



Comments Received Prior to Notice of Incomplete Application

ID	Correspondence	Date	Reference	Comment	Response
1	Evan Walters	6/30/2025		Review of the high-level schedule of the project, and phasing of the SPDES permit interim limits tables (e.g. bridging project, OOWWTP liquid expansion, IWWTP coming online, etc.).	Reviewed high levels slides showing phasing concepts during 7/1/2025 and 8/19/2025 online meetings. Draft slides to be transmitted to NYSDEC.
2	Evan Walters	6/30/2025		Will there be any sanitary sewer extension as part of the project?	Indicated there is no sanitary sewer extension as part of these project in the 7/1/2025 online meeting. A sentence has been added to Section 1.4 of the municipal Engineering Report (Attachment 7) to restate this.
3	Evan Walters	6/30/2025	1.7	Collection System. Please provide a POSS # for Cicero or explain why one is not available	Application submitted to NYSDEC July 16, 2025. POSS NYS700086 description included in Form 2A (Attachment 1).
4	Evan Walters	6/30/2025	1.24	Variance Requests. None of the boxes were checked but the box for a NYS WQBEL variance was underlined. Is there intent to request a variance?	This is a typo. No variance request is being requested at this time, but OCDWEP reserves the right to request one in the future. NYSDEC has known issues with the fillable pdf form. The underlining on this cell has been removed.
5	Evan Walters	6/30/2025	2.4	Flow Diagram. To where are solid wastes (e.g. screenings, grit, wet or dry sludge cake) hauled for disposal?	In call July 1, 2025, we identified that the solids are hauled to Metro for further processing, and ultimately are landfilled. This information is provided in the municipal Engineering Report.
6	Evan Walters	6/30/2025		Please provide analytical reports for any parameters sampled for the SPDES application which are not reported on DMRs.	Reports with QC data to be provided with amended permit application. NY2A, Mercury 253.3, Pesticides/Herbicides/VOCs/SVOCs/, PFAS, 1,4 dioxane = NY2A reports - yearly.
7	Evan Walters	6/30/2025	Tables A-D	Please provide the Excel spreadsheet file for Tables A-D	This data has been included in the "DATA_NY2AAIITables 2025" spreadsheet, as Attachment 5.

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8	Evan Walters	6/30/2025	Table A	The maximum and average daily discharge concentrations reported in Table A for total mercury (25 ng/L and 13 ng/L respectively) are inconsistent with the values reported on the facility's DMRs. Let's discuss these data	Recalculation of these values is provided. Combined data provided in Table A. Retained low level mercury (Method 1631) and removed data for mercury by Method 243.2. Only report method 1631 results. Of note in call 7/7/2025, method used by OCDWEP is USEPA method 243.2 and not the USEPA method 243.7 as required by TOGS 1.3.10.
9	Evan Walters	6/30/2025	Table A	No data were provided in Table A for PFUnA, NMeFOSE, NEtFOSE, or 9CI-PF3ONS. Please explain why these data are unavailable	This data has been included in the "DATA_NY2AAIITables 2025" spreadsheet, as Attachment 5.
10	Evan Walters	6/30/2025		I would like to request both SIC and NAICs codes for all significant industrial users, including Micron.	This data has been included in the "SIC and NAIC codes" spreadsheet, as Attachment 12.
11	Evan Walters	7/8/2025		The flow and loading rates for the maintenance of plant operations (MOPO) phase are critical to the development of effluent limits for this phase. When can we expect to receive this information?	This information is included in the municipal Engineering Report (Attachment 7).
12	Evan Walters	7/8/2025		When in the overall schedule is the outfall modification anticipated to occur, relative to the OOWWTP expansion and the IWWTP construction? This information is also critical to developing phased interim limits for the SPDES permit	Available information on the outfall project status has been added to Section 1.3 of the municipal Engineering Report (Attachment 7).

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13	Evan Walters	7/8/2025	Table F	Water Treatment Chemical Listing. Please provide records of water treatment chemical authorization for aluminum sulfate and sodium bisulfite. If records are unavailable, please submit new WTC request forms.	A number of WTP chemicals have been grandfathered in. OCDWEP is separately and formally applying for WTC approval for the MTT specifically.
14	Evan Walters	7/8/2025		Please provide concentration data, tabulated in an Excel spreadsheet, for the following parameters for the last 5 years (i.e. the concentration data used to calculate and report loading for these parameters on DMRs): total iron, chloroform, total cadmium, total chromium, total copper, total nickel, total zinc, total arsenic, and total phenols.	See response to Comment ID 7 above. The data is provided in this Excel spreadsheet.
15	Evan Walters	7/8/2025		Please indicate how many non-detects are included in the sample sets for the following parameters: a. Table A: BOD5 (403 samples total), 1,4-dioxane (4), and each PFAS parameter b. Table B: Oil & grease (12), nitrite (4), nitrate (4), total nitrogen (4) c. Table C: total selenium (20) d. Table D: heptachlor (4)	See response to Comment ID #7 above. The data is provided in this Excel spreadsheet.
16	Thomas Vigneault	7/8/2025		Design/build	NYSDEC desires to have a discussion regarding the use of D/B. Use of progressive D/B legality is being questioned by NYSDEC. This discussion will be held in September 2025.



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17	Correction	7/10/2025		Information regarding Hoffman Hotdogs was incorrectly included.	Removed Hoffman from SIU/NSIU list. G&L Meats is replacing Hoffman Sausage which was mistakenly included in the original Form 2A (Attachment 1).
18	Evan Walters	7/14/2025		On March 27, 2025, Micron shared with DEC the pretreatment discharge application which Micron submitted to Onondaga County. This application included a list of "Worse-Case Organic Wastewater Constituents to OCDWEP." Please include in the Oak Orchard SPDES application any parameters on this list which are expected to be present in the effluent of the industrial wastewater treatment plant (IWWTP).	See Attachment 16.
19	Evan Walters	7/14/2025		Please provide estimated lat/long coordinates for new internal Outfalls 01A (OOWWTP effluent) and Outfall 01B (IWWTP effluent). (The final coordinates will be incorporated into the permit when known at a later date.)	MTT effluent - Outfall 01B: Latitude: 43°12'1.10"N Longitude: 76°12'39.74"W ITT Effluent - Outfall 01A: Latitude: 43°12'16.52"N Longitude: 76°12'35.29"W
20	Evan Walters	7/14/2025		A POSS Registration and Notifier Application form found on the Sewage Pollution Right To Know - NYSDEC page must be completed for the Town of Cicero. The POSS ID for Cicero to Oak Orchard will be NYS700086.	Application submitted to NYSDEC July 16, 2025. POSS NYS700086 included in Form 2A (Attachment 1).
21	Correction	7/17/2025		Provide hydraulic calculations for the existing outfall.	Available information on the outfall project status has been added to Section 1.3 of the municipal Engineering Report (Attachment 7).

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23	Evan Walters	7/21/2025		DEC proposes using the following naming conventions to refer to Oak Orchard Wastewater Treatment Plant: a. Oak Orchard Wastewater Treatment Plant (OOWWTP) – refers to the whole site including all treatment trains and discharges b. Municipal Treatment Train (MTT) – refers to the existing/upgraded sanitary treatment system at Oak Orchard (new Outfall 01A) c. Industrial Treatment Train (ITT) – refers to the new industrial treatment system to be constructed on site, which will treat Micron's process wastewaters (new Outfall 01B)	Clarification of this naming convention has been added to the abbreviations section of the municipal Engineering Report (Attachment 7).
24	Evan Walters	7/21/2025		Please provide a 30-day average design flow condition for the upgraded municipal treatment train (ref. Table 1.12 in the OOWWTP Expansion Program Basis of Design Report, June 2025). This is a critical flow value for permit limit development	The 30 day average design flow condition is given in Table 1.12 of the municipal Engineering Report (Attachment 7) and corresponds to the maximum month at the Full Future Buildout Projections. A sentence was added to the prose and a line was added to the table to make it clear that this is the design condition.
25	Evan Walters	7/21/2025		Please provide a 30-day average design flow and loadings for the maintenance of plant operations (MOPO) phase of the overall project.	The full flow and load projections for the MOPO design condition have been added to Table 1.12 of the municipal Engineering Report (Attachment 7). This includes the 30 day average design flow and loadings (maximum month).

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26	Evan Walters	7/21/2025		<p>Please explain what flow metric is used for the “maximum design condition” the new industrial treatment train included in Table 1-2 of the Oak Orchard Industrial Wastewater Treatment Plant and Water Reclamation Facility Conceptual Design Engineering Report (June 2025).</p> <p>a. Table 1-2 gives a maximum design flow condition of 8.25 MGD, while other sections of the report use 8.5 MGD. Please clarify the discrepancy.</p>	<p>The maximum design condition for the ITT assumes a flow of 8.25 MGD for FAB1 and 16.5 MGD for FAB2. The references to a FAB1 flow of 8.5 MGD for the ITT were incorrect and should be revised to 8.25 MGD.</p> <p>As listed in Table 1-1, the winter average flow = 8.25 MGD. Based on information provided by Micron a typical peaking factor above the max average flow is 1.3, which corresponds to 10.7 mgd. This flow is expected to only be sustained for several hours. Between the equalization and diversion storage at the ITT and at Micron's campus, the actual flow to the biological system will be equalized to near average flow of 8.25 MGD, even during this peak flow event. Hence, the max design condition is also listed as 8.25 MGD in Table 1-1.</p>
27	Evan Walters	7/21/2025		<p>On DMRs from May 2020 through April 2025, non-detections of total residual chlorine (TRC) were reported as “0” – please provide the method detection limit for TRC.</p>	<p>TRC detection limit is 0.1 mg/l. Note on August 18, 2025, WEP switched to DPD Colorimetric Method (4500-Cl G), using a sample instrument which has an MDL of 0.02 mg/l. NYSDEC Region 7 was notified on August 25, 2025.</p>
28	Evan Walters	7/21/2025		<p>In Table C, four samples were reported for total cadmium with a maximum of 68 mg/L. This value seems high – please confirm the reporting units for these samples</p>	<p>The unit error has been fixed, and updated in the Form 2A Table C included in the "NY2AAITables 2025" spreadsheet, as Attachment 5. reporting units are confirmed all mg/L</p>

Notice of Incomplete Application Comments

ID	Reference	Comment	Response
1		<p>The municipal wastewater treatment expansion project was not evaluated as a connected action in the Micron New York Semiconductor DEIS and must be reviewed under SEQR. This application will remain incomplete until a negative declaration is filed or a draft environmental impact statement has been accepted by the lead agency (6 NYCRR Part 621.3(a)(7)). DEC recommends that the County begin the SEQR process and coordinate a lead agency as soon as possible.</p>	<p>Prior to the NOIA, the County has been proceeding with a separate SEQR process for the municipal treatment train upgrades (i.e., the existing MTT) and has requested lead agency status of involved and interested parties. They expect to take lead agency status in early September 2025. Given environmental studies performed to date, this project is anticipated to result in a negative declaration being determined by the County in mid-October. This timing should not impact NYSDEC's identification of a complete SPDES permit application.</p>
2		<p>Per 6 NYCRR Part 621.3(a)(4), the County must submit all required DEC permit applications simultaneously or provide justification for not doing so. Based on the information available to DEC, this application will remain incomplete until the County submits the following:</p> <ul style="list-style-type: none"> a. a freshwater wetland permit application for the facility expansion and the industrial wastewater conveyance line which connects the facility to the Micron Campus b. 401 Water Quality Certification associated with the Federal 404 permit application c. a protection of water permit for upgrades to the outfall located within the Oneida River d. an Air State Facility or Air Title V permit application 	<p>As NYSDEC is aware, submittal of a Joint Permit Application (JPA) will cover the permitting identified in 2.a.b. and c. The JPA for the Oak Orchard Site is anticipated to be submitted in early to mid-September 2025, and for the Oak Orchard Industrial Conveyance Corridor in mid- to late-September 2025. The JPA for the Outfall diffuser repair or replacement is anticipated in mid- to late-2026, after the design engineering commences. The Oak Orchard WWTP Outfall diffuser project efforts are not connected to Micron related actions.</p> <p>Responses, as follows:</p> <ul style="list-style-type: none"> a. For the Oak Orchard Site, the separate JPAs are being developed to cover the Municipal Treatment Train (MTT) and the Industrial Treatment Train (ITT). Approximately 0.8 acres of New York State (NYS) Jurisdictional Wetlands are anticipated to be permanently affected for the ITT, and mitigation is anticipated. We are awaiting the Jurisdictional Determination to assess if the MTT is impacting jurisdictional wetlands. Currently for

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			<p>the MTT upgrades, no NYS jurisdictional wetlands are anticipated nor is work anticipated within 100 ft of a jurisdictional wetland at this time.</p> <p>b. The ITT conveyance pipeline corridor has both USACE and NYS jurisdictional wetlands. The JPA is being developed with the required 401 Water Quality Certification and Federal 404 permit applications for USACE jurisdictional wetlands. There is still some level of wetland delineation being defined by NYSDEC along the corridor. Coordination with DEC is ongoing. At this time, the JPA is expected to be submitted in mid-September.</p> <p>c. The existing outfall is sufficiently sized to convey up to 64 mgd, and its condition is still being assessed. No design has been initiated as modeling and condition assessment are still on-going. The timing for a modification or replacement of the existing Outfall pipe and/or diffuser is mid- to late-2027; and paired with the MOPO project. Once a design engineer is brought on board for this work, the JPA will be submitted. Federally, it is anticipated that the work will be performed under a Nationwide Permit.</p> <p>d. An Air Permitting Strategy Technical Memorandum (TM) was transmitted to NYSDEC on July 31, 2025, and comments on this TM were received August 15, 2025. The County is evaluating ways to accelerate Air Permit application.</p>



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3		<p>When an action requires a determination by the Office of Parks, Recreation and Historic Preservation pursuant to section 14.09 of the Parks, Recreation and Historic Preservation Law (New York State Historic Preservation Act of 1980), the application is not complete until the Office of Parks, Recreation and Historic Preservation has made a determination whether;</p> <p>a. any historic, architectural, archeological or cultural resources present in the project impact area are significant (listed on or eligible for listing on the State or National Register of Historic Places); and</p> <p>b. the project may have any impacts on such significant resources.</p>	<p>In July 2025, the Office of Parks, Recreation and Historic Preservation (PRHP) was contacted to ascertain whether there are:</p> <p>a. any historic, architectural, archeological or cultural resources present in the project impact area are significant (listed on or eligible for listing on the State or National Register of Historic Places); and</p> <p>b. the project may have any impacts on such significant resources.</p> <p>For the Oak Orchard Site, including the shoreline for the Outfall, PRHP has identified that there are "no historic properties, including archaeological and/or historic resources, will be affected by this undertaking."</p> <p>For the ITT pipeline conveyance corridor, we are awaiting PRHP's determination.</p>
4		<p>Will there be any sanitary sewer extension as part of the project?</p>	<p>Not at this time. A statement to this effect has been included in the municipal Engineering Report (Attachment 7) under Section 1.4.</p>
5	1.7	<p>A POSS Registration and Notifier Application form found on the Sewage Pollution Right to Know - NYSDEC page (https://dec.ny.gov/environmental-protection/water/water-quality/sewage-pollution-right-to-know) was submitted to DEC on July 17, 2025, from the Town of Cicero. The POSS ID for Cicero to Oak Orchard is NYS700086. Please include this ID in the application edits</p>	<p>The Town of Cicero applied for POSS mid-July 2025, and has received a POSS designation. POSS NYS700086 has been included in the updated Form 2A (Attachment 1).</p>
6	1.24	<p>Please check one of the boxes to indicate a variance request or "not applicable."</p>	<p>Form 2A (Attachment 1) variance request is updated with "not applicable". Please note, the County may revise this in the future.</p> <p>Also, NYS should fix the Form 2A so that issues with the pdf fillable form do not impact form completion.</p>

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7	2.2	Inflow and Infiltration: Extraneous flows of 1.1 MGD are considerable. Provide an estimated timeframe for implementing I/I reduction efforts.	We plan to utilize our CMOM/CSO Program Manager to develop a flow metering approach (2026) to help establish an accurate conveyance model (2027-2028) of the Davis Road PS Service Area. Budget-dependent, this will be used to determine future locations for I/I reduction efforts (2028-2029). I/I reduction efforts would likely begin late 2028, early 2029.
8	2.4	Flow Diagram: To where will solid wastes from the upgraded facility (e.g. screenings, grit, sludge cake) be hauled for disposal?	<p>Current: Biosolids from the Oak Orchard WWTP are currently hauled to Metro for digestion and dewatering, then hauled to landfill for disposal. WEP contracts out hauling and disposal of biosolids and grit. This is done through a competitive bid process where the vendor is required to provide capacity assurance notices from properly permitted disposal facilities. Biosolids are currently accepted at Seneca Meadows, Ontario County, and Chemung County landfills. Grit is hauled directly from Oak Orchard to Seneca Meadows Landfill. Screenings are transported by WEP to the local Reworld Waste-to-Energy Facility in Jamesville, New York for incineration.</p> <p>Future: WEP will proceed with a competitive bid process to include the transportation and disposal of grit and sludge cake generated at Oak Orchard at a permitted disposal location. Screenings will continue to be transported by WEP to the local Reworld Waste-to-Energy Facility in Jamesville, New York. The flow diagram has been updated to indicate hauling to landfill.</p>
9		General Instructions for Reporting, Sampling, and Analysis: Please provide analytical reports for any parameters sampled for the SPDES application which are not reported on DMRs.	Analytical data reports these specific parameters are provided as Attachment 13.



<p>10</p>	<p>Tables A-D</p>	<p>a. Please provide the Excel spreadsheet file for Tables A-D.</p> <p>b. The maximum and average daily discharge concentrations reported in Table A for total mercury (25 ng/L and 13 ng/L respectively) are inconsistent with the values reported on the facility's DMRs. According to the Mercury Minimization Plan Annual Status Report submitted May 29, 2025, the facility has been using EPA Method 245.2 for internal monitoring purposes. DOW 1.3.10 indicates that EPA Method 1631 is acceptable for SPDES permit compliance and MMP internal monitoring, and EPA Method 245.7 is acceptable for MMP internal monitoring only (see Table 8). Please resubmit Table A including only data using EPA Method 1631.</p> <p>c. No data were provided in Table A for PFUnA, NMeFOSE, NEtFOSE, or 9Cl-PF3ONS. Please explain why these data are unavailable.</p> <p>d. Please indicate how many non-detects are included in the sample sets for the following parameters:</p> <ul style="list-style-type: none"> i. Table A: BOD5 (403 samples total), 1,4-dioxane (4), and each PFAS parameter ii. Table B: Oil & grease (12), nitrite (4), nitrate (4), total nitrogen (4) iii. Table C: total selenium (20) iv. Table D: heptachlor (4) <p>e. No data were provided in Table B for total residual chlorine or dissolved oxygen. No data were provided in Table C for total phenolic compounds.</p> <p>Please fill out these rows using all sampling data available including those taken for DMRs.</p> <p>f. A maximum of 68 mg/L was reported in Table C for total cadmium. Please confirm the units on these reported samples.</p> <p>g. On March 27, 2025, Micron shared with DEC the pretreatment discharge application which Micron submitted to Onondaga County. This application included a list of "Worse-Case Organic Wastewater Constituents to OCDWEP." Please include in the Oak Orchard SPDES application any parameters on this list which are expected to be present in the effluent of the industrial wastewater treatment plant (IWWTP).</p> <p>h. Please provide concentration data, tabulated in a separate Excel spreadsheet, for the following parameters for the last 5 years (i.e. the</p>	<p>Responses below.</p> <ul style="list-style-type: none"> a. The Excel calculation spreadsheets are provided as Attachment 5. b. Mercury data has been updated to include only analyses conducted using USEPA Method 1631 (low level mercury), and the updated Form 2A Table A has the revised to include just low level mercury. c. Data for these parameters are provided in Attachment 5, and the updated Form 2A Table A (Attachment 5) has the revised to include these parameters. d. The Excel calculation spreadsheet provided in Attachment 5 shows the number of non-detections for all parameters. e. Form 2A Table B (Attachment 5) was updated for DO. Chlorine residuals in LIMS are "field only", and not a reportable value. Table C (Attachment 5) includes the total phenolic, which had been misidentified as phenol. f. The units for the cadmium maximum of 68 mg/L is actually ug/L. Table C (Attachment 5) has been updated. g. See Attachment 16 table that identifies which of the compounds included on the "Worse-Case Organic Wastewater Constituents to OCDWEP" table are potentially present in the biological treatment effluent. h. The excel data spreadsheet for iron, chlorform, total cadmium, total chromium, total copper, total nickel, total zinc, total arsenic and total phenolsis provided as Attachment 5.
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		concentration data used to calculate and report loading for these parameters on DMRs): total iron, chloroform, total cadmium, total chromium, total copper, total nickel, total zinc, total arsenic, and total phenols.	
11	Tables F	Water Treatment Chemical Listing: a. Please provide records of water treatment chemical authorization for aluminum sulfate and sodium bisulfite. If records are unavailable, please submit new WTC request forms.	A number of WTP chemicals have been grandfathered in. OCDWEP is formally applying for WTC approval for MTT specifically.
12	Table G	Table G, Industrial Discharge Information: a. Please submit all applicable SIC and NAICS codes for all significant industrial users. b. Please provide industrial discharge information for Micron in Table G.	This data has been included in the "SIC and NAIC codes" spreadsheet, in Attachment 12.
13		Project Design and Schedule: a. Please provide design flow and loading rates for the maintenance of plant operations (MOPO) phase of the upgrade project. Include a design (annual) average flow, design maximum day flow, design peak hourly flow, and design peak instantaneous flow (Ten States Standards 2014, 11.24). b. Please provide a high-level schedule showing major milestones in the phasing of the project, including: the start and end of the maintenance of plant operation phase (MOPO); completion of construction of the upgraded municipal treatment train; completion of construction of the industrial treatment train (FAB1 and FAB2 portions); and receipt of Ready for Equipment (RFE), Ready for Manufacturing (RFM), and production wastewaters from Micron.	This information is included in the municipal Engineering Report (Attachment 7). Program schedule is shown in Figure 4.4. Also, please see the July 1, 2025 SPDES Meeting slide deck for the combined high level schedule (Attachment 15).
14	Table H	Facility & Collection System Resiliency: a. Include the Gaskin Road Pump Station in Table H.	Gaskin Road has been added to Form 2A, Table H (Attachment 1).



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15	3.1	<p>Description of Outfalls:</p> <p>a. Please provide estimated lat/long coordinates for proposed new internal Outfalls 01A (municipal treatment train effluent) and Outfall 01B (industrial treatment train effluent)</p> <p>b. Add information for all stormwater outfalls to item 3.1. Please include lat/long coordinates and a map showing the stormwater outfall locations.</p>	<p>15a: Lat/Long provided for anticipated outfall locations. The final design consultant (FDC is responsible for final siting. MTT effluent - Outfall 01B: Latitude: 43°12'1.10"N Longitude: 76°12'39.74"W ITT Effluent - Outfall 01A: Latitude: 43°12'16.52"N Longitude: 76°12'35.29"W</p> <p>15b: Form 2A Section 3.1 (Attachment 1) is updated to include stormwater outfalls per the MTT SWPPP. The map identifying the locations of the stormwater outfalls is included in Attachment 14.</p>
16	6.1	<p>Item 6.1, Checklist and Certification Statement:</p> <p>a. Please check "Detailed MZ Form" to indicate submission of the form.</p>	<p>The Detailed MZ Form is checked.</p>
17		<p>Detailed Mixing Zone Forms (Existing and Proposed):</p> <p>a. The Detailed Mixing Zone Form for the existing facility provides a current summer average effluent temperature of 20.31°C and winter average effluent temperature of 10.64°C. The form also provides a current summer average influent temperature of 18.09°C and winter average influent temperature 14.02°C. After expansion, under future flow conditions, effluent temperature is assumed to be equal to the influent temperatures. Since the summer average influent temperature is less than the summer average effluent temperature (18.09°C < 20.31°C), using 18.09°C for effluent temperature is a less conservative assumption for the purposes of evaluating mixing. Please provide justification or clarification for use of the lower summer temperature for mixing zone modeling.</p>	<p>The existing average influent temperature to the plan is 18.09 degrees C, and increases to 20.31 degrees C because of the lagoons. However, under future flow conditions (beginning under Tier 2 flows of 22 MGD), the lagoons will be removed, and it is not expected the proposed processes at the plant would affect the water temperature before discharging to the Oneida River. Therefore, it was assumed under future flow conditions, the influent temperature of 18.09 degrees C would equal the effluent temperature to Oneida River during summer months.</p>

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18		<p>Process Flow Diagram, Dwg 00G09 (25% Design)</p> <p>a. The process flow diagram in Dwg 00G09 indicates a change of influent sampling from the current location directly from the influent force main where it enters the Oak Orchard facility, to one that is after the bar screen and grit removal processes. Please provide a justification for this change in location, or correct, as appropriate.</p>	<p>The current influent sample is taken from primary forcemain entering the facility. This sample location does not capture the influent contribution from the existing Horsehoe Island forcemain. Moving the sample location downstream of the bar screen and grit removal processes will improve influent sample reliability by reducing ragging and allow the sample to be representative of the complete influent entering the facility.</p> <p>Change in sample location will provide an improved sample site to obtain a more representative sample. Additionally, new force mains are expected to enter the headworks area. If we continued to sample at the current location, it would not capture the new waste streams.</p>
19	Table 1.12	<p>OOWWTP Expansion Program Basis of Design Report (June 2025)</p> <p>a. Please provide a 30-day average design flow condition for the upgraded municipal treatment train</p>	<p>The 30 day average design flow condition is given in Table 1.12 of the municipal Engineering Report (Attachment 7) and corresponds to the maximum month at the Full Future Buildout Projections. A sentence was added to the prose and a line was added to the table to make it clear that this is the design condition.</p>
20	Table 1.10	<p>OOWWTP Expansion Program Basis of Design Report (June 2025)</p> <p>a. Please provide a 30-day average design flow and loadings for the maintenance of plant operations (MOPO) phase of the overall project (formerly referred to as the "bridging project").</p>	<p>The full flow and load projections for the MOPO design condition have been added to Table 1.12 of the municipal Engineering Report (Attachment 7). This includes the 30d average design flow and loadings (maximum month).</p>

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21	Table 1-2	<p>Oak Orchard Industrial Wastewater Treatment Plant and Water Reclamation Facility Conceptual Design Engineering Report (June 2025)</p> <p>a. Please explain what flow metric is used for the “maximum design condition” the new industrial treatment train included in Table 1-2 of the Oak Orchard Industrial Wastewater Treatment Plant and Water Reclamation Facility Conceptual Design Engineering Report (June 2025).</p> <p>Additionally, Table 1-2 gives a maximum design flow condition of 8.25 MGD, while other sections of the report use 8.5 MGD. Please clarify the discrepancy.</p>	<p>The maximum design condition for the ITT assumes a flow of 8.25 MGD for FAB1 and 16.5 MGD for the combined flows from FAB1 and FAB2. The references to a FAB1 flow of 8.5 MGD for the ITT were incorrect and have been revised in the industrial Engineering Report (Attachment 9) to 8.25 MGD.</p>
22		<p>Additional Information</p> <p>a. On DMRs from May 2020 through April 2025, non-detections of total residual chlorine (TRC) were reported as “0” – please provide the method detection limit for TRC.</p>	<p>TRC detection limit is 0.1 mg/l. Note on August 18, 2025, WEP switched to DPD Colorimetric Method (4500-Cl G), using a sample instrument which has an MDL of 0.02 mg/l. NYSDEC Region 7 was notified on August 25, 2025.</p>
23		<p>Naming Conventions</p> <p>a. DEC proposes using the following naming conventions to refer to Oak Orchard Wastewater Treatment Plant. Please confirm these names or propose alternatives.</p> <p>i. “Oak Orchard Wastewater Treatment Plant” (OOWWTP) to refer to the whole site including all treatment trains and discharges</p> <p>ii. “Municipal Treatment Train” (MTT) to refer to the existing/upgraded sanitary treatment system at Oak Orchard (new Outfall 01A)</p> <p>iii. “Industrial Treatment Train” (ITT) to refer to the new industrial treatment system to be constructed on site, which will treat Micron’s process wastewaters (new Outfall 01B)</p>	<p>Clarification of this naming convention has been added to the abbreviations section of the municipal Engineering Report (Attachment 7). The municipal and industrial Engineering Reports (Attachments 7 & 9) have not been revised to update these terms, but future correspondences and reports will adopt this convention.</p>
24		<p>General comment: Throughout the Basis of Design Report, abbreviations and acronyms are scattered within in the narrative, tables, and figures without defining their meanings. To inform the general reader and to aid in clarity, these abbreviations must each be defined when they are first introduced in the report. Alternatively, supply a table listing all of the abbreviations used throughout the report, with each’s associated meaning.</p>	<p>Acronyms are defined at the first site of their reference. An acronym table is also included, following the table of contents.</p>

ID	Reference	Comment	Response
25	Page 10/19	Page 10 states the existing administration building shall be retained, however on Page 19 a new administration building is proposed. Please clarify.	The existing administration building is being retained for office space and laboratory space, however due to increased staffing needs for the MTT (i.e., the OOWWTP) and ITT (i.e., the IWWTP), a new (second) administration building will be constructed.
26	Section 1.3.4	The description of the configuration of the existing preliminary treatment is incorrect. After coarse screening, influent proceeds through the climber screens. Then, it is next processed through the aerated grit removal system. Correct this process description so that the public will have a complete understanding of the of existing treatment process	The text has been revised to indicate aerated grit basins are before screening.
27	Section 1.3.5	Alum is currently applied in the effluent channel of the grit removal process, not during or before. Please correct	Carollo's understanding is that alum is added to grit effluent channel per the comment. The text has been corrected.
28	Table 1.5	Include the surface overflow rate for the existing conditions.	<p>The surface area of each clarifier based on as-built drawing dimensions is 3,523 SF. Based on this area and 10 States Standards, the maximum hydraulic capacity of existing clarifiers based on surface loading is 7.05 mgd per clarifier or 28.2 mgd total.</p> <p>Based on historical data and a peak hour flow of 21.07 mgd with 4 clarifiers, the surface loading rate is 1495.2 GPD/SF. This is shown in Table 1.5 of the municipal Engineering Report (Attachment 7).</p>
29	Section 1.4.1	The applicable Technical Memo is located in Appendix F, not Appendix D	The text in the municipal Engineering Report (Attachment 7) has been revised.
30	Section 1.4.1	This section states that space will be allocated for future expansion of 33%. Clarify whether this is buildout associated beyond that generated from Fabs 3 and 4	The current projected MTT Liquid train upgrade is expected to be sufficiently sized to accept Micron's domestic WWTP discharges through Fabs 3 & 4. The 33% expansion space was maintained if commercial growth exceeds projections in the future, beyond the current planning phase. Text has been revised.

ID	Reference	Comment	Response
31	Section 1.4.3	For design of the water reuse facilities, please refer to DEC's water reuse website which contains EPA's 2012 Guidelines for Water Reuse. Review of water reuse applications will include consultation with DOH. DEC Website: Water Reuse - NYSDEC	Yes, the municipal reuse facility will meet Reuse Guidelines in the 2012 Report. This has been noted in the municipal Engineering Report (Attachment 7).
32	Section 1.4.3	Discuss any known pipe sizing and material requirements for the ultra-pure water (UPW) system	Piping will be sized to maintain velocities less than 7 ft/sec to reduce head loss. RO permeate will be either 316 sst or plastic piping such as sch 80 PVC or HDPE due to corrosion issues with RO permeate.
33	Section 1.4.3	Discuss any known or expected water treatment chemical usage for the cooling water component	This comment is not relevant. This section is simply indicating that recycled water may be used in Micron's cooling towers. Listing chemicals used by Micron for Micron's cooling towers in this section is not be applicable
34	Section 2.2	Provide the design side water depth for the new, proposed primary clarifiers.	Dimensions will be identical to existing. The depth from weir crest to floor is 10.5 feet. This meets the Ten States Standard for Primary Settling Tanks of 10 feet minimum SWD.
35	Section 2,2	Given the proposed channel dimensions, provide the design approach velocity for the mechanical coarse screens.	Approach velocity will meet 10 State Standards (not less than 1.25 fps at average flow) based on proposed channel dimensions and water depth.
36	2.4	What design average flow is being used to calculate the surface overflow rate?	Surface loading is calculated based on peak hour flow of 38.6 mgd with 6 clarifiers in service. Ten States Standards for weir loading and surface loading are peak flow metrics and are not applied to average flows.

ID	Reference	Comment	Response
37	Section 2.2.2 & Section 4.2	The proposed weir loading rate under peak hour flows of 40,400 gpd/lf exceeds Ten State Standards (TSS) recommended maximum loading of 30,000 gpd/lf. The DEC recognizes other design references (Metcalf & Eddy and WEF/ASCE) include maximum loading rates up to 40,000 gpd/lf. As stated in Section 4.2, DEC agrees with the approach for the BODR to include provisions to modify the weirs to increase weir length to meet TSS. Further evaluation should include examining whether the new clarifiers will have increased sidewall depth greater than existing, proposed baffle configuration, and consideration for adding additional weirs channels to increase length of weirs (i.e. two weir channels at end of clarifier)	Agree. Modifications to existing clarifier weirs to increase weir length along with construction of two (2) additional clarifiers matching the modified longer weir configuration will comply with the Ten States Standard for peak flow weir loading rate. Note that the six (6) clarifiers meet the surface loading rate, as well.
38	Section 2.3	Provide a copy of the GHD 2021 Facility Plan and Feasibility Analysis (FPFS) and Oak Orchard WWTP Facility Plan and Feasibility Study Site Selection Conceptual Treatment Approach Memorandum (GHD, 2021).	These reports are now included as attachments to the municipal Engineering Report (Attachment 7).
39	Section 2.3	With regard to the planned temporary delivery of additional solids to the Syracuse Metro WWTP as a result of on-going construction at Oak Orchard and additional volumes of sludge generated during the bridging project phase, what consideration has been given to the operational impacts on biosolids handling and disposal practices at the Metro WWTP? By what percentage will these additional solids deliveries increase solids handling loads, and disposal as currently experienced at Metro? Additionally, please discuss the adequacy of the existing containment structures for the gravity thickener's loading pad as it relates to the facility's upgrade.	Sequencing of solids treatment/thickening is discussed in Section 2.3.1 of the municipal Engineering Report (Attachment 7). Separate thickening of PSL and WAS will maintain the current truck volume sent to the Metro WWTP through at least the 5 year growth projection. Operational impacts on longer term biosolids handling at Metro WWTP is not included in the OOWWTP Expansion Program evaluations.
40	Section 2.3.3	Figures 2.1, 2.2, and 2.3 indicate that alum is applied prior to screening and grit removal. Application at the initial entry to the OOWWTP will increase chemical demand for Alum and its subsequent usage if dosed as the proposed location as shown. Justify the application as indicated in these three figures, as opposed to the current application within the primary clarification influent channel.	Municipal Engineering Report (Attachment 7) Figures 2.1, 2.2, and 2.3 have been updated to show alum addition between grit removal and primary clarification. Final alum dose location is shown correctly in the process flow diagram (00G09) and noted in Table 4.6.

ID	Reference	Comment	Response
41	Section 2.3	This section references "TM7" more than once. If the reader assumes that this stands for Technical Memo #7, where can this document be found within the report or has it been renamed and included in an Appendices? Please clarify.	The reference to TM7 has been removed in this section.
42	Section 2.8	Confirm the estimated flows and loads for the Micron Ready for Equipment (RFE) wastewater. Has Micron provided a description of the process that generates the RFE, characterization and list of chemicals used in the generation of this wastewater?	RFE flows are no longer planned to discharge to the MTT. All RFE and RFM flows will be treated at the ITT. This has been modified in the municipal Engineering Report (Attachment 7).
43	Section 4.1.1	Table 4.2: Proposes 2 screens +1 unit as standby. Currently, there are 2 climber screens at OOWWTP. However, this design is assuming peak hourly flows up to 38.4 MGD with no proposed changes to the dimensions of the screening channels' widths or depths. Provide calculations showing that 2 climber screens (with one of the 3 out of service) can adequately supply the necessary flow-through capacity for the PHF conditions without significant headloss due to accumulated screenings and submergence	The proposed channel depth and design water depth of the new screens is greater than the existing screens, thus providing the additional capacity. The new screens will be sized to be able to handle 19.2 MGD each. At 30% blinding, the calculated headloss would be approximately 6".
44	Section 4.12	The proposed design requirements stated for the new receiving substation appear to meet the intent of ten state standards dual power requirement, however, DEC will require submission of the proposed substation design to make a final determination.	A memorandum summarizing power redundancy at the MTT as well as substation drawings have been added to the municipal Engineering Report (Attachment 7) as Appendices Q and R, respectively.



ID	Reference	Comment	Response
45	Section 4.1.3	<p>Justify the assumption that H₂S concentrations within the headworks is expected to be "low." The headworks area receives the majority of its influent wastewater from the Davis Road PS. This wastewater travels through twin force mains at a distance of over 5 miles and provides ample opportunity for hydrogen sulfide to generate within the force mains for ultimate delivery to the headworks of OOWWTP. H₂S is a toxic gas for humans. It is also highly corrosive to exposed equipment. A more robust HVAC and odor control system should be given careful consideration to protect both people and the newly installed treatment units</p>	<p>We recognize the human health and corrosion aspects of H₂S. The term 'low' in this context is used to describe the treatment technology selection to remove H₂S. "Low" meaning that it is low enough to warrant selecting carbon adsorption technology, and not so high that we'd need to consider use of a biotrickling filter. This describes an anticipated concentration as a yearly average being at or under 20ppm. This is to be understood as one of several justifications to select Activated Carbon odor control treatment technology, not as a suggestion that odor control systems will be undersized or underperforming. The MTT plant currently uses sodium hypochlorite to control H₂S generation in the forcemain and the intent is that the plant will continue dosing at Davis Road Pump Station to maintain H₂S within this general range.</p>
46	Section 4.1	<p>Discuss any air monitoring equipment currently installed or proposed to be installed within the headworks building.</p>	<p>Currently there is hydrogen sulfide meter and a LEL meter installed in "C" building to measure ambient atmospheric conditions. The odor control system which pulls air from the influent bunker, the covered grit chambers, and grit chamber effluent weirs in "C" building also has a hydrogen sulfide sensor. This has been added to Section 1.3.4 of the municipal Engineering Report (Attachment 7).</p> <p>Future air monitoring equipment shall follow OSHA and NFPA 820 standard guidelines.</p>

ID	Reference	Comment	Response
47	Section 4.14	DEC will need additional detail on the bridging project and outfall modifications prior to finalizing the SPDES Permit and approving the BODR. It is also noted that Appendix F mentions a future technical memorandum will be submitted for the projected flows and loads for Micron construction and validation wastewater discharges. Please confirm if the terminology ready for equipment (RFE) discharge is considered the same as validation wastewater discharge	<p>Additional information on the MOPO project basis of design has been added to Section 4.10 of the municipal Engineering Report (Attachment 7). Additional information on the outfall has been added section 1.3.8.</p> <p>As noted in the response to comment #42, the municipal treatment train (MTT) is not expected to receive RFE wastewater at this point.</p>
48	Section 4.14	As indicated in DEC June 26, 2025, email, DEC and EFC have requested the County/Consultant to send us additional detail on the Design Build (DB) approach being considered for aspects of the project. We'd like details on process/approach, how the DB will be implemented, how it ties to the recent County Bill passed for DB, there are different DB approaches and we'd like detail on which one will be pursued, what's anticipated for design level submissions/schedule, what's the RFQ process for selecting a DB firm/owners representative and schedule, design criteria provided to DB firm, etc. We recognize some of the above information may not be known at this time, but the intent is for County/Consultant to provide us a better understating of what the DB process/approach for our review and consideration. Once we have this detail, we can work on scheduling a meeting to discuss further.	The use of DB for a project delivery method affects the frequency of interaction between the County and DEC for design approvals, and project schedule. A separate meeting is being scheduled for early to mid-September to address this comment.
49	Section 4.4.1	Table 4-10: Provide the total HRT and HRT for both the anoxic and aerobic zones.	Total, anoxic, and aerobic HRT for the maximum month (MM) condition with all units in service, 55% aerobic volume fraction, and excluding internal recycles is 7.6 hr, 3.5 hr, and 4.2 hr, respectively. Data added to Table 4.10 of the municipal Engineering Report (Attachment 7).
50	Section 4.4.1	Confirm whether DO meters will be installed to monitor the oxygen levels in the anoxic and aerobic. The system must also include an alarm to notify the operator of any potential or actual oxygen deprivation.	DO probes will be installed in the aerobic zones for process monitoring and control. DO probes in the dedicated anoxic zones are not necessary. Alarms will be included to notify operators of deviations from set points.

ID	Reference	Comment	Response
51	Section 4.4.1	Provide the design SRT.	Total and aerobic SRTs for the MMWW condition are 16 d and 10.2 d, respectively. These were added to Table 4.10. in the municipal Engineering Report (Attachment 7).
52	Section 4.4.1	Include the expected MLSS concentration.	A bioreactor MLSS concentration of 6800 mg/L is expected under the maximum month condition. This allows the MLSS concentration in the MBR tank to remain less than the 10,000 mg/L maximum under maximum week loads as required by membrane manufacturers. This was added to Table 4.10. in the municipal Engineering Report (Attachment 7).
53	Section 4.4.1	What is the expected F/M ratio?	The F/M ratio is expected to be 0.07 ppd/lb at the maximum month condition. This is added to Table 4.10. in the municipal Engineering Report (Attachment 7).
54	Section 4.4.1	Include the expected alkalinity range.	Influent alkalinity was based on data collected in 2014 (200 to 290 mg CaCO ₃ /L). This range was added to Table 4.10 of the municipal Engineering Report (Attachment 7).
55	Section 4.5.1	Include the expected MLSS concentration.	A membrane tank MLSS concentration of 8500 mg/L is expected under the maximum month condition. This allows the MLSS concentration in the MBR tank to remain less than the 10,000 mg/L maximum under maximum week loads as required by membrane manufacturers. This was added to Table 4.11 of the municipal Engineering Report (Attachment 7).



ID	Reference	Comment	Response
56	Section 4.5.1	The membrane flux rate is a critical design parameter which is a function of the MLSS concentration, temperature, TMP and membrane fouling. At a given TMP, the flux is inversely related to viscosity, which increases at lower temperatures and at a higher MLSS concentration. Therefore, the more conservative design will be based on the lowest ambient temperature likely to be encountered during treatment. The table indicates a design peak flux at a temperature of 10 degrees C. How was this temperature established for the design?	The design peak flux temperature of 10 degrees C is the 0.05th percentile of the influent daily average temperatures recorded from 2020 through 2024. Membrane manufacturers generally permit higher fluxes for shorter durations. The adopted net membrane flux of 17 gfd is 20 to 30% less than the maximum values allowed by manufacturers and is therefore conservative. This note was added to Table 4.11 of the municipal Engineering Report (Attachment 7).
57	Section 4.6.1	Table 4.12 does not indicate how many treatment trains are proposed for the UV system. Please provide based upon expected design PHF and AAF.	The number of treatment trains will depend on the UV Manufacturer and reactor model proposed. For Wedeco, 4 trains are required. For Trojan, 2 trains are required.
58	Section 4.6.1	For primary clarifier design, an average design flow of 11 MGD is assumed. For the design of the UV system, the ADF is 9 MGD. Please explain the discrepancy.	It's important to note that ADF stands for Average Daily Flow, not Average Design Flow. The UV Annual Average Day Flow (AADF) is listed as 9.04 MGD. This is the average of the 10- and 20-year projections. Using this AADF we can more accurately calculate the annual O&M costs for the equipment over the life of the system.
59	Section 4.7.1.2	Will the existing gravity thickeners be demolished or reused? Whether new or reused GTs, the design must ensure that these can be safely accessed by operators for routine O&M. The existing GTs do not have this type of functionality.	The existing gravity thickeners will be demolished. New gravity thickeners will be designed to provide safe access.
60	Section 4.7.2	The first sentence of this section ("The existing OOWWTP facility co-thickens with primary sludge in two gravity thickeners") is missing an object. It co-thickens what with primary sludge? One may assume that waste activated sludge should have been included in this sentence, however, it must be clearly stated.	Agree, text has been revised to indicate the plant co-thickens WAS and primary sludge.

ID	Reference	Comment	Response
61	Section 4.7.2	The second paragraph seems to be describing the GBT process at Metro. Is this same detailed process also proposed for OOWWTP? This section and the following Section 4.7.3 are written as if the proposed buildings and equipment already exist on the OOWWTP site. The general public does not know if these exist now or are proposed to be constructed in the future. This should be clear to readers who are not familiar with the OOWWTP or with those solids handling facilities which currently exist at Metro	Yes, the upgraded MTT will utilize GBTs for WAS thickening, text will be clarified.
62	Section 4.7.4	The receiving station must be designed with a containment area for high strength waste off-loading purposes.	Agree, Noted in municipal Engineering Report (Attachment 7) for both Section 4.7.3 (high strength liquid waste) and Section 4.7.4 (municipal waste).
63	Section 4.7.4	Identify "BWWTP" correctly as Brewerton Water Pollution Control Plant (BWPCP) if that is what is meant by "BWWTP."	References to BWWTP have been corrected to Brewerton Water Pollution Control Plant (BWPCP).
64	Section 4.7.4	Define "TWAS" abbreviation.	TWAS is thickened waste activated sludge, and has been added to list of abbreviations and defined in the municipal Engineering Report (Attachment 7) text.
65	Section 4.7.5	Define "thickened PS" and from where in the treatment process it originates	The municipal Engineering Report (Attachment 7) text has been revised to be "thickened primary sludge".
66	Section 4.8	The concentrate stream from the RO process is, according to this section, destined for mixing with OOWWTP effluent. What is the expected concentration of Total Dissolved Solids (TDS) in this RO waste stream?	The TDS of the RO concentrate is expected to be about 3,500 mg/L assuming a raw water TDS of 700 mg/L and an 80% RO recovery setpoint.
67	Section 4.8	Figure 1 indicates the injection of ammonia directly before the RO Membrane system. Please describe why the ammonia dosage is needed.	This ammonia addition is for chloramine production. Chloramines are needed to prevent biofouling of the RO.
68	Section 4.9.1	Confirm the hydraulic analysis for sizing pumps considers both scenarios of pumping from the temporary standpipes and the eventual repurposed steel MBBR tanks that will be the final storage tanks for effluent from the reuse facility	Confirmed. The standpipe will be designed to have the same water surface elevation as the final storage tanks. So the TDH required by the pumps will not change when the storage gets switched over to the final tanks.

ID	Reference	Comment	Response
69	Section 4.10	Bridging Project (aka MOPO) section is very brief. Provide a date when NYSDEC can expect to receive the technical information and design concepts for this critical period between current and the supplemental temporary treatment.	Additional information on the MOPO project basis of design has been added to section 4.10 of the municipal Engineering Report (Attachment 7).
70	Section 4.11	Provide a technical memo from an electrical engineer licensed to practice in New York State that the redundant power scheme described in this section will provide electrical power for all essential treatment units under adverse loss-of-power conditions similar to those that occurred at OOWWTP on May 12, 2025. Additionally, the Tech Memo must also provide an explanation on maintenance and access to the proposed receiving substation since an outage to one side of the substation will necessitate that the other redundant side stay energized and available to support the entire load of the expanded facility	A memorandum summarizing power redundancy at MTT, as well as substation drawings, have been added to the municipal Engineering Report (Attachment 7) as appendices Q and R, respectively.
71	Appendix F Section 1.2	This section surmises that the connection of existing onsite systems is not anticipated. Was there an evaluation of existing failing systems in the service area and consultation with DOH?	Sewers in the area are required to connect (via Onondaga County Sanitary Code, published by the Onondaga County Health Department, dated November 4, 2021). As service areas expand in those areas, septic systems could be required to connect if they are failing.
72	Appendix F Section 1.1.1	Expand on the sentence "The flows and loads anticipated from Micron during the validation period will be addressed in a future document." What does this "validation period" entail? When will the future document be submitted which discusses this process?	TM-1 was developed in parallel with Micron finalizing validation period flows, however the validation flows only impact the MOPO project. The upgraded MTT will not receive validation period flows from Micron. TM-1 is an historic document attached to the engineering report for background on the future MTT design flows and load, which do not include Micron validation period flow.
73	Appendix F Section 1.2	This section states that the "connection of existing onsite wastewater treatment systems in OOWWTP's service area are not anticipated based on current town planning." The White Pine Basis of Design Report stated that onsite residential treatment systems will be connected to OOWWTP via delivery from the White Pine PS. Are these flows and loads included and considered in the proposed design of the OOWWTP?	See the response to NOIA Comment #71.

ID	Reference	Comment	Response
74	Appendix F Section 1.2	The Department strongly encourages the County to consider connecting any unsewered areas within the confines of the OOWWTP service area so that these may receive full treatment. This is especially important for those areas adjacent to wetlands or waterbodies.	This comment is similar to NOIA comments #71 and #73. Sewers in the area are required to connect (sanitary code). As service areas expand, those on septic system will be required to connect. WEP will coordinate with DOH as sanitary sewer conveyance expansion plans unfold. There will be consideration for connecting unsewered areas within the service area.
75	Appendix F Section 1.3	Confirm the proposed design will include addressing relocation of all discharges (influent, process returns, etc.) upstream of the influent sampling location, including the Horseshoe Island FM and plant waste pump station discharges.	The municipal Engineering Report (Attachment 7) shows return flows downstream of the MTT influent sampling location. The proposed design relocates the influent sample from the primary forcemain delivering influent to the MTT to downstream of screening and grit removal. See response to NOIA Comment #18. The plant drain (i.e., plant wastes pump station) will be introduced downstream of the influent sample. All influent flows (e.g., Horseshoe Island) are upstream of sampling location.
76	Appendix F Section 1.3	Below Table 1.1, item #2 assumes that the Gaskin Rd. PS flows will continue to be directed to the Wetzel Rd. WWTP for treatment. If excess flow from this pump station --- which cannot be delivered to Wetzel Rd. WWTP --- are still planned to be redirected to OOWWTP from Wetzel Rd. WWTP during significant wet weather events, please indicate whether these flows and loads have also been included in the peak hourly flow analysis.	Wet weather flows from Gaskin Rd PS will continue to be sent to the MTT. Peak flows and loads from Wetzel Rd are accounted for in the flow and load analysis assuming historical peak flow management practices continue. See response to NOIA Comment #77.

ID	Reference	Comment	Response
77	Appendix F Section 1.3	Below Table 1.1, item #3 is confusing and will benefit from clarification. Why does the analysis not assume a "...co-occurrence of peak flows within the OOWWTP service area? In other words, are flowrates (average and peak) not considered in the analysis based on the presumption of continued flow to the Wetzel Rd. WWTP?	Gaskin does not divert flows to the MTT under average conditions. It was assumed that this would continue. Similar peak hour flows (20 mgd to 21 mgd) have been measured at the MTT (i.e. the existing OOWWTP) when Gaskin was diverted to MTT not diverted to Wetzel. As such, assuming the peak flow from the MTT service area and the peak flow from the Gaskin Road PS occurred together results in a peak flow that exceeds the historical MTT peak flow by 36%. Given that a peak hour flow this high has not been observed, assuming co-occurrence of the two peak flows was considered unduly conservative.
78	Appendix F Section 1.3	Since OOWWTP will be expanding, is the County considering directing all flow from the Gaskin Rd. PS to OOWWTP to preclude and reduce the likelihood of a bypass situation at the Wetzel Rd. WWTP during very significant wet weather events?	See response to NOIA Comment #76
79	Appendix F Section 1.3	FN #5 associated with Table 1.1 references a "letter from NYSDEC dated March 25, 2024. This is not a letter from NYSDEC to OCDWEP. Rather, it is the 2023 Annual Flow Certification form submitted by OCDWEP to NYSDEC. Please correct.	Footnote reference has been corrected.
80	Appendix F Section 1.4	Since Davis Road PS flows and organic loadings comprise 82% of the OOWWTP influent, explain how the percentage of TSS from the Davis Road PS is 112.5% of the OOWWTP influent. Is this high TSS loading value due to contributions from Clinton's Ditch?	This cannot be explained presently from the data available. Additional sampling was recommended on p. 1-7 to resolve this discrepancy. The Clinton's Ditch's average TSS concentration is 140 mg/L. As such, it does not have a significant impact on the average TSS load.

ID	Reference	Comment	Response
81	Appendix F Section 1.5	Expand on how it was determined that these measurements are “generally consistent” with expected measurements given the very significant variation in differences between the OOWWTP influent organic loadings and those from the influent bunker.	"Generally consistent" was used to describe 75% of the TSS, cBOD, and BOD comparisons (4 of 6 for each) being within 25% of each other. Given the magnitude of the discrepancy in TSS data, a clear difference between these values would be anticipated if there was a bias in the influent sample. The number of observations available to inform this comparison are extremely limited. Therefore, additional sampling was recommended.
82	Appendix F Section 1.6	FN #5 states “Buildout growth from current assumes 8/7 [1.14] of current loads assuming the addition of 1 new processing train.” How was the value of 8/7 derived? How was the value of 0.04 MGD for additional flow from buildout growth at Clinton’s Ditch calculated?	Clinton's Ditch currently has 7 processing trains in their facility. They are currently expanding their facility to provide space for one additional process train for the future. Therefore, the future flow from Clinton's Ditch was assumed to be 8/7 of the current flow to account for the additional process train.
83	Appendix F Section 1.6	FN #6 notes that flow rate was calculated based on the lower end of the recommended range from Metcalf and Eddy. Why was a less conservative value used in the assumption?	The less conservative value was used in order to keep the industrial contribution at a reasonable percentage of the total influent flow to MTT. When a larger value was used, the industrial flow exceeded 25% of the influent load.
84	Appendix F Section 1.7	Define “OP Load” category for the general, non-technical reader.	OP load, referring to orthophosphate, defined for clarity.
85	Appendix F Section 1.7	FN# 5 is not associated with any category in this table. Either indicate where it belongs or delete.	FN#5 is in reference to the adjusted BOD load for the MTT influent not including the contribution from Clinton's Ditch as this was broken out separately for this analysis.
86	Attachment B Table 1	Explain how the peaking factors were derived and calculated for each constituent, as well as each’s associated max/min/avg values.	Historical process data was analyzed to determine current flows and loads and quantify peaking factors. Historical Data Summary [included as Attachment A to TM-1. TM-1 has been included as Attachment F to the municipal Engineering Report (Attachment 7)] summarizes the results of this analysis.

ID	Reference	Comment	Response
87	Attachment B Table 2	Explain the efficacy of including the 'Maximum Two Week' and 'Maximum Two Week Peak' categories used in this analysis. What technical benefits do these bring?	The maximum two week loading condition is used as the peak condition to determine the maximum dewatering run time.
88	Attachment B Table 2	It is not clear why the Clinton's Ditch Minimum month peaking factor; Maximum Two week; Maximum week, and Maximum Day are calculated differently (i.e. not simply subtracting column 2 from column 1 to derive the adjusted OOWWTP influent values in column 3). Explain how these were calculated to determine the adjusted values.	Subtracting column 2 from column 1 result would be correct if the minima and maxima coincided for the Oak Orchard collection system and Clinton's Ditch. The values in "Measured Oak Orchard Influent" reflect the data collected at MTT. The values in "Clinton's Ditch" reflect the data collected at Clinton's Ditch. The values in "Adjusted Oak Orchard Influent" reflect the collection system without Clinton's Ditch. The summary statistics in this column were calculated from the daily data calculated by subtracting the values observed at Clinton's Ditch from the values measured at the MTT.
89	Attachment B Sec 3.1.4	Define the characteristics of the "validation wastewater" proposed for discharge to OOWWTP prior to the commencement of treatment from the planned IWWTP. This section also states that the flows and loads for this discharge period will be addressed as part of a separate memo. Will this be submitted in the future? If so, when? If this Memo is included in the existing report, reference it here.	Please see the response to NOIA Comment #72.
90	Attachment B Sec 3.3	This section incorrectly states that current permit loading limits were based on a max month condition. The limits in the 2012 permit are based on average design flows and loadings. Please correct.	Reference to the max month condition has been removed.
91	Appendix A (Attachment B)	Table 4: Explain the differences of this table from the values within Table 3. They both pertain to full buildout.	This comment is in reference to Appendix A: OOWWTP Flow and Load Estimates of Attachment B to TM-1. TM-1 has been included as Attachment F to the municipal Engineering Report (Attachment 7). Table 4 (of Appendix A) breaks out the sanitary and industrial flow and load projections separately whereas they are presented as a combined total load in Table 3 (of Appendix A).

ID	Reference	Comment	Response
92	Section 1	<p>Oak Orchard Industrial Wastewater Treatment Plant and Water Reclamation Facility Conceptual Design Engineering Report (June 2025), it is stated that "FAB1 Ready for Equipment (RFE) validation testing is anticipated in April 2028 with Ready for Manufacturing (RFM) validation testing in July 2028, and then production in November 2028."</p> <p>In the absence of specific information on the composition of these wastewaters, DEC will assume the pollutants which are identified as likely to be present in Micron's production wastewaters are also likely to be present in wastewaters generated by RFE and RFM validation testing. Limits will be established based on the identified pollutants in Micron's production wastewaters, as necessary, to protect water quality.</p>	<p>RFE is the facility systems are ready - such as cleanroom conditions, RFM refers to the toolsets being functional and ready to produce wafers. This is updated in the industrial Engineering Report text (Attachment 9).</p> <p>The projected water quality to the ITT shown in Table 1-2 represents the RFM water quality. The proposed approach to assume pollutants present in the RFM water will also be present in the RFE water is a reasonable approach given the data that is currently available.</p>
93	Section 1	<p>Table 1-2: FN #2 states that flows and loads for FAB2 are double those of FAB1. Is it correct to state that this indicates that FAB2 will have double the production capacity from that of FAB1 or is maximum design meant to be a summation of both FAB1 and FAB2? If the latter (as Sec. 3.2 indicates), consider a FN to the column to clarify this for the general reader.</p>	<p>FAB2 is the same flow and load as FAB1, thus the result is double FAB1. Table 1-1 and 1-2 Column header has been adjusted to "FAB1 and FAB2 Combined" in the industrial Engineering Report (Attachment 9).</p>
94	Section 1	<p>Page 10: Please identify the constituents composing the micronutrients that are under consideration for addition to the wastewater sludge to improve dewaterability.</p>	<p>Iron, cobalt, nickel and zinc - text in the industrial Engineering Report (Attachment 9) Section 1.4.1.1.1 revised for clarity.</p>
95	Section 1.4.2.2	<p>A SPDES permit life cycle for surface water discharges is 5 years, not 10 years as stated. Please correct</p>	<p>The industrial Engineering Report (Attachment 9) Section 1.4.2.2 revised to state 5 years.</p>

ID	Reference	Comment	Response
96	Section 2.1	<p>Item #2 states that progressive design/build will be implemented. Please provide additional detail on the D/B approach being considered for the aspects of the IWWTP project. This should include details on the process/approach, how the D/B will be implemented, the anticipated timeline for design level submissions/schedule, and the design criteria provided to the D/B contractor, etc. We recognize that some of the above information may not be known at this time, but the intent is for the County and its consultant to provide DEC with a better understanding of what the D/B process/approach may be for our review and consideration.</p>	<p>This comment is the same as NOIA comment #48. Onondaga County and State Agency representatives intend to meet in early to mid-September to discuss Design-Build (DB) approach for ITT project and will include details on how DB will be implemented, expectations on design submissions, and schedule.</p>
97	Section 2.1	<p>Confirm that the standards criteria in Item #11 are referencing engineering design standards. If not, which standards is this item referring to?</p>	<p>Yes, they are referencing engineering design standards. For example: § 2024 Building Code of New York State (BCNYS). § 2024 Existing Building Code of New York State (EBNYS). § 2024 Energy Conservation Code of New York State. § 2024 Fire Code of New York State. § 2024 Mechanical Code of New York State. § 2024 Electrical Code of New York State. § Accessibility Code American National Standards Institute (ANSI) A117.1. § NFPA 820 Wastewater Facilities. § Ten States Standards-Recommended Standards for Wastewater Facilities § Applicable American Society for Testing and Materials (ASTM) Standards. § 2024 edition of the New York State Energy Conservation Code (NYECC). § ASHRAE 62.1-2022 Ventilation for Acceptable Indoor Air Quality. § ASHRAE Handbook 2021 edition Handbook of Fundamentals (Climate Data). § ANSI/ASHRAE/IESNA Standard 90.1 -2022.</p>



ID	Reference	Comment	Response
98	Section 3.1.3	Wastewater from FAB1 is expected to undergo UV disinfection. What types of pathogens are within the industrial wastewater that require this process?	No pathogens expected, UV was included as a safeguard. The industrial Engineering Report (Attachment 9) Section 3.1.5 has been expanded.
99	Section 3.1.3	The line drawing for the Alternative #10 process indicates that chemical addition for anti-fouling and cleaning purposes. The narrative does not say, but the drawing indicates that this occurs in the Biox effluent tank. Please confirm.	pH Control occurs in the Biox Effluent Tank. Antifouling/cleaning chemicals are added in CIP tank. The industrial Engineering Report (Attachment 9) Sections 3.1.3 and 3.1.5 have been revised.
100	Section 3.1.4	If, as indicated in the earlier introductory narrative (Section 3.1), Alternative 10 provides biological treatment for the wastewater generated during the operation of FAB1 (with the option to upgrade for FAB2), please clarify why "...only biological solids are produced in Alternative 10". From review of this report, it certainly appears that the influent wastewater from FAB1 include industrial wastewater. Won't this wastewater also contain concentrations (or trace concentration) of metals, ammonia, and other inorganic wastes that will be settled in the sludge generated during Alternative 10 treatment? How will the wastewater sludge generated from FAB1 vary from the wastewater sludge expected in FAB2?	Statement was to differentiate between Alternative 11 which will have waste phys/chem solids generated in the brine management process in addition to the biological solids. The industrial Engineering Report (Attachment 9) Section 3.1.4 revised for clarity.
101	Section 3.2.1	The third paragraph in this section states: "The equalization and diversion tank described in Section 3.1 was sized to be able to accommodate the peak FAB2 design flow of 16.5 MGD." As asked above regarding Table 1-2, does this mean that FAB2 will have double the production capacity from that of FAB1? If so, confirm that the EQ and DIV tanks are sized to accommodate the combination of peak flows from both FAB1 (8.25 MGD) and FAB2 (16.5 MGD).	FAB2 is the same flow and load as FAB1, thus the resulting flow and load is double FAB1. Confirmed the EQ is sized for the total flow of FAB1 and FAB2 combined. Industrial Engineering Report (Attachment 9) Section 3.2.1 revised to clarify. Clarification on peak flows and duration is currently being coordinated with Micron. An addendum will be provided as additional information becomes available.

ID	Reference	Comment	Response
102	Section 3.2.2.2	Ten States Standards and TR-16 define redundancy as the available capacity of equipment or a treatment train to process 100% of the design flow should its mirror counterpart be taken out of service. This section states that each treatment train will be sized to handle 50% of the flows and loads of the total influent stream. Unless more than two treatment trains are planned, this does not meet the definition of redundancy as understood in standard wastewater engineering practices.	Alternative 11 adds two trains to the existing 2 trains for a total of 4 equally sized trains. The design flow can be treated with one train out of service. Industrial Engineering Report (Attachment 9) Section 3.2.2.2 revised to clarify.
103	Section 3.3	Please reference the map plan view of the proposed conveyance corridor described in this section as located in Appendix A.	A plan view figure let of the conveyance is included in folder labeled "conveyance corridor plan view".
104	Section 3.3	Provide an estimated timeframe for submittal of the BODr for the proposed conveyance corridor system for the DEC's review and approval.	Conveyance will follow the ITT schedule. Statement added to the industrial Engineering Report (Attachment 9) Section 3.3.