Message

From: Pruzinsky, Amanda [Pruzinsky.Amanda@epa.gov]
Sent: 10/26/2020 2:25:08 PM
To: Pratt, Stacie [Pratt.Stacie@epa.gov]
Subject: FW: QEM prep: Potential EPA Inspection Targets and FFY2020 Q3 (Jan 1-Mar 31) QNRC list
Attachments: PA_EPA_Inspection_Targets_FFY21_Updated20201005.xlsx

FYI

From: Hofstetter, Theia <thhofstett@pa.gov>
Sent: Friday, October 23, 2020 3:41 PM
To: Pruzinsky, Amanda <Pruzinsky.Amanda@epa.gov>
Cc: Kachonik, Robert <rkachonik@pa.gov>; Bloom, Krystal <krbloom@pa.gov>; astabile@pa.gov
Subject: RE: QEM prep: Potential EPA Inspection Targets and FFY2020 Q3 (Jan 1-Mar 31) QNRC list

Hi Amanda,

I've attached an updated version of the Potential EPA Inspection Targets spreadsheet you sent with our feedback. We'll provide the QNCR one next week.

Here are the permit numbers and contact addresses you requested:

Nonresponsive based on revised scope

Nonresponsive based on revised scope

Nonresponsive based on revised scope

Please let us know if you have any questions.

Theia Hofstetter | Environmental Group Manager, Wastewater Operations
Department of Environmental Protection | Bureau of Clean Water
Rachel Carson State Office Building
PO Box 8774 | Harrisburg, PA 17105-8774
Phone: 717.783.8394 | Fax: 717.772.3249
www.dep.pa.gov

PRIVILEGED AND CONFIDENTIAL COMMUNICATION
The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers.

From: Pruzinsky, Amanda <Pruzinsky.Amanda@epa.gov>
Sent: Monday, October 5, 2020 5:35 PM
To: Kachonik, Robert <rkachonik@pa.gov>; Bloom, Krystal <krbloom@pa.gov>; Hofstetter, Theia <thhofstett@pa.gov>; Stabile, Anita <astabile@pa.gov>
Subject: QEM prep: Potential EPA Inspection Targets and FFY2020 Q3 (Jan 1-Mar 31) QNRC list

Bob, Theia, Anita, and Krystal,

I'm sorry this email is so long! I broke it up into two parts, the first on the EPA potential inspection targets that we are now vetting with states as part of the QEM process. The second part is the normal directions for our QNCR/SNC lists. The QEM meeting is scheduled for Tuesday Oct 27, 2020 10-11AM. It would be helpful to receive the inspection targeting feedback and SNC short list narratives a week prior to the meeting if possible. Please let me know if you have questions; email or give me a call (215-814-5456).

Potential EPA Inspection Targeting

- **Please review the attached spreadsheet of NEW potential EPA inspection targets and provided feedback.** It would be helpful to receive the feedback a week prior to the QEM. See the DIRECTIONS below.
- The list contains more facilities than EPA plans to inspect, knowing that the state may have pending actions or know of other situations which would prioritize particular facilities for EPA inspection over others. This is a quarterly process, so new facilities will be vetted each QEM.
- EPA encourages additional state recommendations for consideration for EPA inspection. In particular, EPA would appreciate input on inspection targets for MS4 (in Chesapeake Bay watershed) and construction stormwater (general geographic areas or particular companies would be sufficient if not specific sites).
- EPA will still work these through the regular Enforcement Notification process as inspections are being planned.
- Notes for the excel:
    - **DIRECTIONS:**

      In the "NEW" sheet:

      1) In the column "State Concerns with EPA Inspection (Y/N)", please fill in a Y (yes) to indicate there are concerns from the state for an EPA inspection at this facility or N (no) to indicate there are not any state concerns.
      2) In the column "State Comments", please include any comments particularly if there are state concerns with an EPA inspection.
    - The excel contains both annual and quarterly inspection targets. A tentative timeframe for the EPA inspection was provided where possible, but is subject to change.
    - For stormwater targets EPA considered proximity to impaired water bodies and satellite imagery of the site location.
    - For wastewater targets EPA considered current compliance status, number of quarters in NC and SNC (3 years), effluent violations and pollutants with exceedances, discharging into impaired waters and whether possibly contributing to impairments, and no formal enforcement in the past year.
    - Previously vetted EPA inspection targets still being considered are provided in the "ALREADY VETTED" sheet as an FYI.
        - PADEP also previously suggested "Franklin: Chambersburg Boro, Antrim Twp., Hamilton Twp. (Chambersburg manages compliance)" as an potential MS4 target. Could you provide the NPDES ID(s) and addresses associated with this?

QNCR/SNC/Short List

The FFY20 Q3 (Apr 1-Jun 30) QNRC list is final, so I'm sending it along (attachment: PADEP_FFY20_Q3_Apr1_to_Jun30_SNC_List.xlsx) and identifying our next "short list" facilities.

In the attached excel sheet PADEP_FFY20_Q3_Apr1_to_Jun30_SNC_List.xlsx, the first tab labeled Downloaded Data is the entire SNC list, and I am requesting that we discuss the **bolded** sites during the QEM. The red highlighted sites were on previous SNC lists, but not considered "resolve pending." Please provide a written update on the status of these facilities and we may discuss them again during the QEM if there is enough

time. Please note that I also tried to keep facilities for which EPA has taken the lead off the short list in purple highlight. The second tab is the Short List of the **bolded** sites and red highlighted sites. I added which PADEP region each facility is in to both the short and long list. The third tab is an automatically-generated key/dictionary to the column headings.

Similar to previous QEMs, in advance can you please have regional representatives provide in writing a summary of compliance status and enforcement activities for each **bold** facility? We'd particularly like to know the following for each facility:

1. Is there an existing enforcement addressing action to return the facility to compliance? When is the projected date to return to compliance? This information will help us to prioritize facilities to discuss with you in future QEMs.
2. Will PADEP initiate an enforcement addressing action for the facility to return to compliance? Please include a timeline for the action.
3. Does PADEP believe this facility may not return to compliance within 60 days?
4. Would any facility be a candidate to refer to EPA for follow up?

Additionally, we would like at least one sentence relating to each red highlighted facility that confirms its status and provides any updates.

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