



October 30, 2025

Onondaga County
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RE: Municipal SPDES - Surface Discharge– Permit Modification
DEC ID: 7-3124-00018/00001, Oak Orchard WWTP Expansion
4300 Oak Orchard Rd, Town of Clay, Onondaga County

The New York State Department of Environmental Conservation (DEC) and Environmental Facilities Corporation (EFC) have reviewed your resubmission received on October 17, 2025. This resubmission was based on the Request for Additional Information issued by DEC and sent September 24, 2025. Based on our review of this updated material, DEC/EFC offer the following comments as a request for additional information. In order to meet Micron’s construction timeframes, DEC requests that a response to these comments be submitted by November 7, 2025. DEC is available to discuss the identified comments at your earliest convenience.

Municipal Basis of Design Report (BODR)

2. Initial Question: *Section 1.4.1: Section 2.5 of the Report anticipates that PFAS/PFOS regulatory limits may be imposed.*

DEC Response: Please include a discussion or reference a section in the Industrial BODR that details how PFAS and Emerging Contaminants will be addressed, including a discussion on OCDWEP issuance of an Industrial Wastewater Discharge Permit (IWDP) to Micron, and proposed pretreatment measures at Micron that will address PFAS and Emerging Contaminants. Include proposed measures by the industry including any source separation, and technological treatment measures such as nanofiltration, GAC, ion exchange, and foam fractionation that is being considered.

4. Initial Question: *Table 1-12 and Section 2: Given the understanding that Total Dissolved Solids (TDS) will be included as a permit limit in the modified SPDES permit (500 mg/l WQ Standard), TDS is not included as a parameter of concern for consideration in the design criteria. The BODR should discuss how the proposed recommended treatment design will meet the TDS limit, especially under the treatment capabilities of receiving*

wastewater from the FAB1 alone, prior to advanced treatment from the planned IWWTP.

DEC Response: Please include a discussion on how final TDS effluent limits will be achieved for all phases including the introduction of the concentrated reject brine, from the RO system (Fab 2), being introduced immediately upstream of the final effluent monitoring location for outfall 001. The discussion should include a summary of the proposed additional measures for treating TDS for all phases including from the RO (brine), including the use of evaporators, crystallizers, and dewatering centrifuges with offsite disposal. Confirm if the brine discharge on the drawings is concentrated brine, containing high TDS levels, or if the discharge is condensate from the evaporation/crystallization process. As such, consideration should be given to renaming the brine discharge to reflect condensate. Additionally, the design drawings show the ITT final effluent discharge outfall 01B being introduced downstream of the final effluent monitoring location for outfall 001. The ITT discharge location should be moved upstream of the final effluent monitoring for 001 outfall.

12. *Initial Question: Drawing 00G09: Please explain the presence of the injection of a brine source to the effluent pipe prior to discharge to the Oneida River.*

DEC Response: See comment 4 above.

13. *Initial Question: Section 1.2.1 Establishment of Sewer Debt Responsibility – Provide the updated EDU breakdown to EFC when available.*

EFC Response: An EDU breakdown will be required prior to closing an SRF financing

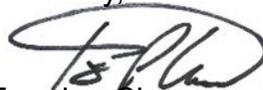
Industrial BODR

22. *Initial Question: Section 3.2: The opening paragraph states: “Following the completion of FAB2, the IWWTP will be required to treat flows from both FAB1 and FAB2. This requires essentially doubling the biological treatment and biosolids management systems described in Alternative 10. It also requires adding chemical and physical treatment for appropriate TDS and other water quality criteria removal to comply with anticipated NY SPDES permit requirements...” Since FAB1 will have the identical SPDES parameter limits for TDS as will both FAB1 and FAB2 combined, please describe the treatment methods for assuring that TDS concentrations will be reduced to assure that the municipal WWTP will not be overwhelmed with TDS loadings under the conditions when FAB1 alone is in operation.*

DEC Response: See comment 4 above.

If you have any technical questions, please contact DEC's Valarie Ellis, at 315-426-7500. If you have questions on the administration of the permit application, please contact DEC's Trendon Choe at 315-426-7445. Thank you.

Sincerely,



Trendon Choe
Deputy Regional Permit Administrator
Division of Environmental Permits, Region 7

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