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Date: March 23, 2005 *Refer To:* ADTS:05-023

Mr. Edward L. Horst Environmental Compliance Specialist Compliance & Enforcement Section New Mexico Environment Department Air Quality Bureau 2048 Galisteo Street Santa Fe, NM 87505

IDEA ID NO. 856 – LOS ALAMOS NATIONAL LABORATORY (LANL) SEMI-ANNUAL EMISSIONS REPORT – OPERATING PERMIT NUMBER: P100

Dear Mr. Horst:

Attached is the semi-annual emissions report for July through December of 2004. This report includes actual emissions from permitted sources included in section 2.0 of the Los Alamos National Laboratory (LANL) Operating Permit. This submission satisfies permit condition 4.1., which requires submission of a semi-annual emissions report on a 6-month basis. Furthermore, this report is submitted within 90 days from the end of the reporting period as stipulated in permit condition 4.3.

In this report, actual emissions are listed along with the emission limits for ease in comparing and verifying compliance. No emission limits were exceeded during this reporting period. Emissions are also reported from insignificant boiler and generator sources. These sources are included to demonstrate that LANL has not exceeded Prevention of Significant Deterioration (PSD) applicability thresholds.

Also included are the more restrictive emission limits for the TA-3 power plant boilers, from NSR Air Quality Permit 2195BM1. This permit was issued on July 30, 2004, to install a combustion turbine at the power plant, but installation is not yet complete. In addition, emissions from the data disintegrator, which replaced the paper shredder in 2004, are included in this report. The emission limits for this unit were taken from NSR Air Quality Permit 2195-H. Both of these units will be incorporated into the LANL Operating Permit modification to be submitted by July 29, 2005.

Should you have any questions or comments regarding the information provided in this report, please contact Steve Story at (505) 665-2169.

Sincerely,

Carolyn A. Mangeng Acting Associate Director

Mr. Edward L. Horst ADTS:05-023 LA-UR-05-2051

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Title V Operating Permit Semi-Annual Emission Report July 1 – December 31, 2004

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Source Name: <u>Los Alamos National Laboratory</u>	County: Los Alamos	<u> </u>
Source Address:		
City: Los Alamos	State: <u>NM</u> Zip Code: <u>875</u>	<u>545</u>
Responsible Official: <u>Carolyn</u> A. Mangeng	Ph No. (505) 667-0079 Fax No. (505) 665-1812	
Technical Contact: <u>Steven L. Story</u>	Ph No. (505) 665-2169 Fax No. (505) 665-8858	
Principal Company Product or Business: <u>National Se</u>	curity and Nuclear Weapons Research Primary SIC Code: 9	<u>9711</u>
Permit No. P100 (IDEA/Tempo ID No. 856)	Permit Issued Date: April 30, 2	004
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I, <u>Carolyn A. Mangeng</u> certify that, based on info	ormation and belief formed after reasonable inquiry, the stateme	ents and
information in the attached semi-annual emission rep	on are true, accurate, and complete.	
(IN a course	3/00/0-	
Signature/ Manuf Mar	Date: <u>429705</u>	-
Title: Associate Director (Acting) Technical Service	ces Directorate	
Associate Director (Acting) - Technical Servi		

This report is being provided to meet the requirement set forth in permit condition 4.1 of the Los Alamos National Laboratory (LANL) Operating Permit Number P100. The emissions were calculated using operating data recorded during the second six months of 2004. The emissions from the first six months of 2004 were submitted in the previous Semi-Annual Emissions Report, but are included here to calculate annual emissions.

Facility Emissions

The following table displays the actual facility-wide emissions compared with the facility wide emission limits specified in permit condition 2.11 of the Operating Permit. These emissions include insignificant sources, which are included to demonstrate that facility-wide emissions are below all PSD applicability threshold limits. Also, due to the method used for calculating Hazardous Air Pollutant (HAP) and Volitile Organic Compound (VOC) emissions from chemical use, fugitive emissions are included (see permit condition 4.1).

Pollutant	January - June Emissions (ton)	July - December Emissions (ton)	2004 Annual Emissions (ton)	Facility Wide Emission Limits (Permit Condition 2.11) (ton per year)
Nitrogen Oxides (NOx)	26.5	24.0	50.5	245
Carbon Monoxide (CO)	19.1	16.3	35.4	225
Volatile Organic Compounds (VOCs)	6.7	4.7	11.4	200
Sulfur Dioxide (SO ₂)	0.7	0.8	1.5	150
Particulate Matter (PM)	2.5	2.3	4.8	120
Hazardous Air Pollutants (HAPs)	4.8	1.9	6.7	24 combined
Highest Individual HAP (Hydrochloric Acid)	1.2	0.3	1.5	8 individual

Source Emissions

The following are the actual emissions from permitted sources listed in permit condition 2.0 of the operating permit for the six month reporting period. Included with these emissions are the source specific emission limits when applicable.

Permit Condition/Source

Pollutant	Jan-June Emissions (ton)	July-Dec Emissions (ton)	Annual Emissions (ton)	Emission Limits (Permit Condition 2.1.2) (ton per year)
NOx	0.0	0.0	0.0	1.0
SO ₂	0.0	0.0	0.0	1.0
PM	0.0	0.0	0.0	*35.4 lb/hr
со	0.0	0.0	0.0	2.6
voc	0.0	0.0	0.0	1.0
HAPs	0.0	0.0	0.0	No Source Permit Limit

2.1 Asphalt Production - Asphalt Plant located at TA-60

Note: The Asphalt Plant did not operate during 2004.

* The Asphalt Plant does not have a ton per year limit for PM. The lb/hr emissions will be demonstrated during the initial source compliance test.

2.2 Beryllium Activities

Source	Pollutant	Jan-June Emissions (gram)	July-Dec Emissions (gram)	Annual Emissions (gram)	Emission Limits (Permit Condition 2.2.2)
Beryllium Test Facility TA-3-141	Beryllium	< 0.0033	< 0.0032	< 0.0065	3.5 gm/yr
Target Fabrication Facility TA-35-213	Beryllium	< 0.04	< 0.009	< 0.049	0.36 gm/yr
Plutonium Facility TA-55-PF4					
Machining Operation	Beryllium	< 1.495	< 1.41	< 2.905	2.99 gm/yr
	Aluminum	< 1.495	< 1.41	< 2.905	2.99 gm/yr
Foundry Operation	Beryllium	0	0	0	8.73 x 10 ⁻⁴ gm/yr
	Aluminum	0	0	0	8.73 x 10 ⁻⁴ gm/yr
Beryllium Tota	l (tons) =	< 1.70 x 10 ⁻⁶	< 1.57 x 10 ⁻⁶	< 3.27 x 10 ⁻⁶	
Aluminum Tota	al (tons) =	< 1.65 x 10 ⁻⁶	< 1.55 x 10 ⁻⁶	< 3.20 x 10 ⁻⁶	

Note: Emission values shown for the Beryllium Test Facility are from actual stack emission measurements. Emissions for the Target Fabrication Facility are based on initial compliance testing of that source and a conservative use of maximum hours of operation. Emissions for the Plutonium Facility Machining Operation are based on initial compliance testing of the source and a conservative use of maximum throughput. The Plutonium Facility Foundry Operations did not operate during 2004. Other beryllium sources listed in section 2.2 of the permit do not require reporting in the Semi-Annual Emissions Report.

2.3 Boilers and Heaters

Pollutant	January - June Emissions (ton)	July - December Emissions (ton)	Annual Emissions (ton)	Emission Limits (Permit Condition 2.3.2) (ton per year)
NOx	15.50	12.80	28.30	80
SO ₂	0.10	0.08	0.18	50
PM	1.20	1.03	2.23	50
PM-10	1.20	1.03	2.23	50
со	12.50	10.25	22.75	80
VOC	0.90	0.71	1.61	50
HAPs	0.26	0.24	0.50	No Source Limit

Note: The emissions shown in this table include significant and insignificant sources. This section does not include the TA-3-22 Power Plant boilers (see section 2.9). The TA-21 steam plant boilers are included in this table.

2.4 Carpenter Shops

Shop	Pollutant	January - June Emissions (ton)	July - December Emission (ton)	Annual Emissions (ton)	Emission Limits (Permit Condition 2.4.2) (ton per year)
TA-3-38	PM ₁₀	0.016	0.005	0.021	3.07
TA-15-563	PM ₁₀	0	0	0	2.81

Note: The TA-15-563 Carpenter Shop did not operate during 2004.

2.5 Chemical Usage

Pollutant	January - June Emissions (ton)	July - December Emissions (ton)	Annual Emissions (ton)	Emission Limits (Permit Condition 2.5.3.1)
VOCs	4.91	3.04	7.95	Source limits refer to facility wide
HAPs	4.28	1.44	5.72	limits. (See Facility
Highest Individual HAP (Hydrochloric Acid)	1.19	0.32	1.51	Emissions Table on Page 1)

2.6 Degreasers

Degreaser TA-55-DG-1	January - June Emissions (ton)	July - December Emissions (ton)	Annual Emissions (ton)	Emission Limits (Permit Condition 2.6.2.1) (ton per year)
VOCs	0.004	0.007	0.011	Source limits refer to facility wide
HAPs	0.004	0.007	0.011	Emissions Table on Page 1)

Note: Degreasers TA-55-DG-2 and TA-55-DG-3 were not used in 2004. These degreasers are not expected to be used in the near future and are in storage.

2.7 Internal Combustion Sources

Generator TA-33-G-1	Jan-June Emissions (ton)	July-Dec Emissions (ton)	Annual (ton)	Emission Limits (Permit Condition 2.7.2) (ton per year)
TSP	0.0	0.0	0.0	0.6
PM ₁₀	0.0	0.0	0.0	0.6
NOx	0.0	0.0	0.0	18.1
CO	0.0	0.0	0.0	15.2
VOC	0.0	0.0	0.0	0.3
SOx	0.0	0.0	0.0	2.5
HAPs	0.0	0.0	0.0	No Source Limit

Note: The TA-33-G-1 generator did not operate during 2004.

Standby Generators	Jan-June Emissions (ton)	July-Dec Emissions (ton)	Annual (ton)	Emission Limits
TSP	0.10	0.20	0.30	
PM ₁₀	0.10	0.20	0.30	
NOx	2.20	3.67	5.87	No Source Specific Emission Limits for Standby Generators
СО	0.50	0.86	1.36	
VOC	0.10	0.22	0.32	
SOx	0.50	0.60	1.10	
HAPs	1.1E-03	1.5E-03	2.6E-03	

Note: Standby Generators are insignificant sources. Insignificant source information is provided to demonstrate compliance with PSD applicability thresholds.

2.8.a Paper Shredder

Emission Unit TA-52-11	January - June Emissions (ton)	July - December Emissions (ton)	Annual Emissions (ton)	Emission Limit (Permit Condition 2.8.2.1) (ton per year)
TSP	0.0012	0.0000	0.0012	13

Note: The paper shredder was shutdown in July 2004 and was replaced with a new data disintegrator (see data disintegrator - section 2.8.b).

2.8.b Data Disintegrator (Unit replaced paper shredder)

Emission Unit TA-52-11	January - June Emissions (ton)	July - December Emissions (ton)	Annual Emissions (ton)	Emission Limits (NSR Permit No. 2195-H) (ton)
TSP	0.00	0.10	0.10	9.9
PM10	0.00	0.09	0.09	9.9

Note: The data disintegrator was started on August 18, 2004, and replaced the existing paper shredder. This unit and its allowable emissions will be included in the next LANL Title V operating permit modification. The data disintegrator was installed under Air Quality Permit No. 2195-H. The emissions from this unit are included in the facility wide total.

2.9 Power Plant at Technical Area 3 (TA-3-22)

Pollutant	January - June Emissions (ton)	July - December Emissions (ton)	Annual Emissions (ton)	Emission Limits (Permit Condition 2.9.2) 12 mo. rolling total (ton)	Emission Limits (NSR Permit No. 2195BM1) 12 mo. rolling total (ton)
NOx	8.85	7.49	16.34	99.6	60.2
SO2	0.15	0.15	0.30	36.9	7.9
TSP	1.18	1.00	2.18	15.7	8.4
PM ₁₀	1.17	0.99	2.16	15.7	8.2
со	6.10	5.16	11.26	81.3	41.3
VOC	0.83	0.70	1.53	11.1	5.6
HAPs	0.29	0.24	0.53	No Source Limit	No Source Limit

Note: The allowable emission limits from Air Quality Permit No. 2195BM1 are included above. This permit was issued on July 30, 2004, for the installation of a combustion turbine. Installation of the turbine is not yet complete. These limits are the most current applicable limits for the power plant boilers. These new limits will be included in the next LANL Title V operating permit modification.

2.10 Rock Crusher

The Rock Crusher was not used in 2004. The unit was retired June 10, 2004.