

Fact Sheet

**Draft Permit Renewal for the
Hazardous Waste Storage and Treatment Permit
ATK Bacchus Facility – NIROP
West Valley City, Utah 84120
EPA ID No: UT3170027277**

The Director of the Utah Division of Waste Management and Radiation Control (the Division) has received an application for the renewal of the Hazardous Waste Storage and Treatment Permit for ATK Launch Systems (ATK) – NIROP facility located at 5000 South 8400 West, in West Valley City, Utah. The current permit was issued in September 2009, and was last modified in 2018. The permit includes the conditions and procedures for storage and treatment of reactive hazardous waste generated at the facility.

The Division has completed its review of the permit renewal application. A draft permit has been prepared and is available for review during the public comment period, which begins on June 16, 2020 and will conclude on July 31, 2020, at 5:00 p.m. The Division will hold a virtual Public Hearing with Google Hangouts at 5:00 pm, on Wednesday, July 15, 2020. The meeting may be accessed at <https://meet.google.com/zhz-igmn-ijq> . You may also join by phone at 1-443-679-3139, PIN: 315 114 806#

The draft permit that includes a redlined version identifying the changes made to the current permit is available for review during the public comment period on the Internet at <https://deq.utah.gov/waste-management-and-radiation-control/waste-management-radiation-control-public-notice>

Written comments will be accepted if received by 5:00 p.m. on July 31, 2020 and should be submitted to the address below. Comments can also be hand delivered to the Division address above as long as they are received by 5:00 p.m. on July 31, 2020.

Ty Howard, Director
Division of Waste Management and Radiation Control
Department of Environmental Quality
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Comments can also be sent by electronic mail to: dwmrcpublic@utah.gov. Comments sent in electronic format should be identified by putting the following in the subject line: Public Comment on Draft ATK NIROP Permit. All documents included in comments should be submitted as ASCII (text) files or in pdf format.

Following the public comment period on the ATK NIROP Hazardous Waste Storage and Treatment Permit, all public comments will be evaluated and where appropriate will be included

in the final decision on whether to reissue the permit. A final permit determination will then be made and the corresponding action taken.

Under Utah Code Section 19-1-301.5, a person who wishes to challenge a Permit Order may only raise an issue or argument during an adjudicatory proceeding that was raised during the public comment period and was supported with sufficient information or documentation to enable the Director to fully consider the substance and significance of the issue.

A RCRA Hazardous Waste Storage and Treatment Permit (Permit) was issued to ATK in 2008 for storing and treating hazardous reactive waste generated from the facility operations. The Permit was last modified in 2018 to add a new storage unit through a Class 2 permit modification. The draft permit consists of five modules and 9 attachments. A summary of each is provided below with the significant changes from the review noted. All changes can be easily found in the redlined version of the draft permit.

Permit Page

The numbering of the state rules of R315 of the Utah Administrative Code waste was changed. Most of these changes involved modification of the numbering of the Code. This resulted in a document where the numbering system reflected, to a large extent, the numbering system used in the Code of Federal Regulations (CFR). As a result, a citation that began as 40 CFR 264.32(a) became R315-264-32(a). There are exceptions to the changes, but they are few. Also, references in the Permit to the Utah Division of Solid and Hazardous Waste were updated to the Division of Waste Management and Radiation Control, to reflect an agency name change. In addition, the director was changed to Ty L Howard.

Module I - Standard Conditions

Condition I.T.3. Reporting of perchlorate spill is modified in the draft permit.

Some minor typos were corrected, and a few conditions were edited for clarifications.

Module II - General Facility Standards

A few permit conditions were rewritten and edited for better clarifications. Errors for permit condition cross referencing were corrected. The risk assessment for the burn grounds was clarified to reflect the risk assessment status.

Module III - Storage in Container

The types of containers for storage of reactive hazardous wastes were specified in permit conditions.

The storage of waste for longer than one year was clarified. The storage of waste rocket motors and motor sections may be requested through emergency permit in the future.

Module IV- Thermal Treatment of Energetic Wastes

No substantial changes were made in Module IV, except some minor editing for clarifications.

Attachment 1 – List of Acronyms

No changes were made.

Attachment 2 – Part B Operation Plan – Facility Description

No substantial changes were made in the attachment.

Attachment 3 – Waste Analysis Plan

Analytical methods were updated to reflect the most current methods.

Attachment 4 – Part B Operation Plan – Process Information

The tanks that are used to store explosive contaminated wastewater were clarified as non-hazardous waste storage tanks. Fire containment measures (e.g. firebreaks) were added to the pre-burn inspections. No substantial changes were made in the attachment.

Attachment 5 – Procedures to Prevent Hazard

No substantial changes to this attachment were made, other than deleting contents relating to the descriptions, inspections, maps of three storage units, namely ES-1, Segment Storage and Round House-1, where were closed under ATK Bacchus Plant 1 Hazardous Waste Storage Permit.

Attachment 6 – Contingency Plan

No substantial changes to this attachment were made, other than deleting contents regarding the three storage units.

Attachment 7 - Personnel Training Plan

No substantial changes to this attachment were made.

Attachment 8 – Closure Plan

The EPA Regional Screening Levels were updated for closure of the storage and treatment units. Verification sampling for clean-closure of the chemical waste storage unit was updated. Analytical methods were updated to use the most current EPA methods.

Attachment 9 – Soil Monitoring Plan

No substantial changes were made in the attachment.