



Environmental Protection & Compliance

Los Alamos National Laboratory

PO Box 1663, K490

Los Alamos, New Mexico 87545

(505) 667-0666

Date: **AUG 16 2018**

Symbol: EPC-DO: 18-293

LA-UR: 18-27820

Locates Action No.: N/A

Mr. Ralph Gruebel
Manager, Compliance and Enforcement Section
New Mexico Environment Department
Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505-1816

Subject: IDEA ID 856 – Los Alamos National Laboratory 2018 Second Quarter Beryllium Emissions Report April 1–June 30, 2018, Air Quality Permit No. 634-M2

Dear Mr. Gruebel:

Attached is a copy of the sampling data for the **second quarter of calendar year 2018**. The attached emissions data were obtained from the continuous air monitor installed on the main exhaust stack at the Beryllium Technology Facility (BTF) at Los Alamos National Laboratory (LANL). This submission of the quarterly emissions data, collected from this source, is required by permit condition 5.f of the New Mexico Environment Department (NMED) New Source Review (NSR) Air Quality Permit #634-M2 dated October 30, 1998. This quarterly report is transmitted within the allowed 60 days after the end of the calendar quarter, as specified in NSR permit and incorporated in Title V permits P100-R2M1 & P100-R2M2.

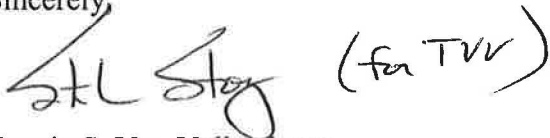
Air Quality Permit #634-M2 condition #2 requires that the beryllium stack emissions from the BTF shall not exceed 0.35 grams in a 24-hour time period and shall not exceed 3.5 grams per year. For this reporting period, the current quarterly data and the total emissions for calendar year 2018 were obtained from the attached data sheet and summarized in the following table.

| Reporting Period | Description of Data | Beryllium Emission Rate | NSR 634-M2/ Title V P100-R2M1 & P100-R2M2 Permit Limit |
|------------------|-----------------------------|-----------------------------------|--------------------------------------------------------|
| 2018Q2 | Highest daily emission rate | 1.79×10^{-5} gm/24 hours | 0.35 gm/ 24 hours |
| 2018Q2 | Total amount for 2018Q2 | 1.59×10^{-3} gm | N/A |

| Reporting Period | Description of Data | Beryllium Emission Rate | NSR 634-M2/ Title V P100-R2M1 & P100-R2M2 Permit Limit |
|------------------|-----------------------------------|--------------------------|--------------------------------------------------------|
| 2018Q1Q2 | Total amount for 2018 (Q1 and Q2) | 3.17×10^{-3} gm | 3.5 gm/year |

Based on the above summary table and Enclosure 1 datasheet, the beryllium emissions are well below the permit limit and LANL is in compliance with condition #2 of NMED Air Quality Permit #634-M2. If you have questions or comments regarding this submittal or would like to discuss this in greater detail, please feel free to contact Steven L. Story at (505) 665-2169 or Vince Carretti at (505) 665-1658.

Sincerely,



Taunia S. Van Valkenburg
Group Leader

TSV/SLS/VAC: jdm

Enclosure: 1) Beryllium 2018 Stack Emissions

Copy: Adrienne L. Nash, NA-LA, (E-File)
Richard M. Kacich, DIR, (E-File)
Craig S. Leasure, PADOPS, (E-File)
William R. Mairson, ADESH, (E-File)
Enrique Torres, EPC-DO, (E-File)
Jennifer E. Payne, EPC-CP, (E-File)
David M. Montoya, PF-DO, (E-File)
Christian D. Lopez, STO-DO, (E-File)
Matt Martinez, PF-WFS, (E-File)
Steven Gonzales, PF-WFS, (E-File)
Marc R. Gallegos, DESHF-STO, (E-File)
Timothy A. Dolan, LC-ESH, (E-File)
Steven L. Story, EPC-CP, (E-File)
Joline D. Martinez, EPC-CP, (E-File)
Vincent A. Carretti, EPC-CP, (E-File)
EPC-CP Beryllium Permit #634-M2 Quarterly Report File
adesh-records@lanl.gov, (E-File)
locatesteam@lanl.gov, (E-File)
epc-correspondence@lanl.gov, (E-File)



**New Mexico Environment Department
Air Quality Bureau
Compliance and Enforcement Section
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505
Phone (505) 476-4300**



Version 07.20.18

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|---------------|--|
| NMED USE ONLY | |
| TEMPO | |

REPORTING SUBMITTAL FORM

| | |
|---------------|--|
| NMED USE ONLY | |
| Staff | |
| Admin | |

PLEASE NOTE: ® - Indicates required field

| SECTION I - GENERAL COMPANY AND FACILITY INFORMATION | | | | | |
|--------------------------------------------------------------------------------------|---------------------------|----------------------------------------------------------------------------------|--------------------------------------------------------------|------------------------------------------------------------|-------------------|
| A. ® Company Name: Los Alamos National Security, LLC | | | D. ® Facility Name: Los Alamos National Laboratory | | |
| B.1 ® Company Address: P.O Box 1663 MS K490 | | | E.1 ® Facility Address: Same as Company | | |
| B.2 ® City: Los Alamos | B.3 ® State: NM | B.4 ® Zip: 8 7 5 4 5 | E.2 ® City: | E.3 ® State: | E.4 ® Zip: |
| C.1 ® Company Environmental Contact: Tania S. Van Valkenburg | | C.2 ® Title: Group Leader, EPC-CP | | F.1 ® Facility Contact: Steven L. Story | |
| C.3 ® Phone Number: (505) 665-9827 | | C.4 ® Fax Number: (505) 665-8858 | | F.2 ® Title: Team Leader, Air Quality Compliance | |
| C.5 ® Email Address: tauniav@lanl.gov | | F.3 ® Phone Number: (505) 665-2169 | | F.4 ® Fax Number: (505) 665-8858 | |
| G. Responsible Official: (Title V only): William Mairson & William Goodrum | | H. Title: Associate Director, ADESH & Manager, Los Alamos Field Office | | I. Phone Number: (505) 667-4218 & (505) 667-5105 | |
| J. Fax Number: (505) 665-3811 | | K. ® AI Number: 856 | | L. Title V Permit Number: P100-R2M1 & P100-R2M2 | |
| M. Title V Permit Issue Date: 02/03/2017 & 06/26/2018 | | N. NSR Permit Number: 634-M2 | | O. NSR Permit Issue Date: 10/30/1998 | |
| P. Reporting Period: From: April 1, 2018 To: June 30, 2018 | | | | | |

Do NOT submit NSPS OOOO or OOOOa well completion or flowback notifications to the Air Quality Bureau. See <https://www.env.nm.gov/air-quality/notices-and-faqs-for-compliance-and-enforcement/> for explanation.

| SECTION II - TYPE OF SUBMITTAL (check one that applies) | | | |
|---------------------------------------------------------|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> | Title V Annual Compliance Certification | Permit Condition(s): | Description: |
| <input type="checkbox"/> | Title V Semi-Annual Monitoring Report | Permit Condition(s): | Description: |
| <input type="checkbox"/> | NSPS Requirement (40CFR60) | Regulation: | Section(s): Description: |
| <input type="checkbox"/> | MACT Requirement (40CFR63) | Regulation: | Section(s): Description: |
| <input type="checkbox"/> | NMAC Requirement (20.2.xx) or NESHAP Requirement (40CFR61) | Regulation: | Section(s): Description: |
| <input checked="" type="checkbox"/> | Permit or Notice of Intent (NOI) Requirement | Permit No. <input checked="" type="checkbox"/> or NOI No. <input type="checkbox"/> 634-M2 | Condition(s): 5.f Description: 2018Q2 Report containing beryllium emissions data from the continuous air monitor of the exhaust stack, due within 60 days after calendar quarter. |
| <input type="checkbox"/> | Requirement of an Enforcement Action | NOV No. <input type="checkbox"/> or SFO No. <input type="checkbox"/> or CD No. <input type="checkbox"/> or Other <input type="checkbox"/> | Section(s): Description: |

| SECTION III - CERTIFICATION | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|---------------------------|-------------------------------------------------------------------------------------------------------------------|
| After reasonable inquiry, I <u>Taunia S. Van Valkenburg</u> certify that the information in this submittal is true, accurate and complete. <small>(Name of Certifier)</small> | | | |
| ® Signature of Certifier: | ® Title: Group Leader, EPC-CP | ® Date: 8/16/18 | ® Responsible Official for Title V? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

Reviewed By: _____

Date Reviewed: _____

ENCLOSURE 1

Beryllium 2018 Stack Emissions

EPC-DO: 18-293

LA-UR-18-27820

Date: **AUG 16 2018**

**Los Alamos National Laboratory
TA-03-0141 Beryllium 2018 Stack Emissions**

TA-03-0141 StackID: 03014101

| Sampling dates | | | Emissions (g) | |
|------------------------------------|---|------------|-----------------------------------------------------|---------------------------------|
| | | | Weekly(1) | Daily(2) |
| | | | <i>Sum of weekly results must be <3.5 g/year</i> | <i>Cannot Exceed 0.35 g/day</i> |
| Period #: 1 | | | | |
| 12/21/2017 | - | 01/04/2018 | < 1.22E-04 | < 8.73E-06 |
| 01/04/2018 | - | 01/11/2018 | < 1.22E-04 | < 1.75E-05 |
| 01/11/2018 | - | 01/18/2018 | < 1.22E-04 | < 1.75E-05 |
| 01/18/2018 | - | 01/25/2018 | < 1.22E-04 | < 1.75E-05 |
| 01/25/2018 | - | 02/01/2018 | < 1.22E-04 | < 1.74E-05 |
| | | | Period 1 Sum: < 6.10E-04 | |
| Period #: 2 | | | | |
| 02/01/2018 | - | 02/08/2018 | < 1.22E-04 | < 1.75E-05 |
| 02/08/2018 | - | 02/15/2018 | < 1.22E-04 | < 1.75E-05 |
| 02/15/2018 | - | 02/22/2018 | < 1.22E-04 | < 1.74E-05 |
| 02/22/2018 | - | 03/01/2018 | < 1.22E-04 | < 1.75E-05 |
| | | | Period 2 Sum: < 4.88E-04 | |
| Period #: 3 | | | | |
| 03/01/2018 | - | 03/08/2018 | < 1.22E-04 | < 1.75E-05 |
| 03/08/2018 | - | 03/15/2018 | < 1.22E-04 | < 1.75E-05 |
| 03/15/2018 | - | 03/22/2018 | < 1.22E-04 | < 1.75E-05 |
| 03/22/2018 | - | 03/29/2018 | < 1.22E-04 | < 1.75E-05 |
| | | | Period 3 Sum: < 4.88E-04 | |
| 1st Quarter Total: 1.59E-03 | | | ^aHDER 1.75E-05 | |

^a HDER = Highest Daily Emission Rate

**Los Alamos National Laboratory
TA-03-0141 Beryllium 2018 Stack Emissions**

TA-03-0141 StackID: 03014101

| Sampling dates | | | Emissions (g) | |
|------------------------------------|---|------------|-----------------------------------------------------|---------------------------------|
| | | | Weekly(1) | Daily(2) |
| | | | <i>Sum of weekly results must be <3.5 g/year</i> | <i>Cannot Exceed 0.35 g/day</i> |
| Period #: 4 | | | | |
| 03/29/2018 | - | 04/05/2018 | < 1.22E-04 | < 1.75E-05 |
| 04/05/2018 | - | 04/12/2018 | < 1.22E-04 | < 1.75E-05 |
| 04/12/2018 | - | 04/19/2018 | < 1.22E-04 | < 1.74E-05 |
| 04/19/2018 | - | 04/26/2018 | < 1.22E-04 | < 1.75E-05 |
| 04/26/2018 | - | 05/03/2018 | < 1.22E-04 | < 1.75E-05 |
| | | | Period 4 Sum: < 6.10E-04 | |
| Period #: 5 | | | | |
| 05/03/2018 | - | 05/10/2018 | < 1.22E-04 | < 1.74E-05 |
| 05/10/2018 | - | 05/17/2018 | < 1.22E-04 | < 1.75E-05 |
| 05/17/2018 | - | 05/24/2018 | < 1.22E-04 | < 1.75E-05 |
| 05/24/2018 | - | 05/31/2018 | < 1.22E-04 | < 1.70E-05 |
| | | | Period 5 Sum: < 4.88E-04 | |
| Period #: 6 | | | | |
| 05/31/2018 | - | 06/07/2018 | < 1.22E-04 | < 1.79E-05 |
| 06/07/2018 | - | 06/14/2018 | < 1.22E-04 | < 1.75E-05 |
| 06/14/2018 | - | 06/21/2018 | < 1.22E-04 | < 1.75E-05 |
| 06/21/2018 | - | 06/28/2018 | < 1.22E-04 | < 1.75E-05 |
| | | | Period 6 Sum: < 4.88E-04 | |
| 2nd Quarter Total: 1.59E-03 | | | ^aHDER 1.79E-05 | |

^a HDER = Highest Daily Emission Rate