



October 11, 2021

Environmental Quality Board
Rachel Carson State Office Building
16th Floor
400 Market Street
Harrisburg, PA 17101-2301

Re: Proposed Rulemaking, Additional RACT Requirements for Major Sources of NO_x and VOCs for the 2015 Ozone NAAQS

Dear Sir or Madam,

Thank you for the opportunity to provide comments on the Proposed Rulemaking, Additional RACT Requirements for Major Sources of NO_x and VOCs for the 2015 Ozone NAAQS, which was published in the Pennsylvania Bulletin on August 7, 2021. Armstrong World Industries, Inc. ("AWI") is a leader in the design and manufacture of innovative commercial and residential ceiling, wall and suspension system solutions in the Americas. With \$937 million in revenue in 2020, AWI has approximately 2,800 employees and a manufacturing network of 15 facilities, plus six facilities dedicated to our WAVE joint venture. Our headquarters and one of our largest manufacturing plants are both located in Pennsylvania. We would like to offer the following comments for consideration.

In Section 129.111, the implication is that major NO_x sources follow NO_x requirements, and major VOC sources follow VOC requirements. However, in some sections the language may contradict this, such as in 129.112 (a) (page 4344 of the notice) which states:

§ 129.112. Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule. (a) The owner and operator of a source listed in one or more of subsections (b)–(k) located at a major NO_x emitting facility or major VOC emitting facility subject to § 129.111 (relating to applicability) shall comply with the applicable presumptive RACT requirement or RACT emission limitation, or both, beginning with the specified compliance date as follows, unless an alternative compliance schedule is submitted and approved under subsections (n)–(p) or § 129.114 (relating to alternative RACT proposal and petition for alternative compliance schedule): (1) January 1, 2023, for a source subject to § 129.111(a).

Further in subpart (k) (page 4347 of the notice):

(k) The owner and operator of a direct-fired heater, furnace or oven with a rated heat input equal to or greater than 20 million Btu/hour subject to § 129.111 shall comply with the presumptive RACT emission limitation of 0.10 lb. NO_x/million Btu heat input on a daily average basis or as determined through a stack test.

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Thus, it could be inferred that if 129.111 applies to an entity, they may have to meet this presumptive NOx RACT limit even if they were a minor source for NOx (assuming major for VOC), or any other RACT limit, i.e., if you are in as a major source for NOx or VOC then presumptive RACT requirements for both NOx and VOC could apply.

We request that the Department provide additional clarification to ensure that the apparent overall intent of the regulations is clear, that major NOx sources follow NOx requirements, and major VOC sources follow VOC requirements.

Also, the new definition (“combustion source”) for whatever reason was not used in (k), not sure if this was intentional or not, and if it was intentional, why.

On page 14 of the Regulatory Analysis Form the Department indicates that possible facility costs for alternative compliance provisions could be on the order of \$4,000 to \$6,000 per facility. We believe that this is very low. Most plants, regardless of whether they need to implement alternative compliance provisions, are estimated to spend on the order of \$15K to \$20K for some sort of combination of internal and external consulting costs, and plan approval fees. We have provided an attachment with a calculation for a low end and high-end range cost, which could total \$4.4 to \$8.8 million.

Also, on page 16 of the Regulatory Analysis the Department estimates that the cost of add-on controls to the regulatory community will be \$25 million. However, it is not shown how this number is derived. In the separate Technical Support Document there are several appendices which have various pollution control cost estimates, most on the order of \$2 million to \$4 million. That seems reasonable, but if one divides \$25 million by \$2 and \$4 million, on this basis there would be a total of 6 to 13 facilities out of 500 potentially impacted who would need to install additional controls.

While we would agree that most sources should not need to install additional controls, it seems unlikely that the number would only be limited to 6 to 13 out of 500 (1.2% to 2.6%) facilities. We request that the Department provide additional documentation and reasoning to justify the \$25 million number or revise this estimate accordingly. We also do not see these cost estimates in Section F of the draft rulemaking. The Department has only provided the estimated benefit dollars in the preamble.

Thank you again for the opportunity to provide comments on this important proposed regulation.

Sincerely,



John A. Ackiewicz
Senior Manager, Environmental, Corp EHS
Armstrong World Industries