

RESPONSE TO COMMENTS

McCain Foods USA,
Burley Factory
NPDES Permit ID0000612
August 18,2014

On July 16,2014, the U.S. Environmental Protection Agency (EPA) issued a public notice for the reissuance of the McCain Foods USA, Burley Factory National Pollutant Discharge Elimination System (NPDES) Permit No. ID0000612. This Response to Comments provides a summary of significant comments and provides corresponding EPA responses. The comments resulted in extending the date to begin continuous temperature monitoring by six months to twelve months after the effective date of the permit.

Comments were received from the following:

Douglas Hahn, McCain Foods

Comment: As detailed in the proposed permit, McCain is obligated to begin continuous temperature monitoring within (6) months of permit issuance. As you are aware, we have been performing temperature monitoring on our wastewater discharge on a grab basis. The grab sample for temperature monitoring has always been collected in the morning when evaluating other parameters. From our reporting history over the last (10) years, we have had only one violation of our temperature limit of 32 °C. However, we have always been extremely close to the limit, especially in the months of July and August. We are concerned that we may have slight exceedances of the temperature limit during the progression of the day. We respectfully request an extension of the continuous monitoring limit timeframe to (12) months in order to give us time to evaluate the temperature of our discharge throughout the day and plan for appropriate corrections as required. Our fiscal year begins on July 1 of each year and we do not have funding allocated to correcting this potential issue in this current fiscal year. We realize that the continuous temperature monitoring system is inexpensive, but we may need to spend in excess of +\$200,000 in capital to reduce our wastewater temperature leaving the plant if we determine that we have potential issues with temperature on discharge. This may be in the form of energy reduction projects to strip heat out of the wastewater stream leaving the factory.

In closing, we respectfully request that the permit condition Note 8 of Table 1 be modified to read as follows:

"Continuous temperature monitoring must begin within twelve months of the effective date of the permit".

Response: The EPA concurs and the date to begin temperature monitoring is extended from six months after the effective date of the permit to 12 months.