Message

**From**: Green, Margaret [green.margaret@epa.gov]
**Sent**: 2/1/2021 4:35:26 PM
**To**: Pratt, Stacie [Pratt.Stacie@epa.gov]; Shuart, Ryan [shuart.ryan@epa.gov]
**CC**: Martinsen, Jessica [Martinsen.Jessica@epa.gov]; Pruzinsky, Amanda [Pruzinsky.Amanda@epa.gov]; Crosby, Monica [Crosby.Monica@epa.gov]
**Subject**: RE: Pretreatment

Hi Stacie, Amanda,

In regards to Nonresponsive based on revised scope
assistance to
forward my correspondence to Amanda.

Ex. 5 Deliberative Process (DP)

If anything else comes to mind I will get in touch with Amanda ASAP.

Thanks for looping us in.

Best,

Maggie

**From:** Pratt, Stacie <Pratt.Stacie@epa.gov>
**Sent:** Monday, February 01, 2021 10:05 AM
**To:** Green, Margaret <green.margaret@epa.gov>; Shuart, Ryan <shuart.ryan@epa.gov>
**Cc:** Martinsen, Jessica <Martinsen.Jessica@epa.gov>; Pruzinsky, Amanda <Pruzinsky.Amanda@epa.gov>; Crosby, Monica <Crosby.Monica@epa.gov>
**Subject:** FW: Pretreatment

Maggie/Ryan – We are planning an inspection of Hanover Foods this week- It will be on Thursday. Amanda raised some questions, and Jennie provided some recommendation, so wanted to share with you some of the back and forth. It will not be pretreatment inspection, but a POTW SNC WW inspection. If you have any further insight on this facility, please let us know.

Also, Amanda received some info. on the Nonresponsive based on revised scope as part of her QEMs. Again, if you have anything further that may help inform the conversations we are having with PA, please let us know.

Thank you!

Stacie

**From:** Pruzinsky, Amanda <Pruzinsky.Amanda@epa.gov>
**Sent:** Friday, January 29, 2021 9:53 AM
**To:** Pratt, Stacie <Pratt.Stacie@epa.gov>
**Subject:** RE: Pretreatment

Stacie,

For [redacted] I think we could just give the pretreatment folks a heads up that Sharon may be having an issue with an IU, but seems to be on it enforcement wise, just as an FYI.

Ex. 7(A)

Hanover Foods ECHO: https://echo.epa.gov/detailed-facility-report?fid=PA0044741&sys=ICP
Penn Township ECHO: https://echo.epa.gov/detailed-facility-report?fid=110024821273

Best,
Amanda

Amanda Pruzinsky
Physical Scientist
Water Branch NPDES Section
Enforcement and Compliance Assurance Division (ECAD)
U.S. EPA Region 3
1650 Arch St.
Philadelphia, PA 19103
215-814-5456
Pruzinsky.Amanda@epa.gov

**From:** Pratt, Stacie <Pratt.Stacie@epa.gov>
**Sent:** Friday, January 29, 2021 8:17 AM
**To:** Pruzinsky, Amanda <Pruzinsky.Amanda@epa.gov>
**Subject:** Fwd: Pretreatment

I haven't read through this but thought I would share it.

Sent from my iPhone

Begin forwarded message:

**From:** "Brancho, Jennie" <Brancho.Jennie@epa.gov>
**Date:** January 29, 2021 at 8:14:04 AM EST
**To:** "Pratt, Stacie" <Pratt.Stacie@epa.gov>
**Subject: RE: Pretreatment**

Hey Stacie,

I looked into this a bit this morning.

**Hanover:**

Ex. 7(A)

**Nonresponsive based on revised scope**

Nonresponsive based on revised scope

Hope that helps!

**Jennie Brancho**
U.S. Environmental Protection Agency Region III
Enforcement and Compliance Assurance Division
Water Branch – NPDES Section (3ED32)
brancho.jennie@epa.gov
Office Phone: 215-814-2087

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**From:** Pratt, Stacie <Pratt.Stacie@epa.gov>
**Sent:** Thursday, January 28, 2021 9:05 PM
**To:** Brancho, Jennie <Brancho.Jennie@epa.gov>
**Subject:** Fwd: Pretreatment

Jennie, before u leave, do you have any thoughts or reaction

To Amanda's questions or concerns..using u up until your last minute :)

Thanks.

Sent from my iPhone

Begin forwarded message:

> **From:** "Pruzinsky, Amanda" <Pruzinsky.Amanda@epa.gov>
> **Date:** January 28, 2021 at 6:09:20 PM EST
> **To:** "Pratt, Stacie" <Pratt.Stacie@epa.gov>
> **Subject: Pretreatment**
>
> Hi Stacie,
>
> During my recent QEM with PADEP, I noticed that there was a facility Nonresponsive based on revised scope that believes their issues are being caused by a IU that is part of the pretreatment program. Sounds like they are working on enforcement against them, but thought it might be good to pass the information along to the pretreatment folks.

Ex. 7(A)

Below are the QEM narratives PADEP provided for these facilities:

Nonresponsive based on revised scope

schedule.

HANOVER FOODS
CORP PA0044741
minor IW
**SNC Status:** Effluent - Monthly Average Limit

| Existing Enforcement Date Executed | Projected Date of Compliance | Will Enforcement be Pursued? | Achieve Compliance in 60 Days? | Ref EF |
|---|---|---|---|---|
| NOV 8/26/2020 | unsure | Yes | unsure | y |

- The Department executed Consent Order and Agreements (COAs) in 2013 (w/2014 Amendment) and in 2017 (2017 COA supersedes/replaces 2013 COA) for upgrade of the IWTP to meet NPDES Permit final effluent limits. The upgrade of the IWTP was completed on 06/21/2017.
  HFC continues to pay stipulated civil penalties for NPDES permit final effluent limit violations.
  The COA does not terminate until HFC maintains 6 months of compliance.

Ex. 7(A)

- February 2020: The 2017 COA was closed on 6/30/19. Hanover Foods completed the upgrade of the IWTP and maintained compliance with the NPDES Permit final effluent limits between January 2019 and June 2019. These actions satisfied the requirements for the termination of the January 3, 2017 COA and the Department closed the remaining milestones of the COA on June 30, 2019.
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- 
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Ex. 7(A)

Best,
Amanda

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