



Northrop Grumman Corporation
Innovation Systems

Flight Systems Group
Propulsion Systems
9160 North Highway 83
Promontory, UT 84307

August 15, 2018

Thomas Gunter
Utah Department of Environmental Quality
Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820

Subject: Revision to Section IX, Control Measures for Area and Point Sources, Part H,
Emission Limits

Dear Mr. Gunter:

ATK Launch Systems, Inc. (ATK) has reviewed the proposed Revision to Section IX, Control Measures for Area and Point Sources, Part H, Emissions Limits of the Utah State Implementation Plan and is submitting this comment for the public record.

Specifically, ATK has reviewed Part H.12.a. of the Plan regarding emission limitations for the Promontory plant. Part H.12.a.1 restricts emissions on open burning of reactive wastes. The limitation reads as follows:

“During the period November 1 to February 28/29 on days when the 24-hour average PM2.5 levels exceed 35 ug/m3at the nearest real-time monitoring station, the open burning of reactive wastes with properties identified in 40 CFR 261.23 (a) (6) (7) (8) will be limited to 50 percent of the treatment facility's Department of Solid and Hazardous Waste permitted daily limit. During this period, on days when open burning occurs, records will be maintained identifying the quantity burned and the PM2.5 level at the nearest real-time monitoring station.”

The limitation was drafted prior to finalization of the facility's Subpart X permit authorized by the federal Resource Conservation and Recovery Act (RCRA). The Subpart X permit was issued to the Promontory facility in 2016. The RCRA Subpart X permit and the facility's Clean Air Act (CAA) Title V permit authorize open burning of reactive wastes under the clearing index system. Historically, the clearing index system is a more stringent parameter under which to conduct open burning. Therefore, the Promontory facility would

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Utah Division of Waste Management Radiation Control

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like to align Part H.12.a limitations with limitations already established in the RCRA Subpart X permit and the CAA Title V permit. ATK requests the language in Part H.12.a to change to the following:

“During the period November 1 to February 28/29 the open burning of reactive wastes with properties identified in 40 CFR 261.23 (a) (6) (7) (8) may be conducted when the clearing index is greater than 500. Limited quantities, as authorized in the facility’s RCRA Subpart X permit, of time-sensitive reactive wastes may be open burned when the clearing index is below 500. The Division of Air Quality and Division of Waste Management and Radiation Control must be notified prior to conducting a burn when the clearing index is below 500. During this period, on days when open burning occurs, records will be maintained identifying the quantity burned and the clearing index at the time of the burn.

ATK believes this change clarifies open burning requirements during the typical PM_{2.5} season and aligns those requirements with facility permits.

Additionally, ATK is submitting comment regarding the Promontory facility’s PM_{2.5} SIP Evaluation Report issued on July 1, 2018. Section 2.2 of the report (page 21-22), mentions control options for ammonia emissions. At the time of issuance, the Promontory facility was investigating the degree of permitted and actual emissions from wastewater treatment and propellant reclamation activities. The investigation reviewed historical permits that allowed ammonia emissions and determined how those emissions relate to current activities. A BACT analysis was completed for ammonia emissions and is being submitted to the Major Source New Source Review Section separately from this comment.

ATK Launch Systems, Inc. appreciates your consideration of this comment.

Sincerely,



Kris H. Blauer
Manager
Environmental Services
NGIS, Propulsion Systems