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Sent: Monday, February 08, 2016 1:01 PM
To: Troy Smith
Cc: MCCRAY, JEFFERSON D.
Subject: RE: IPDES Guidance Documents

Section 3.3.2 All Other Permit Types and Sectors

We should have a more detailed explanation of the difference between Major and Minor Industrial Permits. The guide that Karen Burgess referenced was incomplete. The instructions referenced in the guide were nowhere to be found. I believe by using the complexity of the permit limitations and in turn the complexity of the facility needed to stay under the necessary limitations of a permit should determine if a treatment plant is a major or a minor permit. The flow of a wastewater treatment should be a minor issue. For instance, a facility could have in their discharge permit a “no net gain or “0” for the discharge of lbs. of phosphorus” to a receiving stream and discharge into a very sensitive water body. This facility would need to have a very high level of phosphorus removal using biological and chemical needs to reach that limit. This flow could be at 1.0 MGD. On the other hand a facility that had a phosphorus limit of 300 lbs. /day could be discharging 3.0 MGD. This facility would not have to have the same high level phosphorus removal system therefore, should not be held to the same standards as the previous facility. The complexity of the permit and the complexity of the facility to maintain the limits should determine if a discharge permit is a major or minor discharge.

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