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Ms. Debra McElroy Compliance & Enforcement Section New Mexico Environment Department Air Quality Bureau 1301 Siler Rd. Bld. B Santa Fe, NM 87507

IDEA ID NO. 856 – LOS ALAMOS NATIONAL LABORATORY (LANL) OPERATING PERMIT NO: P100M2 SEMI-ANNUAL EMISSIONS REPORT – JULY 1, 2007 TO DECEMBER 31, 2007

Date: March 21, 2008

Refer to: ENV-DO:08-006

Dear Ms. McElroy:

Enclosed is Los Alamos National Laboratory's (LANL) semi-annual emissions report for the period July 1, 2007 through December 31, 2007. This report is required by permit condition 4.1 and is submitted within 90 days from the end of the reporting period as required by permit condition 4.3.

The semi-annual emissions report includes actual emissions from permitted sources included in section 2.0 of LANL's Operating Permit. 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. In this report, actual emissions are listed along with the emission limits for ease in comparing and verifying compliance. No annual emission limits were exceeded during this reporting period.

This submittal includes a signed certification statement (Attachment 1) and the semi-annual emissions report for the period July 1, 2007 through December 31, 2007 (Attachment 2).

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

Sincerely,

Victoria A. George Division Leader

**Environmental Protection Division** 

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ENV-EAQ Title V Emissions Report File

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New Mexico Environmental Department



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Form 836 (7/06)

Attachment 1 Certification Statement

# **Title V Operating Permit** Semi-Annual Emission Report July 1, 2007 – December 31, 2007

| Identifying Information   |   |   |
|---|---|---|
| Source Name: Los Alamos National Laboratory   | County: Los A   | Alamos .  |
| Source Address: City: Los Alamos  | State: NM   | Zip Code: <u>87545</u>  |
| Responsible Official: <u>Victoria A. George</u> Technical Contact: <u>Steven L. Story</u> Ph No.  Principal Company Product or Business: <u>National Security and</u> | Ph No. (505) 667-22<br>(505) 665-2169 Fax No. (50<br>Nuclear Weapons Research | 11 Fax No. (505) 665-8858<br>05) 665-8858<br>Primary SIC Code: 9711 |
| Permit No. P100M2 {IDEA/Tempo ID No. 856}   | Permit  | Issued Date: <u>July 16, 2007</u>                                   |
|   |   |   |
|   |   |   |
| Certification of Truth, Accuracy, and Com   | pleteness   |   |
| I, <u>Victoria A. George</u> certify that, based on informatiand information in the attached semi-annual emission report are  | on and belief formed after reas-<br>true, accurate, and complete.             | onable inquiry, the statements                                      |
| Signature   | Date:   | 3/17/08   |
| Title: <u>Division Leader, Environmental Protection Division</u>  |   |   |

Attachment 2 Semi-Annual Emissions Report July1, 2007 to December 31, 2007

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 P100M2. The emissions were calculated using operating data recorded during the second six months of 2007. The emissions from the first six months of 2007 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 2.10.1 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. Hazardous Air Pollutant (HAP) and Volatile Organic Compound (VOC) emissions from chemical use include point source and fugitive emissions (see permit condition 4.1).

| Pollutant                                  | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | 2007 Annual Emissions<br>(tons) | Facility Wide Emission Limits<br>(Permit Condition 2.10.1)<br>(tons per year) |
|--|---------------------------------------|--|---------------------------------|---|
| Nitrogen Oxides (NOx)                      | 26.6                                  | 25.4                                   | 52.0                            | 245   |
| Sulfur Dioxide (SO <sub>2</sub> )          | 0.6                                   | 0.4                                    | 1.0                             | 150   |
| Particulate Matter (PM)                    | 2.7                                   | 2.2                                    | 4.9                             | 120   |
| Carbon Monoxide (CO)                       | 18.7                                  | 14.6                                   | 33.3                            | 225   |
| Volatile Organic Compounds (VOCs)          | 7.3                                   | 8.1                                    | 15.4                            | 200   |
| Hazardous Air Pollutants (HAPs)            | 3.6                                   | 3.2                                    | 6.8                             | 24 combined   |
| Highest Individual HAP (Hydrochloric Acid) | 0.51                                  | 0.54                                   | 1.05                            | 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 if applicable.

#### **Permit Condition/Source**

### 2.1 Asphalt Production

| Asphalt Plant<br>TA-60-BDM | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limits<br>(Condition 2.1.2)<br>(tons per year) |
|----------------------------|---------------------------------------|--|-------------------------------|---|
| NOx                        | 0.008                                 | 0.013                                  | 0.021                         | 1.0   |
| SO <sub>2</sub>            | 0.002                                 | 0.002                                  | 0.004                         | 1.0   |
| PM                         | 0.003                                 | 0.005                                  | 0.008                         | *35.4 lb/hr   |
| CO                         | 0.135                                 | 0.211                                  | 0.346                         | 2.6   |
| VOC                        | 0.003                                 | 0.004                                  | 0.007                         | 1.0   |
| HAPs                       | 0.003                                 | 0.004                                  | 0.007                         | No Source Permit<br>Limit                             |

**Note:** \* The Asphalt Plant does not have an annual limit for PM. The hourly emissions were demonstrated during the initial source compliance test conducted on August 25th & 26th, 2005 and submitted to NMED.

#### 2.2 Beryllium Activities

| Source  | Pollutant                 | January - June<br>Emissions | July - December<br>Emissions | Annual<br>Emissions | Permit Limits<br>(Condition 2.2.2) |
|---|---------------------------|-----------------------------|------------------------------|---------------------|------------------------------------|
| Beryllium Test Facility<br>TA-3-141 <sup>(1)</sup>      | Beryllium (grams)         | < 0.0033                    | < 0.0033                     | < 0.007             | 3.5 gm/yr                          |
| Target Fabrication Facility<br>TA-35-213 <sup>(2)</sup> | Beryllium (grams)         | < 0.00944                   | < 0.009                      | < 0.018             | 0.36 gm/yr                         |
| Plutonium Facility<br>TA-55-PF4 <sup>(3)</sup>          | Beryllium (grams)         | < 1.495                     | < 1.41                       | < 2.91              | 2.99 gm/yr                         |
| Machining Operation                                     | Aluminum (grams)          | < 1.495                     | < 1.41                       | < 2.91              | 2.99 gm/yr                         |
| Plutonium Facility<br>TA-55-PF4                         | Beryllium (grams)         | 0                           | 0                            | 0.00                | 8.73 x 10 <sup>-4</sup> gm/yr      |
| Foundry Operation <sup>(4)</sup>                        | Aluminum (grams)          | 0                           | 0                            | 0.00                | 8.73 x 10 <sup>-4</sup> gm/yr      |
| Beryllium Tota  | l <sup>(5)</sup> (tons) = | < 1.66E-06                  | < 1.57E-06                   | < 3.23E-06          |                                    |
| Aluminum Tot  | al (tons) =               | < 1.65E-06                  | < 1.55E-06                   | < 3.30E-06          |                                    |

**Notes:** <sup>(1)</sup> Emission values shown for the Beryllium Technology Facility are from actual stack emission measurements which are submitted to NMED quarterly. <sup>(2)</sup> Emissions for the Target Fabrication Facility are from initial compliance testing of that source and calculated based on a conservative assumption of 8 hour work days. Log books were checked to verify that work days were much less than 8 hours. <sup>(3)</sup> Emissions for the Plutonium Facility are calculated based on permitted throughputs. Log books were checked to verify that throughputs were much less than permitted values. <sup>(4)</sup> The Plutonium Facility foundry operations did not operate during 2007. <sup>(5)</sup> Other Beryllium activities listed in section 2.2 of the permit do not require reporting in the Semi-Annual Emissions Report.

#### 2.3 Boilers and Heaters

| Boilers and Heaters | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limits<br>(Condition 2.3.2)<br>(tons per year) |
|---------------------|---------------------------------------|--|-------------------------------|---|
| NOx                 | 15.10                                 | 10.53                                  | 25.63                         | 80  |
| SO <sub>2</sub>     | 0.09                                  | 0.06                                   | 0.15                          | 50  |
| PM                  | 1.20                                  | 0.84                                   | 2.04                          | 50  |
| PM-10               | 1.20                                  | 0.84                                   | 2.04                          | 50  |
| CO                  | 12.25                                 | 8.53                                   | 20.78                         | 80  |
| VOCs                | 0.84                                  | 0.59                                   | 1.43                          | 50  |
| HAPs                | 0.29                                  | 0.20                                   | 0.49                          | 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 which can be found under Section 2.9 of this report. The TA-21 steam plant boilers are included in this table.

#### 2.4 Carpenter Shops

| Shop      | Pollutant        | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limits<br>(Condition 2.4.2)<br>(tons per year) |
|-----------|------------------|---------------------------------------|--|-------------------------------|---|
| TA-3-38   | PM <sub>10</sub> | 0.014                                 | 0.008                                  | 0.022                         | 3.07  |
| TA-15-563 | PM <sub>10</sub> | 0.029                                 | 0.015                                  | 0.044                         | 2.81  |

### 2.5 Chemical Usage

| Chemical Usage<br>LANL-FW-CHEM                                      | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limits<br>(Condition 2.5.3.1)         |
|---|---------------------------------------|--|-------------------------------|--|
| VOCs  | 5.63                                  | 6.62                                   | 12.25                         | Source limits refer                          |
| HAPs  | 2.97                                  | 2.83                                   | 5.80                          | to facility-wide<br>limits.<br>(See Facility |
| Highest Individual HAP for the first six months (Hydrochloric Acid) | 0.51                                  | 0.54                                   | 1.05                          | Emissions Table on<br>Page 1)                |

#### 2.6 Degreasers

| Degreaser<br>TA-55-DG-1 | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limits<br>(Condition 2.6.2.1)<br>(tons per year)          |
|-------------------------|---------------------------------------|--|-------------------------------|--|
| VOCs                    | 0.005                                 | 0.007                                  | 0.012                         | Source limits refer<br>to facility-wide<br>limits. (See Facility |
| HAPs                    | 0.005                                 | 0.007                                  | 0.012                         | Emissions Table on<br>Page 1)                                    |

**Note:** Degreasers TA-55-DG-2 and TA-55-DG-3 were not used from January 1 to December 31, 2007. These degreasers are not expected to be used in the near future and are in storage.

#### 2.7 Internal Combustion Sources

| Generator<br>TA-33-G-1 | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limits<br>(Condition 2.7.2)<br>(tons per year) |
|------------------------|---------------------------------------|--|-------------------------------|---|
| NOx                    | 0.00                                  | 0.00                                   | 0.0                           | 18.1  |
| SO <sub>X</sub>        | 0.00                                  | 0.00                                   | 0.0                           | 2.5   |
| TSP                    | 0.00                                  | 0.00                                   | 0.0                           | 0.6   |
| PM <sub>10</sub>       | 0.00                                  | 0.00                                   | 0.0                           | 0.6   |
| CO                     | 0.00                                  | 0.00                                   | 0.0                           | 15.2  |
| VOC                    | 0.00                                  | 0.00                                   | 0.0                           | 0.3   |
| HAPs                   | 0.00                                  | 0.00                                   | 0.0                           | No Source Limit                                       |

Note: This generator did not run in 2007.

| Stationary Standby<br>Generators | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limits       |
|----------------------------------|---------------------------------------|--|-------------------------------|---------------------|
| NOx                              | 3.52                                  | 9.23                                   | 12.75                         |                     |
| SOx                              | 0.10                                  | 0.26                                   | 0.36                          |                     |
| TSP                              | 0.14                                  | 0.37                                   | 0.51                          | No Source Specific  |
| PM <sub>10</sub>                 | 0.14                                  | 0.37                                   | 0.51                          | Emission Limits for |
| СО                               | 0.83                                  | 2.04                                   | 2.87                          | Standby Generators  |
| VOC                              | 0.14                                  | 0.37                                   | 0.51                          |                     |
| HAPs                             | 1.40E-03                              | 2.24E-03                               | 3.64E-03                      |                     |

Note: Standby Generators are insignificant sources.

### 2.8 Data Disintegrator

| Data Disintegrator<br>TA-52-11 | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limits<br>(Condition 2.8.2)<br>(tons per year) |
|--------------------------------|---------------------------------------|--|-------------------------------|---|
| TSP                            | 0.28                                  | 0.20                                   | 0.48                          | 9.9   |
| PM10                           | 0.26                                  | 0.18                                   | 0.44                          | 9.9   |

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

| Boilers<br>TA_3-22-1, TA-3-22-2<br>TA-3-22-3 | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limit<br>(Condition 2.9.2)<br>(tons per year) |
|--|---------------------------------------|--|-------------------------------|--|
| NOx  | 7.97                                  | 5.49                                   | 13.46                         | 60.2   |
| SO <sub>2</sub>                              | 0.38                                  | 0.07                                   | 0.45                          | 7.9  |
| TSP  | 1.13                                  | 0.72                                   | 1.85                          | 8.4  |
| PM <sub>10</sub>                             | 1.09                                  | 0.72                                   | 1.81                          | 8.2  |
| CO   | 5.46                                  | 3.78                                   | 9.24                          | 41.3   |
| VOC  | 0.73                                  | 0.52                                   | 1.25                          | 5.6  |
| HAPs   | 0.25                                  | 0.18                                   | 0.43                          | No Source Limit                                      |

| Combustion Turbine<br>TA-3-22 CT-1 | January - June<br>Emissions<br>(tons) | July - December<br>Emissions<br>(tons) | Annual<br>Emissions<br>(tons) | Permit Limit<br>(Condition 2.9.2)<br>(tons per year) |
|------------------------------------|---------------------------------------|--|-------------------------------|--|
| NOx                                | 0.00                                  | 0.16                                   | 0.16                          | 33.2   |
| SO <sub>2</sub>                    | 0.00                                  | 0.01                                   | 0.01                          | 1.9  |
| TSP                                | 0.00                                  | 0.02                                   | 0.02                          | 2.3  |
| PM <sub>10</sub>                   | 0.00                                  | 0.02                                   | 0.02                          | 2.3  |
| CO                                 | 0.00                                  | 0.03                                   | 0.03                          | 19.8   |
| VOC                                | 0.00                                  | 0.01                                   | 0.01                          | No TPY Limit   |
| HAPs                               | 0.00                                  | 3.34E-03                               | 3.34E-03                      | No Source Limit                                      |

Note: The combustion turbine began operation on September 23, 2007.