

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

**NPDES PERMIT FACT SHEET
SECOND DRAFT**

Application No. PA0011185
APS ID 622600
Authorization ID 1243156

Applicant and Facility Information

Applicant Name	<u>Air Products & Chemicals, Inc.</u>	Facility Name	<u>Air Products & Chemicals, Inc.</u>
Applicant Address	<u>7201 Hamilton Boulevard</u> <u>Allentown, PA 18195-1501</u>	Facility Address	<u>7201 Hamilton Boulevard</u> <u>Allentown, PA 18195</u>
Applicant Contact	<u>Cindy Clarkson, Environmental Engineer</u>	Facility Contact	<u>Cindy Clarkson, Environmental Engineer</u>
Applicant Phone	<u>(610) 481-6350</u>	Facility Phone	<u>(610) 481-6350</u>
Client ID	<u>62388</u>	Site ID	<u>246182</u>
SIC Code	<u>2813</u>	Municipality	<u>Upper Macungie Township</u>
SIC Description	<u>Manufacturing - Industrial Gases</u>	County	<u>Lehigh</u>
Date Published in PA Bulletin	<u>November 23, 2019</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>December 23, 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

Public notice was posted in the PA Bulletin on November 23, 2019. A comment letter dated November 14, 2019 was received via email on November 14, 2019 and via mail on November 15, 2019 from Air Products and Chemicals, Inc. The comment letter states that the applicant believes the permit is no longer applicable for this location. The facility is now being used as headquarter offices and R&D, with manufacturing no longer occurring at the facility. The letter also states that Air Products will be relocating to a new location in 2021 and would be discontinuing operations at the current location in 2022.

A follow up email was received on November 25, 2019 from Air Products and Chemicals, Inc. asking about the possibility of continuing to operate under the same permit conditions as the previous permit and then submitting a Notice of Termination (NOT) when the headquarter relocation is completed in summer 2021

The Department was not comfortable terminating the permit immediately because the facility is still in use. However, the facility's inspector confirmed that fueling areas are undercover, the Non-Contact Cooling Water evaporates, and BMP's were in place/maintained during his last inspection. The facility is located in a High-Quality watershed and therefore cannot apply for a No-Exposure permit.

After discussion with the Permit Chief, the Department has decided to apply the limitations and frequencies from the previous permit until December 31, 2021. The relocation should be completed by this time. Starting on January 1, 2022 the new limitations and frequencies that appeared in the first draft permit will begin. The applicant can apply for the NOT when the relocation is complete and operations cease at this facility.

Limitations from the previous permit include annual monitoring/reporting of Total Suspended Solids (TSS), Total Kjeldahl Nitrogen, and Total Iron. Starting on January 1, 2022, semi-annual monitoring/reporting of COD (120.0 mg/L IMAX), TSS (100.0 mg/L IMAX), Nitrate-Nitrite as N, Total Phosphorous, Total Aluminum, Total Iron, Total Lead, and Total Zinc will begin.

Limitations for flow, pH, Total Residual Chlorine (TRC), temperature, and rainfall were carried over from the previous permit and were present in the first draft. These limitations will remain in the second draft.

Approve	Return	Deny	Signatures	Date
X			/s/ Allison Seyfried / Environmental Engineering Specialist	February 4, 2020
X			/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	February 4, 2020