



Environment Safety & Health Directorate Los Alamos National Laboratory PO Box 1663, K491 Los Alamos, New Mexico 87545 (505) 667-4218

National Nuclear Security Administration Los Alamos Field Office 3747 West Jemez Road, A316 Los Alamos, New Mexico, 87545 (505) 667-5105/Fax (505) 667-5948

Date:

SEP 1 2 2018

Symbol: ADESH: 18-061

LA-UR: 18-28268

Locates Action No.: NA

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: Semi-Annual Emissions Report for Los Alamos National Laboratory, AI No. 856, Title V Operating Permit P100-R2M1 and P100-R2M2 for January 1 – June 30, 2018

Dear Mr. Gruebel:

Enclosed is Los Alamos National Laboratory's Semi-Annual Emissions Report for the first half of 2018 for Operating Permit P100-R2M1 which became effective February 3, 2017, and P100-R2M2, which consisted of an administrative change to the Owner and Operator, effective May 7, 2018. This Semi-Annual Emissions Report covers the January 1 – June 30, 2018 reporting period. We are submitting one Semi-Annual Emissions Report for the six month period, and two Report Certifications, and Report Submittal Forms. One Report Certification and Report Submittal Form for the period January 1 – May 6, 2018 (P100-R2M1) signed by the Los Alamos National Security, LLC (LANS) Responsible Official, and separate Report Certification and Report Submittal Forms for the period May 7 – June 30, 2018 (P100-R2M2) signed by the National Nuclear Security Administration, Los Alamos Site Office (NNSA-LASO) Responsible Official.

This submission is required by permit condition A109.B. of the Title V Operating Permit P100-R2M1/M2, and is submitted within 90 days following June 30, 2018, the end of the six month reporting period.

The Semi-Annual Emissions report includes actual emissions from permitted sources included in LANL's Operating Permit. In this report, the 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.



ADESH: 18-061

If you have questions or comments regarding this submittal or would like to discuss this submittal in greater detail, please contact Steven L. Story at (505) 665-2169 or Adrienne Nash, NA-LA at (505) 665-5026.

- 2 -

Sincerely

William R. Mairson Associate Director Sincerely

William S. Goodrum

Manager

WRM/WSG/SLS/WWW:jdm

Enclosure: 1) LANL Title V Semi-Annual Emissions Report for AI 856/P100-R2M1 and P100-R2M2,

January 1-June 30, 2018.

Copy: Adrienne L. Nash, LASO-NS-LP, (E-File)

Hai Shen, EM-SG, (E-File)

Annette E. Russell, EM-LA, (E-File)

Frazer R. Lockhart, N3B, (E-File)

Christian T. Maupin, N3B, (E-File)

Richard M. Kacich, DIR, (E-File)

Craig S. Leasure, PADOPS, (E-File)

John Bretzke, ADESH, (E-File)

Enrique Torres, EPC-DO, (E-File)

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**EPC-CP Title V Monitoring Report File** 



Reviewed By:

# 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 Fax (505) 476-4375



Version 04.04.18

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B.2 ® Los Ala		B.3 ® State: B.4 ® Zip	: 5 4 5	E.2 ® City:			E.3 ® Sta	te: E.4 ® Zi	p:
	ompany Environmental Contact: S. Van Valkenburg	C.2 ® Title: EPC-CP Group Leader		F.1 ® Facility Steven L. Sto			F.2 ® Tit Air Qualit Leader	le: y Compliand	e Team
C.3 ® P (505) 66	Phone Number: 65-9827	C.4 ® Fax Number: (505) 665-8858		F.3 ® Phone (505) 665-216				x Number: 5-8858	
	Email Address: @lanl.gov			F.5 ® Email					
	onsible Official: (Title V only):	H. Title:		story@lanl.go			J. Fax N	umber:	
William	R. Mairson	Associate Director for E		(505) 667-42	18		(505) 66	5-3811	
856	P100-R2N		itle V Permit Is 3, 2017		I. NSR Permit 2195	Number:	O. N		Issue Date:
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D. 🔲	MACT Requirement (40CFR63)	Regulation:	Section(s)	:	Description:				
E. 🗌	NMAC Requirement (20.2.xx) or NESHAP Requirement (40CFR61)	Regulation:	Section(s):		Description:				
		Permit No.⊠: or NOI No.□:	Condition(	s):	Description:				
F. 🔯	Permit or Notice of Intent (NOI) Requirement	P100-R2M1	A109 B		LANL Semi-A	innual Emis	ssions Rep	ort for Janua	ary 1 - May 6,
G. 🗌	Requirement of an Enforcement Action	NOV No. : or SFO No. : or CD No. : or Other :	Section(s):		Description:				
SECTI	ON III - CERTIFICATIO	N							
After re	asonable inquiry, I	William R. Mairson (name of reporting official)	certi	fy that the info	rmation in thi	s submitta	l is true, a	ccurate and	d complete.
® Signa	ture of Reporting Official:	, and a second control of	® Tit	le: ciate Director	آم ا	Date / 2 ^	A	Responsible Of	ficial for Title V?
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Date Reviewed:



# New Mexico Environment Department Air Quality Bureau



Date Reviewed:

Version 04.04.18

Air Quanty Bureau
Compliance and Enforcement Section
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505
Phone (505) 476-4300 Fax (505) 476-4375

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	Phone Number: 65-5026		C.4 ® Fax N (505) 667-99			F.3 ® Phot (505) 665-2	ne Number: 2169			x Number: 5-8858	
	Email Address: ne.nash@nnsa.doe.	QOV				F.5 ® Ema story@lanl	ail Address:				
G. Resp	onsible Official: (Title		H. Title: Manager, N	NSAL ASO		I. Phone N (505) 667-	umber:		J. Fax Ni (505) 667		
	l Number: L	Title V Po	ermit Number	: M. T	itle V Permit		N. NSR Pen	mit Number:	O. N	SR Permit	Issue Date:
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Aπer re	asonable inquiry, I	-	William S. Go (name of reporting		cert	ify that the ir	nformation in	this submitta	l is true, a	ccurate an	d complete.
® Signa	ture of Reporting	Official:		gomay	® Ti	tle: ager, NNSA-l	LASO	® Date		Responsible Of	fficial for Title V?
	4										

Reviewed By:

# Title V Semi-Annual Emissions Report for Permit P100-R2M1

January 1, 2018 – May 6, 2018

Identifying Information			
Source Name: Los Alamos National Laboratory	County: La	os Alamos .	
Source Address: City: Los Alamos	State: NM	Zip Code: <u>87545</u>	
Responsible Official: William R. Mairson  Technical Contact: Steven L. Story  Principal Company Product or Business: National Security and  Permit No. P100-R2M1, January 1, 2018 – May 6, 2018 {IDE	Ph No. (505) 667-421: Ph No. (505) 665-216: d Nuclear Weapons Research	8 Fax No. (505) 665-3811 Fax No. (505) 665-8858 h Primary SIC Code: <u>8733</u>	
		ķ.	
Certification of Truth, Accuracy, and Con-	npleteness		L C
I, <u>William R. Mairson</u> certify that, based on information and information in the attached semi-annual emission report are tru	d belief formed after reasonal le, accurate, and complete.	ole inquiry, the statements and	
Signature Long Main	Da	ate: 9-12-18	
Title: Associate Director Environmental, Safety, and Health			

# Title V Semi-Annual Emissions Report for Permit P100-R2M2

May 7, 2018 - June 30, 2018

Identifying Information	
Source Name: Los Alamos National Laboratory	County: Los Alamos
Source Address: City: Los Alamos	State: <u>NM</u> Zip Code: <u>87545</u>
Responsible Official: William S. Goodrum Technical Contact: Steven L. Story Principal Company Product or Business: National Security and	Ph No. (505) 665-2169 Fax No. (505) 665-8858
Permit No. <u>P100-R2M2</u> , May 7, 2018 – June 30, 2018 {IDEA/T	<u>Γempo ID No. 856</u> } Permit Issued Date: <u>May 7, 2018</u>
Certification of Truth, Accuracy, and Comp	pleteness
I, William S. Goodrum certify that, based on information and information in the attached semi-annual emission report are true,  Signature	
Title: Manager, NNSA-LASO	

# **ENCLOSURE 1**

LANL Title V Semi-Annual Emissions Report for AI 856 Permit P100-R2M1 and P100-R2M2 January 1, 2018 – June 30, 2018

ADESH: 18-061

LA-UR-18-28268

SEP 1 2 2018
Date:

# Title V Semi-Annual Emissions Report AI 856, Permits P100-R2M1 and P100-R2M2 January 1, 2018 - June 30, 2018

# **Emission Reporting Requirements**

#### A109 Facility: Reporting Schedules

- A. A Semi-Annual Report of monitoring activities is due within 45 days following the end of every 6-month reporting period. The six month reporting periods start on January 1<sup>st</sup> and July 1<sup>st</sup> of each year.
- B. A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

# **Specific Emissions Reports:**

# **A600 Asphalt Production**

A602 Emission Limits - Asphalt Production

Unit No.	Nox tpy	SO <sub>2</sub> tpy	PM tpy	CO tpy	VOC tpy
TA-60-BDM	50.0	50.0	50.0	30.0	50.0

# Reporting Requirement

A607 F The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has this re	Has this reporting requirement been met during this reporting period with a separate reporting submittal? Answer Yes or No below.							
	Yes	Date report submitted:	Tracking Number:					
x	No Prov	ide comments and identify any supporting docume	ntation as an attachment.					

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Co	m	m	e	n	ts

Asphalt Plant TA-60-BDM	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A602 A) (tons per year)
NOx	0.0027			50.0
SO₂	0,0010			50.0
PM	0.0016			50.0
СО	0.0942			30.0
VOC	0.0018			50.0
HAPs	0.0017			No Source Permit Limit

# A700 Beryllium Activities

A702 Emission Limits - Beryllium Activities

Source	Beryllium Particulate Matter	Aluminum Particulate Matter
Sigma Facility TA-3-66	10 gm/24 hr	N/A
Beryllium Technology Facility TA-3-141	3.5 gm/yr	N/A
Target Fabrication Facility TA-35-213	0.36 gm/yr	N/A
Plutonium Facility TA-55-PF-4 Machining Operation	2,99 gm/yr	2,99 gm/yr
Plutonium Facility TA-55-PF-4 Foundry Operation	8.73X10 <sup>-04</sup> gm/yr	8.73Х10 <sup>о4</sup> gm/уг

# Reporting Requirement

A707 D The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has this rep	Has this reporting requirement been met during this reporting period with a separate reporting submittal? Answer Yes or No below.							
	Yes	Date report submit	ed;	Tr	acking Number:			
x		vide comments and identify a						
	Comments: To meet condition of 5.f in NSR permit #634-M2, LANL submitted the following quarterly beryllium emissions reports for the Beryllium Technology Facility: first quarter report, April 18, 2018 (SBR20180006) and second quarter report, August 17, 2018 (SBR20180008).							
			Continued on the next pag	e				

# A700 Beryllium Activities - continued

Comments:

Source	Pollutant	January - June Emissions	July - December Emissions	Annual Emissions	Permit Limits (Condition A702 A)
Sigma Facility TA-3-66 <sup>(1)</sup>	Beryllium (grams)	0,020			10 gm/24 hr
Beryllium Technology Facility TA-3-141 <sup>(2)</sup>	Beryllium (grams)	3.17E-03			3.5 gm/yr
Target Fabrication Facility TA-35-213 <sup>(3)</sup>	Beryllium (grams)	< 0,00944			0.36 gm/yr
Plutonium Facility TA-55-PF4	Beryllium (grams)	< 1,495			2.99 gm/yr
Machining Operation <sup>(4)</sup>	Aluminum (grams)	< 1,495			2.99 gm/yr
Plutonium Facility TA-55-PF4	Beryllium (grams)	0			8.73 x 10 <sup>-4</sup> gm/yr
Foundry Operation <sup>(5)</sup>	Aluminum (grams)	0			8.73 x 10 <sup>-4</sup> gm/yr
Beryllium Total <sup>(5)</sup> (to	< 1.69E-06				
Aluminum Total (to	ns) =	< 1.65E-06			

Notes: (1) Emissions from the Sigma Facility are from electroplating, chemical milling, and metallographic operations. (2) Emission values shown for the Beryllium Technology Facility are from actual stack emission measurements which are submitted to NMED quarterly. (3) 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. (4) 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. (5) The Plutonium Facility foundry operations did not operate during the first 6 months of 2018.

#### **A800 External Combustion**

A802 Emission Limits - External Combustion

Unit No.	NOx tpy	CO tpy	VOC tpy	SO, tpy	TSP tpy	PM <sub>10</sub> tpy
All Boilers	80.0	80.0	50.0	50.0	50.0	50.0

Unit No.	NOx tpy	CO tpy	SO <sub>2</sub> tpy	TSP tpy	PM <sub>10</sub> tpy	PM <sub>2.5</sub> tpy
RLUOB-BHW-I (gas)	2.9	4.8	0.3	0.4	0.4	0.4
RLUOB-BHW-2 (gas)	2.9	4.8	0.3	0.4	0.4	0.4
RLUOB-BHW-3 (gas)	2.9	4.8	0.3	0.4	0.4	0.4
RLUOB-BHW-4 (gas)	2.9	4.8	0.3	0.4	0.4	0.4
RLUOB Boilers (oil)	2.9	0.9	10.4	0.5	0.3	0.3
RLUOB Boilers Total	14.5	20.1	11.6	2.1	1.9	1.9

# Reporting Requirement

A807 B The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has t	his reporting requirement	been met during	this report	ing period	ı with a separate	reporting s	submittal?	Answer '	Yes or No below.
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Yes

Date report submitted:

Tracking Number:

X

No Provide comments and identify any supporting documentation as an attachment.

Boilers	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 A) (tons per year)
NOx	10.98			80
SO <sub>2</sub>	0.07			50
TSP	0.88			50
PM-10	0.88			50
CO	8.86			80
VOCs	0.63			50
HAPs	0.21			No Source Limit

Note: The emissions shown in this table includes all exempt, non-exempt, metered, and non-metered boilers at LANL except for the TA-3-22 Power Plant boilers. The Power Plant boilers can be found under Section A1300 of this report.

# A800 External Combustion - continued

RLUOB-BHW-1 (Gas)	January - June Emissions (toпs)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.0056			2.9
SO <sub>2</sub>	0.0001			0.3
TSP	0.0009			0.4
PM-10	0.0009			0.4
PM-2.5	0.0009			0.4
со	0.0072			4.8
VOCs	0.0048			No Source Limit
HAPs	3,55E-04			No Source Limit

RLUOB-BHW-2 (Gas)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.0056			2.9
SO <sub>2</sub>	0.0001			0.3
TSP	0,0009			0.4
PM-10	0.0009			0.4
PM-2.5	0.0009			0.4
со	0.0072			4.8
VOCs	0.0048			No Source Limit
HAPs	3.55E-04			No Source Limit

RLUOB-BHW-3 (Gas)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.0056			2.9
SO <sub>2</sub>	0.0001			0.3
TSP	0.0009			0.4
PM-10	0.0009			0.4
PM-2.5	0.0009			0.4
со	0,0072			4.8
VOCs	0.0048			No Source Limit
HAPs	3.55E-04			No Source Limit

RLUOB-BHW-4 (Gas)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0			2.9
SO₂	0			0.3
TSP	0			0.4
PM-10	0			0.4
PM-2.5	0			0.4
со	0			4.8
VOCs	0			No Source Limit
HAPs	0			No Source Limit

Note: The RLUOB-BHW-4 boiler has not been installed.

# A800 External Combustion - continued

RLUOB Bollers Totals (OII)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0			2.9
SO <sub>2</sub>	0			10.4
TSP	0			0.5
PM-10	0			0.3
PM-2.5	0			0.3
СО	2 0			0.9
VOCs	0			No Source Limit
HAPs	0			No Source Limit

Note: The RLUOB boilers did not operate on fuel oil during the first 6 months of 2018.

RLUOB Boilers Totals (Gas and Oil)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.0168			14.5
SO <sub>2</sub>	0.0003			11.6
TSP	0.0028			2.1
PM-10	0.0028			1.9
PM-2.5	0.0028			1.9
СО	0.0215			20.1
VOCs	0.0145			No Source Limit
HAPs	1.07E-03			No Source Limit

# A900 Chemical Usage

A902 Emission Limits - Chemical Usage

Unit No.	VOC/HAPs tpy
LANL-FW-CHEM	2.1
CMRR-CHEM	3.75

<sup>1</sup> The VOC emissions from this source category are included in the facility-wide allowable emissions limit established in Table 106.B: 200 tpy VOC, 8.0 tpy per individual HAP, and 24.0 tpy of combined total HAPs. Any VHAPs that are also defined as a VOC shall be included in the VOC total.

# Reporting Requirement

- A907 A The permittee shall submit reports described in Section A109 and in accordance with B110. With respect to individual HAPs, reports shall include any HAP emitted in quantity greater than 0.5 tons per year.
- A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Hae this	reporting requirement	heen met during	this reporting period	with a separate reporting	submittal? An	swer Yes or No below.
rias uns	renorumy reaumement	. Deen met duting	una reportine period	WILL a Separate reporting	g suominar: Ans	SWCI I CS OI INO DOLOW.

Yes	Date report submitted:	Tracking Number:	

No Provide comments and identify any supporting documentation as an attachment.

#### Comments:

X

Chemical Usag LANL-FW-CHEM	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)	
VOCs		5.64			
HAPs		3.07			
Individual HAPs greater than	Hydrochloric Acid	0.70			Source limits refer to facility-wide limits.
0.5 tons	Methanol	0.57		Ÿ	

Chemical Usage CMRR-CHEM	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)
HAPs	0.0124			3.75
VOCs	0.0034			3.75
TAPs	0.0369			No Source Limit

#### A1000 Degreasers

A1002 Emission Limits - Degreasers

Unit No.	VOC/HAPs tpy
TA-55-DG-1	:57

# Reporting Requirement

A1007 A The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has this reporting requirement been met during this reporting period with a separate reporting submittal? Answer Yes or No below.

	Yes	Date report submitted:	Tracking Number:
x	No Pro	vide comments and identify any supporting docum	entation as an attachment.

#### Comments:

Degreaser TA-55-DG-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1002 A) (tons per year)
VOCs	0			Source limits refer
HAPs	0			to facility-wide limits.

Note: The TA-55-DG-1 degreaser did not operate during the first 6 months of 2018.

<sup>1</sup> The VOC emissions from this source category are included in the facility-wide allowable emissions limit established in Table 106.B: 200 tpy VOC, 8.0 tpy per individual HAP, and 24.0 tpy of combined total HAPs. Any VHAPs that are also defined as a VOC shall be included in the VOC total.

#### **A1100 Internal Combustion**

A1102 Emission Limits - Internal Combustion

Unit No.	NOx tpy	CO tpy	VOC tpy	SO <sub>2</sub> tpy	TSP tpy	PM <sub>10</sub> tpy
TA-33-G-1P	18.1	15.2	0.3	2.5	0.6	0.6
TA-33-G-2	0.21	0.1	1"	75:	/**	***
TA-33-G-3	0.21	0,1		¥#E	New C	
TA-33-G-4	2.33	1,4	0.2	0.16	/45/	

<sup>1</sup> The VOC emissions from this source category are included in the facility-wide allowable emissions limit established in condition 106.B: 200 tpy VOC, 8.0 tpy per individual HAP, and 24.0 tpy of combined total HAPs.

# Reporting Requirement

- A1107 A The permittee shall comply with all applicable reporting requirements of 40 CFR 60, Subpart A as required in 60.4218 and in accordance with Section B110.
- A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has this rep	orting requiremen	t been met during this reporting period with a separate	reporting submittal? Answer Yes or No below.	
	Yes	Date report submitted:	Tracking Number:	
V	No Provi	ide comments and identify any supporting docume	ntation as an attachment	

#### Comments:

Generator TA-33-G-1P	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1102 A) (tons per year)
NOx	0.0157			18.1
SO <sub>2</sub>	0.0004			2.5
TSP	0.0005			0.6
PM <sub>10</sub>	0.0005			0.6
со	0.0016	:		15.2
voc	0.0011			0.3
HAPs	4.53E-06			No Source Limit

Generator TA-33-G-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1102 A) (tons per year)
NOx	5.21E-05			0.21
SO <sub>2</sub>	3,58E-06			Not Required
TSP	3.58E-06			Not Required
PM <sub>10</sub>	3.58E-06			Not Required
СО	1.52E-05			0.1
voc	4.13E-06			Not Required
HAPs	1.69E-08			No Source Limit

# A1100 Internal Combustion- continued

Generator TA-33-G-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1102 A) (tons per year)
NOx	0			0.21
SO <sub>2</sub>	0			Not Required
TSP	0			Not Required
PM <sub>10</sub>	0			Not Required
СО	0			0.1
voc	0			Not Required
HAPs	0			No Source Limit

Note: The TA-33-G-3 generator did not operate during the first 6 months of 2018.

Generator TA-33-G-4	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1102 A) (tons per year)
NOx	0.0234			2.33
SO <sub>2</sub>	0.0016			0.16
TSP	0.0016			Not Required
PM <sub>10</sub>	0.0016			Not Required
со	0.0141			1.4
voc	0.0019	1		0.2
HAPs	7.60E-06			No Source Limit

Generator RLUOB-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0			
SO <sub>2</sub>	0			
TSP	0			No Source Specific
PM <sub>10</sub>	0			Emission Limits for the CMRR
СО	0			Generators
voc	0			Contrators
HAPs	0			

Note: The RLUOB-GEN-1 generator did not operate during the first 6 months of 2018.

Generator RLUOB-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0,722			
SO <sub>2</sub>	0.019			
TSP	0.042			No Source Specific
PM <sub>10</sub>	0.035			Emission Limits for the CMRR
со	0.895			Generators
voc	0.102			Constators .
HAPs	2.07E-04			

# A1100 Internal Combustion-continued

Generator RLUOB-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0,227			
SO <sub>2</sub>	0,006			
TSP	0.013			No Source Specific
PM <sub>10</sub>	0,011			Emission Limits for the CMRR
СО	0.281			Generators
voc	0.032			
HAPs	6,51E-05		-	West Control of the

Generator TA-48-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0			
SO <sub>2</sub>	0			
TSP	0			No Source Specific
PM <sub>10</sub>	0			Emission Limits for the TA-48
со	0			Generator
voc	0			
HAPs	0			

Note: The TA-48-GEN-1 generator did not operate during the first six months of 2018.

Generator TA-55-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0			
SO <sub>2</sub>	0			
TSP	0			No Source Specific
PM <sub>10</sub>	0			Emission Limits for the TA-55
со	0			Generators
voc	0			
HAPs	0			

Note: The TA-55-GEN-1 generator did not operate during the first six months of 2018.

Generator TA-55-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0			
SO <sub>2</sub>	0		1.0	
TSP	0			No Source Specific
PM <sub>10</sub>	0			Emission Limits for the TA-55
со	0			Generators
voc	0			
HAPs	0			

Note: The TA-55-GEN-2 generator did not operate during the first six months of 2018.

# A1100 Internal Combustion- continued

Generator TA-55-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.1474			
SO₂	0.0025			
TSP	0.0046			No Source Specific
PM <sub>t0</sub>	0.0046			Emission Limits for
СО	0.0322			the TA-55 Generators
VOC	0.0046			Contrators
HAPs	2.68E-05			

# A1200 Data Disintegrator

A1202 Emission Limits - Data Disintegrator

Unit No.	TSP tpy	PM10 tpy
TA-52-11	9.9	9.9

# Reporting Requirement

A1207 A The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has this reporting requirement been met during this reporting period with a separate reporting submittal? Answer Yes or No below,						
Yes	Date report submitted:			Tracking Number:	18	
X No Provide co	omments and identify a	ny supporting docume	ntation as an atta	chment.		
Data Disintegrator TA-52-11	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1202 A) (tons per year)		
TSP	0,22			9.9		
PM10	0.20		7	9.9		

# A1300 TA-3 Power Plant

A1302 Emission Limits - TA-3 Power Plant

All TA-3 Power Plant Boilers Combined (TA-33-1, TA-33-2, TA-33-3)						
NOx tpy	CO tpy	VOC tpy	SOx tpy	TSP tpy	PM <sub>10</sub> tpy	PM2.5 tpy
31.5	21.5	2.8	4.9	4.7	4.4	4.2

TA-3 Power P	lant Turbine (TA-3	-22-CT-1)				
NOx tpy	CO tpy	VOC tpy	SOx tpy	TSP tpy	PM <sub>10</sub> tpy	PM2.5 tpy
59.4	72.3	1.5	4.2	4.8	4.8	4.8

# Reporting Requirement

A1307 A The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has this reporting requirement been met	during this reporting period	with a separate reporting submittal?	Answer Yes or No below.
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Yes	Date report submitted:	Tracking Number:

No Provide comments and identify any supporting documentation as an attachment.

#### Comments:

Boilers TA-3-22-1, TA-3-22-2, TA-3-22-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limit (Condition A1302 A) (tons per year)
NOx	5.40			31.5
SO <sub>2</sub>	0.06			4.9
TSP	0.71			4.7
PM <sub>10</sub>	0.71			4.4
PM <sub>2.5</sub>	0.71			4.2
СО	3.72			21.5
voc	0,51			2.8
HAPs	0.18			No Source Limit

Combustion Turbine TA-3-22 CT-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limit (Condition A1302 A) (tons per year)
NOx	3.254			59.4
SOx	0.226			4.2
TSP	0.438			4.8
PM <sub>10</sub>	0.438			4.8
PM <sub>2.5</sub>	0.438			4.8
СО	0.677			72.3
voc	0.142			1.5
HAPs	0.089			No Source Limit

# A1400 Open Burning

A1402 Emission Limits - Open Burning

Unit No.	Individual HAP' (tpy)	Total HAPs'(tpy)
Facility-Wide Open Burning	8.0	24.0

<sup>1</sup> Individual and Total HAPs emitted by Open Burning are included in facility-wide HAP emission limits at Table 106.B.

# Reporting Requirement

- A1407 A The permittee shall submit reports as outlined in the Condition 1407.A Requirements, as described in Section A109, and in accordance with Section B110.
- A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources and the Soil Vapor Extraction equipment at Material Disposal Area L shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has this rep	orting requiremen	t been met during this reporting period with	a separate reporting submittal	? Answer Yes or No be	low.
	Yes	Date report submitted:		Tracking Number:	
<b>x</b>	No Prov	ide comments and identify any supporti	ng documentation as an attac	hment.	
Comments No open bur		place during the first six months of 2018.			
	41				
					v

# A1500 Evaporative Sprayers

A1502 Emission Limits - Evaporative Sprayers

Unit No.	HAPs tpy
TA-60-EVAP-1	(i)
TA-60-EVAP-2	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
TA-60-EVAP-3	9239Th
TA-60-EVAP-4	i saidi
TA-60-EVAP-5	t

Hazardous air pollutants (HAPs) from the evaporative coolers are included in and subject to the individual and total HAP facility-wide emission limits in Table 106,B: 8,0 tpy per individual HAP, and 24,0 tpy of combined total HAPs.

# Reporting Requirement

**Antimony Compounds** 

**TOTAL HAPs** 

A1507 A The permittee shall submit reports described in Section A109 and in accordance with B111.

A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A, Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has this report	Has this reporting requirement been met during this reporting period with a separate reporting submittal? Answer Yes or No below.						
	Yes	Date report submitted:	Tracking Number:				
x	No	Provide comments and identify any supporting docume	ntation as an attachment.				
Commonte							

Evaporative Sprayer TA-60-EVAP-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychorinated biphenyls	1.02E-09			
Chloroform	4.71E-06			
Chloromethane	3.22E-06			
Bromoform	4.16E-06			Source limits refer
Cyanide Compounds	9.57E-06			to facility-wide limits.
Manganese Compounds	3.46E-05			

1.64E-05

7.26E-05

Evaporative Sprayer TA-60-EVAP-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)	
Polychorinated biphenyls	6.20E-10			vector to 131.	
Chloroform	2.85E-06			THE RESERVE	
Chloromethane	1.95E-06		-		
Bromoform	2.52E-06			Source limits refer	
Cyanide Compounds	5.79E-06			to facility-wide limits.	
Manganese Compounds	2.09E-05				
Antimony Compounds	9.89E-06				
TOTAL HAPs	4.39E-05				

# A1500 Evaporative Sprayers - continued

Evaporative Sprayer TA-60-EVAP-3	January - June Emissions (tons)	July - December Emissions .(tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychorinated biphenyls	0			
Chloroform	0			
Chloromethane	0			
Bromoform	0			Source limits refer to facility-wide limits.
Cyanide Compounds	0			to racinty-wide infints.
Manganese Compounds	0			
Antimony Compounds	0			
TOTAL HAPs	0			

Note: The TA-60-EVAP-3 evaporative sprayer did not operate during the first 6 months of 2018.

Evaporative Sprayer TA-60-EVAP-4	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)	
Polychorinated biphenyls	0			Reserve to 182	
Chloroform	0				
Chloromethane	0				
Bromoform	0			Source limits refer	
Cyanide Compounds	0			to facility-wide limits.	
Manganese Compounds	0				
Antimony Compounds	0				
TOTAL HAPs	0				

Note: The TA-60-EVAP-4 evaporative sprayer has not been installed.

Evaporative Sprayer TA-60-EVAP-5	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychorinated biphenyls	0			151 V 5/ 10 PM
Chloroform	0			
Chloromethane	0			Source limits refer to facility-wide limits
Bromoform	0			
Cyanide Compounds	0			
Manganese Compounds	0			
Antimony Compounds	0			
TOTAL HAPs	0			5-14-15-5-S

Note: The TA-60-EVAP-5 evaporative sprayer has not been installed.

# A102 Facility Wide Emission Limits

Table 102.A: Total Potential Criteria Pollutant Emissions from Entire Facility

Pollutant	Emissions (tons per year)		
Nitrogen Oxides (NOx)	245,0		
Carbon Monoxide (CO)	225.0		
Volatile Organic Carbons (VOC)	200.0		
Sulfur Dioxide (SO <sub>2</sub> )	150.0		
Total Particulate Matter (TSP)	120.0		
Particulate Mater less than 10 microns (PM <sub>10</sub> )	120.0		
Particulate Mater less than 2.5 microns (PM <sub>25</sub> )	120.0		

Table 102.B: Total Potential HAPs that exceed 1.0 tons per year

Pollutant	Emissions (tons per year)
Individual HAP	8.0
Total HAPs	24.0

# Reporting Requirement

A109 B A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of criteria pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Has this reporting requirement been met during this reporting period with a separate reporting submittal? Answer Yes or No below.						
	Yes	Date report submitted:	Tracking Number:			
x	No Prov	ide comments and identify any supporting docume	ntation as an attachment.			

#### Comments:

Pollutant	January - June Emissions (tons)	July - December Emissions (tons)	2018 Annual Emissions (tons)	Facility Wide Permit Limits (Condition A102) (tons per year)
Nitrogen Oxides	20,77			245
Carbon Monoxide	14.57			225
Volatile Organic Carbons	7.06			200
Sulfur Dioxide	0.38			150
Total Particulate Matter	2.31			120
Particulate Matter less than 10 microns	2.28			120
Particulate Matter less than 2.5 microns	1.15			120
Hazardous Air Pollutants	3,55			24