

# Fact Sheet



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

Permit Number: **R30-05700011-2009 (Part 1 of 3)**

Application Received: **June 27, 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**

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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

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## **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 1 of the facility - Motor Manufacturing operations.

## Emissions Summary

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

*PM<sub>10</sub> is a component of TSP.*

*HAPs is a component of VOC.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2007 Actual Emissions</b>
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
<b>Chromium compounds</b> (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
<b>Hydrochloric Acid</b>	26.7135	8.062
Isocyanates (mixed)	0.0376	0.0114
<b>Lead *</b>	0.33	0.09942
<b>Lead compounds*</b>	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
<b>Methylene chloride</b>	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
<b>TOTAL:</b>	<b>58.4141</b>	<b>17.3856</b>

\* 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	No objectionable odors.
	45CSR27	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, 45CSR15, 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> )
R13-0401B	05/23/2001	
R13-0898B	04/27/2004	
R13-1047B	03/04/2002	
R13-1455A	07/18/2001	
R13-1694B	11/17/2003	
R13-1782A	07/19/2001	
R13-1798A	07/19/2001	
R13-2037A	07/26/2001	
R13-2246A	10/14/2003	

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 initial Title V Permit:

- 1) Monitoring subsections 4.2. and 5.2. were added to Sections 4 and 5 of the Permit, therefore Testing, Recordkeeping and Reporting subsections of these Sections, and their Requirements were renumbered accordingly.
- 2) Consent Order CO R27-99-23-A(91) was closed in 2004 because use of the materials covered by this Consent Order was eliminated with the exception of Nitrate Ester Sparge-352 materials with methylene chloride (001 Ingredient Preparation). Emission limits for the Nitrate Ester Sparge-352 and other related requirements were included with Permit R13-0898B. Subsequently, Attachment 2 to the Title V Permit was deleted and Requirements 3.1.13., 3.5.12., 3.5.13., 4.3.2. (former 4.2.2. – see also item (7) below) and 4.4.1. (former 4.3.1.) were revised or deleted.
- 3) Attachments 3 through 16 were deleted, and instead a description of recordkeeping was included in the Permit.
- 4) Several equipment units (G-1S, G-5S, G-6S, G-7S, G-8S, K-2S, K-6S, G-2C) were removed from the facility, therefore they were deleted from the Emission Units Table 1.1. Parts Washer K-2S unit was deleted from Requirements 7.1.1. and 7.1.2. without changing of combined annual limits for Heptane usage and Heptane emissions.
- 5) Requirement 3.2.1 was revised per Company's request based on historical data of very low or absent opacity from paint booths and other equipment (except Emission Points 1-3E, 1-7E, F-6E, F-11E, F-14E), and instead 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 3.5.11. was expanded to explain what needs to be included in the report required.
- 7) Requirements 4.3.2, 4.4.6 and 4.4.7. (former 4.2.2, 4.3.6 and 4.3.7) were revised to make them consistent with the Permit R13-0898B modified after initial Title V Permit was issued. Requirement 3.5.12. is also revised and moved to Section 4 (Requirement 4.5.1.).

### **Non-Applicability Determinations**

The Part 1 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: February 28, 2009

Ending Date: March 31, 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 57<sup>th</sup> 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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

On March 24, 2009 the Company sent comments on the Draft/Proposed Fact Sheet. The following change was made to the Fact Sheet based in the comments – PTE for SO<sub>2</sub> was revised from 289.14 TPY to 318.24 TPY because it was miscalculated before for No. 2 distillate oil.

Also, Item 1 was added to the Determinations and Justifications Section of the Fact Sheet to clarify renumbering of some sections, and Item 2 was expanded to add more detail on Consent Order CO R27-99-23-A(91) closing.