

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 21, 2014.

Permit Number: **R30-05700011-2014 (1 of 3)**
Application Received: **December 2, 2015**
Plant Identification Number: **057-00011**
Permittee: **Alliant Techsystems Operations LLC**
Facility Name: **Allegany Ballistics Laboratory**
Mailing Address: **210 State Route 956, Rocket Center, WV 26726-3548**

Permit Action Number: *MM01* Revised: *August 2, 2016*

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 1 of the facility - Motor Manufacturing operations.

The purpose of this modification is the addition of a second methylene chloride recovery unit on the nitrate ester sparging operation.

Emissions Summary

There are no emission changes associated with this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 122.12 tons per year of Carbon Monoxide, 124.29 tons per year of Nitrogen Oxides, 289.14 tons per year of Sulfur Dioxide, 110.44 TPY of Volatile Organic Compounds, over 10 tons per year each of 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, over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, Alliant Techsystems Operations LLC 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	NSR permit.
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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>)
R13-0898C	5/27/2016	

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," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes were made with this modification:

- Emission Point 1-13E, Control Device 1-10C, and Footnote 1 were added to the emission units table.
- The citation for Condition B.5 of R13-0898 was removed from condition 3.1.11.
- Condition 4.4.1 of R13-0898C was added to the citation in condition 3.4.1.
- Conditions 4.1.11 and 4.1.12 were revised slightly and reformatted to reflect the changes made in R13-0898C.
- Condition 4.1.14, which addresses Operation and Maintenance of Air Pollution Control Equipment, was added to this permit. This condition references condition 4.1.3 of R13-0898C.
- Condition 4.4.8, which addresses Record of Maintenance of Air Pollution Control Equipment, was added to this permit. This condition references condition 4.4.2 of R13-0898C.
- Condition 4.4.9, which addresses Record of Malfunction of Air Pollution Control Equipment, was added to this permit. This condition references condition 4.4.3 of R13-0898C.
- Conditions 4.3.2, 4.4.6, and 4.5.1 was revised to reflect the current language in R13-0898C.
- Additionally, R13-0898C was rewritten with the new NSR boilerplate, therefore all citations of R13-0898 were revised accordingly.

Non-Applicability Determinations

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

45CSR14: Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration: any actual increase in emissions associated with the proposed changes (not anticipated) is below the significant thresholds 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: 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.

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: N/A
Ending Date: N/A

Point of Contact

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

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
Rex.E.Compston@wv.gov

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.

Response to Comments (Statement of Basis)

Not applicable.