

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant and Minor Modifications, 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: **May 25, 2023 (SM02) and October 13, 2023 (MM02)**
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: *SM02 / MM02* 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.

These significant and minor modifications (SM02 and MM02) are based on recently issued permits R13-3334B and R13-3534A. They cover an increase of annual production of rocket motor cases from the Guided Multiple Launch Rocket System (GMLRS) production line from 260 lots per year (24 cases per lot) to 650 lots per year (permit R13-3334B), and changes to the product line that is developing the manufacturing process for a different variant of an existing missile system (permit R13-3534A).

Emissions Summary

The change in potential emissions associated with these modifications (SM02 and MM02) is as follows:

Pollutants	Increase in Potential Emissions, TPY
VOC	19.90
PM	0.18
PM10	0.18
PM2.5	0.18
HAPs	3.49
Toluene	2.09

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 165.8 TPY of VOC, 32.98 TPY of Toluene and 56.93 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 (<i>if any</i>)
R13-3334B	November 17, 2023	
R13-3534A	January 19, 2024	

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 to the permit:

- 1) Emission Units Table 1.1 - revised design capacities for Emission Units 2-19S and 2-20S (Crossdraft Paint Booths B432) from "Varies" to "N/A", and a control device for Emission Unit 2-20S was revised from "2-10C 3 Stage Filtration" to "2-9C 3-Stage Filtration". There were changes to the description of the emission units Z-7S, Z-8S, Z-9S, Z-12S, Z-13S in the Area 00Z-GMLRS (Rocket Motor Chamber Preparation), and emission units Z-3S and Z-4S were removed. Also, a description was corrected for a control device "Aget Manufacturing Company Dry Cyclone collector" (Control Device ID Z-4C).
- 2) Boilerplate conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2 were revised.
- 3) Section 8.0 "GMLRS Rocket Motor Chamber Preparation Requirements – Plant 1"- was revised in accordance with requirements of underlying permit R13-3334B to increase production of cases from the GMLRS production line: requirements 8.1.1 through 8.1.5 were revised (including 40 CFR 63 Subpart GG conditions), old 8.1.6 - deleted, old 8.1.7 - re-numbered to 8.1.6; 8.2.1 through 8.2.3, 8.4.3 (40 CFR 63 Subpart GG conditions) and 8.5.1 - revised; 8.2.4 and 8.5.2 (40 CFR 63 Subpart GG conditions) - added.
- 4) Section 12.0 "Requirements for Crossdraft Paint Booths - B432 (2-19S) & B432 (2-20S)" - was revised in accordance with requirements of underlying permit R13-3534A to cover changes to the product line that is developing the manufacturing process for a different variant of an existing missile system: requirements 12.1.1 through 12.1.4 - replaced, 12.1.5 - added, old 12.1.5 - re-numbered to 12.1.6; 12.2.1 through 12.2.3 - replaced; 12.3.1 - deleted; 12.4.1 through 12.4.6 - deleted, old requirements 12.4.7 through 12.4.9 - re-numbered to 12.4.1 through 12.4.3, and 12.4.4 (40 CFR 63 Subpart GG conditions) - added; 12.5.1 - revised, 12.5.2 (40 CFR 63 Subpart GG conditions) - added.
- 5) 40 CFR 63 Subpart GG - per 40 CFR §63.741 the facility is subject to 40 CFR 63 Subpart GG because it is engaged in the manufacture or rework of military aerospace components and is a major source of HAPs. The activity used in the manufacturing of the rocket motor cases are subject to the "40 CFR §63.744 Standards: Cleaning operations" and "40 CFR §63.745 Standards: Primer, topcoat and specialty coating application operations". The regulation is focused on reducing HAPs in cleaning solvents and coatings. For the Cleaning requirements ATK has elected to use acetone for most cleaning activities. Acetone is non-VOC and non-HAP solvent. Also, methyl ethyl ketone (MEK) is a non-HAP solvent that is used to comply with the Cleaning requirements of 40 CFR 63 Subpart GG. Toluene is required for some cleaning activities (spray gun cleaning), and ATK uses it with one of the spray gun approved cleaning techniques

(Disassembled spray gun cleaning). Applicable requirements of 40 CFR 63 Subpart GG are included in Sections 8.0 and 12.0 (see items 3 and 4 above).

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.
- (e) 40CFR64 CAM Plan - not applicable because there were no new PSEU added to the facility during these modifications.

Request for Variances or Alternatives

(Description of any requests for variances, etc. If none, write "None.")

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: March 26, 2024
Ending Date: April 25, 2024

Point of Contact

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

Natalya V. Chertkovsky
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41250
natalya.v.chertkovsky@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.