

Application Type Renewal  
Facility Type Industrial  
Major / Minor Minor

**NPDES PERMIT FACT SHEET  
RE-DRAFT**

Application No. PA0008761  
APS ID 34617  
Authorization ID 1030948

**Applicant and Facility Information**

Applicant Name	<u>Armstrong World Industries, Inc.</u>	Facility Name	<u>Armstrong World Industries – Marietta Ceiling Plant</u>
Applicant Address	<u>1507 River Road Marietta, PA 17547-9403</u>	Facility Address	<u>1507 River Road Marietta, PA 17547-9403</u>
Applicant Contact	<u>John A. Ackiewicz, P.E.</u>	Facility Contact	<u>John A. Ackiewicz, P.E.</u>
Applicant Phone	<u>(717) 396-5373</u>	Facility Phone	<u>(717) 396-5373</u>
Client ID	<u>40742</u>	Site ID	<u>238314</u>
SIC Code	<u>3999</u>	Municipality	<u>East Donegal Township</u>
SIC Description	<u>Manufacturing Industries, Not Elsewhere Classified</u>	County	<u>Lancaster</u>
Date Published in PA Bulletin	<u>September 14, 2019</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>October 14, 2019</u>	If No, Reason	<u></u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Industrial</u>		

**Internal Review and Recommendations**

A draft NPDES permit was issued on September 5, 2019 and was published in the PA Bulletin on September 14, 2019. Comments were received from Armstrong World Industries (AWI) on October 4, 2019. A copy of the comments is attached to this report. A summary of the comments from AWI is below:

1. The facility contact listed on the cover letter and page 1 of the fact sheet was incorrectly listed as Mr. James Thompson.
2. The facility SIC code identified on the public notice and fact sheet is incorrect. The correct SIC code used by AWI is 3999: Manufacturing Industries, Not Elsewhere Classified. According to DEP's current NPDES PAG-03, this SIC code is subject to Appendix S stormwater requirements.
3. Outfall 008 was incorrectly identified on the NPDES permit; this outfall is no longer part of AWI and receives no discharge from AWI.
4. Outfalls 002 and 003 are combined stormwater discharges from AWI and off-site properties, and there is no sampling point upstream that contains only AWI discharges.
5. AWI will be submitting paperwork to PADEP Central Office under separate cover to register a second certifier for the facility eDMR reporting.
6. The maximum usage rates listed on the Chemical Additive Notification forms received on May 17, 2019 listed the WQBEL as determined by PentoxSD. Usage rates for several of these additives exceeded the WQBEL, so the chemical manufacturers were contacted to discuss degradability of their products. Revised Chemical Additive Notification forms were submitted for Spectrum RX5080, RX9100, and XD8800. They were revised based on the assumption that 90% of the RX5080 and RX9100 and 98% of the XD8800 will degrade by the time it reaches the WWTP discharge as indicated by the manufacturers.

Approve	Return	Deny	Signatures	Date
			Benjamin R. Lockwood / Environmental Engineering Specialist	May 1, 2020
			Daniel W. Martin, P.E. / Environmental Engineer Manager	
			Maria D. Bebenek, P.E. / Program Manager	

**Internal Review and Recommendations**

7. AWI requested that chemical additive monitoring and reporting requirements be revised from a daily requirement to a monthly requirement based on purchasing information, as usage rates are significantly lower than the maximum usage rate for most of the chemicals.
8. AWI would like to note which products are in use at the facility that do not meet the PADEP definition of chemical additive. These included chemicals in use exclusively at the WWTP to facilitate the treatment process, paint biocides that are applied to the product, and retention aids and boardmill polymers that facilitate board forming.
9. AWI determined that there are chemicals currently in use that are not on the approved list. AWI has worked with chemical manufacturers to find substitutes on the approved list. A Chemical Additive Form for NexGuard 22358 is enclosed. There are two additives that do not have approved substitutes, therefore AWI has requested the manufacturers have them added to the approved list. These products are Solenis Spectrum RX7845-NA and Nalco 7649.

An additional comment was received on May 14, 2020 from AWI via email. It noted changes to the treatment process.

In response, the facility contact information on the fact sheet addendum and final cover letter has been updated to Mr. John A. Ackiewicz, P.E.

The fact sheet addendum has been updated to reflect SIC Code 3999. The NPDES permit has been revised to include the monitoring requirements from Appendix S of the current PAG-03 General Permit. Stormwater sampling requirements for Outfalls 002, 003, and 008 have been removed from the NPDES Permit. This is consistent with the existing NPDES permit. As a result, in the final NPDES permit, stormwater monitoring will be performed at Outfalls 004, 005, 006, and 007 for pH, TSS, and Total Zinc.

The submittal of additional paperwork for a second certifier for eDMR reporting has been noted.

The revised chemical additive forms are noted, and relevant information is included in the table below.

The Chemical Additives Usage report is designed to monitor the daily usage rates, and ensure that the maximum allowable usage rates are not being exceeded. Therefore, the Chemical Additives usage report will remain as a daily reporting report.

The list of products that do not meet DEP's definition of chemical additives are noted. DEP agrees with this assessment.

Information for the Chemical Additive NexGuard 22358 has been included on the updated Chemical Additive table below. For the two chemical additives not on DEP's Approved List, Solenis Spectrum RX7845-NA and Nalco 7649, once the Bureau of Clean Water has approved the requests, Chemical Additives Notification Forms should be submitted.

The treatment process steps are as follows: Thickening and Clarification – Water Storage – Aerated Equalization – Aeration – Final Clarification – Outfall 001. The previous thickening and clarification processes will be combined by replacing the existing thickener tank and primary clarifier tank with two new primary clarifiers that perform thickening and clarification together.

A revised NPDES permit will be re-drafted with the changes listed in this addendum. There are currently no open violations for the permittee or facility.

<b>Chemical Additive</b>	<b>Purpose</b>	<b>Maximum Usage (lb/day)</b>	<b>Usage Frequency</b>
3D Trasar 3DT465	Antiscale	13,369	Constant Feed
Advantage 1490	Defoamer	2,395	Constant Feed
DeAirex 8061	Defoamer	4,299	Constant Feed
Infinity SL4369	Antiscale	12,976	Constant Feed
Nalco 1720	Oxygen Scavenger	2,365	Intermittent
Nalco 60103	Defoamer	18,986	Constant Feed
Nalco 7346 TAB	Non-oxidizing Biocide	3.64	As Needed
NexGuard 22310	Boiler Treatment Chemical	5,569	Intermittent
Rezosol 4609	Release Agent	0.81	Constant Feed

**Internal Review and Recommendations**

Spectrum RX 3510	Biocide	89.09	As Needed
Spectrum RX 5080	Biocide	250	2/Day
Spectrum RX 9100	Biocide	290	2/Day
Spectrum XD 3899	Biocide	5,019	Intermittent
Spectrum XD 8800	Biocide	235	Hourly
NexGuard 22358	Boiler Treatment Chemical	10,211	Intermittent