

## RESPONSE TO COMMENTS

**Aerojet- General Corporation  
East Walton Road  
East Camden, AR 71701  
Calhoun County**

**AFIN: 07-00035**

On, October 30, 2006, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. Before the close of the comment period, comments were received from the facility. The Department gives the following responses to these comments:

### Facility Comments

#### **Comment 1:**

#### **CLARIFICATION OF PERMIT REQUIREMENTS FOR OPACITY MEASUREMENTS AT SN-67**

Aerojet operates a number of grit blast machines (Source Number (SN) –67) throughout the East Camden facility. Some of these units are vented directly to the atmosphere, whereas others are exhausted inside the production buildings.

Specific Condition (SC) #112 establishes the opacity monitoring requirements for the grit blast machines. Visible emission observations must be conducted on a weekly basis.

Aerojet respectfully requests that Condition #112 be revised. For the sake of future reference, we wish to clarify that weekly opacity readings are required *only* at those grit blast machines (SN-67) that are vented to the atmosphere. The proposed changes to the permit language are shown below (in redline-strikeout format):

SC #112: The permittee shall conduct weekly observations of the opacity from each ~~building~~ grit blast machine that is vented to the atmosphere at source SN-67 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

#### **Response 1:**

The sources that do not directly vent to the atmosphere still have the potential to have opacity while venting through vents, doors, windows or other openings. The permit remains as written.

#### **Comment 2:**

#### **CLARIFICATION OF PERMIT REQUIREMENTS FOR SN-80**

Aerojet manufactures a variety of warheads for rockets and missiles. A specialty coating is applied (SN-80) to certain units during the fabrication process. Solvents are sometimes used to hand-wipe clean the warheads prior to coating.

Specific Condition #137 establishes the emission limits for the coating operation. Compliance with this condition is demonstrated by complying with Plantwide Condition (PC) #7. It establishes the throughput limits and formulation limits for the solvents used on-site. However, two other Plantwide Conditions are also applicable. They are PC #9, which establishes the throughput limit for the facility-wide coating operations, and PC #11, which establishes the formulation limits for the coatings used on-site.

Aerojet respectfully requests that Specific Condition #137 be revised. References to Plantwide Condition #9 (coating throughput limit) and Plantwide Condition #11 (coating formulation limits) should be included. In addition, the warhead coating operation (SN 80) should also be listed in the aforementioned Plantwide Conditions. The proposed changes to the permit language are shown below (in redline-strikeout format):

SC #137: The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Plantwide Conditions #7, #9 and #11, and equipment limitations. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52, Subpart E]

PC #9: The permittee shall not use in excess of 59,500 pounds of surface coating materials (primers, paints, catalysts, thinners, and related compounds) in SN-12, SN-24, SN-43, SN-44, SN-65, SN-80 or SN-83 combined during any consecutive twelve month period. [§19.501 et seq. of Regulation #19 and 40 CFR Part 52 Subpart E]

PC #11: The surface coating compounds processed at sources SN-12, SN-24, SN-43, SN-44, SN-65, SN-80 and SN-83, shall not exceed the VOC and HAP content listed in the following table. The maximum density of the paint is 14.00 pounds per gallon. [§18.1004 of Regulation #18, §19.705 of Regulation #19, 40 CFR Part 70.6, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

#### **Response 2:**

The final makes the requested changes.

#### **Comment 3:**

#### **CLARIFICATION OF PERMIT REQUIREMENTS FOR OPACITY MEASUREMENTS AT SN-81**

Aerojet operates a diesel-powered pump (SN-81) at the Rocket Motor Case Washout Facility. The unit is operated on an intermittent basis depending on the number of motor cases that must be processed.

Specific Condition #141 establishes the opacity monitoring requirements for this diesel-fired pump. Visible emission observations must be conducted on a daily basis.

Aerojet respectfully requests that Condition #141 be revised. For the sake of future reference, we wish to clarify that daily opacity readings are required only when the diesel-powered pump (SN-81) is in operation. The proposed changes to the permit language are shown below (in redline-strikeout format):

SC #141: The permittee shall conduct daily observations of the opacity from source SN-81 on those days when the equipment is in operation and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request. [§18.501 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

**Response 3:**

The final permit allows for opacity readings on the days the diesel-powered pump (SN-81) at the Rocket Motor Case Washout Facility is operating. The final permit makes the requested changes.

**Comment 4:**

**ADMINISTRATIVE CHANGES TO THE DRAFT PERMIT**

The draft Operating Permit contains some minor typographic errors. Aerojet respectfully requests that these items be corrected for the sake of future reference. To that end, an edited version of the air permit is provided herein in electronic form. The proposed administrative changes are identified in redline-strikeout format. This approach should help simplify preparation of the final permit. (The non-administrative changes requested in the preceding paragraphs are not included in the edited permit.)

**Response 4:**

The final permit corrects the typographic errors.