

## HOUSE, JASON

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**From:** HOUSE, JASON  
**Sent:** Monday, April 6, 2020 12:21 PM  
**To:** dringlespaugh@Park100Foods.com  
**Cc:** STARKS, GARY; McDaniel, Rose; 'Mclaughlin, Robert'; Gardner, Nicole  
**Subject:** Park 100 Foods Request for Sampling Reduction

Hello,

IDEM is sensitive to your issues, IDEM has the following allowances and discretion that can be offered due to the COVID-19 pandemic. Please review the document. (linked)

[https://www.in.gov/idem/files/coronavirus\\_enforcement\\_discretion.pdf](https://www.in.gov/idem/files/coronavirus_enforcement_discretion.pdf)

We will provide discretion per these policy documents.

Please do your best to obtain samples per your NPDES permit to the degree that is possible. IDEM is amenable to the proposed reduction of sampling for pH as requested.

For the separate issue you raise concerning the inability to collect a samples due to the construction project, please continue to collect a sample until it is no longer possible, at that time, please contact your Wastewater Inspector of the inability. At that time, you can indicate on your DMR forms that no sample was collected per the code given by Rose McDaniel in her April 6, 2020 email to you.

Best,

Jason House, Branch Chief  
IDEM – OWQ – Compliance Branch  
3172330470

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**From:** McDaniel, Rose  
**Sent:** Monday, April 06, 2020 8:36 AM  
**To:** [dringlespaugh@park100foods.com](mailto:dringlespaugh@park100foods.com)  
**Cc:** [jtaylor@park100foods.com](mailto:jtaylor@park100foods.com); IDEM Netdmr <[Netdmr@idem.IN.gov](mailto:Netdmr@idem.IN.gov)>; GLOVER, GREG <[GGLOVER@idem.IN.gov](mailto:GGLOVER@idem.IN.gov)>; STARKS, GARY <[GSTARKS@idem.IN.gov](mailto:GSTARKS@idem.IN.gov)>; Deboy, Devery J <[DDeboy@idem.IN.gov](mailto:DDeboy@idem.IN.gov)>  
**Subject:** Fw: Park 100 Foods

Hello Mr. Ringlespaugh (Dan),

Thank you for contacting us, and I'm sorry to hear about the temporary plant shutdown.

The NPDES permit reporting requirement has to do with effluent being discharged from your facility. So whether plant operations are shut down or not, if there is effluent being sent to the city, sampling/testing should occur. If there is no discharge then there is no need to sample unless it is for internal monitoring reasons. But the netDMR/MMR should continue to be reported.

Typically, I would respond to your first question in this way: if *any* discharge occurs during a calendar month then sampling and reporting of that effluent should be reported/submitted on the netDMR. If discharge only occurs for the first half of April we would expect to see data for your parameters on the corresponding netDMR/MMR, but perhaps at only half the sampling frequency rate (i.e., CBOD5 would only be sampled once in April instead of twice). If there was no discharge for the entire month of May, then you could use the NODI (no data indicated) code of "C" ("no discharge") on the netDMR and no sampling data would be expected for the month of May. Again, netDMRs/MMRs must continue to be completed/submitted throughout this time, as a requirement of the NPDES permit.

I am forwarding your email to Mr. Greg Glover and Mr. Gary Starks, Compliance Data Section, who may have additional questions for you regarding your first question (reducing sampling frequencies). Also, they are the ones who would need to respond to your second question (concerning foregoing sampling while City construction occurs near your outfall) to determine if anything else should be determined (new sampling point, permit modification, etc.).

I wish the best for you and your company. Please continue to keep us informed.

Have a great day,

*Rose S. McDaniel*

IDEM  
OWQ/Compliance Branch  
Compliance Data Section  
100 N Senate Ave  
Indianapolis, IN 46204

[rmcdanie@idem.in.gov](mailto:rmcdanie@idem.in.gov)

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**From:** Dan Ringlespaugh <[dringlespaugh@Park100Foods.com](mailto:dringlespaugh@Park100Foods.com)>  
**Sent:** Friday, April 3, 2020 10:50 AM  
**To:** McDaniel, Rose <[RMCDANIE@idem.IN.gov](mailto:RMCDANIE@idem.IN.gov)>  
**Cc:** Joe Taylor <[jtaylor@Park100Foods.com](mailto:jtaylor@Park100Foods.com)>; Mclaughlin, Robert <[RMclaugh@idem.IN.gov](mailto:RMclaugh@idem.IN.gov)>; Deboy, Devery J <[DDeboy@idem.IN.gov](mailto:DDeboy@idem.IN.gov)>  
**Subject:** RE: Park 100 Foods

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Hello Rose,

Devery Deboy suggested that I contact you about two separate situations pertaining to our IDEM permit testing requirements at Park 100 Foods. The first reason is related to the impact of the COVID-19 on our business. We will halt all production at the end of next week and will have no further production for an undetermined amount of time. This time period would be a minimum of three weeks but could easily last 8 weeks or more. We would like to be permitted to suspend all testing starting the week 4/12/2020 through the end of the undefined shutdown. At a minimum we would like to reduce the pH testing from 5 times per week to 1 time per week.

Our second reason for reaching out is because the city of Tipton is undergoing a major initiative to upgrade the storm sewer system and separate it completely from the sanitary system. They plan to do major excavation on our property at the location of our Outfall #1 which is our permit required sampling point. They estimate that we would not be able to sample from this location for up to 3 weeks. I would like to suspend our sampling requirements during this time period. They will begin removal of the property line fencing this week, so I would expect digging to begin very soon. Most likely if my first request is approved then the 2<sup>nd</sup> request is a moot point because the time periods would overlap.

Attached is a letter from Rex Boyer TMU Utility manager talking about the excavation work as it relates to testing.

Thank you.

Dan Ringlespaugh | Corporate Director of Operations and Engineering

**PARK 100 FOODS, INC.**

326 E Adams St, Tipton, IN 46072

T: (317) 853-4206