



Municipal Basis of Design Report / Industrial Basis of Design Report

ID	Reference	Comment	Response
2	BODR Section 1.4.1	<p>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.</p>	<p>To accept new discharges from the Micron Campus, OCDWEP has applied for an updated SPDES permit for the discharge of treated wastewater to the Oneida River. It is anticipated that NYSDEC will require effluent monitoring for PFAS and other compounds in OCDWEP's SPDES permit, including sampling for approximately 40 PFAS compounds using EPA Method 1633/1633A and leveraging state guidance values, as applicable (NYSDEC 2025).</p> <p>Micron's proposed wastewater discharges to the Oak Orchard ITT will require an industrial wastewater discharge permit (IWDP) issued by OCDWEP. This permit will establish PFAS discharge limits and other terms consistent with the USEPA-approved pretreatment program and the requirements of the Oak Orchard WWTP SPDES permit for PFAS. Establishment of Micron's discharge requirements for these 40 compounds will be subject to any changes in regulatory or SPDES permit requirements. Periodic monitoring and reporting of these compounds by Micron will be required (NYSDEC 2025; USEPA 2022), as part of its IWDP.</p> <p>In order to meet these effluent limitations in its IWDP, Micron will include PFAS wastewater treatment or alternative source segregation/separation at the Micron campus to comply with the limitations imposed by the IWDP. Micron is still developing PFAS segregation and treatment technologies at the time of the EIS development, and as detailed in the EIS Appendix titled "Use, Management and Disposal of Per- and Polyfluoroalkyl Substances at the Micron New York Semiconductor Fabrication Facilities"</p> <p>Regarding Micron's specific measures, the current and best available information regarding proposed measures for PFAS source separation or technological treatment and emerging contaminants (ECs) can be found in the EIS. These details are expected to be clarified in the coming months.</p> <p>Development of local limits for the ITT and MTT were not identified as a critical path issue for issuance of the SPDES permit. Though the County has made significant progress on these, the IWDP was not identified as a critical path related to the issuance of a SPDES permit. The bulk of the information requested will be made available in the coming months as the ITT/IWDP development proceeds.</p>



<p>4</p>	<p>BODR Table 1-12 and Section 2</p>	<p>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</p>	<p>The County's current plan is to meet future TDS discharge limits, with any necessary reduction in TDS from the ITT (Outfall 01B). There are no plans, at this time, to reduce TDS from the MTT (Outfall 01A).</p> <p>The ITT expects that a new mixing zone will be approved for discharges from Outfall 001, which results in an increased TDS discharge allocation from the OOWWTP and a higher TDS discharge limit.</p> <p>After the incorporation of a mixing zone, estimates show that a recalculated TDS discharge limit would permit discharge from the ITT using the proposed Alternative 10 flow sheet outlined in the ITT engineering report for wastewater treatment from Fab 1. If a mixing zone is not approved, or if it does not establish a sufficiently high TDS discharge limit for ITT effluent to comply, tertiary TDS treatment will be added after the biological treatment system in the ITT for treatment of Fab 1 wastewater. This TDS treatment would use the same processes (i.e., ion exchange, reverse osmosis (RO), and thermal treatment [evaporation/crystallization] of the RO concentrate stream) as those included in the proposed Alternative 11 and currently planned to be implemented when Fab 2 begins production. Under no scenario being considered will the ITT discharge to the MTT, instead the ITT and MTT effluents will combine prior to final discharge; therefore, the MTT will never be overwhelmed with TDS loadings by the ITT.</p> <p>The ITT drawings do not include a brine discharge that is introduced immediately upstream of the final effluent. If RO brine is generated during the ITT process, it is planned that it would be further treated with thermal treatment consisting of evaporation, crystallization, dewatering of the crystallized salts, and off-site disposal of the dewatered salt solids. The distillate or condensate from the evaporation and crystallization processes will contain low amounts of TDS and will be combined with the RO permeate for either discharge or reuse. Brine discharge is not a label used on the ITT process flow drawings. The drawing cited in the question (00G09) is not an ITT drawing.</p> <p>The ITT discharge location (Outfall 01B) will be upstream of the final effluent outfall monitoring location for outfall 001.</p> <p>As drawing 00G09 is provided in the MTT's Engineering Report. If Micron is provided with reclaimed water from the MTT, the RO treatment system will be further treating SPDES-acceptable and dischargeable wastewater from the MTT, and providing the RO permeate to Micron for their reuse. In this case, the RO system will generate a reject stream. The RO reject is labeled as "brine" in 00G09 and this drawing also clearly shows that the brine is introduced prior to the effluent (Outfall 01A) SPDES monitoring point and a Outfall 01A flow meter, and therefore is upstream from Outfall 001.</p>
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			It is unclear as to what NYSDEC is referencing related to drawing 00G09, and the ITT.
12	BODR Drawing 00G09	See comment 4 above.	See response to comment 4.
13	BODR Section 1.2.1 Establishment of Sewer Debt Responsibility	An EDU breakdown will be required prior to closing an SRF financing.	Comment noted.
22	Industrial BODR Section 3.2	See comment 4 above.	See response to comment 4.

