

Fact Sheet



For Draft/Proposed Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on July 16, 2019.

Permit Number: **R30-05700011-2019 (1 of 3)**
Application Received: **August 31, 2021**
Plant Identification Number: **057-00011**
Permittee: **Alliant Techsystems Operations LLC**
Facility Name: **Allegheny Ballistics Laboratory**
Mailing Address: **210 State Route 956, Rocket Center, WV 26726-3548**

Permit Action Number: *SM01* Revised: *Draft/Proposed*

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.

Emissions Summary

The change in potential emissions associated with the significant modification (SM01) is as follows:

Pollutants	Change in Potential Emissions, TPY
Total HAPs	+0.21
PM	+0.02
VOC	+1.04

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 145.9 TPY of VOC, 30.89 TPY of Toluene and 53.44 TPY 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:	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR13	Preconstruction permits for sources
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40CFR63, Subpart GG	National Emission Standards for Aerospace Manufacturing and Rework Facilities
State Only:	None	

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-3534	January 7, 2022	

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

This modification is to install a new chamber preparation facility for a new rocket motor program. The operations include two (2) exhaust hoods (Emission Unit IDs-(2-19S and 2-20S) that encompass wipe cleaning, sanding, priming, and painting operations. Emission Unit IDs-(2-19S and 2-20S) were added to the Emission Units Table and the applicable (from R13-3534) requirements were added in section 12 of this permit.

40CFR63, Subpart GG-National Emission Standards for Aerospace Manufacturing and Rework Facilities.

The new spray booths (Emission Unit IDs-(2-19S and 2-20S) are subject to Subpart GG as defined in 40CFR§ 63.741(a):

“This subpart applies to facilities that are engaged, either in part or in whole, in the manufacture or rework of commercial, civil, or military aerospace vehicles or components and that are major sources as defined in § 63.2.”

The applicable requirements from Subpart GG for the new spray booths are contained in conditions 3.1.9, 3.2.4, 3.4.5, and 3.5.10.

Non-Applicability Determinations

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

- (a) 45CSR21– Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. The facility is not located in a county that is currently subject to 45CSR21, and is therefore currently exempt from this regulation.
- (b) 40CFR63, Subpart PPP – National Emission Standards for Polyether Polyol Production. The facility manufactures Terathane Polyethylene Glycol Block Copolymer (TPEG), which is a Polyether Polyol. However, the operation is exempted from this MACT because there are no HAPs used or generated during the manufacturing operation.
- (c) 40CFR63, Subpart GGGGG – National Emission Standards for Site Remediation. The facility currently has two sites under remediation for groundwater contamination. These sites are both CERCLA (“Superfund”) sites and are thus exempt from the MACT requirements. The facility also has a third site, commonly referred to as Plant 2, which is currently being investigated under the RCRA corrective action program, that could potentially require some form of active groundwater remediation or treatment within the next five to ten years. This site would also be exempted since it is being managed under a RCRA corrective action.

- (d) 40CFR63, Subpart WWWW – National Emission Standards for Reinforced Plastic Composites Manufacturing. The facility manufactures composite based rocket motor chambers and aircraft components. However, the facility is exempt from this MACT because none of the resin or fiber systems used, contain HAPs.

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: January 25, 2022
Ending Date: February 24, 2022

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.