



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

NOV 15 2018

Ms. Tonya Aggson
Environmental Engineer
Alliant Techsystem Operations, LLC - Lake City Army Ammunition Plant
25201 East MO Hwy 78
Independence, MO 64051

RE: New Source Review Permit Correction - Permit Number: 032018-007A
Project Number: 2018-10-015; Installation Number: 095-0046

Dear Ms. Aggson:

Upon a review of your issued construction permit 032018-007, Alliant Techsystem Operations, LLC- Lake City Army Ammunition Plant (LCAAP) requested changes to Special Condition 2.C. which required testing for every shipment of waste solvents that LCAAP wanted to use as credit in the VOC recordkeeping. The Special Condition 2 of this correction will replace Special Condition 2 from permit 032018-007. The main change is the changes for testing VOC content of the waste solvents sent off-site for reclamation. Due to the expected relative steady use of consistent solvents, testing was reduced from every shipment to the testing of the first four shipments with annual testing thereafter to ensure continued compliance.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.



Recycled paper

Ms. Tonya Aggson
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If you have any questions regarding this correction, please do not hesitate to contact Jordan Hull, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in cursive script that reads "Kendall B. Hale".

Kendall B. Hale
Permits Section Chief

KBH:jhj

Enclosures

c: Kansas City Regional Office
PAMS File: 2018-10-015

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Permit No.	032018-007A
Project No.	2018-10-015

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Alliant Techsystem Operations, LLC - Lake City Army Ammunition Plant
Jackson County, S31/32, T50N, R30W

1. **Superseding Condition**
The conditions of this permit supersede the following special conditions found in the previously issued construction permit 032018-007 issued by the Air Pollution Control Program.
 - A. **Special Condition 2- VOC Emission Limitation**

2. **VOC Emission Limitation**
 - A. Alliant Techsystem Operations, LLC - Lake City Army Ammunition Plant shall emit less than 40.0 tons of VOCs in any consecutive 12-month period from all equipment in Phases I-VI of this project (see table below)

Table 1 Project (Phases I-VI) Emission Units

Emission Point	Description
EP-13F	Phase I: 7.62mm & 50Cal Can Printer Ink
EP-13F	Phase I: 7.62mm & 50Cal Can Printer Make-up Solution/Solvent
EP-13G	Phase I: 7.62mm & 50Cal Crate Printer Ink
EP-15G	Phase I: 7.62mm & 50Cal Crate Printer Make-up Solution/Solvent
EP-20G	Phase II: Annealing Furnace, 2.5 MMBtu/hr natural gas
EP-20H	Phase II: Annealing Furnace, 2.5 MMBtu/hr natural gas
EP-34E	Phase II: Pickle/Wash Dryer, 0.4 MMBtu/hr natural gas
EP-34F	Phase II: Pickle/Wash Dryer, 0.4 MMBtu/hr natural gas

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

Emission Point	Description
EP-20G	Phase III: Annealing Furnace, 2.5 MMBtu/hr natural gas
EP-20G	Phase III: Pickle/Wash Dryer, 0.4 MMBtu/hr natural gas
EP-15G	Phase IV: Shellac Sealant
EP-16A	Phase IV: Foil Paper Activation
EP-16B	Phase IV: Sealant Thinners
EP-19C	Phase IV: Solvent Cleaning
EP-54	Phase IV: Primer Particulates
EP-13H	Phase V: 50Cal Crate Printer Ink
EP-13H	Phase V: 50Cal Crate Printer Make-up Solution/Solvent
EP- 13I	Phase VI: 7.62mm and 50Cal Can Printer Ink
EP-13I	Phase VI: 7.62mm and 50Cal Can Printer Make-up Solution/Solvent
EP-13J	Phase VI: 7.62mm and 50Cal Crate Printer Ink
EP-13J	Phase VI: 7.62mm and 50Cal Crate Printer Make-up Solution/Solvent

- B. Attachment A or equivalent form, such as an electronic form, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A.
- C. Alliant Techsystem Operations, LLC – Lake City Army Ammunition Plant shall retain records for each waste solvent shipment sent off-site for reclamation. These records shall consist of:
- 1) Date of each shipment
 - 2) Weight (tons) of each shipment
 - 3) VOC content (wt %) - VOC content of shipments shall be tested for the first 4 consecutive shipments during full operation to establish a baseline VOC content. The lowest weight percentage of VOC content found shall be used as the VOC content (wt %) for the following 12 months. Every 12 months following, the VOC content shall be tested to ensure it is showing similar results every year. If a test results in a lower VOC content percentage from the previous

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SPECIAL CONDITIONS:

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- year then Alliant Techsystem Operations, LLC - Lake City Army Ammunition Plant shall use the lowest percentage found for reclamation.
- 4) An EPA test method(s) shall be used to determine the VOC content (wt%) when testing the shipments.

Attachment A – VOC Compliance Worksheet (Phase I-VI)

Alliant Techsystems Operations, LLC – Lake City Army Ammunition Plant

Jackson County (S31/32, T50N, R30W)

Project Number: 2018-10-015

Installation ID Number: 095-0046

Permit Number: 032018-007A

This sheet covers the month of _____ in the year _____.

Chemical	¹ Amount of Chemical Used (gal)	² VOC Content (lb/gal)	³ Amount of VOCs Consumed (tons)	⁴ Amount of VOCs Disposed (tons)	⁵ Phase I Monthly Emissions (tons)	Phase II&III Monthly Emissions (tons)	⁵ Phase IV Monthly Emissions (tons)	⁵ Phase V Monthly Emissions (tons)	⁵ Phase VI Monthly Emissions (tons)	⁶ Individual Monthly Emissions (tons)
<i>(Ex.) PSM24</i>	205	6.06	0.621	0.170	0.0175	0.0171	0.451	.0093	0.012	0.507
						0.0171				
						0.0171				
						0.0171				
						0.0171				
						0.0171				
⁷Total Monthly Emissions (tons)										
⁸Previous 11 Months' Total Emissions (tons)										
⁹Current 12-Month Total Emissions (tons)										

¹ Enter the total amount of each VOC-containing chemical used in any of the older can/crate printer (Phase 1), the six primer manufacturing lines (Phase IV), the new crate printer (Phase V), or the new can/crate printers in the given month.

² Enter the VOC content of each chemical, taken from the respective SDS sheet. If a range is listed, use the highest value in the range to demonstrate compliance.

³ Multiply the Amount of Chemical Used (gal) by the VOC Content (lb/gal) and divide by 2,000

⁴ Enter the total amount of VOCs from waste solvent collected and disposed for each chemical. The Amount of VOCs Disposed (tons) = Tons of waste solvent sent off-site for reclamation x VOC Content of the waste solvent.

⁵ Subtract the Amount of VOCs Disposed (tons) from the Amount of VOCs Consumed (tons) for each phase (I, IV, V, & VI) and place calculated value in appropriate column

⁶ Add all Phases (I, II&III, IV, V, & VI) Monthly Emissions (tons) to get a sum of VOCs for the month

⁷ Add the Individual Monthly Emissions (tons) for all chemicals

⁸ Enter the sum of the Total Monthly Emissions (tons) for the previous 11 months

⁹ Add the Total Monthly Emissions (tons) to the Previous 11 Months' Total Emissions (tons)

A Current 12-Month Total Emissions (tons) of less than **40.0** is necessary for compliance.

The installation is required to include the startup, shutdown, and malfunction emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050 towards compliance with this limit