

## **Fact Sheet**

### **Draft Permit Renewal for the Hazardous Waste Treatment and Storage Permit ATK Launch Systems Inc. Promontory Facility Brigham City, Utah EPA I.D. No. UTD009081357**

The Director of the Division of Waste Management and Radiation Control has received an application for the renewal of the Hazardous Waste Treatment and Storage Permit for the ATK Launch Systems, Promontory facility located in Box Elder County, approximately 30 miles northwest of Brigham City, Utah on State Highway 83. The current permit was issued in September 2008 and was last modified in August, 2018.

ATK manufacturing activities consist of production and testing of solid rocket motor propellants, assembly of rocket motor segments, rocket motor restoration and production of military flares. From these operations, ATK generates, treats and stores hazardous waste. The Hazardous Waste Treatment and Storage Permit includes conditions and procedures that direct the thermal treatment (open burning and detonation) of reactive hazardous wastes, treatment of reactive hazardous waste by an oxidizer leaching process and the storage of hazardous wastes prior to shipment off-site for disposal.

The Division has completed its review of the permit renewal application. A draft permit has been prepared and will be available for review during the public comment period which begins on July 26, 2019 and concludes on September 9, 2019, at 5:00 p.m.

A public hearing to receive comment on the draft permit has been scheduled for 6:00 p.m. on Thursday, August 22nd, 2019 at the Brigham City Public Library located at 26 East Forest Street, Brigham City, Utah.

The draft permit that includes a redline strike-out version identifying the changes made to the current permit is available for review during the public comment period at the following location:

Division of Waste Management and Radiation Control  
Multi Agency State Office Building  
195 North 1950 West, 2<sup>nd</sup> Floor  
Salt Lake City, Utah

For the public's convenience, a fact sheet and the draft permit are 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 September 9, 2019 and should be submitted to the P.O. Box address below. Comments can also be hand delivered to the Division's office at the address above as long as they are received by 5:00 p.m. on September 9, 2019.

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](mailto:dwmrcpublic@utah.gov). Comments sent in electronic format should be identified by putting the following in the subject line: Public Comment on ATK Promontory Draft 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 Hazardous Waste Treatment and Storage 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 Ann. § 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 Permit (Permit) was issued to ATK in 2008 for managing and storing hazardous chemical waste and reactive waste generated from the facility operations. The Permit was modified in November, 2016 to add thermal treatment of reactive hazardous wastes. In addition, a new Module has been added to the Draft Permit for an oxidizer leaching process for the treatment of reactive hazardous waste.

ATK has also been issued a Post-Closure Permit for the site management of closed surface impoundments, corrective action of waste management sites, and the monitoring and corrective action of contaminated groundwater.

The Draft Hazardous Waste Treatment and Storage Permit consists of six modules and 12 attachments. A summary of each is provided below with the significant changes from the review noted. In June 2016, Title R315 of the Utah Administrative Code waste substantially changed. Most of the 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. All changes can be easily found in the redlined version of the draft permit.

## **MODULES**

**Module I; Standard Conditions:** Module I contains the standard permit conditions, outlined in Utah Admin. Code R315-270-30, that are required to be in all permits. These conditions include enforceability, effect of permit, permit actions and duties and requirements. Permit conditions regarding the duty to apply for permit reissuance, as applicable, and permit expiration are also included in Module I.

The only substantial change to Module I is the facility owner has been changed to Northrup Grumman. ATK will remain the operator of the facility.

**Module II; General Facility Conditions:** Module II contains the general facility conditions, which include requirements for the design and operation of the facility, waste analysis, security, inspections, personnel training, preparedness and prevention, contingency plans, record keeping, closure and liability and financial assurance.

No substantial changes were made to Module II.

**Module III; Storage of Hazardous Waste:** Module III contains requirements for the storage of hazardous wastes at the facility. Conditions include identification of permitted waste codes, condition and management of containers, waste compatibility, containment, inspections and closure.

The permitted hazardous waste codes that may be stored at waste storage facilities has been clarified in Module III. In addition, a requirement was added requiring ATK to report to the Director of the Division if reactive hazardous waste is stored in the M-136 Burn Grounds for longer than 45 days.

**Module IV; Thermal Treatment of Energetic Wastes:** Module IV specifies the requirements applicable to the open burning and open detonation of reactive hazardous wastes. Conditions include the permitted and prohibited wastes, general operating conditions, treatment scenarios and limits, waste tracking, storm water management, treatment residue and ash management, inspections, environmental monitoring and closure.

Module IV of the draft permit clarifies the sources the ATK accepts off-site waste from and adds the ability to treat restricted quantities of time-sensitive reactive wastes when the clearing index is less than 500.

**Module V; Treatment of Waste Hydrazine:** Most of the hydrazine used at the facility is reclaimed and reused. Waste hydrazine is diluted in order to make it safe to ship off-site for disposal. Module V specifies the requirements associated with the treatment by dilution process.

No substantial changes were made to Module V.

**Module VI; Oxidizer Leaching Treatment of Energetic Waste:** Module VI is a new module that has been added to the Draft Permit. ATK has developed a new treatment process for materials that are contaminated with reactive hazardous waste residue. The oxidizer leaching process treats contaminated materials so they are no longer reactive hazardous wastes. This is a substantial improvement over thermal treatment by open burning. The Modules contains Conditions for permitted wastes, general operating conditions, record keeping and closure.

## **ATTACHMENTS**

The Attachments contain detailed information regarding the Permit Conditions that are presented in the Modules. The Attachments included in the Draft Permit, and any significant changes from the existing Permit that are proposed, are listed below:

### **Attachment 1 – Waste Analysis Plan**

A section on Waste Analysis for the new Oxidizer Leaching Process (Section 3.3.3 Waste Analysis Parameters and Rationale for the M-705X Oxidizer Leaching Process) was added to Attachment 1.

### **Attachment 2 – Inspection Schedules and Procedures**

Table II-I, the inspection schedule for the new Oxidizer Leaching Process at Building M-705X was added to Attachment 2.

### **Attachment 3 – Personnel Training**

No substantial changes were made to the Personnel Training Attachment.

### **Attachment 4 – Contingency Plan**

The facility function and evacuation route diagram have been added to Attachment 4 for the new Oxidizer Leaching process at M-705X.

### **Attachment 5 – Closure Plan**

Information regarding closure of the Oxidizer Leaching Process at Building M-705X has been added to Attachment 5.

## **Attachment 6 – Maps**

A Site Map and Building Layout Diagram have been added to Attachment 6 for the Oxidizer Leaching Process at Building M-705X.

## **Attachment 7 – Security Plan**

Information regarding security for the Oxidizer Leaching Process at Building M-705X has been added to Attachment 7.

## **Attachment 8 – Preparedness and Prevention Plan**

No substantial changes were made to the Preparedness and Prevention Plan.

## **Attachment 9 – Container Management Procedures**

Containment capacity for the treatment tank at M-705L has been added to Attachment 9 for the new Oxidizer Leaching Process.

## **Attachment 10 – T-29B Hydrazine Dilution Procedures**

No substantial changes were made to Attachment 10.

## **Attachment 11 – M-136 and M-225 Thermal Treatment Operations**

On August 29, 2017, the Director of the Division of Waste Management and Radiation Control approved ATK's request to waive the ecological risk assessment for the Thermal Treatment Operations based on the justifications presented by ATK. The approval of the waiver request has been added to Attachment 11.

## **Attachment 12 – M-705X Oxidizer Leaching Process**

Attachment 12 is a new attachment that has been added to the Permit for the new Oxidizer Leaching Process. Attachment 12 contains detailed information on the new process.