

From: [BACHMAN Jeff](#)
To: [ROOT Jenny](#)
Subject: FW: FYI: Breakdown of Tier 1 and 2 WPCF permits
Date: Tuesday, January 07, 2014 12:40:19 PM
Attachments: [WPCF Individual permits minus onsite.xlsx](#)

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From: NOMURA Ranei
Sent: Tuesday, April 02, 2013 6:04 PM
To: HUTCHENS-WOODS Cheryl; YELTON-BRAM Tiffany; SCHNURBUSCH Steve
Cc: ADES Dennis R; BACHMAN Jeff; BROWN Courtney; HICKMAN Jane
Subject: FYI: Breakdown of Tier 1 and 2 WPCF permits

From our conversation today, it did sound like there ***was not*** regional support for putting the Tier 2 individual permits for WPCF food processors and mining activities in the \$8000 (proposed to increase to \$12000) matrix. However, the following options A and B below are what I heard the regions say they were likely to support. ***Please get back to me ASAP with the option you prefer. Thank you!***

(Spreadsheet of all WPCF individual permittees minus onsite WPCFs is attached if you are curious - it includes domestic and industrial WPCF individual permits but remember this discussion is focused on **industrial** permits.)

- 1) **Option A:** We go back to only regulating Tier 1 WPCF food processors, then ER has two (2) and WR and NWR have none. (The numbers I mentioned during the meeting included NPDES permits.)

WQFileNbr	Category	DEQClass	PermitType	PermitDescription
CONAGRA FOODS LAMB WESTON, INC.	IND	Tier1	WPCF-IW-B05	Food/beverage processing - Large and complex. Flow greater than or equal to 1 MGD for 180 days/year or more
PORT OF MORROW	IND	Tier1	WPCF-IW-B05	Food/beverage processing - Large and complex. Flow greater than or equal to 1 MGD for 180 days/year or more

- 2) **Option B:** We regulate ALL Tier 1 WPCF permittees the same as Tier 1 NPDES permittees and move them into the \$8000 (proposed to increase to \$12000). Only one(1) Tier 1 WPCF industrial permit for timber and wood products would be added and it's in ER. See table below with yellow highlight.

*(Cheryl - I can't quite tell what is going with Collins from the database. In addition to their Tier 1 WPCF individual permit, they also have a Tier 1 NPDES individual permit. From talking with Sonja, it sounds like we are supposed to be using the NPDES ratings worksheet to determine the tiers for WPCF individual permits when there is no specification of production levels in the fee tables. If that's the case, I find it hard to believe that Collins would be a Tier 1 WPCF individual permit because of the way the NPDES worksheet adds up points to get to a "major" (lots of surface water-related questions). I'm guessing that it probably got its Tier 1 rating for its WPCF individual permit because of its Tier 1 NPDES individual permit. **Let me know if you want me to follow up.**)*

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PORT OF MORROW	IND	Tier1	WPCF-IW-B05	Food/beverage processing - Large and complex. Flow greater than or equal to 1 MGD for 180 days/year or more
				Timber and Wood Products - Hardboard, veneer,

COLLINS PRODUCTS LLC	IND	Tier1	WPCF-IW-B20	plywood, particle board, pressboard manufacturing, wood products.
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WPCF Industrial and Domestic Individual Permits by Region

Count of Category	Column Labels		Tier1 Total	Tier2		Tier2 Total	Grand Total
	Tier1 DOM	IND		DOM	IND		
Row Labels							
ER		3 3	6	73 35		108	114
NWR				14 8		22	22
WR				50 13		63	63
Grand Total		3 3	6	137 56		193	199