



Northrop Grumman Corporation
Innovation Systems

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

November 29, 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:

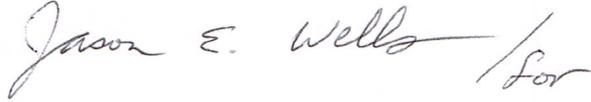
ATK Launch Systems, Inc. (ATK) has reviewed the proposed Revision to Section IX, Control Measures for Area and Point Sources, Part H, Emissions Limits of the Utah State Implementation Plan and is submitting this comment for the public record.

Specifically, ATK has reviewed Part H.12.a.iii of the Plan regarding annual stack testing for natural gas boilers in buildings M-576 and M-14 at the Promontory plant. ATK questions how an annual stack testing frequency was derived in regards to emissions reduction/control. Additionally, ATK is not aware of a cost benefit analysis that determines that the cost of annual testing provides more meaningful emissions control than the more common three year frequency. ATK would appreciate the Division provide an evaluation for why annual stack testing on natural gas boilers provides better emission control than a three year frequency.

If the Division's data justifies an annual stack testing frequency, ATK proposes the long term frequency be based on the results of the test. This approach is used in 40 CFR 63.7515 (Boiler MACT DDDDD) where performance test frequency is reduced to every third year if the source is able to show actual emissions are lower than the limit for two consecutive years. Albeit, the MACT is written to control hazardous air pollutants from boiler emissions, it would seem a similar strategy could be applied for PM_{2.5} emissions and precursors. Such a strategy rewards sources for good work practices and incentivizes emission reductions.

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

Sincerely,

A handwritten signature in cursive script that reads "Jason E. Wells" followed by a horizontal line and the word "for" written below it.

Kris H. Blauer
Manager
Environmental Services
NGIS, Propulsion Systems