

Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	Alliant Techsystems Operations LLC		Facility:	Rocket Center	
Region:	9	Plant ID:	057-00011	Application #:	13-0898C
Engineer:	Kessler, Joe		Category:	Defense	
Physical Address:	Allegheny Ballistics Lab 210 State Route 956 Rocket Center WV 26726		SIC: [3761] TRANSPORTATION EQUIPMENT - GUIDED MISSILES AND SPACE VEHICLES NAICS: [336414] Guided Missile and Space Vehicle Manufacturing SIC: [2892] CHEMICALS AND ALLIED PRODUCTS - EXPLOSIVES NAICS: [325920] Explosives Manufacturing SIC: [9711] NATIONAL SECURITY AND INTERNATIONAL AFFAIRS - NATIONAL SECURITY NAICS: [928110] National Security SIC: [3764] TRANSPORTATION EQUIPMENT - MISSILE/SPACE PROPULSION UNITS & PARTS NAICS: [336415] Guided Missile and Space Vehicle Propulsion Unit and Propulsion Unit Parts Manufacturing		
County:	Mineral				
Other Parties:	ENV ENG - FOOR, SUE ELLEN 304-726-5506				

Information Needed for Database and AIRS
 No required information is missing.

Regulated Pollutants

Summary from this Permit 13-0898C		
Air Programs	Applicable Regulations	
TITLE V Title V/Major AFTER FACT		
Fee Program	Fee	Application Type
6A	\$3,500.00	MODIFICATION
Activity Dates		
APPLICATION FEE PAID		02/09/2015 2000
APPLICATION RECEIVED		12/02/2015
APPLICATION FEE PAID		12/03/2015 1500
ASSIGNED DATE		12/03/2015
APPLICATION INCOMPLETE		12/29/2015
APPLICATION DEEMED COMPLETE		02/01/2016

Notes from Database
 Permit Note: \$2000 moved from R13-3235T 12-3-15

 Permit Note: After-the-fact addition of a second cryogenic recovery system for methylene chloride.

 Permit Note: No emissions increase associated with this permitting action.

NOTICE

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 057-00011
 Company: Alliant Techsystems Operations
 Printed: 04/18/2016
 Engineer: Kessler, Joe

IPR FILE INDEX

Applicant : Alliant Techsystems Operations, LLC **Plant ID No.:** 057-00011
Facility : Orbital ATK Allegany Ballistics Laboratory R13-0898C

Chronological Order - Add Index Pages As Necessary

Date	To	From	Subject	# of pages
12/03/15	ATO	Sandie Adkins	48-Hour Letter	
12/29/15	ATO	Joe Kessler	Incompleteness Letter	
1/14/16	Joe Kessler	ATO	Affidavit of Publication	
2/01/16	ATO	Joe Kessler	Completeness Determination	
	File	Joe Kessler	DAQ/ATO E-mails	
4/25/16	File	Joe Kessler	Engineering Evaluation, Draft Permit R13-0898C, Tracking Manifest	
4/25/16	File	Joe Kessler	Public Notice Documents	

JRK
4/25/2016

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

On December 2, 2015, Alliant Techsystems Operations LLC applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to modify the Orbital ATK Allegany Ballistics Laboratory located at 210 State Route 956, Rocket Center, Mineral County, WV at latitude 39.561 and longitude -78.833. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the modified facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-0898C.

There will be no increase in the facility's potential-to-emit as a result of this permitting action.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on **XXXXX**. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Joe Kessler, PE
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone: 304/926-0499, ext. 1219
FAX: 304/926-0478

Entire Document
NON-CONFIDENTIAL

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx

Kessler, Joseph R

From: Adkins, Sandra K
Sent: Friday, April 22, 2016 10:17 AM
To: classified@newstribune.info
Cc: Kessler, Joseph R
Subject: Publication of Class I Legal Ad for the WV Division of Air Quality

Please publish the information below as a Class I legal advertisement (one time only) in the Tuesday, April 26, 2016, issue of the *Mineral Daily News Tribune*. Please let me know that this has been received and will be published as requested. Thank you.

Send the invoice for payment and affidavit of publication to:

Sandra Adkins

**WV Department of Environmental Protection
DIVISION OF AIR QUALITY**

601- 57th Street

Charleston, WV 25304

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Kessler, Joseph R

From: Adkins, Sandra K
Sent: Friday, April 22, 2016 11:20 AM
To: kmiller@newstribune.info
Cc: Kessler, Joseph R
Subject: FW: Publication of Class I Legal Ad for the WV Division of Air Quality
Attachments: WV D E.pdf; ReceiptForAcct_00000260_Order_00010286[1].pdf

Thank you.

From: Kelly Miller [mailto:kmiller@newstribune.info]
Sent: Friday, April 22, 2016 10:47 AM
To: Adkins, Sandra K <Sandra.K.Adkins@wv.gov>; classified@newstribune.info
Cc: Kessler, Joseph R <Joseph.R.Kessler@wv.gov>
Subject: Re: Publication of Class I Legal Ad for the WV Division of Air Quality

Thank you. Please let me know if you have any concerns.

Kelly Miller

Publisher

News Tribune Media

Mineral Daily News Tribune

304-788-3333 X116

From: "Adkins, Sandra K" <Sandra.K.Adkins@wv.gov>
Date: Friday, April 22, 2016 at 10:17 AM
To: "classified@newstribune.info" <classified@newstribune.info>
Cc: "Kessler, Joseph R" <Joseph.R.Kessler@wv.gov>
Subject: Publication of Class I Legal Ad for the WV Division of Air Quality

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This message may contain confidential and/or privileged information. If you are not the intended recipient or authorized to receive this for the intended recipient, you must not use, copy, disclose or take any action based on this message or any information herein. If you have received this message in error, please advise the sender immediately by sending a reply e-mail and delete this message. Thank you for your cooperation.

Kessler, Joseph R

From: Adkins, Sandra K
Sent: Friday, April 22, 2016 11:46 AM
To: 'wentworth.paul@epa.gov'; 'bradley.megan@epa.gov'; sueellen.foor@orbitalatk.com
Cc: Durham, William F; McKeone, Beverly D; McCumbers, Carrie; Hammonds, Stephanie E; Rice, Jennifer L; Kessler, Joseph R; Taylor, Danielle R; Seevers, Sharon M
Subject: WV Draft Permit R13-0898C for Alliant Techsystems Operations LLC; Orbital ATK Allegany Ballistics Laboratory
Attachments: 0898C.pdf; Eval0898C.pdf; Appendix A.pdf; notice.pdf

Please find attached the Draft Permit R13-0898C, Engineering Evaluation, Public Notice, and Appendix A for Alliant Techsystems Operations LLC's Orbital ATK Allegany Ballistics Laboratory located in Mineral County.

The notice will be published in the *Mineral Daily News Tribune* on Tuesday, April 26, 2016, and the thirty day comment period will end on Thursday, May 26, 2016.

Should you have any questions or comments, please contact the permit writer, Joe Kessler, at 304 926-0499 x1219.

Kessler, Joseph R

From: Adkins, Sandra K
Sent: Friday, April 22, 2016 11:53 AM
To: Wheeler, Cathy L
Cc: Kessler, Joseph R
Subject: DAQ Public Notice

Please see below the Public Notice for Draft Permit R13-0898C for Alliant Techsystems Operations LLC's Orbital ATK Allegany Ballistics Laboratory located in Mineral County.

The notice will be published in the *Mineral Daily News Tribune* on Tuesday, April 26, 2016, and the thirty day public comment period will end on Thursday, May 26, 2016.

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Permit to Modify



Entire Document
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R13-0898C

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Alliant Techsystems Operations LLC
Orbital ATK Allegany Ballistics Laboratory
057-00011

DRAFT

William F. Durham
Director

Issued: **DRAFT**

This permit will supercede and replace Permit R13-0898B issued on April 27, 2004.

Facility Location: Short Gap, Mineral County, West Virginia
Mailing Address: 210 State Route 956, Rocket Center, WV 26726
Facility Description: Liquid Nitrate Ester Solution Sparging and Storage Facility
SIC/NAICS Codes: 3764/336415
UTM Coordinates: Easting: 4318.2 km Northing: 686.5 km Zone: 17
Latitude/Longitude: 39.561/-78.833
Permit Type: Modification
Desc. of Change: Addition of a second methylene chloride recovery unit on the nitrate ester sparging operation.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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APPENDIX A A1

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1-4S	1-4E, 1-13E	Nitrate Ester Sparging Unit	1988 ⁽¹⁾	1,200 lb/hr laquer	1-2C, 1-10C

(1) A second methylene chloride emission control system (1-10C, 1-13E) was added in 2015.

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO _x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM _{2.5}	Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM ₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO ₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-0898B. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-0898 through R13-0898C and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission

limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly

authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Operating Fee.**

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained

on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Liquid Nitrate Ester Solution Sparging operations shall be in accordance with the following:

- a. The methylene chloride emission control system (consisting of two cryogenic recovery systems), referenced in Mr. G. H. Moody's letter of December 19, 1986 (see Appendix A), shall be in operation during sparging operations in the Liquid Nitrate Ester Solution Facility (Emission Point 1-4E or 1-13E, Control Device ID 1-2C or 1-10C - Cryogenic Recovery System at building 352) at all times, excepting only periods of emergency repairs for the control equipment and unanticipated control equipment failure for reasons beyond the reasonable control of the permittee, and should achieve a minimum recovery of 80% of the VOC released by the sparging operation;
- b. In the event that the control equipment is inoperable, the production unit shall be shut down as expeditiously as possible. Recognizing the potentially reactive nature of the production units products, however, in-process material may continue to be processed;
- c. The permittee shall not begin operation of the production unit when the control equipment is not in operation without being granted a variance by the Director;
- d. Additionally, only one cryogenic recovery system may be run in recovery mode at any time. Any concurrent use would be limited to use of one unit isn defrost mode and one unit in recovery mode; and
- e. For all periods in which control equipment or measures are inoperable or malfunctioning, the permittee shall not operate the related production equipment unless the Company is granted a variance pursuant to 45CSR§27-12.1.

4.1.2. The aggregate annual methylene chloride emission limit from sparging operations, as controlled by 1-2C and 1-10C, and as emitted through vent ID# 1-4E and 1-13E, is 3,990 pounds per a rolling twelve month period.

4.1.x. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

- 4.2.1. To demonstrate compliance with 4.1.1, the permittee shall maintain records of the sparging operations and Cryogenic Recovery system operation and maintenance.
- 4.2.2. To demonstrate compliance with 4.1.2., the permittee shall maintain records of the amounts of methylene chloride sparged per batch as well as the quantity of methylene chloride recovered and drummed for reuse. These records shall be used to determine losses of methylene chloride.

Compliance with the annual emission limit shall be demonstrated using a rolling yearly total. A rolling yearly total shall mean the sum of methylene chloride emissions generated by the sparging operations over the previous twelve (12) consecutive calendar months. Records shall be maintained on site and shall be certified and made available to the Director or his/her duly authorized representative upon request.

4.3. Testing Requirements

- 4.3.1. Upon the Director's request, the permittee shall submit to the Director a detailed plan and test protocol for approval of methods to demonstrate compliance with the emission limits set forth in 4.1.2. The Director reserves the right to require the application of any specific valid test or emissions monitoring methods for the determination of TAP emissions from this source.

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.5. Reporting Requirements

- 4.5.1. Upon the discovery of any Toxic Air Pollutant (as defined under 45CSR27) not addressed in this Permit and the emissions of which is not known as of the issuance date, the permittee shall notify the Director in writing within fifteen (15) days of such discovery. Unless the Director determines these emissions to be insignificant, the permittee shall submit a compliance program for control of such emissions within sixty (60) days of the date of notification. Upon a determination by the Director that the proposed compliance program represents BAT, the Director shall, in his or her discretion, consider such program for a consent order and shall determine the conditions to be met for approval and entry of such consent order.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____ Date _____
(please use blue ink) Responsible Official or Authorized Representative

Name and Title _____ Title _____
(please print or type) Name

Telephone No. _____ Fax No. _____

- ¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
 - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
 - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
 - d. The designated representative delegated with such authority and approved in advance by the Director.



Hercules Incorporated
Aerospace Products Group
Allegany Ballistics Laboratory
P. O. Box 210
Rocket Center, WV 26726
(304) 726-5000

December 19, 1986

Director
West Virginia Air Pollution Control Commission
1558 Washington Street, East
Charleston, West Virginia 25311

Attention: Mr. Steve Anderson

Dear Sir:

Construction Permit Application No. 898

This letter confirms the discussions on December 18, 1986, between Messrs. Carl Beard II and Steve Anderson of the West Virginia Air Pollution Control Commission (WVAPCC) and Messrs. Ted Rissell and Dave McBride of Hercules Incorporated/Allegany Ballistics Laboratory (HI/ABL) concerning the construction permit for a nitrate ester sparge facility.

HI/ABL will provide an emission control system on the air effluent stream, containing methylene chloride, from the nitrate ester sparge facility as a part of the construction package. This system will be operational at the start of facility sparging operations. The system will utilize a low temperature refrigeration system to condense and recover volatile organic chemicals (VOC) from the effluent stream. A design operating temperature of -40°F. will be used for the condenser. A copy of literature from Edwards Engineering Corporation, a potential recovery system supplier, is attached. The system will be designed and sized to achieve a minimum recovery of 80% of the VOC released by the sparging operation.

This unit is recognized as constituting a technology development and, as such, Hercules/ABL understands that system testing and documentation after start-up will be required to demonstrate degree of VOC recovery actually achieved. We would plan to measure system performance by material balance. The quantity of methylene chloride stripped from the nitrate ester solutions and the quantity recovered will be measured by weighing on a routine basis during any prescribed demonstration period.

Ancillary process items relating to process safety are currently in study and design. While these items will be part of the total system, they will not influence the VOC recovery operation or efficiency.

Very truly yours,

G. H. Moody
Vice President and Resident Manager

DAMcBride:beh(1993B)
Attachment



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone (304) 926-0475 • FAX: (304) 926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-0898C
Plant ID No.:	057-00011
Applicant:	Alliant Techsystems Operations LLC (ATO)
Facility Name:	Orbital ATK Allegany Ballistics Laboratory
Location:	Mineral County
SIC/NAICS Code:	3764/336415
Application Type:	Modification
Received Date:	December 2, 2015
Engineer Assigned:	Joe Kessler
Fee Amount:	\$3,500
Date Received:	December 2, 2015
Complete Date:	February 1, 2016
Due Date:	May 1, 2016
Applicant Ad Date:	January 14, 2016
Newspaper:	<i>News Tribune</i>
UTM's:	Easting: 686.5 km Northing: 4,381.2 km Zone: 17
Latitude/Longitude:	39.561/-78.833
Description:	Addition of a second methylene chloride recovery unit on the nitrate ester sparging operation.

COPY

Entire Document
NON-CONFIDENTIAL

The Allegany Ballistics Laboratory was originally constructed during World War II as part of the Kelly Springfield Tire Company located in nearby Cumberland, Maryland. Because of rubber shortages, the primary product at the site at the time was mortar shells. Since that time, many additions, process changes, and ownership changes have taken place at the facility. The first 45CSR13 permit was issued for a process at the facility in 1978. Many more permits covering different sections, emission units, and processes at the facility have been issued since that time. Permit Number R13-0898 was issued on December 29, 1986 for nitrate ester sparging operations in Building 352. Since that time R13-0898A and R13-0898B were issued to ATO as Class I Administrative Updates to incorporate requirements from their 45CSR27 Consent Order (CO-R27-99-23-A(91)).

DESCRIPTION OF PROCESS/MODIFICATIONS

Existing Facility Description

Building 352 of the Allegany Ballistics Laboratory is used to air-sparge methylene chloride (1-4S) out of nitroglycerin based mixtures call "lacquers." Methylene chloride is added to nitroglycerin as a desensitizing agent to allow for safe transport over the roads from the manufacturing facility to the ATO facility. Upon receipt, the desensitized material is combined with nitrocellulose and other liquid explosives to create the lacquers. Before the lacquers can be used in the production of propellants for rocket motors, the methylene chloride must be removed. This is achieved by bubbling air through the lacquer to drive off the solvent. The solvent is then routed through an existing cryogenic recovery system (1-2C) that was originally installed in 1989. The sparging process for a single lacquer is a 4-5 day process. The methylene chloride cryogenic recovery system utilizes a low-temperature refrigeration system to condense and recover VOCs from the effluent stream.

Proposed Modifications

ATO is now proposing (after-the-fact, the control system was added in November 2015) to add a second methylene chloride cryogenic recovery system to control emissions from the nitrate ester sparging operations (1-10C). A second recovery system will be installed to supplement the existing unit. This will allow more process flexibility because there is a defrost cycle for each lacquer processed to remove ice from the system. Ice forms in system from moisture in the nitroglycerin. Approximately 25 pounds of water are removed from each lacquer processed. The defrost cycle must be completed with each lacquer to maintain recovery efficiency. The defrost cycle varies dependent upon the time of year and whether it is completed at ambient temperature or using heated air for the cycle. The minimum defrost cycle is 24 hours but is typically 4-5 days. The second system would also act as a backup to the aging system currently in use. The existing unit has been running at a recovery efficiency of 90-92% and the new unit is expected to achieve the same rate (however, to be conservative, the a minimum of 80% recovery efficiency is used in the emission calculations for both units). There are no plans to use both systems at the same time for recovery. However, concurrent use could come in the form of running the defrost cycle on one unit while the other unit is in an active recovery mode. The maximum emission limit of 3,990 pounds of methylene chloride per year will not be changes as a result of this after-the-fact change. The addition of the second control system creates no new emissions.

SITE INSPECTION

Due to the nature of the proposed modification, the author did not perform a site inspection of the facility for this permitting action. The facility was last inspected by DAQ Compliance/Enforcement (C/E) Inspector Karl Dettinger of the North Central Regional Office on July 1, 2014. This inspection found the facility be "Status 30 - In Compliance."

AIR EMISSIONS AND CALCULATION METHODOLOGIES

ATO did not request any change in the potential-to-emit (PTE) of the nitrate ester sparging operations as a result of the permitting action evaluated herein. The second methylene chloride cryogenic recovery system (1-13E) will have the same minimum guaranteed recovery efficiency as the existing unit (80%) and no increase in production was requested. Based on information from the most recent Title V (R30-05700011-2014) Fact Sheet, the facility-wide PTE remains as given in the following table:

Table 1: Facility-Wide PTE

Pollutant	tons/year
NO _x	146.01
CO	162.69
VOC	113.03
PM ₁₀	23.33
SO ₂	289.50
HAPs	59.80

REGULATORY APPLICABILITY

The following will discuss each rule applicable or potentially applicable to the evaluated herein.

45CSR13: Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation

The proposed modification of the Orbital ATK Allegany Ballistics Laboratory does not have the potential to increase the emissions of a regulated pollutant. Therefore, the proposed changes would normally be eligible to be reviewed as a Class II Administrative Update. However, ATO voluntarily submitted the application as a modification and it was reviewed as such. Pursuant to §45-13-5.1, “[n]o person shall cause, suffer, allow or permit the construction, modification, relocation and operation of any stationary source to be commenced without . . . obtaining a permit to construct.” Therefore, ATO is required to obtain a permit under 45CSR13 for the modification of the Allegany Ballistics Laboratory.

As required under §45-13-8.3 (“Notice Level A”), ATO placed a Class I legal advertisement in a “newspaper of *general circulation* in the area where the source is . . . located.” The ad ran on January 14, 2016 in the *News Tribune* and the affidavit of publication for this legal advertisement was submitted on January 14, 2016.

45CSR14: Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration

The Allegany Ballistics Laboratory is an existing major stationary source under 45CSR14 and the proposed installation of a methylene chloride recovery unit is considered, pursuant to §45-14-2.40, a “physical change or a change in the method of operation.” Therefore, to determine if the project is defined as a “major modification,” pursuant to §45-14-3.4(a), the project is examined under a two-step applicability test: “[A] project is a major modification for a regulated NSR pollutant if it causes two types of emissions increases -- a significant emissions increase (as defined in subsection [§45-14-2.75]), and a significant net emissions increase (as defined in subsections [§45-14-2.46] and [§45-14-2.74]). The proposed project is not a major modification if it does not cause a significant emissions increase. If the proposed project causes a significant emissions increase, then the project is a major modification only if it also results in a significant net emissions increase.”

Therefore, for the proposed changes to meet the definition of a major modification, the changes themselves must result in a significant emissions increase. The methodology for calculating the emissions increase under the first step is given under Sections §45-14-3.4(b), 3.4(c), 3.4(d) and 3.4(f). The substantive language relevant to the changes evaluated herein is given below:

[§45-14-3.4(b)]

The procedure for calculating (before beginning actual construction) whether a significant emissions increase (i.e., the first step of the process) will occur depends upon the type of emissions units being modified, according to subdivisions 3.4.c through 3.4.f.

[§45-14-3.4(c)]

Actual-to-projected-actual applicability test for projects that only involve existing emissions units. -- A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the projected actual emissions (as defined in subsection 2.63) and the baseline actual emissions (as defined in subdivisions 2.8.a and 2.8.b), for each existing emissions unit, equals or exceeds the significant amount for that pollutant (as defined in subsection 2.74)

As the total PTE associated with the nitrate ester sparging operations covered under proposed Permit Number R13-0898C is equal to approximately 2.0 TPY of VOCs, any actual increase in emissions associated with the proposed changes (not anticipated) is below the significant thresholds under 2.74 and, therefore, the proposed changes are not defined as a “major modification” under 45CSR14.

45CSR27: To Prevent and Control the Emissions of Toxic Air Pollutants - (NON APPLICABILITY)

Pursuant to §45-27-3.1, the “owner or operator of a plant that discharges or may discharge a toxic air pollutant into the open air in excess of the amount shown in the Table A [of 45CSR27] shall employ [Best Available Technology] at all chemical processing units emitting the toxic air pollutant.” As noted above, Permit R13-0898B incorporated the requirements of 45CSR27 Consent Order CO-R27-99-23-A(91) - which required the installation of the methylene chloride recovery unit (which, in turn limited the facility-wide emissions of methylene chloride to amounts below the 45CSR27 trigger level). Therefore, the facility is not subject to 45CSR27.

45CSR30: Requirements for Operating Permits

45CSR30 provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act. The Allegany Ballistics Laboratory, defined under Title V as a “major source,” was last issued a Title V permit on July 29, 2014. Proposed changes evaluated herein must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

TOXICITY ANALYSIS OF NON-CRITERIA REGULATED POLLUTANTS

This section provides an analysis for those regulated pollutants that may be emitted from the proposed presses and that are not classified as “criteria pollutants.” Criteria pollutants are defined as Carbon Monoxide (CO), Lead (Pb), Oxides of Nitrogen (NO_x), Ozone, Particulate Matter (PM), Particulate Matter less than 10 microns (PM₁₀), Particulate Matter less than 2.5 microns (PM_{2.5}), and Sulfur Dioxide (SO₂). These pollutants have National Ambient Air Quality Standards (NAAQS) set for each that are designed to protect the public health and welfare. Other pollutants of concern, although designated as non-criteria and without national concentration standards, are regulated through various federal and programs designed to limit their emissions and public exposure. These programs include federal source-specific Hazardous Air Pollutants (HAPs) limits promulgated under 40 CFR 61 (NESHAPS) and 40 CFR 63 (MACT). Any potential applicability to these programs were discussed above under REGULATORY APPLICABILITY.

The majority of non-criteria regulated pollutants fall under the definition of HAPs which, with some revision since, were 188 compounds identified under Section 112(b) of the Clean Air Act (CAA) as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other serious human health effects. No additional, or increases in existing, regulated non-criteria pollutants will be emitted as a result of the changes evaluated herein. The only HAP emitted by the nitrate ester sparging operation is methylene chloride. The following table lists methylene chloride’s carcinogenic risk (as based on analysis provided in the Integrated Risk Information System (IRIS)):

Table 2: Potential HAPs - Carcinogenic Risk

HAPs	Type	Known/Suspected Carcinogen	Classification/Comments
Methylene Chloride	VOC	Yes	Likely to be carcinogenic to humans

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health affects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals.* For a complete discussion of the known health effects of each compound refer to the IRIS database located at www.epa.gov/iris.

AIR QUALITY IMPACT ANALYSIS

The proposed modification does not meet the definition of a “major modification” pursuant to 45CSR14 and, therefore, an air quality impact (computer modeling) analysis was not required. Additionally, based on the nature of the proposed modification, modeling was not required under 45CSR13, Section 7.

MONITORING, COMPLIANCE DEMONSTRATIONS, RECORD-KEEPING, AND REPORTING REQUIREMENTS

No substantive changes are being made in the monitoring, compliance demonstrations, record-keeping, and reporting requirements in the draft permit.

TESTING OF OPERATIONS

No additional testing requirements were added as a part of this modification.

CHANGES TO PERMIT R13-0898B

While only minor changes were made to the existing permitting language (addition of the second methylene chloride cryogenic recovery system), the requirements were placed in the new permitting boilerplate.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that compliance with all applicable state and federal air quality regulations will be achieved. Therefore, I recommend to the Director the issuance of Permit Number R13-0898C to Alliant Techsystems Operations LLC for the above discussed changes to the Orbital ATK Allegany Ballistics Laboratory located near Short Gap, Mineral County, WV.



Joe Kessler, PE
Engineer

4-18-16

Date

Fact Sheet R13-0898C
Alliant Techsystems Operations LLC
Orbital ATK Allegany Ballistics Laboratory

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name ALLIANT TECHSYSTEMS OPERATIONS LLC

Permitting Action Number R13-0898C Total Days 138 DAQ Days 77

Permitting Action:

- | | | |
|---|------------------------------------|---|
| <input type="radio"/> Permit Determination | <input type="radio"/> Temporary | <input checked="" type="radio"/> Modification (A-E-F) |
| <input type="radio"/> General Permit | <input type="radio"/> Relocation | <input type="radio"/> PSD (Rule 14) |
| <input type="radio"/> Administrative Update | <input type="radio"/> Construction | <input type="radio"/> NNSR (Rule 19) |

Documents Attached:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Engineering Evaluation/Memo | <input checked="" type="checkbox"/> Completed Database Sheet |
| <input checked="" type="checkbox"/> Draft Permit | <input type="checkbox"/> Withdrawal |
| <input checked="" type="checkbox"/> Notice | <input type="checkbox"/> Letter |
| <input type="checkbox"/> Denial | <input type="checkbox"/> Other (specify) _____ |
| <input type="checkbox"/> Final Permit/General Permit Registration | _____ |

Date	From	To	Action Requested
4-18-16	Joe Kessler	Bev McKeone	<i>NOTICE APPROVAL</i>
4/21	<i>Bev</i>	<i>Joe</i>	<i>Contd Notice</i>

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).

Kessler, Joseph R

From: Foor, SueEllen <sueellen.foor@orbitalatk.com>
Sent: Thursday, December 03, 2015 1:02 PM
To: Adkins, Sandra K; Hadra, Bob
Cc: McKeone, Beverly D; Kessler, Joseph R
Subject: RE: WV DAQ Permit Application Status for Alliant Techsystems Operations LLC; Rocket Center

Joe,
The legal ad was sent to the Mineral Daily News-Tribune on Monday. A copy of the affidavit of publication will be forwarded to you upon receipt.
Thank you.
Sue Ellen Foor

Sue Ellen Foor
ATK - ABL Operations
210 State Route 956
Rocket Center, WV 26726
Phone: 304-726-5506
Fax: 304-726-5562
sueellen.foor@orbitalatk.com

Entire Document
NON-CONFIDENTIAL

I.D. No. 057-00011 Reg. 0898C
Company ATO
Facility Rocket Center Region
Initials

From: Adkins, Sandra K [mailto:Sandra.K.Adkins@wv.gov]
Sent: Thursday, December 03, 2015 12:45 PM
To: Hadra, Bob; Foor, SueEllen
Cc: McKeone, Beverly D; Kessler, Joseph R
Subject: WV DAQ Permit Application Status for Alliant Techsystems Operations LLC; Rocket Center

RE: Application Status
Alliant Techsystems Operations LLC
Rocket Center
Plant ID No. 057-00011
Application No. R13-0898C

Mr. Hadra,

Your application for a modification permit for the Rocket Center facility was received by this Division on December 2, 2015, and was assigned to Joe Kessler. The following item was not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.
**Please use extension 1250 in future legal ads.*

This item is necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from Joe stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Joe Kessler, at 304-926-0499, extension 1219.

Notice: This e-mail is intended solely for use of the individual or entity to which it is addressed and may contain information that is proprietary, privileged and exempt from disclosure under applicable law. If the reader is not the intended recipient or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. This communication may also contain data subject to U.S. export laws. If so, that data subject to the International Traffic in Arms Regulation cannot be disseminated, distributed or copied to foreign nationals, residing in the U.S. or abroad, absent the express prior approval of the U.S. Department of State. If you have received this communication in error, please notify the sender by reply e-mail and destroy the e-mail message and any physical copies made of the communication. Thank you.

Kessler, Joseph R

From: Foor, SueEllen <sueellen.foor@orbitalatk.com>
Sent: Tuesday, December 29, 2015 4:17 PM
To: Kessler, Joseph R
Subject: RE: R13-0898C Permit Application Review Status
Attachments: B352 Permit Mod App.docx; 2015 Orbital Name Change and Signatory Change.pdf

Joe,
Just checked the mail and no affidavit received yet. I am guessing I will have it by Monday. Attached is a copy of the application form with the name changed and a signatory letter. Mr. Hadra is listed as a signatory.
Have a good new year!

Sue Ellen Foor

Sue Ellen Foor
ATK - ABL Operations
210 State Route 956
Rocket Center, WV 26726
Phone: 304-726-5506
Fax: 304-726-5562
sueellen.foor@orbitalatk.com

From: Kessler, Joseph R [mailto:Joseph.R.Kessler@wv.gov]
Sent: Tuesday, December 29, 2015 3:56 PM
To: Foor, SueEllen
Cc: Kessler, Joseph R
Subject: R13-0898C Permit Application Review Status

RE: Application Status: Incomplete
Alliant Techsystems Operations LLC
Allegany Ballistics Laboratory
Permit Application: R13-0898C
Plant ID No.: 057-00011

Dear Ms. Foor:

Your application for a modification to the Allegany Ballistics Laboratory was received by the Division of Air Quality (DAQ) on December 2, 2015 and assigned to the writer for review. Upon an initial review of the application, it has been determined that the following item needs to be addressed prior to the application being deemed complete:

1. The original affidavit of publication from the required Class I Legal Advertisement has not been submitted.

Please address the above items as quickly as possible in order to facilitate review of the permit application. Should you have any questions, please contact me at (304) 926-0499 ext. 1219.

Joe Kessler, PE
Engineer
West Virginia Division of Air Quality

601-57th St., SE
Charleston, WV 25304
Phone: (304) 926-0499 x1219
Fax: (304) 926-0478
Joseph.r.kessler@wv.gov

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Kessler, Joseph R

From: Foor, SueEllen <sueellen.foor@orbitalatk.com>
Sent: Wednesday, January 06, 2016 10:22 AM
To: Kessler, Joseph R
Subject: RE: R13-0898C Permit Application Review Status
Attachments: Affidavit Receipt Letter.pdf; Public notice affidavit.pdf

Joe,
Attached is a scanned copy of the affidavit of publication. I am putting the hard copy in the mail to you today.
Thank you.
Sue Ellen Foor

Sue Ellen Foor
ATK - ABL Operations
210 State Route 956
Rocket Center, WV 26726
Phone: 304-726-5506
Fax: 304-726-5562
sueellen.foor@orbitalatk.com

From: Kessler, Joseph R [mailto:Joseph.R.Kessler@wv.gov]
Sent: Tuesday, December 29, 2015 3:56 PM
To: Foor, SueEllen
Cc: Kessler, Joseph R
Subject: R13-0898C Permit Application Review Status

RE: Application Status: Incomplete
Alliant Techsystems Operations LLC
Allegany Ballistics Laboratory
Permit Application: R13-0898C
Plant ID No.: 057-00011

Dear Ms. Foor:

Your application for a modification to the Allegany Ballistics Laboratory was received by the Division of Air Quality (DAQ) on December 2, 2015 and assigned to the writer for review. Upon an initial review of the application, it has been determined that the following item needs to be addressed prior to the application being deemed complete:

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Joe Kessler, PE
Engineer
West Virginia Division of Air Quality
601-57th St., SE
Charleston, WV 25304

Phone: (304) 926-0499 x1219

Fax: (304) 926-0478

Joseph.r.kessler@wv.gov

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Kessler, Joseph R

From: Foor, SueEllen <sueellen.foor@orbitalatk.com>
Sent: Wednesday, April 13, 2016 11:32 AM
To: Kessler, Joseph R
Subject: George Moody letter
Attachments: Moody Letter 12-19-86.pdf; ATT00001.txt

Joe,
Here is a copy of the letter you requested. It was nice to take a short trip to the past and reread it because it was signed by my dad who has since passed.
If you need anything else, let me know. I will be out of the office starting around 2 this afternoon until Monday.

Thanks.
Sue Ellen

Sue Ellen Foor
ATK - ABL Operations
210 State Route 956
Rocket Center, WV 26726
Phone: 304-726-5506
Fax: 304-726-5562
sueellen.foor@orbitalatk.com

Kessler, Joseph R

From: Foor, SueEllen <sueellen.foor@orbitalatk.com>
Sent: Wednesday, April 13, 2016 2:15 PM
To: Kessler, Joseph R
Subject: RE: George Moody letter

The plant first started operating during WWII as part of the Kelly Springfield Tire Company located in nearby Cumberland, MD. Because of the rubber shortages during the war, the company was looking for another means of keeping manufacturing running. They started machining mortar shells for DOD. But they could not load them with gun powder in the city limits. So they purchased the land out here to do that. The facility changed hands several times in the 40s and finally wound up being owned by the Dept. of the Navy. In the mid 50s, Hercules Powder Company took over the lease and ran the facility for the Navy. Early work was all nitroglycerin based explosives for mortar rounds and then later for Polaris and Minuteman missile systems (way bigger than what we do now). In the late 60s, Hercules purchased about 57 acres from the Navy for the Plant 2 facility (they are contiguous) to build a facility to build rocket motors with Ammonium Perchlorate based propellants in place of the NG based ones.

In the 80s we started diversifying from the strictly explosive loading side of the rocket motor business. We started with composite structures business to wind graphite and carbon rocket motor cases and helicopter blades. Then we moved our McGregor Texas operations in in 1996 and started doing metal fabrication of the rocket motor cases rather than buying them all. We do a mix of make and buy now. Then we moved in the high rate tank ammunition metal machining operations from NJ, then the medium caliber ammunition machining from Wisconsin (we do not load these units with explosive). The last addition was the move of our electronic fuzing operations from MN to the facility.

We have various processing lines to get the ingredients ready, mix the explosives, get the cases ready, load them with explosives, cure them, and finish them to send to customers.

Hopefully this will give you a little bit of an idea of what we do here at the facility. If you want to discuss further I can give you a call one day next week. You can also look up Allegany Ballistics Laboratory on Wikipedia to get some history.

I will be leaving the office once I mail this to you and won't be back until Monday. Out for RCRA training and vacation.

Thanks.
Sue Ellen

From: Kessler, Joseph R [mailto:Joseph.R.Kessler@wv.gov]
Sent: Wednesday, April 13, 2016 1:33 PM
To: Foor, SueEllen
Subject: RE: George Moody letter

So I have a little background in my fact sheet, can you tell me when was the facility originally constructed and a little background as to what you primarily produce at the facility?

Thanks

Joe

From: Foor, SueEllen [<mailto:sueellen.foor@orbitalatk.com>]
Sent: Wednesday, April 13, 2016 11:49 AM
To: Kessler, Joseph R <Joseph.R.Kessler@wv.gov>
Subject: RE: George Moody letter

I was a summer intern here.

From: Kessler, Joseph R [<mailto:Joseph.R.Kessler@wv.gov>]
Sent: Wednesday, April 13, 2016 11:40 AM
To: Foor, SueEllen
Subject: RE: George Moody letter

Thank you, that was a long time ago. I was in 8th grade I believe.

Joe

From: Foor, SueEllen [<mailto:sueellen.foor@orbitalatk.com>]
Sent: Wednesday, April 13, 2016 11:32 AM
To: Kessler, Joseph R <Joseph.R.Kessler@wv.gov>
Subject: George Moody letter

Joe,
Here is a copy of the letter you requested. It was nice to take a short trip to the past and reread it because it was signed by my dad who has since passed.
If you need anything else, let me know. I will be out of the office starting around 2 this afternoon until Monday.

Thanks.
Sue Ellen

Sue Ellen Foor
ATK - ABL Operations
210 State Route 956
Rocket Center, WV 26726
Phone: 304-726-5506
Fax: 304-726-5562
sueellen.foor@orbitalatk.com

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Kessler, Joseph R

From: Kessler, Joseph R
Sent: Monday, February 01, 2016 11:08 AM
To: Foor, SueEllen (sueellen.foor@orbitalatk.com)
Cc: Kessler, Joseph R
Subject: R13-0898C Permit Application Review Status

RE: Application Status: Complete
Alliant Techsystems Operations LLC
Allegany Ballistics Laboratory
Permit Application: R13-0898C
Plant ID No.: 057-00011

Dear Ms. Foor:

Your application for a modification permit was received by the Division of Air Quality (DAQ) on December 2, 2015 and assigned to the writer for review. Upon an initial review of the application, it was determined that an additional item needed to be addressed prior to the application being deemed complete. After receiving the required additional information, the application has been deemed complete as of the date of this e-mail. The ninety (90) day statutory time frame began on that day.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact me at (304) 926-0499 ext. 1219 or reply to this e-mail.

Joe Kessler, PE
Engineer
West Virginia Division of Air Quality
601-57th St., SE
Charleston, WV 25304
Phone: (304) 926-0499 x1219
Fax: (304) 926-0478
Joseph.r.kessler@wv.gov

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Alliant Techsystems Operations LLC.
Missile Products Group
210 State Route 956
Rocket Center, WV 26726

www.atk.com

January 6, 2015

Mr. Fred Durham
WV Department of Environmental Protection
Division of Air Quality
601 57th Street
Charleston, WV 25304

Re: Class I Administrative Update of Regulation 45CSR 13 & 30 Permits

Dear Mr. Durham:

Alliant Techsystems Inc., who operates the Allegany Ballistics Laboratory (ABL) facility located in Rocket Center, West Virginia, is merging with Orbital Sciences sometime during the first quarter of 2015. The merger completion date is not yet known. With the merger, the parent company name will be changing to Orbital ATK Inc. The division business name that is used in our air permits will remain Alliant Techsystems Operations LLC.

This letter is to request a Class I administrative update for each of ABL's existing Regulation 13 permits (numbers 0401B, 0898B, 0974A, 1047B, 1455A, 1694B, 1771B, 1782A, 1797A, 1798B, 2023C, 2037A, 2246A, 2301A, 2579A, 2606A, 2680, & 2754); Emergency Generator permits C80-C020; and our existing Regulation 30 permits (number R30-05700011-2014 Parts 1, 2 & 3) in order to incorporate the name change. ABL's Air Quality ID# is 03540570011.

The designees for signature authority now include:

Mr. Eric H. Hughes – Senior Manager - Safety, Environmental, and Security
Chris Fritz; Market Segment Director, Tactical Subsystems
Gerald Brode; Market Segment Director, Tactical Propulsion
Bob Hadra; Director, SFPMO, Safety, Security & Environmental
Scott Pfeiffer; Director, Manufacturing Operations
Gregg Corley; Director, Engineering

If you should have any questions, please contact Sue Ellen Foor at (304) 726-5506.

Sincerely yours,

Patrick Nolan
V. P. & Site Manager – ABL Operations

Cc: J. Bode

UC Defaulted Accounts Search Results

Sorry, no records matching your criteria were found.

FEIN:

Business name: 274026908

Doing business as/Trading as:

Please use your browsers back button to try again.

WorkforceWV	Unemployment Compensation	Offices of the Insurance Commissioner
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Kessler, Joseph R

From: Adkins, Sandra K
Sent: Thursday, December 03, 2015 12:05 PM
To: Kessler, Joseph R
Subject: FW: Receipt/WVDEP DAQ App Fee R13-3235T
Attachments: 2015_02_09_11_55_48.pdf

This is the receipt that they have included with the current app package along with the withdraw letter I locate the email I sent Steve that includes deposit info as well.

From: Adkins, Sandra K
Sent: Monday, February 09, 2015 11:58 AM
To: sueellen.foor@atk.com
Subject: Receipt/WVDEP DAQ App Fee R13-3235T

Hello,
Attached is the receipt in payment of the DAQ app fee that follows:

Application Status
Alliant Techsystems Operations LLC
Rocket Center Facility
Plant ID No. 057-00011
Application No. R13-3235T

Application fee AND/OR additional application fees not included:
***\$1,000 Construction, Modification, Relocation or Temporary Permit**
***\$1,000 NSPS**

Thank you.
Sandra

Kessler, Joseph R

From: Adkins, Sandra K
Sent: Thursday, December 03, 2015 12:06 PM
To: Kessler, Joseph R
Subject: FW: Alliant Techsystems Operations LLC/Permit Application Fee

This is it.

From: Adkins, Sandra K
Sent: Monday, February 09, 2015 3:30 PM
To: Pursley, Steven R <Steven.R.Pursley@wv.gov>
Cc: Rice, Jennifer L <Jennifer.L.Rice@wv.gov>
Subject: Alliant Techsystems Operations LLC/Permit Application Fee

This is the receipt for payment received from:

Sue Ellen Foor, credit card payment, February 9, 2015, \$2,000.00
Alliant Techsystems Operations LLC Rocket Center Facility R13-3235T id no 057-00011

OASIS Deposit No CR 1500087867 February 9, 2015

Kessler, Joseph R

From: Null, Gregory L
Sent: Friday, December 04, 2015 2:44 PM
To: Kessler, Joseph R
Subject: Orbital ATK/Permit Application Fee

The is the receipt for payment received from:

Orbital ATK, credit card, 12/1/15, \$1,500
R13-898B

For Mod

OASIS Deposit CR 1600060903, December 2, 2015



January 6, 2016

Mr. Joe Kessler
WV Department of Environmental Protection
Division of Air Quality
601 – 57th Street
Charleston, WV 25304

Entire Document
NON-CONFIDENTIAL

**Alliant Techsystems Operations LLC
Allegany Ballistics Laboratory
WVDAQ ID# 057-00011**

SUBJECT: R13-0898B Permit Modification Application

Dear Mr. Kessler:

Attached please find the hard copy of the affidavit of publication for the public notice for the above referenced permit modification application. Should you have additional questions regarding this submittal please contact me at 304-726-5506 or sueellen.foor@orbitalatk.com.



Sincerely,

Sue Ellen Foor
Environmental Engineer
Orbital ATK
Allegany Ballistics Laboratory

G:\SESS Division\Env\SEFAir\Affidavit Receipt Letter.docx

ID. No. 057-00011 Reg. 0898C
Company ATO
Facility Rocket Center Region _____
Initials EF

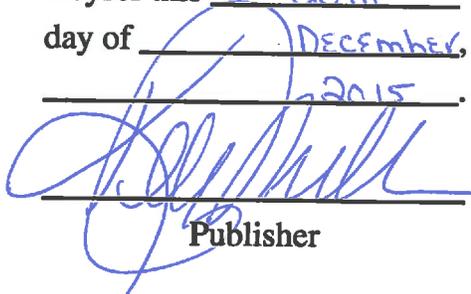
I, as an officer of the News-Tribune, a daily newspaper published at Keyser, Mineral County, West Virginia, hereby certify that the Alliant TechSYSTEMS Inc. in the case of Orbital ATK

Minor Modification vs. to add second CONDENSER

a copy whereof is hereto annexed has been published for 3 consecutive WEEKS

in said NEWS TRIBUNE, the first publication being on the 9th day of, DECEMBER 2015.

Given under my hand at Keyser this 28th day of DECEMBER, 2015.



Publisher

Publisher's Fee
\$ 111.52

NOTICE

Notice is given that Orbital ATK LLC-ABL Operations has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Minor Modification to add a second condenser to a nitrate ester sparging operation located on 210 State Route, near Keyser in Mineral County, West Virginia. The latitude and longitude coordinates are: 39.561 degrees latitude, -78.833 degrees longitude.

The applicant estimates that the potential change to discharge the following Regulated Air Pollutants will be:

Hazardous Air Pollutant (HAP)
Methylene Chloride- 0 lb/hr and 0 TPY

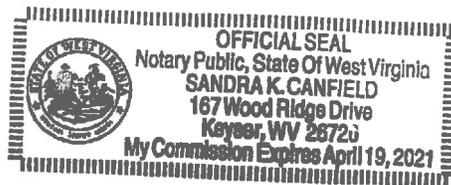
Startup of operation is planned to begin on or about the 15th day of January,

2016. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, West Virginia, 25304, for a period of 30 days calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the 1st day of December, 2015.

By:
Orbital ATK LLC-ABL Operations
Robert Hadra
Director, SFPMO, Safety Security & Environmental
210 State Route 956
Rocket Center,
West Virginia 26726-3548



Sandra K. Canfield
My Commission expires
4-19-21

Kessler, Joseph R

From: Kessler, Joseph R
Sent: Tuesday, December 29, 2015 3:56 PM
To: Foor, SueEllen (sueellen.foor@orbitalatk.com)
Cc: Kessler, Joseph R
Subject: R13-0898C Permit Application Review Status

RE: Application Status: Incomplete
Alliant Techsystems Operations LLC
Allegany Ballistics Laboratory
Permit Application: R13-0898C
Plant ID No.: 057-00011

Entire Document
NON-CONFIDENTIAL

Dear Ms. Foor:

Your application for a modification to the Allegany Ballistics Laboratory was received by the Division of Air Quality (DAQ) on December 2, 2015 and assigned to the writer for review. Upon an initial review of the application, it has been determined that the following item needs to be addressed prior to the application being deemed complete:

1. The original affidavit of publication from the required Class I Legal Advertisement has not been submitted.

Please address the above items as quickly as possible in order to facilitate review of the permit application. Should you have any questions, please contact me at (304) 926-0499 ext. 1219.

Joe Kessler, PE
Engineer
West Virginia Division of Air Quality
601-57th St., SE
Charleston, WV 25304
Phone: (304) 926-0499 x1219
Fax: (304) 926-0478
Joseph.r.kessler@wv.gov

Adkins, Sandra K

From: Adkins, Sandra K
Sent: Thursday, December 03, 2015 12:45 PM
To: 'bob.hadra@orbitalatk.com'; 'sueellen.foor@orbitalatk.com'
Cc: McKeone, Beverly D; Kessler, Joseph R
Subject: WV DAQ Permit Application Status for Alliant Techsystems Operations LLC; Rocket Center

**RE: Application Status
Alliant Techsystems Operations LLC
Rocket Center
Plant ID No. 057-00011
Application No. R13-0898C**

Entire Document
NON-CONFIDENTIAL

Mr. Hadra,

Your application for a modification permit for the Rocket Center facility was received by this Division on December 2, 2015, and was assigned to Joe Kessler. The following item was not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.

**Please use extension 1250 in future legal ads.*

This item is necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from Joe stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Joe Kessler, at 304-926-0499, extension 1219.