



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 JFK Blvd.
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date: 12/6/2023
Regulatory Program: National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater
Facility Name: AHF Products Lancaster Facility
Permittee: AHF Products Lancaster Facility
Facility Owner/Operator: AHF Products LLC
Facility Address: 1067 Dillerville Rd.
Lancaster, PA 17603-2613
Latitude and Longitude: 40.0554 N, -76.3187 W
Permit No.: PAR323512
SIC Code: 3996
Unique Project #: ECAD-537

Site/Facility Representative(s):

David Kreiser, Quality & EHS Manager
Phone: (717)-381-2034

Email: david.kresier@ahfproducts.com

EPA Inspectors:

Dominic Cotton, USEPA Region 3
Phone: (215)-814-2046

Email: cotton.dominic@epa.gov

Chuck Schadel, USEPA Region 3
Phone: (215)-814-5761

Email: schadel.chuck@epa.gov

Report Preparer
Signature/Date

Dominic Cotton (3ED32) NPDES Section 1

Supervisor
Signature/Date

Mark Zolandz (3ED32) Chief, NPDES Section 1

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- Attachment 1: NPDES General Permit for Discharges of Stormwater Associated with Industrial Activity (PAG-03)
- Attachment 2: AHF Products Lancaster Facility Renewal NOI Application (March 2023)
- Attachment 3: Photograph Log
- Attachment 4: AHF Products Lancaster Plant Integrated Contingency Plan (March 2023)
- Attachment 5: City of Lancaster Industrial Waste Discharge Permit (Effective 9/1/2019)

I. INTRODUCTION

On December 6, 2023, an inspection team composed of staff from the US Environmental Protection Agency (“EPA”) Region 3 (hereinafter, “EPA Inspection Team”) conducted a compliance evaluation inspection (CEI) of the AHF Products Lancaster Facility located at 1067 Dillerville Road in Lancaster, PA (hereinafter, the “Facility”). The purpose of the inspection was to observe compliance with the Clean Water Act (“CWA”) and to verify compliance with the Facility’s coverage under Pennsylvania’s National Pollutant Discharge Elimination System (“NPDES”) General Permit for Discharge of Stormwater Associated with Industrial Activity (PAG-03) Permit No. PAR323512 (hereinafter, the “Permit”) and applicable state and federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the Facility at approximately 1:30 PM EST for the inspection. The inspection involved the following people:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspectors and Contractors			
Dominic Cotton	USEPA Inspector	215-814-2046	cotton.dominic@epa.gov
Chuck Schadel	USEPA Inspector	215-814-5761	schadel.chuck@epa.gov
Debbie Lindsey	USEPA SPCC Inspector	304-234-0249	lindsey.deborah@epa.gov
Site/Facility Representatives			
David Kreiser	AHF Products – Quality & EHS Manager	717-381-2034	david.kreiser@ahfproducts.com

Chuck Schadel and Debbie Lindsey displayed their credentials to Chris Brittner and Frank Kiefer at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in Appendix A. The EPA Inspection Team informed the Facility representatives that any information that the Facility deemed to be confidential business information (“CBI”) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA’s CBI procedures.

B. Weather and Precipitation

During the inspection, weather was 40 degrees and cloudy. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

Table. 2 Precipitation Preceding Inspection

Station Name	Date	Precipitation Amount (inches)¹
Lancaster Airport, PA US USW00054737	12/01/2023	0.18
Lancaster Airport, PA US USW00054737	12/02/2023	0.02
Lancaster Airport, PA US USW00054737	12/03/2023	0.42
Lancaster Airport, PA US USW00054737	12/04/2023	0.00
Lancaster Airport, PA US USW00054737	12/05/2023	0.00
Lancaster Airport, PA US USW00054737	12/06/2023	0.00

C. Summary of the Facility

AHF Products was acquired by Armstrong Flooring in August 2022. AHF Products owns and operates the Facility, which is a sheet and tile vinyl flooring manufacturing plant. Raw products, including PVC resins, limestone, plasticizers, and stabilizers, arrive at the Facility via commercial carrier tanks, plastic totes, drums, and bags on pallets. There are two manufacturing lines at the Facility: a residential sheet vinyl line (“CVL”) and a luxury residential and commercial vinyl tile line (“LVT”). The CVL product consists of a saturated fiberglass backing, barrier coatings, and patterned water-based ink. The LVT product consists of a laminated decorative protective layer applied to a plasticized vinyl sheet.

CVL operations take place in Buildings 95, 95A (Photograph 3989), 96, 97, 98, 100, 100A, 100RL, 100AM, and 105. LVT operations take place in Buildings 90, 90B, 93, 94, 94A, 200 and 201 (Photographs 3983-3985). Building 57 (Photographs 3992-3995) is the boiler house, which provides heat and steam for the buildings and onsite operations. In addition to the manufacturing buildings, there is a guard shack, employee parking, and a stormwater detention basin.

The Facility has two stormwater drainage areas (Drainage Area 1 and Drainage Area 2) that discharge to separate outlet structures located just outside the northeast corner of the property. Drainage Area 1 includes Bldg. 94 (part), Bldg. 95A101, Bldg. 94A, Bldg. 95, Bldg. 95A, Bldg. 96, Bldg. 97, Bldg. 98, Bldg. 100, Bldg. 100A, Bldg. 100RL, and Bldg. 100AM, Bldg. 102-7, Bldg. 105-6, and Bldg. 57. Drainage Area 1 generally drains to the northeast and discharges to Outfall 001, situated inside a vegetated area and fenced off to the public (Photograph 3986). Drainage Area 2 includes Bldg. 94 (part), Bldg. 200, Bldg. 201, Bldg. 90, Bldg. 90B, and Bldg. 93., as well as the employee parking area and parking lot detention basin (Photographs 3981 and 3982). Drainage Area 2 includes stormwater discharges associated with both the LVT and CVL operations. Drainage Area 2 generally drains to the east and discharges to Outfall 002.

Several yards away from Outfall 001 is a fuel island composed of two (2) double-walled fuel tanks, 500-gallon, gasoline and 500-gallon diesel tank (Photographs 3987 and 3988). Stormwater at the site in both drainage areas generally flows in a northeasterly direction, and both outfalls discharge to the City of Lancaster Municipal Separate Storm Sewer System (MS4) and then east approximately 2.11 miles to the Conestoga River.

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

The Facility is covered by Pennsylvania Department of Environment Protection (PADEP) General Permit for Discharges of Stormwater Associated with Industrial Activity (PAG-03). The Facility is also an industrial user (IU) and is authorized to discharge industrial wastewater to the City of Lancaster sanitary sewerage system and wastewater treatment plant as part of their pretreatment program in compliance with the City Ordinance-Chapter 249.

II. OBSERVATIONS

During the inspection, the EPA Inspection Team made observations pursuant to the requirements of the Permit. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Chuck Schadel and are provided in Attachment 3. Not all photographs were used within the inspection report but can be available upon request.

The photographs (Attachment 3 – PHOTO LOG) for this report have been processed using EPA Region 3 's Photo Management Process. A file name which incorporates the date and time the photo was taken (e.g., 2023-12-06--10.24.27), as well as the original camera generated file name (e.g., DSCN3986) is assigned to each photo as part of the processing. The file names generated by the camera are used to identify each photo in the main narrative and the Photo Log of this inspection report. Unused photos are digitally stored and maintained in the inspection file. Unused photos are available upon request.

The following section presents the Inspection Team's observations relative to the Facility's Permit requirements.

Good Housekeeping

Part C.II.E.1 of the Permit states: "The permittee shall perform good housekeeping measures in order to minimize pollutant discharges including routine implementation of the following measures, at a minimum:

1. Implement a routine cleaning and maintenance program for all impervious areas of the Facility where particulate matter, dust or debris may accumulate to minimize the discharge of pollutants in stormwater. The cleaning and maintenance program must encompass, as appropriate, areas where material loading and unloading, storage, handling and processing occur."

Observation 1:

- During the inspection, the EPA Inspection Team observed storm drain units and manholes throughout the Facility. The EPA Inspection Team observed manholes with apparent gray residue around them located alongside Building 94 (Photograph 4008 and 4009) and track out adjacent to Building 95A (Photographs 3989 and 3990). Building 94 is another area where LVT operations are conducted. Also, the EPA Inspection Team observed a storm drain inlet (Photograph 3999) located outside of Garage 102-A with apparent residue leading up to the structure.
- Inside Building 100, the EPA Inspection Team observed a floor drain behind the garage door of the building with apparent white material around the structure (Photograph 3996).

- Outside Building 102, the EPA Inspection Team observed white residue (PVC) on the ground (Photograph 3998).
- The EPA Inspection Team went inside to observed Building 95A (Photograph 3989) where CVL (residential sheet vinyl line) are produced. Inside Building 95A, the EPA Inspection Team observed pallets of CVL packaged and ready to be shipped out with noticeable CVL (white residue) material observed throughout (Photographs 4002-4004). Outside Building 95A (Photographs 4005 and 4006), the EPA Inspection Team observed the same white residue material being tracked out.
- The EPA Inspection Team observed an apparent gray residue outside of Building 94 (Photograph 94).
- The EPA Inspection Team observed white residual substance tracked on the ground by the totes located next to Building 57 (Photographs 3992-3994). Within the alleyway of Building 57, the EPA Inspection Team observed a leak of PVC plastisol in front of a Conex box (Photograph 3995). Located outside south of Building 100, the EPA Inspection Team observed four (4) 54,000-pound silos containing PVC Resin, with white residue observed in front of Silo 5102 (Photographs 4000 and 4001).

Spill Prevention and Response

Part C.II.G of the Permit states: “The permittee shall minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop a plan consistent with Part C IV for effective responses to such releases. The permittee shall conduct the following spill prevention and response measures, at a minimum:

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2. Implement procedures and control measures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas.

3. Develop and implement employee and contractor training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. This shall also address all sector-specific procedures and potential pollutant sources relating to the industrial activity present on site including, but not limited to use of reused and recycled waters; solvents management; proper disposal of dyes, petroleum products, and spent lubricants; hazardous treatment chemicals; and any additional training requirements included in the applicable appendices. The permittee shall conduct periodic training, no less than annually, on these procedures to ensure that all personnel operating on-site are able to appropriately respond to leaks, spills, and other releases. The permittee shall document this training in the Annual Report required by Part A III.C.1 of this permit.

4. Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made.

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Observation 2:

- The EPA Inspection Team observed totes outside of Building 57 (Photographs 3992 and 3993) uncovered and exposed to the environments.

- At the end of the inspection, the EPA Inspection Team observed an air scrubber. The air scrubber had apparent black material around the structure (Photographs 4011-4017).
- The EPA Inspection Team observed several buckets located underneath and around the air scrubber where apparent leaks occurred (Photographs 4011-4013). Within the buckets, the EPA Inspection Team observed absorbent pads and residual content from the air scrubber. The EPA Inspection Team also observed apparent black material from the air scrubber on the ground (Photographs 4011-4013).
- Underneath the air scrubber, the EPA Inspection Team observed a storm drain inlet with apparent staining around the structure (Photograph 4017).

III. CLOSING CONFERENCE

After the facility's inspection, the EPA Inspection Team met with the Facility representative for a closing conference. The EPA Inspection Team shared preliminary observations with the Facility. The EPA Inspection Team reiterated to the Facility representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at 3:30PM EST.