

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-05700011-2009 (Part 2 of 3)**

Application Received: **August 19, 2008**

Plant Identification Number: **05700011**

Permittee: **Alliant Techsystems, Inc.**

Facility Name: **ATK Tactical Propulsion & Controls / Allegany Ballistics Laboratory**

Mailing Address: **210 State Route 956, Rocket Center, WV 26726-3548**

Physical Location: Rocket Center, Mineral County, West Virginia
UTM Coordinates: 686.47 km Easting • 4381.25 km Northing • Zone 17
Directions: Left on plant access road from State Route 956 at the North Branch of the Potomac River

Facility Description

SIC Codes: Primary - 3764, Secondary – 3089

Fabrication of both steel and composite structure rocket motor and warhead cases, production of propellants and explosives which are loaded into above cases and all associated case preparation and testing for motors.

The facility is located at two plants - Plant 1 and Plant 2. For Title V Permit purposes the facility operations were divided into the following Parts:

Part 1 - Motor Manufacturing,

Part 2 - Composites Manufacturing and Metal Fabrication,

Part 3 - Miscellaneous Units.

This Permit covers Part 2 of the facility.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2007 Actual Emissions
Carbon Monoxide (CO)	122.12	53.196
Nitrogen Oxides (NO _x)	124.29	75.64
Particulate Matter uncontrolled (PM ₁₀)	22.89	8.616
Total Particulate Matter controlled (TSP)	42.62	12.22
Sulfur Dioxide (SO ₂)	318.24	187.8
Volatile Organic Compounds (VOC)	110.44	32.13

PM₁₀ is a component of TSP.

HAPs is a component of VOC.

Hazardous Air Pollutants	Potential Emissions	2007 Actual Emissions
Antimony compounds*	1.154	0.04662
Benzene	0.0414	0.0125
Beryllium	0.0001	1.9E-5
Cadmium compounds*	0.0015	0.00045
Chromium*	0.0069	0.00208
Chromium compounds (not identified)*	0.0277	0.00839
Cobalt*	0.0091	0.00366
Dibutyl phthalate	0.3439	0.1039
Ethyl benzene	0.3456	0.1012
Ethyl glycol	0.0464	0.0011
Formaldehyde	0.0047	0.0015
Glycol ether compounds	4.4905	1.3435
Hexane	0.3459	0.1067
Hydrochloric Acid	26.7135	8.062
Isocyanates (mixed)	0.0376	0.0114
Lead *	0.33	0.09942
Lead compounds*	0.3298	0.0000
Mercury*	0.0014	0.00043

Methanol	0.4742	0.1445
Methyl ethyl ketone (MEK)	3.32	1.1125
Methyl isobutyl ketone (MIBK)	1.43	0.4364
Methyl tert butyl ether	0.1193	0.0360
Methylene chloride	0.6554	0.198
Nickel*	0.1685	0.05092
Phenol	0.0497	0.0159
Strontium chromate*	0.0017	0.00082
Styrene	0.2167	0.0654
Toluene	14.5305	4.4480
Trichloroethylene (TCE)	0.0112	0.0034
Xylene	3.2068	0.952
Zinc chromate*	0.0001	0.00003
TOTAL:		

* Component of TSP emissions in Plant-wide Emission Summary table above

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit over 122.12 tons per year of Carbon Monoxide, 124.29 tons per year of Nitrogen Oxides, 289.14 tons per year of Sulfur Dioxide, over 10 tons per year of each Hydrochloric Acid and Toluene, and over 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 25 tons per year of aggregate HAPs, Alliant Techsystems, Inc., ATK Tactical Propulsion & Controls is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Fugitive dust, particulate matter, and visible emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40CFR63, Subpart GG	Aerospace manufacturing and Rework Facilities

	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4 45CSR27	No objectionable odors. Toxic Air Pollutants

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1797A	01/30/2002	
R13-2037A	07/26/2001	
R13-2579A	10/17/2005	
R13-2680	01/04/2007	
R13-2754	08/12/2008	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B", which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made to the latest version of the Title V Permit (SM01):

- Monitoring subsections 4.2, 5.2 and 6.2 were added to Sections 4, 5 and 6 of the Permit, therefore Testing, Recordkeeping and Reporting subsections of these Sections, and their Requirements were renumbered accordingly.
- Title V Permit Attachments 1 through 3 and 5 through 8 were deleted, and instead descriptions of recordkeeping were included in the Permit. Also, Attachment 9 was renamed to Attachment 1.
- Consent Order CO R27-99-23-A(91) was closed in 2004 because use of the materials covered by the Consent Order was eliminated. Subsequently, Attachment 4 to this Title V Permit was deleted, and Requirements 3.1.13, 3.5.12, 3.5.13, 5.2.2. and 5.3.2 (former 5.2.2) were revised or deleted.
- Emission Units Table 1.1. - several equipment units were removed from the facility; therefore they were deleted from the table. Grieve Electric Oven (former Source ID A-11S, Emission Point A-18E) was moved from Metal Fabrication Group (building 167) to Nozzle / Insulator Preparation Group

- (building 421) (new Source ID D-49S, new Emission Point ID D-20E). Pittsburgh Spray Booth-368ANN (Source ID B-102S, Emission Point ID B-34E) and Fabric filter for spray booth (control device ID B-14C) were added under Composite Case Manufacturing Group. Composite Structures Manufacturing Area former process was shut down, and the building was equipped for new process as per Permit R13-2754, therefore this group of equipment was revised in the table. Chemical Vapor Deposition Reactor Group was added per Permit R13-2680.
- 5) Requirement 3.2.1 was revised per Company's request based on historical data of very low or absent opacity from several emission points (except Emission Points A-7E, B-16E, B-19E, B-21E, B-25E). Emission Points B-27E, B-34E, B-31E, D-7E were eliminated from the requirements because they do not handle materials with PM, and Emission Point D-8E was eliminated because it vents inside the building. For paint booths and related equipment (Emission Points B-3E, B-4E, B-32E, D-1E, D-9E, D-17E, V-1E, V-2E, V-4E, V-5E) and grinding (A-2E and A-6E), alternative methods of compliance demonstration with the opacity limit were included in the Permit (Requirements 3.2.2 and 3.2.3). Also, recordkeeping Requirement 3.4.4 was revised to add recordkeeping for the Requirements 3.2.2 and 3.2.3.
 - 6) Requirement 3.4.6 – clarification was added that the recordkeeping is required “to demonstrate compliance with Specialty Coatings definition in order to maintain exemption from the requirements of Subpart GG 40CFR63.745 (as per 3.7.2(b))”.
 - 7) Requirement 3.5.11 was expanded to explain what needs to be included in the report required.
 - 8) Section 7 - Composite Structures Manufacturing Area specific requirements were added per Permit R13-2754 under Section 7.
 - 9) Section 8 - Chemical Vapor Deposition (CVD) Reactor (Plant 1, Area 00X) specific requirements were added per Permit R13-2680 under Section 8.
 - 10) Attachment 2 “Air Emission Estimates – ATK CVD process” was added based on Attachment N to Permit Application R13-2680.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

The Part 2 facility doesn't have Pollutant-Specific Emissions Units (PSEUs), because none of the units have annual pre-control PTE equal to or greater than the Title V Major Source Threshold. Therefore, the Part 1 facility is not subject to Compliance Assurance Monitoring (CAM) Rule (40 CFR Part 64).

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: March 31, 2009
Ending Date: April 30, 2009

All written comments should be addressed to the following individual and office:

Natalya Chertkovsky-Veselova
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Natalya Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
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Response to Comments (Statement of Basis)

No comments were received.