#### STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0617-AOP-R21 AFIN: 07-00035

## 1. PERMITTING AUTHORITY:

Division of Environmental Quality 5301 Northshore Drive North Little Rock, Arkansas 72118-5317

### 2. APPLICANT:

Aerojet Rocketdyne, Inc. East Walton Road, (Highway 274), Highland Industrial Park East Camden, Arkansas 71701

## 3. PERMIT WRITER:

**Shawn Hutchings** 

### 4. NAICS DESCRIPTION AND CODE:

NAICS Description: Ammunition (except Small Arms) Manufacturing

NAICS Code: 332993

### 5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application	Short Description of Any Changes
	(New, Renewal, Modification,	That Would Be Considered New or
	Deminimis/Minor Mod, or	Modified Emissions
	Administrative Amendment)	
3/26/2023	Modification/Minor	A number of new sources see below.
	Modification	
2//07/2023	Modification	None Federal Subpart Changes only

## 6. REVIEWER'S NOTES:

Aerojet Rocketdyne, Inc. currently operates a manufacturing facility located in the Highland Industrial Park near East Camden, Arkansas. This permit is a modifications to add subpart GG requirements in the permit; add a AAL Automated Spray Liner at Building 29 as SN-143; and add a Ductless Paint Booth at Building 48 as SN-145; and a minor modification to add a Grit Blasting Cabinet at Building M-2 West as SN-67Z; add a Diesel Emergency Generator at Building 29 as SN-144; and add an Ultrasonic Cleaner at Building M-8 as a Group A-13 insignificant activity. Permitted emission rates

AFIN: 07-00035 Page 2 of 15

increased 0.1 tpy of particulate, 0.5 tpy of SO<sub>2</sub>, 4.1 tpy of VOC, 1.2 tpy of CO, 2.2 tpy of NO<sub>x</sub>, and 3.5 tpy of HAPs.

## 7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility has a proposed CAO for issues with Subpart GG compliance. This modification will fix permit requirements related to that issue. They also had a recent CAO for unpermitted sources.

## 8. PSD/GHG APPLICABILITY:

- a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? /N If yes, were GHG emission increases significant? N
- b) Is the facility categorized as a major source for PSD? N
- Single pollutant  $\geq 100$  tpy and on the list of 28 or single pollutant  $\geq 250$  tpy and not on list

If yes for 8(b), explain why this permit modification is not PSD.

## 9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-86, SN-87, SN-89, SN- 95, SN-102, SN-103, SN- 120, SN-123, SN-138, SN- 139,	VOC CO NO <sub>x</sub>	NSPS JJJJ
81, 81A, 81B, SN-86, SN-87, SN-89, SN-91, SN-92, SN- 95, SN-102, SN-103, SN- 103, SN-120, SN-123, SN- 138, SN-139, 90, 91, 93, 121, 143	HAPs	MACT ZZZZ
71	VOC/HAP	NSPS Kb
72	VOC/HAP	NSPS Kb
Plantwide	VOC/HAP	NESHAP Part 63 Subpart GG
SN- 02C,02F, 02G, 25A, 25C, 25E, 25F, 69E, 69F, 69G, 69H, 94, 96, 112, 113, 115, 116, 117, 119, and 122	HAPs	MACT DDDDD
121, 81, 81A, 81B, 143	Criteria	NSPS IIII

AFIN: 07-00035 Page 3 of 15

### 10. UNCONSTRUCTED SOURCES:

Unconstructed	Permit Approval	Extension Requested	Extension Approval	If Greater than 18 Months without Approval, List Reason for	
Source	Date	Date	Date	Continued Inclusion in Permit	
None added with this modification.					

### 11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N (Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Rule 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? N If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason		
	27/4			
N/A				

## 12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
67, 73, 104, 118, 124, 125, 126, 128	Particulate	Pre-control below major source thresholds.

#### 13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

AFIN: 07-00035 Page 4 of 15

## 14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

## a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

## b) Non-Criteria Pollutants:

HAP emission evaluation of the previous permit below. There were no changes to emissions.

The non-criteria pollutants listed below were evaluated. Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

## 1<sup>st</sup> Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Division of Environmental Quality has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acetone	1,781	196	372	N
Chromium	0.01	0.0011	23.9	N
Chromium VI	0.0002	0.000022	23.9	N
Ethyl Benzene	86.8	9.55	132	N
Lead	0.05	0.0055	284	N
Methanol	262	288	265	N
MDI	0.05	0.0055	0.06	N
MIBK	81.9	9	489	N
Toluene	75.4	8.3	570	N

AFIN: 07-00035 Page 5 of 15

Pollutant	TLV (mg/m³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
TDI	0.01	0.0011	0.02	N
Xylene	434	47.8	520	N

2<sup>nd</sup> Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Division of Environmental Quality to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL $(\mu g/m^3) = 1/100$ of Threshold Limit Value	Modeled Concentration (μg/m³)	Pass?
Acetone	1.78E+04	5.21E+02	Y
Chromium	1.00E-01	1.73E-01	Y*
Chromium VI	2.00E-01	3.07E-02	Y*
Ethyl Benzene	8.68E+02	3.69E+02	Y
Lead	5.00E-01	1.26E-02	Y
Methanol	2.62E+03	4.28E+02	Y
MDI	5.12E-01	9.34E-02	Y
MIBK	8.19E+02	7.64E+02	Y
Toluene	7.53E+02	6.20E+02	Y
TDI	7.12E-02	2.20E-02	Y
Xylene	4.34E+03	1.30E+03	Y

For Cr(VI) an alternative standard to the PAIL is used to evaluate the off-site impacts. The annual average modeled concentration was compared to the chronic reference exposure level (REL) from the California Office of Environmental Health Hazard Assessment (OEHHA). For Cr the OSHA 8-hr TWA was used.

## c) H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

AFIN: 07-00035 Page 6 of 15

Is the facility exempt from the H<sub>2</sub>S Standards If exempt, explain: No H<sub>2</sub>S emitted

N

# 15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Natural Gas Fired sources	AP-42 Natural gas	Varied	None	None	
Engines	AP-42 Combustion engines	Varied	None	None	
Bubbled Sources, Lacquer, foam blowing	Usage Rates Mass Balance	Varied	None	None	
03A-F 04 30	EQTCH Products of Combustion model	Varied	None	None	
Blast Machines	BAAQMD emission factors for abrasive blasting	Varied per material used	Cyclone and Baghouses	90 and 99%	
Tanks	EPA Tanks Program	Equations	None	none	
13 19	AP-42 Table 4.6-2	0.08 Lb/hr/ft2			
56	Mass Balance				
63	Mass Balance		Condenser	95%	
64 84 98 141, 142, 143a, b, c	Mass Balance		None	N/A	
73 104 118, 124	Mass Balance	5% material loss	Baghouse	99.9	

# 16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification	
This permit contains no testing requirements.					

## 17. MONITORING OR CEMS:

AFIN: 07-00035 Page 7 of 15

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
24, 125, 126	differential pressure and/or air velocity	Pressure gauge, or velocity meter	Weekly	Y

## 18. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN- 02C,02F, 02G, 25A, 25C, 25E, 25F, 69E, 69F, 69G, 69H, 94, 96, 112, 113, 115, 116, 117, 119, and 122	DDDDD Records	None	As needed	Y
03	Materials Tested	Table in Specific Condition 12	Monthly	Y
11	Lacquer premix used	20,000 pounds	Monthly	Y
4	Materials Processed hourly. Emissions monthly	Conditions 16, 17, and 18	Daily, Monthly	Y
30	Energetic materials used	300 pounds per hour 24,000 pounds per 12 months	Monthly	Y
47	Resin usage	40,000 lbs/12 mo	Monthly	Y
48A, 48B, and 49	Phenolic Resin	500,000 lbs/12 mo	Monthly	Y
63	Stabilizing Solvent	20,000lb/12 months	Monthly	Y
81, 81A, 81B	Hours	8760 per 12- month combined	Monthly	Y
84	Asphalt and wax coatings	15,000 pounds each	Monthly	Y

AFIN: 07-00035 Page 8 of 15

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)	
Emergency	Operation hours	Hours based on			
	and	calculations see	Monthly	Y	
Engines	maintainence	permit	<u> </u>		
07, 12, 13, 19,					
20A & B, 22, 24,					
28, 36 37B, 38A					
& B, 39A & B,					
40A & B, 41A &					
B, 42, 43, 44A -					
AC, 52A & B,		See Plantwide			
74, 75, 76A & B,	Solvent usage	Condition 10	Monthly	Y	
77A & B, 78A &		Condition to			
B, 85, 98, 99,					
101A & B, 107,					
108, 109, 110,					
111, 125, 126,					
127, 128, 129,					
140, 141, 145					
SN-12, 24, 43,	Surface Coating				
44A - AC, 101A	Materials 63,000 pounds Monthly		Monthly	Y	
& B, 125, 126	171000110115				
SN-12, 24, 43,	VOC and HAP	See table	Monthly		
44A - AC, 101A	contents	Plantwide		Y	
& B, 125, 126		Condition 14			
SN-44A – AC,	Miscellaneous	25.500	3.6 .11	***	
SN-100A,SN-	Materials	35,500 pounds	Monthly	Y	
100B and 128		G . 11			
SN-44A – AC,	VOC and HAP	See table	3.6 .11	Y	
SN-100A, SN-	content	Plantwide	Monthly		
100B and 128		Condition 14			
SN-39A & B,					
40A & B, 41A &					
B, 44A – AC,	Hanne	41,400 lbs per	Mand1-1-	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
76A & B, 77A &	Usage	12 mo	Monthly	Y	
B, 78A & B, 98,					
99, 101A & B,					
108, and 109					
SN-39A & B,					
40A & B, 41A &					
B, 44A – AC,	Content	Plantwide 22	Monthly	Y	
76A & B, 77A &	Content	rianiwide 22	Monthly	ı	
B, 78A & B, 98,					
99, 101A & B,					
108, and 109					

AFIN: 07-00035 Page 9 of 15

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-48 and 49	Phenolic Molding compounds	500,000 per year	Monthly	Y
SN-67C through S	Blasting Media	300,000 per 12 months	Monthly	Y
SN-39A & B, 40A & B, 41A & B, 44A – AC, 76A & B, 77A & B, 78A & B, 98, 99, 101A & B, 108, 109, 145	adhesives, adhesive primers, adhesive catalysts, barrier coatings, and related compounds	27,600 pounds	Monthly	Y
SN-39A & B, 40A & B, 41A & B, 44A – AC, 76A & B, 77A & B, 78A & B, 98, 99, 101A & B, 108, 109, 145	VOC and HAP content	See table Plantwide Condition 19	Monthly	Y
All	HAP substitution records	Comply with Plantwide Condition 22	Annual	N
71	Gasoline throughput	200,000 gallons per 12 months	Monthly	Y
72	Diesel Throughput	40,000 gallons per year	Monthly	Y
SN-86, SN-87, SN-89, SN-90, SN-91, SN-92, SN-93, SN-95, SN-102, SN- 103, SN104, SN-105, SN- 106, SN-120, SN-121, SN- 123, 130, 138, 139, 143	IIII JJJJ and ZZZZ records	None	As needed	Y
84	Throughput	15,000 pounds asphalt coating	Monthly	Y
SN-86, SN-87, SN-89, SN-90, SN-91, SN-92, SN-93, SN-95,	Hours of Operation	500 per 12 mo.	Monthly	Y

AFIN: 07-00035 Page 10 of 15

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
SN-102, SN-				
103, SN104,				
SN-105, SN-				
106, SN-120,				
SN-121, SN-				
123, 130, 138,				
139, 143				
Plantwide	GG Records	None	As Needed	Y

# 19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
SN-02C, 02F, 02G, 25A, 25C, 25E, 25F, 69E, 69F, 69G, 69H, 94, 96, 97, 101A, 101B, 112, 113, 115, 116, 117, 119, 122, 131, 132, 133, 134, 135, 136, and 137	5%	Department Guidance	Natural Gas Combustion only.
SN-24, 40A, 40B, 43	5%	Department Guidance	Weekly Observations
56	5%	Department Guidance	
67C through z	5%	Department Guidance	Weekly Observations
73, 73B, 73C, 73D, 73E, 73F	5%	Department Guidance	Established standard operating procedures for processing energetic materials.
81, 81A, 81B	20%	Department Guidance	Daily Observations
SN-86 SN-87 SN-89 SN-90 SN-95 SN-102 SN-103 SN-105 SN-120 SN-123 SN-138 SN-139	5%	Department Guidance	Natural Gas Combustion only.
SN-91 SN-92 SN-93 SN-106 SN-121 SN-130, 144	20%	Department Guidance	
SN-125 SN-126	5%	Department Guidance	Weekly control device monitoring
81, 81A, 81B	20%	Department Guidance	Daily Observation
118, 124, 12, 44A- 44AC, 100A, 100B, 56, 145	5%	Department Guidance	Plantwide Condition 5

AFIN: 07-00035 Page 11 of 15

# 20. DELETED CONDITIONS:

Former SC	Justification for removal			
	None			
	TYONG			

# 21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

	Group A			Emissi	ons (tpy)			
Source Name	Group A Category	PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	СО	NOx	НА	
DO LG:	cutegory	1 1/1/1 1/110		, 66		1101	Single	Total
DOA Storage Tank (3,500 gallons)	Group A, Number			0.01				
Diesel Fuel Tank #1, 550 gal, Building 41, for SN-81	Group A, Number			0.01				
Diesel Fuel Tank #2, 550 gal, Building 41, for SN-81	Group A, Number			0.01				
Diesel Fuel Tank, 500 gal, Building 66, for SN-91	Group A, Number			0.01				
Diesel Fuel Tank, 200 gal, Building M-2, for SN- 92	Group A, Number			0.01				
Diesel Fuel Tank, 520 gal, Building M-14, for SN-106	Group A, Number			0.01				
Diesel Fuel Tank, 460 gal, Building	Group A, Number			0.01				

AFIN: 07-00035 Page 12 of 15

	G .			Emissi	ons (tpy)			
Source Name	Group A	DM/DM	SO				НА	Ps
	Category	$PM/PM_{10}$	$SO_2$	VOC	CO	$NO_x$	Single	Total
105, for SN- 121								
Diesel Fuel Tank, 2,400 gal, Building 301, for SN- 141	Group A, Number 3			0.01				
Total	Group A, Number			0.08				
Water Heater #4 (Building 301) 1.05 MMBTU	Group A, Number	0.04	0.01	0.03	0.38	0.46	0.01	
Water Heater #2 (Building M-11) 1.314 MMBTU	Group A, Number 1	0.05	0.01	0.04	0.48	0.57	0.02	
Laboratory at Building 17	Group A, Number 5			0.79				0.79
Laboratory at Building 109	Group A, Number 5			0.79				0.79
Total	Group A, Number 5			1.59				1.59
MLRS Igniter Assembly at Building M- 85	Group A, Number 13			0.09				0.06
Ingredient Preparation Room	Group A, Number 13	0.03						
Metalworking Lathes at Building 2- SH-3	Group A, Number 13	0.28						
Polymer Tank Farm	Group A, Number 13			0.04				

AFIN: 07-00035 Page 13 of 15

				Emissi	ons (tpy)	)		
Source Name	Group A	PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NOx	НА	Ps
	Category	PIMI/PIMI10	$SO_2$	VOC	CO	NOx	Single	Total
Parts Fabrication in Trailer at Building 2- SH-4	Group A, Number 13	0.27						
Dry Ice Blasting	Group A, Number 13	CO2 only						
Vibratory Ceramic Pill Parts Cleaner at Building M-82	Group A, Number 13	0.01						
Winding and Curing Operation A at Building M-8	Group A, Number 13			0.07			0.01	0.01
Winding and Curing Operation B at Building M-8	Group A, Number 13			0.07			0.01	0.01
Winding and Curing Operation C at Building M-8	Group A, Number 13			0.07			0.01	0.01
Winding and Curing Operation D at Building M-8	Group A, Number 13			0.07			0.01	0.01
Composite Case Grinder A at Building M-8	Group A, Number 13	0.05						
Composite Case Grinder B at Building M-8	Group A, Number 13	0.05						

AFIN: 07-00035 Page 14 of 15

	C A			Emissi	ons (tpy)	)		
Source Name	Group A	DM/DM.	CO-			NOx	HA	Ps
	Category	PM/PM <sub>10</sub>	$SO_2$	VOC	СО	NOx	Single	Total
Composite Case Grinder C at Building M-8	Group A, Number 13	0.05						
Composite Case Grinder D at Building M-8	Group A, Number 13	0.05						
Saw, Drill, & Chamfer Machine A at Building M-8	Group A, Number 13	0.21						
Saw, Drill, & Chamfer Machine B at Building M-8	Group A, Number 13	0.21						
Saw, Drill, & Chamfer Machine C at Building M-8	Group A, Number 13	0.21						
Winding and Curing Operation at Building M- 85	Group A, Number 13			0.07			0.01	0.01
Six (6) Cooling Towers at Buildings 2- SH-14, 2-SH- 3, 23, 24, 25, & 51	Group A, Number 13	0.44						
Ultrasonic Cleaner	Group A, Number 13			0.13				
Total	Group A, Number 13	1.81		0.61			0.11	0.11

AFIN: 07-00035 Page 15 of 15

# 22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0617-AOP-R20



# Fee Calculation for Major Source

Aerojet Rocketdyne, Inc. Permit #: 0617-AOP-R21

AFIN: 07-00035

\$/ton factor	27.27	Annual Chargeable Emissi
Permit Type	Modification	Permit Fee \$
•		
Minor Modification Fee \$	500	
Minimum Modification Fee \$	1000	
Renewal with Minor Modification \$	500	
Check if Facility Holds an Active Minor Source or Mino	r _	
Source General Permit		
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0	
Total Permit Fee Chargeable Emissions (tpy)	7.7	
Initial Title V Permit Fee Chargeable Emissions (tpy)		

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene C Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in  $\epsilon$  in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit
PM		236	236.1
$PM_{10}$		236	236.1
$PM_{2.5}$		0	0
$SO_2$		9.9	10.4
VOC		217.2	221.3
со		110.4	111.6
$NO_X$		89.4	91.6
Lead		7.37	7.37
Chlorine	<b>&gt;</b>	11.3	11.3
Ethyl Benzene		10.43	10.58
Hydrogen Chloride	•	187.8	187.8
Hydrogen Fluoride	<b>&gt;</b>	1.1	1.1
Methanol		19.93	19.93
Methylene Chloride	<b>V</b>	6.87	6.87
Methyl Isobutyl Ketone		39.56	39.56
Toluene		46.5	48.52
1,1,1-Trichloroethane	<b>~</b>	44.66	44.66
Xylene		41.49	42
Other HAPs		15.51	15.52

	Check if		
	Chargeable		
Pollutant (tpy)	Emission	Old Permit	New Permit
Acetone	~	32.9	33.7
Ammonia	✓	0.08	0.08
HFC-245fa		2.5	2.5
		0	0
		0	0
		0	0
		0	0
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