zoom Meeting

<https://zoom.us/j/96292750334?pwd=cUhWUGpXSUJ0ZTk0eVdBM2F0b05ndz09>

Meeting ID: 962 9275 0334
Passcode: 105643

Your participation is highly appreciated.


ATTY. ANALIZA REBUELTA-TEH



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MEMORANDUM

TO : THE DIRECTOR
Environmental Management Bureau

FROM : THE UNDERSECRETARY
Finance, Information Systems, and Climate Change

SUBJECT : REQUEST OF NATIONAL POWER CORPORATION (NPC)
FOR ASSISTANCE ON EMB REQUIREMENTS ON DOMESTIC
WASTEWATER TREATMENT FACILITIES OF SPUG POWER
PLANTS

DATE : 14 June 2021

This refers to the letter dated 8 June 2021 of Mr. Pio J. Benavidez, President and CEO, National Power Corporation (NPC), requesting for assistance in NPC's appeal for leniency in the enforcement of requirements by the EMB on wastewater treatment facilities (septic tanks) of Small Power Utilities Group (SPUG) power plants. Said letter also communicates the challenges in complying with the requirements imposed on SPUG plants located in small islands.

May we request your Office to set a meeting with the NPC to provide necessary assistance and discuss their concerns. Please also submit updates to the Office of the Undersigned on the matter.

For your appropriate action.

ATTY. ANALIZA REBUELTA-TEH

CC: **ATTY. JUAN MIGUEL T. CUNA (CESO I)**
Undersecretary for Field Operations and Environment

NONITA S. CAGUIOA
Assistant Secretary for Finance, Information Systems and Mining Concerns

PIO J. BENAVIDEZ
President and CEO, National Power Corporation
BIR Road cor. Quezon Avenue, Diliman
Quezon City 1100
pjbenavidez@napocor.gov.ph

Let's Go Green!!!



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14 June 2021

PIO J. BENAVIDEZ
President and CEO
National Power Corporation (NPC)
BIR Road cor. Quezon Avenue, Diliman
Quezon City 1100
pjbenavidez@napocor.gov.ph


Dear Mr. Benavidez:

This refers to your letter dated 8 June 2021, requesting for assistance in NPC's appeal for leniency in the enforcement of requirements by the EMB on wastewater treatment facilities (septic tanks) of Small Power Utilities Group (SPUG) power plants.

Please be informed that the Environmental Management Bureau (EMB) will be coordinating a meeting with your Office to provide necessary assistance on the matter.

Thank you.

Very truly yours,


ATTY. ANALIZA RIBUELTA-TEH
Undersecretary for Finance, Information Systems,
and Climate Change

CC: **ENGR. WILLIAM P. CUÑADO**
Director, EMB

ATTY. JUAN MIGUEL T. CUNA (CESO I)
Undersecretary for Field Operations and Environment

NONITA S. CAGUIOA
Assistant Secretary for Finance, Information Systems and Mining Concerns

Let's Go Green!!!

2. Water-tight septic tanks require regular/periodic siphoning, so as not to discharge domestic wastewater with sludge. However, some regions do not have desludging facilities with ESC from the DOH and DOH Regional Offices do not allow/encourage desludging facilities for Inter-island transport of domestic wastewater sludge.
3. Water-tight septic tanks are provided with discharge pipes but there are no sewerage systems in small islands to receive discharges unlike in metro areas.
4. The required holding time for effluent for some major parameters (e.g. BOD, coliform) may not be met due to the long travel time from the plants to the DENR-accredited laboratories located in the mainland.
5. NPC already submitted appeals to Central and Regional Offices but were denied.

The favorable response of DENR on this matter is crucial to NPC considering that several (11) WDP/renewal applications filed by NPC for SPUG plants in 2020 and 2021 were already denied by EMB Regional Offices and plenty (21) are still pending. Also, several SPUG plants received Notices of Violation (NOVs) and designated Pollution Control Officers were required to pay the penalties. Since WDP is a prerequisite for the Certificate of Compliance (COC) applications filed to Energy Regulatory Commission (ERC), delay or failure to secure this permit will trigger issuances of NOV and Impositions of penalties by ERC.

Thank you for your consideration and best regards.

Very truly yours,


PIO J. BENAVIDEZ
President & CEO