

# 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 August 10, 2009.

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

Application Received: November 29, 2010

Plant Identification Number: **03-54-05700011**

Permittee: Alliant Techsystems, Inc.

Facility Name: ATK Missile Subsystems & Components Division

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

Permit Action Number: *MM01*      Revised: April 25, 2011

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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 3 of the facility - Miscellaneous Units.

This minor modification is to include recently permitted engines (EG-1 through 10) under the Class II General Permit G60-C020 in the Title V permit.

**Emissions Summary**

The following are the changes in potential emissions due to this modification:

Pollutant	Change in potential emissions (+ or -), TPY
NOx	+ 24.87
CO	+ 7.77
SO <sub>2</sub>	+ 1.15
PM <sub>10</sub>	+ 1.31
VOC	+ 1.59

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility maintains the potential to emit over 129.89 tons per year of Carbon Monoxide, 149.16 tons per year of Nitrogen Oxides, 319.39 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 Missile Subsystems & Components Division 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	Permits for Construction, Modification, Relocation
	45CSR16	Standards of Performance for New Stationary sources Pursuant to 40 CFR Part 60
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 CFR Part 63
	40CFR60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
	40CFR63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
State Only:	45CSR42	Greenhouse gas Emissions Inventory Program

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> )
G60-C020	9-30-10	N/A

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 have been made to the existing Title V permit:

1. In section 1.1, a new category named "Emergency Engines" has been added; this new category includes 10 emergency engines. 2 engines L-5S and L-14S have been moved from category "Boilers - Group 00L" to category "Emergency Engines". L-5S has been renamed EG-2 and L-14S has been renamed EG-8 to match with 45CSR13 permit G60-C020. 8 engines EG-1, 3-7, 9 and 10 have been added due to the issuance of 45CSR13 permit G60-C020. According to the company, EG-2 was manufactured in 1993 but was not installed until 2000, EG-10 was installed in November, 2006. The application company submitted (for 45CSR13 permit G60-C020) listed both the install and manufacture dates for EG-2 as 1993, so the Year Installed listed in the General Permit was 1993; this is an error and should be 2000 as the install date.
2. In Section 1.2 45CSR13 permit G60-C020 has been added.
3. In Section 2.1.4 "monthly" has been added to better define "rolling yearly total".
4. In Section 2.2 definition of SIC has been expanded.
5. The citation in section 3.1.3 has been changed due to the repeal of 45CSR15 and now 40 C.F.R. 61 is incorporated in 45CSR34.
6. Sections 3.1.11 and 3.5.11 have been added due to new rule 45CSR42 for greenhouse gas emissions.
7. Sections 3.5.3 and 3.5.5 are changed to include electronic report submittal to EPA.
8. Section 7.0 has been added for the emergency engines. Applicable sections of 40 C.F.R. 63 Subpart ZZZZ to the engines are added in sections 7.1.1 to 7.5.1. The following is a discussion of which sections of 40 C.F.R. 63 Subpart ZZZZ are applicable to each engine and why they are applicable:

- a. EG-10 is an emergency engine installed November, 2006. EG-10 is a new emergency engine installed after 6-12-2006, less than 500 HP located at a major source of HAPs – according to 40 C.F.R. § 63.6590, since EG-10 is subject to 40 CFR part 60 subpart IIII, no further requirements apply for such engines under 40 CFR 63 Subpart ZZZZ.
  - b. EG-1, 3, 4, 5 and 8 are emergency engines installed before 6-12-2006, less than 500 HP located at a major source of HAPs – they are subject to the following sections of 40 CFR 63 Subpart ZZZZ - 40 C.F.R. §§ 63.6602(table 2c), 63.6625, 63.6605, 63.6640, 63.6655 and 63.6645.
  - c. EG-2 is an emergency engine installed before 12-19-2002, more than 500 HP located at a major source of HAPs – EG-2 is subject to the following section of 40 CFR 63 Subpart ZZZZ - 40 C.F.R. § 63.6640(f).
  - d. EG-6, 7 and 9 are emergency engines installed after 12-19-2002, more than 500 HP located at a major source of HAPs – they are subject to the following sections of 40 CFR 63 Subpart ZZZZ - 40 C.F.R. §§ 63.6640 and 63.6645(f).
9. 45CSR13 permit G60-C020 states that 40CFR60 Subpart IIII is applicable to all the engines. Engineering evaluation for G60-C020 states that 40CFR60 Subpart IIII applies only to engines EG-7, 9 & 10 – therefore a note is added in section 7.0.
10. This is a re-proposed fact sheet because of some information that was submitted by the company during the original proposed permit.

### **Non-Applicability Determinations**

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

N/A

### **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: Not Applicable  
Ending Date: N/A

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

U.K.Bachhawat  
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**

U.K.Bachhawat  
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. 1256 • Fax: 304/926-0478

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

Not applicable.