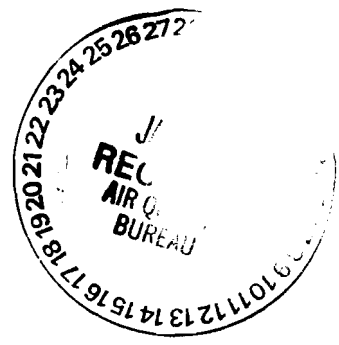
Los Alamos
NATIONAL LABORATORY
EST. 1943

*Environment, Safety, Health and Quality*
P. O. Box 1663, MS K491
Los Alamos, New Mexico 87545
505-667-4218/Fax 505-665-3811

*Date:* January 29, 2007
*Refer To:* ESH&Q-07-005




Mr. Ed Horst
Manager, Enforcement
New Mexico Environment Department
Air Quality Bureau
2048 Galisteo St.
Santa Fe, New Mexico 87505

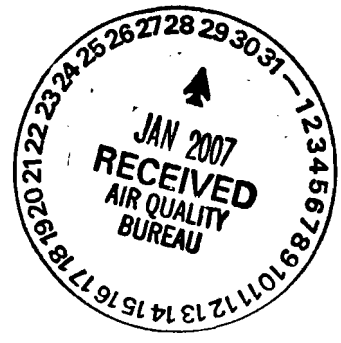
**SUBJECT: IDEA ID NO. 856 – LOS ALAMOS NATIONAL LABORATORY (LANL) AIR QUALITY TITLE V OPERATING PERMIT P100M1 ANNUAL COMPLIANCE CERTIFICATION REPORT FOR JANUARY– DECEMBER, 2006**

Dear Mr. Horst:

Attached is a copy of Los Alamos National Laboratory's Title V Operating Permit Annual Compliance Certification report for the period **January 1 – December 31, 2006**. This submission is required by permit condition 5.1 of NMED Operating Permit P100M1 dated June 15, 2006, and is transmitted by January 30th following the reporting period. In addition, this certification is made on NMED's Annual Compliance Certification Report form, is certified by LANL's "responsible official" as defined in 20.2.70 NMAC, and a copy is being provided to US EPA Region 6. Two permit deviations are listed in Part 4 of the certification report.

If you have any questions or comments regarding this submittal or would like to discuss the submittal in greater detail, please contact Steve Story at (505) 665-2169.

Sincerely,




Richard S. Watkins
Associate Director
Environment, Safety, Health & Quality
Los Alamos National Security, LLC

SLS:sab

Attachment: a/s

Cy:
David Neleigh (6PD-R), U.S. EPA
V. Bynum, PADOPS, A102
S. Fong, DOE-LA-AO, A316
P. Wardwell, LC-ESH, A187
V. George, ENV-DO, J978
D. Wilburn, ENV-EAQ, J978
S. Story, ENV-EAQ, J978
D. Fuehne, ENV-EAQ, J978
H. Decker, ENV-RCRA, E501
IRM-RMSSO, A150
ESH&Q File, w/att., K491
ENV-EAQ Title V Certification Report File
ENV-EAQ Reading File

LA-UR-07-0407

*Approved for public release; distribution is unlimited.*

| | |
|---|---|
| *Title:* | 2006 Annual Compliance Certification Report<br>Air Quality Title V Operating Permit P100M1 |
| *Author(s):* | Steven Story, ENV-EAQ |
| *Submitted to:* | Mr. Edward Horst<br>Manager, Enforcement<br>New Mexico Environment Department<br>Air Quality Bureau<br>2048 Galisteo St.<br>Santa Fe, New Mexico 87505 |

# Operating Permit
# Annual Compliance Certification Report Form

January 1 – December 31, 2006

**(PART 1)**

## Identifying Information

Source Name: Los Alamos National Laboratory County: Los Alamos

Source Address:
City: Los Alamos State: NM Zip Code: 87545

Responsible Official: Richard S. Watkins Ph No. (505) 667-4218 Fax No. (505) 665-3811
Technical Contact: Steven L. Story Ph No. (505) 665-2169 Fax No. (505) 665-8858

Principal Company Product or Business: National Security and Nuclear Weapons Research Primary SIC Code: 9711

Permit No. P100M1 Permit Issued Date: June 15, 2006

## Certification of Truth, Accuracy, and Completeness

I, Richard S. Watkins certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in the attached annual compliance certification are true, accurate, and complete.

Signature Richard S Watkins Date: 1/28/07

Title: Associate Director, Environment, Safety, Health & Quality

# Operating Permits
# Annual Compliance Certification Form

**(PART 2)**



| Annual Compliance Certification Data for State Permit No. P100M1 | | | |
|---|---|---|---|
| Permit Term or Condition Identification No.<br>{1} | Method(s) or other information or other facts used to determine the compliance status<br>{2} | Data Collection Frequency continuous (C) or intermittent (I)<br>{3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3)<br>{4} |
| **2.1 Asphalt Production** | | | |
| 2.1.1 Applicable Req's 2.1.1.1 of the permit | LANL Asphalt Plant operations meet requirements of 20.2.11 NMAC; 40 CFR Part 60, Subpart I; and NSR Permit No. GCP-3-2195G. | I | Yes |
| 2.1.2 Emission Limits | Emissions are calculated and reported to NMED on a 6-month basis in accordance with permit condition 4.1. Emissions are compared to allowable emission limits in each semi-annual report and have not been exceeded. Particulate matter (PM) rate (lb/hr) was determined during compliance testing and a report with this value was submitted to NMED on 9/22/2005. | I | Yes |
| 2.1.2.1 of the permit | LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limitation. Opacity reports are provided to NMED in the semi-annual monitoring reports. | I | Dev |
| 2.1.3 Operational Req's 2.1.3.1 of the permit | Data on asphalt production is collected on a monthly basis. The 12-month rolling total is calculated and compared against the production limit set in this permit condition. LANL did not exceed the 13,000 tons per year, 12-month rolling total limit. | I | Yes |
| 2.1.3.2 of the permit | The plant is equipped with a fugitive dust control system, which limits particulate emissions to the stack. | I | Yes |
| 2.1.3.3 of the permit | Dust collection and control systems are in place on screens, conveyor belts, and transfer points to sufficiently prevent opacity from exceeding 20%. Opacity is monitored monthly and reports are included in LANL's semi-annual monitoring | I | Dev |

# Operating Permits
# Annual Compliance Certification Form

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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | reports. An additional transfer point cover was added in August to address an opacity exceedance. | | |
| 2.1.3.4 of the permit | The baghouse is equipped with a differential pressure gauge, which continuously monitors differential pressure across the baghouse. | I | Yes |
| 2.1.3.5 of the permit | Natural gas is not used by the plant at this time. | N/A | N/A |
| 2.1.3.6 of the permit | Total sulfur content is ≤ 0.5 percent by weight for propane used. Purchase records from the propane supplier are maintained on site as required by condition 2.1.5.1 of the permit. | I | Yes |
| 2.1.3.7 of the permit | The Asphalt Plant operates within the specified hours-of-operation. To aid operators, a sunrise/sunset chart is maintained at the plant. A log of start up and shut down times is kept as required by condition 2.1.5.1. | I | Yes |
| 2.1.3.8 of the permit | The Asphalt Plant did not exceed 4,380 hours of operation in 2006. A log is maintained as required by condition 2.1.5.1. | I | Yes |
| 2.1.3.9 of the permit | During 2006, the haul road was paved. A log of road sweeping is maintained as required by condition 2.1.5.1. Up to the time the road was paved, logs were kept showing the frequency of road watering as required by condition 2.1.5.1. | I | Yes |
| 2.1.3.10 of the permit | A location evaluation of this source has been performed and placement, including setback and co-location, meets conditions of the NSR permit GCP-3-2195G. Particulate abatement systems are in place and pressure drop monitored to reduce emissions from the plant. A closed loop system is used to recycle baghouse fines. Haul roads, when required, were watered to reduce dust. The newly paved haul road has been periodically swept to prevent visible emissions. No internal combustion engines will be used at the plant. To be in accordance with NSR permit GCP3-2195G, | I | Dev |

# Operating Permits
# Annual Compliance Certification Form

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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | section III.H.3., an additional transfer point cover was added in August to address an opacity exceedance. | | |
| 2.1.4 Emissions Monitoring Req's 2.1.4.1 of the permit | LANL has certified opacity readers on-site who perform monthly six minute opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limit. Potential emission points are determined by EPA Method 22. Opacity reports are provided to NMED in the semi-annual monitoring reports. | I | Yes |
| 2.1.4.2 of the permit | The differential pressure across the bag house is monitored and collected in accordance with condition IV.C.2 of NSR permit GCP-3-2195G. | I | Yes |
| 2.1.4.3 of the permit | LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limit. | I | Yes |
| 2.1.5 Recordkeeping 2.1.5.1 of the permit | Recordkeeping conditions are met using the following methods: hours of operation – hour log kept; production rates – production log kept; number of haul truck trips – haul log kept; fuel sulfur content – supplier documentation kept; tickets of fuel purchased – fuel purchase documents kept; frequency of water applied to haul roads – haul log includes water applied; frequency of haul road sweeping – sweep log kept; and copies of proposed and performed maintenance – maintenance records are kept. (Records are kept at the asphalt plant). | I | Yes |
| 2.1.5.2 of the permit | An initial start-up compliance test for PM and opacity was performed on August 25 & 26, 2005. A copy of the final report was submitted to NMED on September 22, 2005. The report is also maintained on-site. | I | Yes |
| 2.1.5.3 of the permit | Monthly six (6) minute opacity readings are performed. Results are submitted to NMED with the semi-annual monitoring report. | I | Yes |

# Operating Permits
# Annual Compliance Certification Form

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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | Records are also maintained on-site. | | |
| 2.1.5.4 of the permit | Records of the monitoring of differential pressure across the baghouse are maintained on-site. | I | Yes |
| 2.1.6 Reporting<br>2.1.6.1 of the permit | Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 9, 2006 and August 8, 2006. Emissions reports were submitted to NMED on March 24, 2006 and September 15, 2006. | I | Yes |
| **2.2 Beryllium Activities** | | | |
| 2.2.1 Applicable Req's<br>2.2.1.1. of the permit | LANL beryllium operations meet requirements of 40 CFR Part 61, Subpart C, and NSR Permit Numbers 632, 634 and 1081. | I | Yes |
| 2.2.2 Emission Limits | Emissions are calculated and reported to NMED on a 6-month basis in accordance with permit condition 4.1. Emissions are compared to allowable emission limits in each semi-annual report. Allowable emission limits have not been exceeded. | I | Yes |
| 2.2.3 Operational Req's | TA-3-29: Hood exhausts from melting operations are exhausted through a HEPA filtration system prior to entering the atmosphere.<br>TA-3-66: Emissions from machining and arc melt/casting operations are exhausted through a HEPA filtration system prior to entering the atmosphere. Polishing and electroplating/ chemical milling operations are conducted in aqueous solution or lubricant baths.<br>TA-3-141: All processes are exhausted through a HEPA filtration system prior to entering the atmosphere. Powder operations, other than closed glovebox operations, and machining | I | Yes |

# Operating Permits
# Annual Compliance Certification Form

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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | operations, other than metallographic preparation, are exhausted through a cartridge filtration system then through HEPA filtration. Metallographic preparation activities are conducted in lubricating baths or equivalent. No process limits were exceeded, and the continuous emission monitor is maintained in accordance with the Laboratory's quality program.<br>TA-16-207: Sanding of beryllium surfaces is performed wet using a fine grit abrasive.<br>TA-35-87: All cutting and punching of beryllium foil occurs within an enclosed bench top glovebox.<br>TA-35-213: All processes are exhausted through a HEPA filtration system prior to entering the atmosphere.<br>TA-55-PF4: All operations are exhausted through the facility HEPA filtration system (3 filters with a control efficiency of 99.95% each). The non-accessible filter ($4^{th}$ filter with a control efficiency of 99.95%) is replaced when pressure drop across the filter indicates breakthrough or excessive loading. No process limits were exceeded. | | |
| 2.2.4 Monitoring Req's | TA-3-29 – A log indicating the number of samples processed is maintained.<br>TA-3-66 – Log books are maintained during operations showing the number of metallographic specimens used in the polishing operation and the weight of samples processed in the electroplating/chemical milling, machining, and arc melting/casting operations.<br>TA-3-141 – The exhaust stack has a continuous emission monitor; cartridge and HEPA filters are equipped with differential pressure gauges that measure differential pressure when fans are in operation | I | Yes |

# Operating Permits
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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | TA-16-207– Project files of components prepared for testing are maintained.<br>TA-35-87 – A log of the number of filters cut is maintained.<br>TA-35-213 – A copy of the stack emission test results is available for inspection.<br>TA-55-PF4 – The HEPA filtration system contains a differential pressure gauge that measures differential pressure across the HEPA filters. The differential pressure is verified daily while the exhaust fans are in operation. Annual HEPA filter challenge tests are performed and results are submitted to NMED in LANL's semi-annual monitoring reports. | | |
| 2.2.5 Recordkeeping | TA-3-29 – Recordkeeping for this source is specified in condition 2.2.4.<br>TA-3-66 – Recordkeeping for this source is specified in condition 2.2.4.<br>TA-3-141 – LANL maintains inventory records to demonstrate compliance with beryllium process limits and daily differential pressure readings. Control equipment maintenance is also recorded.<br>TA-16-207 – Recordkeeping for this source is specified in condition 2.2.4.<br>TA-35-87 – Recordkeeping for this source is specified in condition 2.2.4.<br>TA-35-213 – Recordkeeping for this source is specified in condition 2.2.4.<br>TA-55-PF4 – Stack emission test results and operating parameters, including daily differential pressure readings when exhaust fans are running, are recorded and available at the facility. A copy of annual HEPA filter test reports and daily differential pressure readings are kept. Filter change out records are also kept. Process records are available of the quantity and weight of classified parts | I | Yes |

# Operating Permits
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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | processed during a 24-hour period and annually. | | |
| 2.2.6 Reporting | Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 9, 2006 and August 8, 2006. Emissions reports were submitted to NMED on March 24, 2006 and September 15, 2006.<br><br>TA-3-141 quarterly reports were submitted to NMED within 60 days after each calendar quarter. Results for 2006 were submitted on 2/10/2006, 5/8/2006, 8/7/2006 and 11/21/2006 documenting the compliance status with the permitted emission rate from the continuous monitoring system. | I | Yes |
| **2.3 Boilers and Heaters** | | | |
| 2.3.1 Applicable Req's 2.3.1.1 of the permit | LANL boiler and heater operations meet the requirements of 40 CFR Part 60, Subpart Dc, as required, and 20.2.61 NMAC. | I | Yes |
| 2.3.2 Emission Limits | Emissions are calculated and reported to NMED on a 6-month basis in accordance with permit condition 4.1. Emissions are compared to the allowable emission limits in each semi-annual report. In addition, fuel use records are collected monthly and emissions calculated to verify compliance with the emission limits. Allowable emission limits have not been exceeded. | I | Yes |
| 2.3.2.1 of the permit | LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limitation. Opacity reports are provided to NMED in the semi-annual monitoring reports. Visible emissions did not equal or exceed 20% opacity. | I | Yes |

# Operating Permits
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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| 2.3.3 Operational Req's 2.3.3.1 of the permit | For units listed under this permit condition, a 12-month rolling total of natural gas used is calculated and recorded each month. The rolling total is compared to the fuel use limit each month and provided in the semi-annual monitoring report. Natural gas usage limits were not exceeded. | I | Yes |
| 2.3.3.2 of the permit | For units located at TA-21-357, a 12-month rolling total of natural gas and fuel oil use is calculated and recorded each month. Rolling totals are compared to fuel use limits in this permit and provided to NMED in the semi-annual monitoring report. Natural gas and fuel oil usage limits were not exceeded. | I | Yes |
| 2.3.4 Monitoring Req's 2.3.4.1 of the permit | For units located at TA-21-357, a volumetric flow meter is in place and used to monitor monthly natural gas use. Readings from this flow meter are recorded monthly and included in LANL's Gas Usage Report. | I | Yes |
| 2.3.4.2 of the permit | For units located at TA-55-6, a volumetric flow meter is in place and used to monitor monthly natural gas use. Readings from this flow meter are recorded monthly and included in LANL's Gas Usage Report. | I | Yes |
| 2.3.4.3 of the permit | LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limit. | I | Yes |
| 2.3.5 Recordkeeping 2.3.5.1 of the permit | Facility wide natural gas use is collected on a monthly basis and distributed in the LANL Gas Usage Report. From the total usage, metered sources are subtracted and the difference is apportioned between non-metered boilers and heaters based on fuel or heat input ratings.<br><br>Facility wide fuel oil usage for applicable units is collected on a monthly basis and distributed in the LANL Plant Quantities Report. | I | Yes |

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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| 2.3.6 Reporting 2.3.6.1 of the permit | Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 9, 2006 and August 8, 2006. Emissions reports were submitted to NMED on March 24, 2006 and September 15, 2006. | I | Yes |
| **2.4 Carpenter Shops** | | | |
| 2.4.1 Applicable Req's 2.4.1.1 of the permit | None | N/A | N/A |
| 2.4.2 Emission Limits | Emissions of $PM_{10}$ are calculated and reported on a 6-month basis in accordance with permit condition 4.1. Emissions are compared to allowable emission limits in each semi-annual report. Allowable emission limits have not been exceeded. | I | Yes |
| 2.4.3 Operational Req's 2.4.3.1 of the permit | Hourly use of saws, drills, shaping and sanding equipment are tracked. Hours of operation are collected monthly and provided in the semi-annual monitoring report. LANL carpenter shops did not exceed 4368 hours of operation in 2006. | I | Yes |
| 2.4.3.2 of the permit | Process cyclones are operated during shop operations that are vented to the cyclones. | I | Yes |
| 2.4.4 Monitoring Req's 2.4.4.1 of the permit | A log is maintained of monthly hours of operation for each shop. | I | Yes |
| 2.4.5 Recordkeeping 2.4.5.1 of the permit | The monthly hours of operation for each shop is recorded and provided to NMED in the semi-annual monitoring report. | I | Yes |
| 2.4.6 Reporting 2.4.6.1 of the permit | Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 9, 2006 and August 8, 2006. Emissions reports were submitted to NMED on March 24, 2006 and September 15, 2006. | I | Yes |

# Operating Permits
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**(PART 2)**



| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| **2.5 Chemical Usage** | | | |
| 2.5.1 Applicable Req's 2.5.1.1 of the permit | None | N/A | N/A |
| 2.5.2 Operational Req's | None | N/A | N/A |
| 2.5.3 Emission Limits 2.5.3.1 of the permit | Facility wide emissions from chemical use are calculated and reported on a 6-month basis in accordance with permit condition 4.1. A comparison against the allowable emission limits is performed at each of these reporting periods. Facility wide emission limits have not been exceeded. | I | Yes |
| 2.5.4 Monitoring Req's 2.5.4.1 of the permit | Facility wide chemical purchase records are collected in LANL's ChemLog database and used to calculate emissions. Chemical emission information is submitted to NMED every 6-months in accordance with permit condition 4.1. | I | Yes |
| 2.5.5 Reporting 2.5.5.1 of the permit | Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 9, 2006 and August 8, 2006. Emissions reports were submitted to NMED on March 24, 2006 and September 15, 2006. | I | Yes |
| **2.6 Degreasers** | TA-55-DG-2 & TA-55-DG-3 did not operate in CY2006 | | |
| 2.6.1 Applicable Req's 2.6.1.1 of the permit | LANL degreaser operations met all requirements of 40 CFR Part 63, Subpart T except the freeboard ratio requirement. | I | Dev |
| 2.6.2 Emission Limits 2.6.2.1 of the permit | Emissions are calculated and reported on a 6-month basis in accordance with permit condition 4.1. Comparison against the allowable emission limits is performed at each of these reporting periods. Allowable emissions have not been exceeded. | I | Yes |
| 2.6.3 Operational Req's 2.6.3.1 of the permit | • 2.6.3.1.1 - The degreaser is equipped with a tight fitting cover. An administrative | I | Dev |

# Operating Permits
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**(PART 2)**



| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | control is in place to close the lid after use. 2.6.3.1.2 – TA-55-DG-1 does not meet 0.75 or greater freeboard ratio requirement.<br>• 2.6.3.1.3 - All waste solvent and solvent contaminated rags are collected and stored in closed containers.<br>• 2.6.3.1.4 – Flushing is not performed in the freeboard area. A final rinse is performed in a process separate from degreaser operations in a container using less than 7.6 liters (2 gallons) of solvent.<br>• 2.6.3.1.5 – Administrative controls are in place to allow cleaned parts to drip for 15 seconds or until dripping stops.<br>• 2.6.3.1.6 - A fill line has been established to prevent the unit from being overfilled.<br>• 2.6.3.1.7 - Administrative controls are in place to wipe up spills immediately.<br>• 2.6.3.1.8 – Administrative controls are in place to prevent splashing with an agitation device.<br>• 2.6.3.1.9 – The degreaser is located in an enclosure (glove box) with a set ventilation flow rate. Exhaust flows are set to not exceed 40 m/min.<br>• 2.6.3.1.10 – Administrative controls are in place to not clean sponges, fabric, wood, or paper. | | |
| 2.6.4 Monitoring Req's 2.6.4.1 of the permit | A computerized software system is used to track the amount of degreaser solvent added, removed, and lost. This system is used to calculate emissions, which are reported on a 6-month basis in accordance with permit condition 4.1. | I | Yes |
| 2.6.4.2 of the permit | Checklists for work practice standards are completed. | I | Yes |
| 2.6.5 Recordkeeping 2.6.5.1 of the permit | A Material Safety Data Sheet (MSDS) is kept and available that describes the content and | I | Yes |

# Operating Permits
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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | concentration of the solvent. Records of work practice checklists are also maintained. | | |
| 2.6.6 Reporting 2.6.6.1 of the permit | Only one of the three permitted degreasers is being used. If other units are brought on-line, NMED will be notified. | I | Yes |
| 2.6.6.2 of the permit | If a stored unit should become active, a compliance report will be submitted to the NMED within 150 days after startup. | I | Yes |
| 2.6.6.3 of the permit | Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 9, 2006 and August 8, 2006. Emissions reports were submitted to NMED on March 24, 2006 and September 15, 2006. | I | Yes |
| **2.7 Internal Combustion** | | | |
| 2.7.1 Applicable Req's 2.7.1.1 of the permit | TA-33-G-1 meets the requirements of 20.2.61 NMAC and NSR Permit No. 2195F. | I | Yes |
| 2.7.2 Emission Limits | Emissions are calculated and reported to NMED on a 6-month basis in accordance with permit condition 4.1. Emissions are compared to allowable emission limits in each semi-annual report and have not been exceeded. | I | Yes |
| 2.7.2.1 of the permit | LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limitation. Visible emissions did not equal or exceed 20% opacity. | I | Yes |
| 2.7.3 Operational Req's 2.7.3.1 of the permit | Hours of each stationary standby generator are tracked and evaluated twice a year to verify that the average hours per year limit is not exceeded. The hours of operation are provided to NMED in LANL's Semi-Annual Monitoring report. The limit of 168 hr/year average was not exceeded. | I | Yes |
| 2.7.3.2 of the permit | The TA-33-G-1 generator did not exceed either 12,000 kWh/day or 1,350,000 kWh/year in | I | Yes |

# Operating Permits
# Annual Compliance Certification Form

**(PART 2)**



| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | 2006. | | |
| 2.7.3.3 of the permit | The TA-33-G-1 generator did not operate over eight hours a day in calendar year 2006. Hours of operation were limited to the hours between 7:00 am and 5:00 pm. | I | Yes |
| 2.7.4 Monitoring Req's | Hours of each stationary standby generator are tracked and evaluated twice a year to verify that the average hour per year limit is not exceeded. The hours of operation are provided to NMED in LANL's Semi-Annual Monitoring report.<br><br>TA-33-G-1 hourly and 12-month rolling total kWh are tracked. In addition, hours of operation and the time operation begins and ends each day are recorded. | I | Yes |
| 2.7.4.1 of the permit | LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limitation. | I | Yes |
| 2.7.5 Recordkeeping 2.7.5.1 of the permit | Recordkeeping requirements are specified at condition 2.7.4. | I | Yes |
| 2.7.6 Reporting 2.7.6.1 of the permit | Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 9, 2006 and August 8, 2006. Emissions reports were submitted to NMED on March 24, 2006 and September 15, 2006. | I | Yes |
| **2.8 Data Disintegrator** | | | |
| 2.8.1 Applicable Req's 2.8.1.1 of the permit | LANL Data Disintegrator operations meet requirements of NSR Permit No. 2195H. | I | Yes |
| 2.8.2 Emission Limits | Emissions are calculated and reported on a 6-month basis in accordance with permit condition 4.1. A comparison against the allowable emission limits is performed at each of these reporting periods. Allowable emission | I | Yes |

# Operating Permits
# Annual Compliance Certification Form

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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | limits were not exceeded. | | |
| 2.8.3 Operational Req's | None | N/A | N/A |
| 2.8.4 Monitoring Req's 2.8.4.1 of the permit | A log is kept to record the number of boxes of media destroyed monthly and is used to calculate emissions on a semi-annual basis. The number of boxes destroyed is provided to NMED in the semi-annual monitoring reports. | I | Yes |
| 2.8.4.2 of the permit | LANL has a service contract in place to perform regular maintenance and repair on the cyclone and cloth tube filter per manufacturer's recommendation. | I | Yes |
| 2.8.5 Recordkeeping 2.8.5.1 of the permit | A log is kept of the number of boxes of media that are destroyed monthly. | I | Yes |
| 2.8.5.2 of the permit | Records are maintained to demonstrate compliance with manufacturer's recommended repair and maintenance schedules for the cyclone and cloth tube filter. | I | Yes |
| 2.8.6 Reporting 2.8.6.1 of the permit | Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 9, 2006 and August 8, 2006. Emissions reports were submitted to NMED on March 24, 2006 and September 15, 2006. | I | Yes |
| 2.8.7 Compliance 2.8.7.1 of the permit | No compliance test required during 2006. | N/A | Yes |
| **2.9 Power Plant (TA-3-22)** | Combustion Turbine TA-3-22 CT-1 has not started operation. | | |
| 2.9.1 Applicable Req's 2.9.1.1 of the permit | Power Plant boilers meet the requirements of 20.2.33, 20.2.34, 20.2.61 NMAC and NSR Permit Number 2195-BM1.<br><br>Combustion Turbine has not started operation. | I | Yes |
| 2.9.2 Emission Limits | Compliance with the pound per hour emission limits was determined during source compliance | I | Yes |

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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | tests performed in September 2002. The test results were provided to NMED. Emissions are also calculated and reported to the NMED on a 6-month basis in accordance with permit condition 4.1. Comparison against the 12-month rolling total emission limits is performed each month and at each of the above mentioned emission reporting periods.<br><br>Combustion Turbine has not started operation. | | |
| 2.9.2.1 of the permit | Results from source compliance tests performed on the boilers in September 2002, demonstrate that $NO_2$ emissions do not exceed 0.3 lbs per MMBtu of heat input. | I | Yes |
| 2.9.2.2 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.3 Operational Req's 2.9.3.1 of the permit | The natural gas supply contract states that gas provided to LANL will be pipeline quality. Pipeline quality gas contains no more than 2 grains of total sulfur per 100 scf. Fuel oil is checked/analyzed prior to or upon delivery to verify it contains less than or equal to 0.05% sulfur by weight. | I | Yes |
| 2.9.3.2 of the permit | A 365 day rolling total for both natural gas and fuel oil use is maintained and reviewed to verify usage does not exceed 2,000 MMscf and 500,000 gallons respectively. The rolling totals are provided in LANL's semi-annual monitoring report. | I | Yes |
| 2.9.3.3 of the permit | A flow meter is used to measure natural gas flowing to all 3 boilers as a combined total. The flow rate is continually recorded. | I | Yes |
| 2.9.3.4 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.3.5 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.3.6 of the permit | Combustion Turbine has not started operation. | N/A | N/A |

# Operating Permits
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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| 2.9.3.7 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.3.8 of the permit | An operator log book is used to identify when a boiler was brought on line or taken off line (or standby). It also records the type of fuel the boiler is using. The plant computer monitoring system also has information on boiler start and stop times and duration of use. | I | Yes |
| 2.9.4 Monitoring Req's 2.9.4.1 of the permit | Data on fuel oil use is electronically collected and calculated as a 365 day rolling total. | I | Yes |
| 2.9.4.2 of the permit | Volumetric flow meters with correctors are in place at the facility to monitor natural gas. The correctors are periodically inspected and calibrated to maintain accuracy. The flow data from this meter is electronically collected and is used to calculate a 365 day rolling total. | I | Yes |
| 2.9.4.3 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.4.4 & 2.9.4.5 of the permit | No fuel oil deliveries to the plant were made in 2006. A supplier certification showing sulfur content is required prior to or upon delivery. If the certification is not available, the fuel oil is analyzed to verify it contains less than or equal to 0.05% sulfur by weight. | I | Yes |
| 2.9.4.6 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.4.7 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.4.8 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.4.9 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.4.10 of the permit | Visible emissions did not equal or exceed 20% opacity during 2006. Each time No. 2 fuel oil is used, opacity readings are taken. Fuel oil was not used continuously for a calendar quarter during 2006. LANL has certified opacity readers on-site who perform opacity readings | | |

# Operating Permits
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**(PART 2)**



| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limitation. Opacity readings are provided to NMED in the semi-annual monitoring reports. | | |
| 2.9.4.11of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.4.12 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.5 Recordkeeping 2.9.5.1 of the permit | Fuel oil use is tracked electronically to provide a monthly record of daily and 365 day rolling totals. | I | Yes |
| 2.9.5.2 of the permit | Natural Gas Consumption is tracked electronically to provide a monthly record of daily and 365 day rolling totals. | I | Yes |
| 2.9.5.3 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.5.4 of the permit | No fuel oil deliveries were made to the Power Plant in 2006. | I | Yes |
| 2.9.5.5 of the permit | No fuel oil deliveries were made to the Power Plant in 2006. | N/A | N/A |
| 2.9.5.6 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.5.7 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.5.8 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.5.9 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.5.10 of the permit | The natural gas supply contract states that gas provided to LANL will be pipeline quality. Pipeline quality gas contains no more than 2 grains of total sulfur per 100 scf. Fuel oil is | I | Yes |

# Operating Permits
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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | checked/analyzed prior to or upon delivery to verify it contains less than or equal to 0.05% sulfur by weight. Daily logs are kept which record the dates and duration of fuel oil use. Opacity readings are taken and recorded on a visible emission observation form when a boiler is initially started on fuel oil. | | |
| 2.9.5.11 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.5.12 of the permit | Combustion Turbine has not started operation. | N/A | N/A |
| 2.9.6 Reporting<br>2.9.6.1 of the permit | Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 9, 2006 and August 8, 2006. Emissions reports were submitted to NMED on March 24, 2006 and September 15, 2006. | I | Yes |
| **2.10 Facility Wide Emission Limits** | | | |
| 2.10.1 of the permit | Facility-wide actual emissions are calculated and compared with the facility-wide emission limits twice a year. Emission reports are submitted on a 6-month basis in accordance with permit condition 4.1. LANL submitted emission reports to NMED on March 24, 2006 and September 15, 2006. | I | Yes |
| 2.10.2 of the permit | The LANL air quality group has a review process for construction and modification projects. This process identifies projects applicable to 20.2.72 NMAC. | I | Yes |
| **8.0 Stratospheric Ozone** | | | |
| 8.1 Subpart F | A stratospheric ozone protection program is in place at LANL. LANL, through our | I | Yes |

# Operating Permits
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**(PART 2)**



| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| | maintenance subcontractors KSL and Trane, uses appropriately certified technicians and certified recycling and recovery equipment. KSL and Trane follow LANL procedures to demonstrate that required service practices found in 40 CFR 82.156 (Subpart F) are followed. | | |
| 8.2 Subpart B | Motor vehicle air conditioners (MVAC) are serviced at LANL by KSL pursuant to 40 CFR part 82, subpart B. KSL technicians comply with EPA standards for servicing motor vehicle air conditioners. | I | Yes |
| 8.3 Subpart H | KSL maintains LANL halon systems. KSL technicians comply with the standards for servicing and maintaining equipment containing halons pursuant to 40 CFR Part 82, Subpart H. | I | Yes |

# Operating Permits
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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| **9.0 Radionuclide NESHAPs** | | | |
| 9.1 Subpart H – *Emissions of radionuclides other than radon from DOE facilities.* | LANL has a radionuclide NESHAP team that is devoted to compliance with 40 CFR Part 61, Subpart H (Emissions of radionuclides other than radon from DOE facilities). The EPA limit for radionuclide emissions, corresponding to a maximum off-site dose of 10 millirem per year. Emissions from 2006 resulted in approximately 0.5 millirem off-site. The reduction in dose from the 2005 level (6.5 millirem) is due to increased emissions controls at the LANSCE particle accelerator facility.<br><br>The annual report summarizing 2006 emissions will be issued before June 30, 2007. The 2005 report, LA-14298, is available on the ENV-MAQ web site (http://www.airquality.lanl.gov/docs/reports/LA-14298_NoMaps.pdf).<br><br>In 2006, emissions from 28 stacks were continuously monitored. Two of these stacks were shut down in September after all operations ceased at these facilities. Also, LANL evaluated emissions from over 50 non-monitored sources and operated 18 ambient air monitoring stations to meet Subpart H requirements. | I | Yes |

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| Permit Term or Condition Identification No. {1} | Method(s) or other information or other facts used to determine the compliance status {2} | Data Collection Frequency continuous (C) or intermittent (I) {3} | In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4} |
|---|---|---|---|
| 9.2 Subpart Q – *Emissions of radon from DOE facilities.* | LANL has a radionuclide NESHAP team that is devoted to compliance with 40 CFR Part 61, which includes compliance with Subpart Q (emissions of radon from DOE facilities). LANL operations do not meet the criteria described in Subpart Q which require compliance with this standard. EPA Region 6 has confirmed this with LANL and the NMED at the Title V Open House February 25, 2003. | I | Yes |
| **10.0 Asbestos NESHAP** | | | |
| 10.1 Subpart M | LANL has a program in place to meet the requirements found in the Asbestos NESHAP standard 40 CFR Part 61, Subpart M. LANL submitted quarterly reports to NMED during 2006 summarizing asbestos activities and provided asbestos notifications as required. NMED routinely performs inspections of asbestos work at LANL. | I | Yes |

# Instructions to
# Operating Permits
# Annual Compliance Certification

(PART 2 Instructions)



==========

**Annual Compliance Certification Data Element:**

***1.*** *Identify each Permit Term or Condition Identification No.* that is the basis of certification. The responsible official may restate permit terms and emission units or cross-reference the relevant terms and conditions of the permit, previous compliance reports, or other applicable documentation in order to satisfy this requirement.

***2.*** *Identify method(s) or other information used to determine compliance status* of each term and condition of a permit. The responsible official is to identify monitoring and/or testing methods for each emission unit and its associated applicable requirement. The certification may cross-reference the permit, previous compliance reports, or other applicable documentation in order to satisfy this requirement. The cross-reference should be clear as to what the unit's requirements and methods used to determine compliance status are. The certification should identify other material information that has been assessed in relation to how the information potentially affects the source's compliance status during the certification period.[1]

***3.*** *Identify whether the method(s) or other means identified above provide continuous or intermittent data*. The responsible official must identify whether the methods or other means used for determining the compliance status provide continuous or intermittent data. If the owner or operator uses cross-referencing to identify the methods or other information used to determine the source's compliance status, the certification must clearly indicate whether the cross-referenced information provides continuous or intermittent data.

***4.*** Identify the compliance status of each term and condition of the permit using the method(s) or other means identified in data element 2. In *data element 2*, the responsible official identified whether the compliance determination methods provide continuous or intermittent data. Based on those methods and other material information, the responsible official must identify the compliance status of each permit term and condition. The certification requires the responsible official to certify compliance with each permit term or condition. If the facility or emissions unit has been in compliance with the permit term or condition, type in yes in the box. If however, the facility or emission unit(s) have deviated from the permit term or condition type "Dev" and complete the next table entitled "Deviation Reporting" (Part 3).

In identifying the compliance status of each term and condition of the permit, a source shall certify intermittent

---

[1] If a source becomes aware of other material information that indicates that an emission unit has experienced deviations (as that term is defined in State programs) or may otherwise be out of compliance with an applicable requirement even though the unit's permit-identified data indicates compliance, the source must consider this information, identify and address it in the compliance certification, and certify accordingly. See, e.g., 62 FR 8314, 8320 (Feb. 24, 1997). Sources may not ignore obvious relevant information and risk making a false certification, omitting material information, or otherwise violating prohibitions on fraud.

compliance when basing its certification on methods or other information providing intermittent data, and on methods or other information providing continuous or intermittent data, which identifies any deviation, exceedance or excursion. A source may certify continuous compliance when basing its certification on methods or other information providing continuous data but not indicating deviations, exceedances or excursions from those permit terms or conditions. EPA does not interpret a certification of intermittent compliance to necessarily mean that the responsible official is certifying periods of noncompliance.

# Operating Permits
# Annual Compliance Certification Form



| **Deviation Reporting** | |
|---|---|
| Question | Responds (Yes/No) |
| Are there any deviations being reported with this annual compliance certification. If yes complete the table entitled "Deviation Summary Report" (Part 4). | Yes |
| Have there been any previous deviation reports (ie. Region 6 Operating Permits Deviation Summary Report) forwarded to the EPA. If yes, attach the Deviation Summary Report to this annual compliance certification or complete the table entitled "Deviation Summary Report" (Part 4). | No |
| Have all quarter or semiannual deviation reports been submitted to NMED? If yes Part 4 does not need to be included on your submittal to state. However it is required for the EPA's review. | N/A |

# Deviation Summary Report

**(PART 4)**



## Deviation Report — Permit No. P100M1

| No | Emission Unit ID | Poll | Applicable Requirement (Include Rule Citation) | Monitoring Method (Include Rule Citation) | Monitoring Frequency | Total # of Deviations |
|---|---|---|---|---|---|---|
| 1 | TA-60 BDM Asphalt Plant | PM | Permit Condition 2.1.2.1 | 40 CFR Part 60, Appendix A, Method 9 | Monthly | 1 |
| 2 | TA-55 Degreaser | HAP | Permit Condition 2.6.3.1.2 | 40 CFR Part 63, Subpart T | Semi-annual | |
| | | | | | | |

| | Deviation Started | | Deviation Ended | | | | |
|---|---|---|---|---|---|---|---|
| No | Date | Time | Date | Time | # of Days | Cause of Deviation | Corrective Action Taken |
| 1 | 5/1/2006 | 11:12 | 5/1/2006 | 11:22 | < 1 | Opacity exceedence of 24% occurred at a transfer point on the conveyor belt between the aggregate hopper and the rotary dryer. The exceedence occurred during a period of dry weather under very windy conditions. | LANL installed an enclosure over the conveyor belt transfer point. |
| 2 | | | | | | LANL operates a small 10" x 12" x 10" deep batch cold cleaning machine (degreaser) inside a fully enclosed glove box. The degreaser uses trichloroethylene. When registered and certified in 1998, it was understood that a 0.75 freeboard ratio could not be maintained. A compliance approach based on 40 CFR 63.462 Batch Cold Cleaning Machine work practice standards and 40 CFR 63.464 Alternative Standards was proposed and submitted to | LANL met with NMED Enforcement staff to discuss the compliance approach currently used for the degreaser and whether this approach requires EPA approval. After this meeting, NMED requested that LANL notify EPA Region 6 and request approval for the alternative measures used to comply with Subpart T. We have contacted |

# Deviation Summary Report

**(PART 4)**



| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | | | | | NMED. After reviewing the operation, LANL believes that EPA may need to approve this compliance strategy as an alternative measure. . | Michelle Kelly, Air Enforcement Section, EPA Region 6, and will send a letter to her requesting approval. |