



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](mailto:web@denr.gov.ph)

**MEMORANDUM**

TO : THE DIRECTOR  
Environmental Management Bureau

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

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

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

DATE : 15 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.

Based on our meeting last 14 July 2021, it was agreed that the concerned EMB Regional Offices (2, 4-B, 5, 8 and CARAGA) will meet with their NPC counterparts to assist them comply with pertinent EMB requirements and address the denied/pending Wastewater Discharge Permits/renewal applications filed by NPC for SPUG plants. Areas of concern include:

1. Drawing of facility's septic tank showing that it is water-tight in consonance with DOH AO 2019-0047.
2. Certificate of Desludging and Treatment of Septic Tank from Septage Collection, Treatment and Disposal Service Providers with DOH-issued Environmental Sanitation Clearance.
3. Results of Effluent Analysis.

Said compliance is crucial to NPC. Accordingly, the Wastewater Discharge Permit is a prerequisite for the issuance of Certificate of Compliance (COC) by the Energy Regulatory Commission (ERC). Delay or failure to secure such permit will trigger issuances of Notice of Violations (NOV) and imposition of penalties by the ERC.

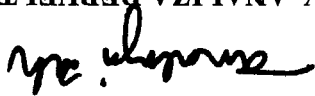
MEMO NO. 2021 - 523

**Let's Go Green!!!**

May we request all concerned Regional Offices to provide reports on the agreements with your NPC counterparts **on or before 21 July 2021** to the Office of the Undersecretary for Finance, Information Systems and Mining Concerns <quart.dem20@gmail.com>, copy furnished the Assistant Secretary for Finance, Information Systems and Mining Concerns <asec.fismc@demr.gov.ph>. Should there be no specific issues/concerns of NPC in your Region, kindly submit a status report.

We appreciate so much your usual support and cooperation.

ATTY. ANALIZA REBUERTA-TEH



CC: THE UNDERSECRETARY  
Field Operations and Environment  
THE ASSISTANT SECRETARY  
Finance, Information Systems and Mining Concerns  
ATTY. MELCHOR P. RIDULME  
OIC President  
National Power Corporation (NPC)



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](mailto:web@denr.gov.ph)

**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](mailto:pjbenavidez@napocor.gov.ph)



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](mailto:web@denr.gov.ph)

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](mailto: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 REBUELTA-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



OUFISCC <ouart.denr20@gmail.com>

# Request for Assistance on EMB Requirements on Domestic Wastewater Treatment Facilities of SPUG Power Plants

1 message

Environmental Management Department <omemd@napocor.gov.ph>

11 June 2021 at 11:21

To: ouart.denr20@gmail.com

11 June 2021

**DENR - Climate Change and Mining Concerns**

DENR Compound

Diliman, Quezon City

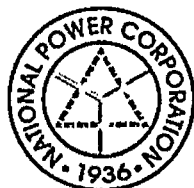
To the Officer-in-Charge:

Greetings!

This is to respectfully transmit an advanced copy of the memo letter with the subject ***Request for Assistance on EMB Requirements on Domestic Wastewater Treatment Facilities of SPUG Power Plants.***

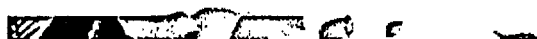
For further queries, please do not hesitate to contact us through direct line at **8921-7906** or through e-mail address at **omemd@napocor.gov.ph**.

Thank you for your usual support.



**OFFICE OF THE MANAGER**

Environmental Management Department



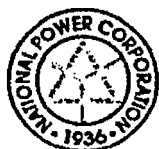
Contact: (02) 8921-7916 loc: 5308

Email: [omemd@napocor.gov.ph](mailto:omemd@napocor.gov.ph)

National Power Corporation | 1101, Quezon City

The content of this email is confidential and intended for the recipient specified in the message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message, followed by its deletion, so that we can ensure such a mistake does not occur in the future.

**PES-EMD-21-291 Request for Assistance on EMB Requirements on Domestic Wastewater Treatment Facilities of SPUG Power Plants.pdf**  
1407K



## **NATIONAL POWER CORPORATION**

---

08 June 2021

**ATTY. ANALIZA REBUelta-TEH, CESO I**

Undersecretary

Climate Change and Mining Concerns

Department of Environment and Natural Resources

DENR Compound, Diliman, Quezon City

**ENGR. NONITA S. CAGUIOA**

Assistant Secretary for Finance

Information Systems and Mining Concerns

Department of Environment and Natural Resources

DENR Compound, Diliman, Quezon City

**SUBJECT: REQUEST FOR ASSISTANCE ON EMB REQUIREMENTS ON  
DOMESTIC WASTEWATER TREATMENT FACILITIES OF SPUG  
POWER PLANTS**

**Dear Usec Rebuelta-Teh and Asec Caguioa:**

We would like to request for assistance in NPC's appeal for leniency in the enforcement of requirements by the Environmental Management Bureau (EMB) on the wastewater treatment facilities (septic tanks) of SPUG power plants.

In 2020, the DENR-EMB started to require three-chambered water-tight septic tanks instead of two-chambered leaching type septic tanks. This requirement is in consonance with the Department of Health (DOH) Administrative Order (AO) No. 2019-0047 *"National Standard on the Design, Construction, Operation, and Maintenance of Septic Tank Systems"* and is intended to reduce groundwater pollution. Compliance to this requirement was made a prerequisite for Wastewater Discharge Permit (WDP) and renewal applications. Relative to this, EMB also requires the submission of Certificate of Desludging and Treatment of septic tanks from accredited service providers with DOH-issued Environmental Sanitation Clearance (ESC) and results of effluent (treated domestic wastewater) analysis by DENR-accredited laboratories compliant with DENR AO No. 2016-08 *"Water Quality Guidelines and General Effluent Standards"*.

NPC agrees on the need to control groundwater pollution. However, these requirements imposed on SPUG plants located in small islands seem to be impractical and biased since a huge number of residential structures continue to use leaching type septic tanks and are not being regulated. Compliance to these requirements remain a big challenge considering the following:

1. Most SPUG plants have two-chambered leaching type septic tanks, particularly those constructed before 2020 and located in small remote islands or hard-to-reach areas where no desludging facilities are available.

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



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](mailto: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



## MEETING WITH DENR

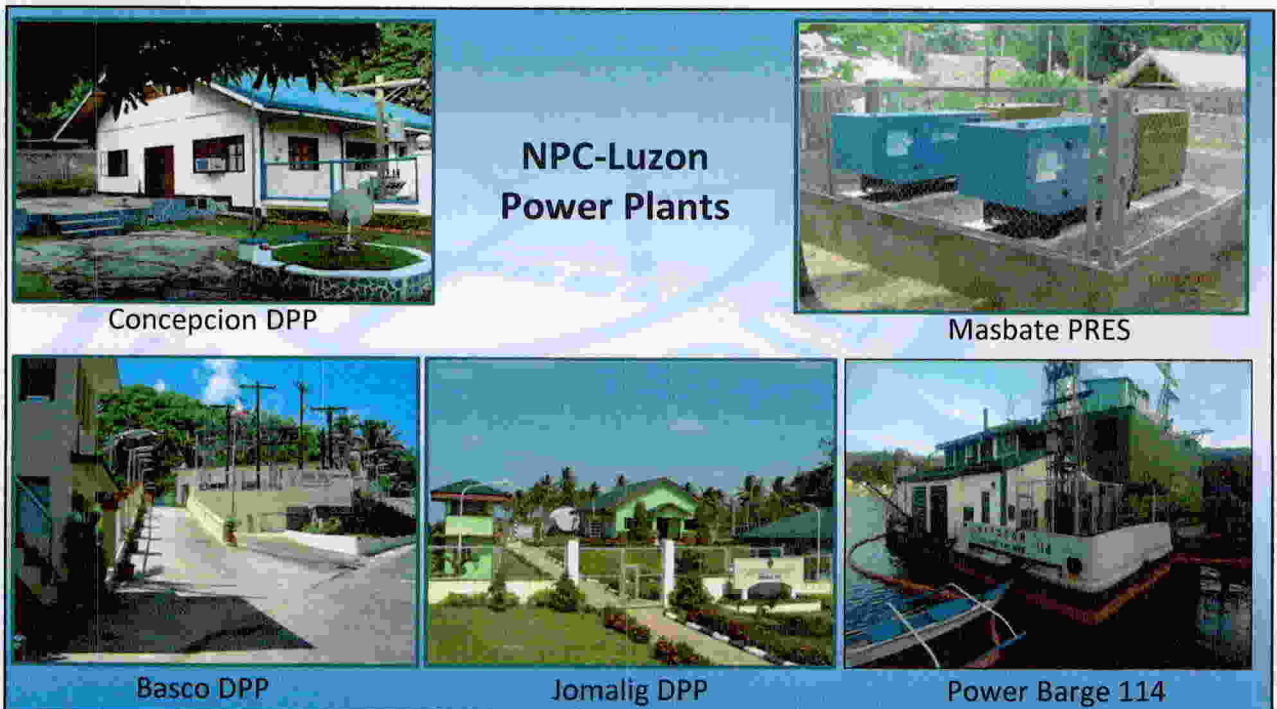
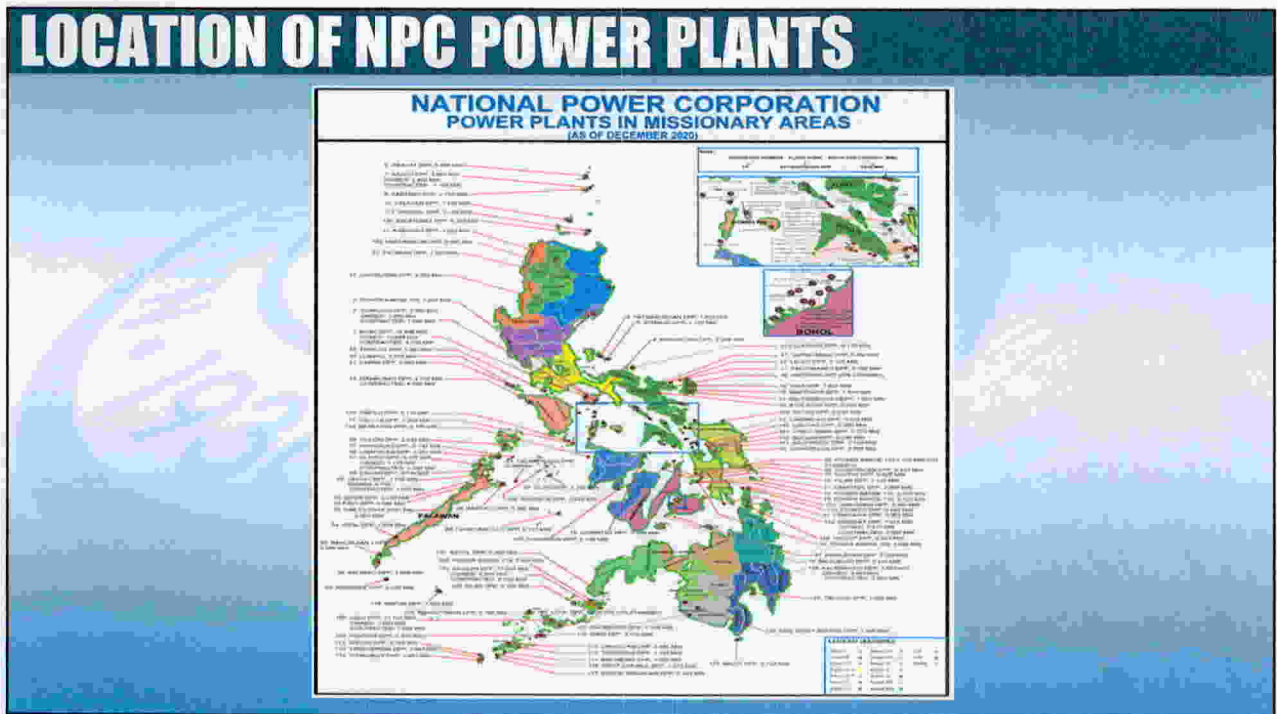
# CONSIDERATION ON SOME DISCHARGE PERMIT REQUIREMENTS ON THE NPC POWER PLANTS WASTEWATER TREATMENT FACILITIES (SEPTIC TANKS)

01 July 2021

## BACKGROUND

- NPC performs Missionary Electrification in remote areas and islands not connected to main power grid
- Operates 142 small diesel power plants (DPPs)/barges (with 2-5 personnel) and 12 substation facilities - estimated water usage 100 liters/capita/day\*
- Power plants/facilities use septic tanks to treat sewage
  - Some power plants/facilities established before 2020 use leaching-type septic tanks

\*Quezon City Green Building Code




**NPC-Visayas Power Plants**



Cinco Rama DPP



Ubay DPP



Mocaboc DPP



San Antonio DPP



Pilar DPP

**NPC-Mindanao Power Plants**



Sibutu DPP



Ninoy Aquino DPP



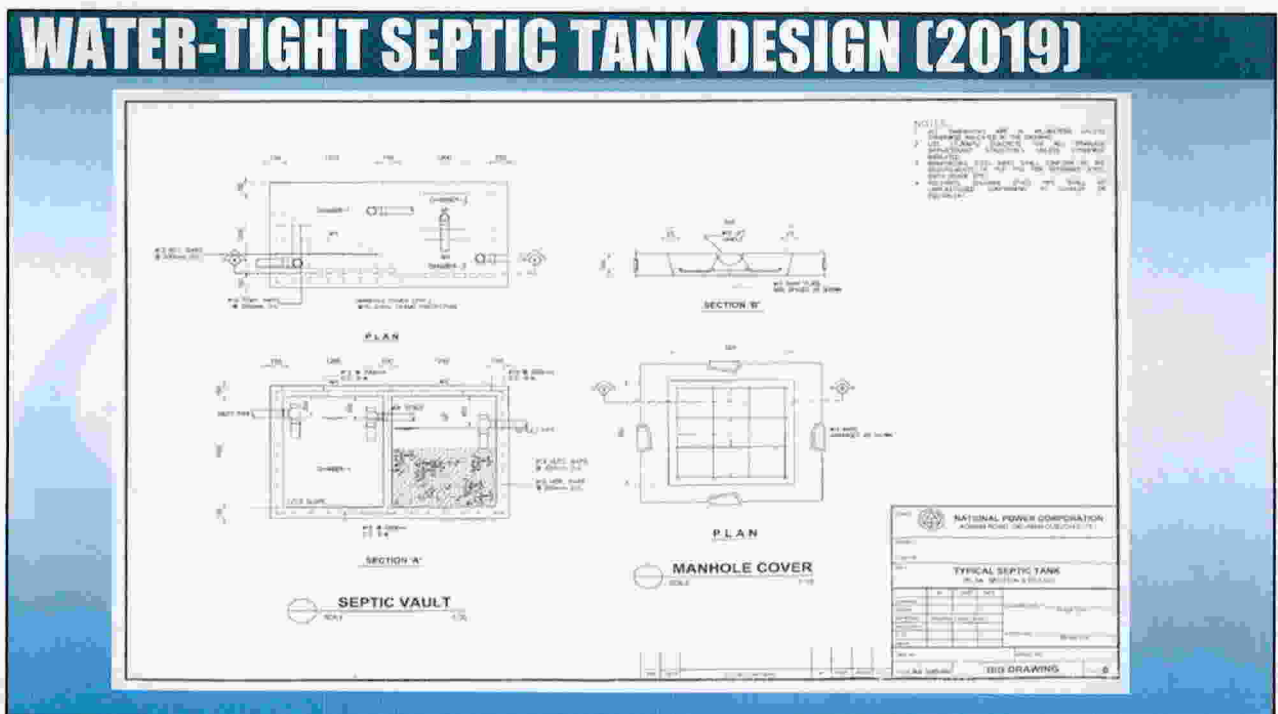
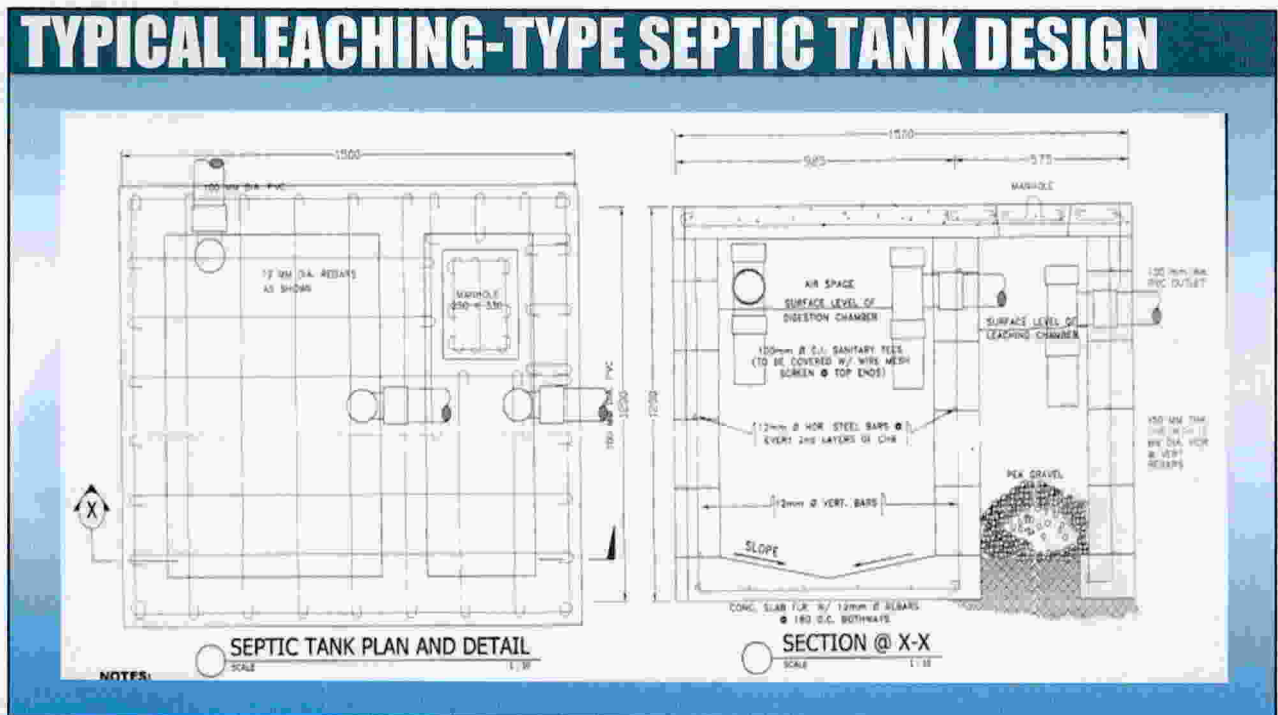
Balut DPP



West Simunul DPP



Mapun DPP



## LIST OF DENR-EMB REQUIREMENTS FOR CONSIDERATION

- Drawing of facility's septic tank showing that it is water-tight in consonance with DOH AO 2019-0047
- Certificate of Desludging and Treatment of septic tank from Septage Collection, Treatment and Disposal Service Providers with DOH-issued Environmental Sanitation Clearance
- Results of Effluent Analysis

## ISSUES FOR COMPLIANCE

- Water-tight septic tanks require regular/periodic siphoning to avoid sludge/solids from being discharge with the wastewater.
- Regions 2, 4b, 5, 8 and CARAGA do not have desludging facilities with Environmental Sanitation Clearance from DOH

## ISSUES FOR COMPLIANCE

- DOH Regional Office do not allow/encourage desludging facilities for inter-island transport of wastewater sludge. Desludging facilities have limited operational service area.
- Most SPUG plants/facilities are located in remote islands which have no sewage treatment facilities and are outside the service areas of DOH accredited desludging facilities/companies.

## ISSUES FOR COMPLIANCE

- Most SPUG plants cannot comply with required analysis of effluent for BOD & Coliform since the samples cannot be analyzed within the required holding time (DENR prescribed procedure) due to long travel time from the facility to the nearest DENR-accredited laboratory.
- Discharge Permit (DP) is a requirement in the issuance of Certificate of Compliance (COC) from Energy Regulatory Commission (ERC), delay or failure to secure DP will trigger issuances of Notice of Violation and imposition of penalties by ERC.

## ISSUES FOR COMPLIANCE

- Discharge Permit is also a requirement for PCO Accreditation renewal. PCO Accreditation Certificate is a prerequisite in the application for Permit to Operate, Chemical Control Order, etc.

## CONCERN/NPC's REQUEST

DENR-EMB REQUIREMENTS	NPC's REQUESTS
Drawing of facility's septic tank showing that it is water-tight in consonance with DOH AO 2019-0047.	Consider Compliance Action Plan for the construction of water-tight septic tank.
Certificate of Desludging and Treatment of Septic Tank from Septage Collection, Treatment and Disposal Service Providers with DOH-issued Environmental Sanitation Clearance.	Exempt from the submission of the Certificate of Desludging and Treatment of septic tanks until an accredited DOH service provider operates in the area.
Results of Effluent Analysis	Exempt 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.



