

Fact Sheet



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

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

Application Received: **December 26, 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 3 of the facility - Miscellaneous Units.

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:	58.4141	17.3856

* 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, 318.24 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:	45CSR2	Particulate matter/Indirect Heat Exchangers
	45CSR7	Fugitive dust, particulate matter, and visible emissions

	45CSR10	Sulfur oxides emissions
	45CSR13	Permits for Construction, Modification, Relocation
	45CSR30	Operating permit requirement
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, 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>)
R13-0974A	05/23/2001	
R13-1771B	04/27/2004	
R13-2023B	04/14/2009	
R13-2301A	07/13/2001	
R13-2606A	01/28/2006	

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) Attachments 1 and 3 were deleted, and instead a description of recordkeeping was included in the Permit. Also, "Certification Of Data Accuracy" from the reverse side of former Attachment 1 and Attachment 2 was included as new Attachment 1.
- 3) Emission Units Table 1.1 – several units (P-98S, M-14S through M-17S and M-19S, P-6C) were removed from the facility. New fuze line manufacturing area was added to Laser Products Fabrication (Emission Units 9-23S through 9-28S). These operations were relocated from Janesville, Wisconsin site. New operations have the following PTE:

Regulated Pollutants	Hourly, lb/hr	Annual, TPY
VOCs	1.08	1.10
HAPs	0.27	0.28

Based on PD05-051 no pre-construction Permit was needed.

New MAC Warhead Aluminum Preparation (MAC WH) operations were added to the facility (Group 00X, Emission Units X-1S through X-6S). These operations have PTE 18.5 lb/yr of PM, and therefore they are not subject to pre-construction NSR Permit. However, they are subject to opacity limit under 45CSR§7-3.1 and fugitive emissions control requirements per 45CSR§7-5.1 and 5.2 (Requirement 3.1.9 of the Permit). The operations are done with use of water system in order to eliminate dust (the exhaust runs through a water bath to pick out the aluminum).

- 4) Requirement 3.5.10. (former 3.5.11) was expanded to explain what needs to be included in the report required.
- 5) Conditions 4.1.13 through 4.1.16, and Condition 4.4.8 were added to include requirements of Permit R13-2606A.
- 6) Requirements 4.1.5. through 4.1.8, 4.4.3 and 4.4.4 were revised to include conditions of recently updated Permit R13-2023B: for No. 1 boiler (L-11S) fuel oil no. 6 with sulphur content 2.0 % was changed to fuel oil No. 2 with sulphur content 0.4 %.
- 7) 40 C.F.R. 63 Subpart DDDDD (Boiler MACT) - Requirement 4.1.12 was replaced with new language regarding Boilers No. 1, 2 and 17, and R13-2606A, Conditions 4.1.6, 4.1.11 and 4.1.12 related to Boiler No. 2 (Source ID L-12S) Boiler MACT applicability were not included in the Title V Permit due to the following reason. After consultation with US EPA Region III in which DAQ was informed that 112(j) applied to the vacated standard 40 C.F.R. 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters", but that no date of becoming subject was known, the agency determined that inserting a permit condition to address this situation to allow for a permit application shield while US EPA was in the process of re-proposing and re-promulgating a MACT standard was a reasonable course of action and use of limited resources. The agency's current position to delay the 112(j) reviews is based on the November 13, 2008 order filed by the United States District Court for the District of Columbia for US EPA to issue a new Boiler and Process Heater MACT to be proposed by July 15, 2009 and promulgated by July 15, 2010; to maintain national consistency; and to most effectively use agency resources.

On July 30, 2007, the United States Court of Appeals for the District of Columbia Circuit vacated and remanded the Boiler MACT. As a result of the court's decision, a MACT for this source category will

have to be implemented via a 112(j) case-by-case MACT determination or a subsequent 40 C.F.R. 63 proposal. Per DAQ's "Interim Guidance for Existing Sources – Boiler and Process Heater MACT Vacature," dated September 7, 2007, the DAQ does not intend to implement the provisions of the Boiler and Process Heater MACT for existing sources at this time. US EPA will be issuing guidance regarding the 112(j) case-by-case MACT determination of equivalent emission limitation in the future. Due to these facts, the 40 C.F.R. 63, Subpart DDDDD placeholder language was removed for existing Boiler No. 17.

Non-Applicability Determinations

- 1) The Part 3 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 3 facility is not subject to Compliance Assurance Monitoring (CAM) Rule (40 CFR Part 64).
- 2) Condition 4.1.9 of the Permit R13-2606 ("Objectionable Odor") is left out of the Title V Permit because it is a definition, not an applicable requirement.
- 3) New MAC Warhead Aluminum Preparation (MAC WH) operations PTE for PM is below 1 lbs/hr and 1000 lbs/yr, and these PM do not consist of HAPS, therefore MAC WH operations are exempt from 45CSR§7-4.1 (maximum allowable PM emission rate) per 45CSR§7-10.5.
- 4) New MAC Warhead Aluminum Preparation (MAC WH) operations are not a subject to 45CSR10 because they don't generate sulfur oxides emissions.

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: June 23, 2009
Ending Date: July 23, 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

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Response to Comments (Statement of Basis)

N/A