

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, 2009 Refer To: ESH&Q-09-003

Compliance Reporting Manager New Mexico Environment Department Air Quality Bureau 1301 Siler Road Building B Santa Fe, New Mexico 87507

Dear Compliance Reporting Manager:

SUBJECT: ANNUAL COMPLIANCE CERTIFICATION REPORT FOR
JANUARY- DECEMBER, 2008
TITLE V OPERATING PERMIT P100M2
IDEA ID NO. 856 – LOS ALAMOS NATIONAL LABORATORY (LANL)

Attached is Los Alamos National Laboratory's Title V Operating Permit Annual Compliance Certification Report for the period **January 1** – **December 31, 2008**. This report is required by permit condition 5.1 of Operating Permit P100M2, and is being submitted by January 30<sup>th</sup> as required by this condition. 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.

One permit deviations occurred during this certification period. The deviation was with permit conditions 2.9.4.7 and 2.9.4.8 of our operating permit. Detailed information on this deviation can be found in these sections of the attached report. No excess emissions occurred as a result of this deviation.

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

Wastern

Los Alamos National Security, LLC

Attachment: a/s

Cy: David Garcia (6EN-A), U.S. EPA

M. Mallory, ADPADOPS, 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

IRM-RMSSO, A150

ESH&Q File, w/att., K491

ENV-EAQ Title V Certification Report File

ENV-EAQ File

# **Title V Report Certification Form**

I. Report Type					
		-			
☐ Semi-Annual Monitoring Report					
☐ Other Specify:				_	
II. Identifying Information					
Facility Name: Los Alamos National Laboratory					
Facility Address: P.O. Box 1663, MS J978, Los Alamos	St	tate: NM	1	Zip	o: 87545
Responsible Official (RO): Richard S. Watkins		Phone:	505-667-42	218	Fax: 505-665-3811
RO Title: Assoc. Director Environmental, Safety, Health, and	1 Q	uality	RO e-mail:	rsw	atkin@lanl.gov
Permit No.: P100M2	I	Date Peri	mit Issued: 3	July	16, 2007
Report Due Date (as required by the permit): 01/30/2009	F	Permit A	I number: 8	56	
Time period covered by this Report: From: January 1, 200	80		To: Dece	mbe	r 31, 2008
III. Certification of Truth, Accuracy, and Comple	ete	eness			
I am the Responsible Official indicated above. I, (Richard S. Watkins) cer	rtify	v that I me	et the requirem	ients i	of 20 2 70 7 AD
NMAC. I certify that, based on information and belief formed after reason the attached Title V report are true, accurate, and complete.					
the analysis This Froport are true, accurate, and complete.					
		,			
Signature Pulaul Illatherus	Da	ate: <u>//2</u>	409		
		/	(		



### New Mexico Environment Department Air Quality Bureau Compliance and Enforcement Section 2048 Galisteo



Phone (505) 827-1494 Fax (505) 827-1523



Version 11.22.06

Reviewed By:

#### NMED USE ONLY REPORTING SUBMITTAL FORM Staff PLEASE NOTE: ® - Indicates required field Admin SECTION I - GENERAL COMPANY AND FACILITY INFORMATION ® Company Name: ® Facility Name: Los Alamos National Security Los Alamos National Laboratory ® Company Address: ® Facility Address: P.O. Box 1663 Same as Company MS J978 ® City: ® State: ® Zip: ® City: ® State: ® Zip: Los Alamos NM ® Company Environmental Contact: ® Title: ® Facility Contact: ® Title: Dianne Wilburn **EAQ Group Leader** Steve Story Air Compliance Manager ® Phone Number: ® Fax Number: ® Phone Number: ® Fax Number: 505 667 6952 505 665 8858 505 665 2169 505 665 8858 ® Email Address: ® Email Address: dianne@lanl.gov story@lanl.gov Responsible Official: (Title V only): Title: **Phone Number:** Fax Number: Richard S. Watkins Associate Director ESH&Q 505 667 4218 505 665 3811 ® Al Number: Title V Permit Issue Date: Title V Permit Number: **NSR Permit Number:** NSR Permit Issue Date: 856 P100M2 July 16, 2007 2195 Various ® Date of Submittal: Reporting Period: Proposed Test Date: **Actual Test Date:** OR OR January 22, 2008 2008 Annual Report (full year) SECTION II - TYPE OF SUBMITTAL (check one that applies) Title V Annual Permit Condition(s): Description: $\bowtie$ Compliance Certification **LANL 2008 Compliance Certification Report** Title V Semi-annual Permit Condition(s): Description: B. **Monitoring Report** Regulation: Section(s): Description: **NSPS** Requirement C. (40CFR60) Test Report Other Test Protocol Regulation: Section(s): Description: MACT Requirement D. (40CFR63) Test Protocol Test Report Other Regulation: Section(s): Description: **NMAC** Requirement (20.2.xx) or NESHAP Requirement (40CFR61) Test Protocol Test Report Other Permit No.: Condition(s): Description: F. **Permit Requirement** Other Test Protocol Test Report NOV or SFO No.: Section(s): Description: Requirement of a G. Settlement Agreement or Compliance Order Test Protocol Test Report Other **SECTION III - CERTIFICATION** certify that the information in this submittal is true, accurate and complete. After reasonable inquiry, I Richard S. Watkins (name of reporting official) ® Signature of Reporting Official: ® Title: ® Responsible Official for Title V?

Date Reviewed:

## Attachment

Los Alamos National Laboratory's

Title-V Operating Permit P100-M2

2008 Annual Compliance Certification Report

#### LA-UR-09-00349

Approved for public release; distribution is unlimited.

Title:

Los Alamos National Laboratory Title V Operating Permit P100M2 2008 Annual Compliance Certification Report

Author(s):

David Paulson, ENV-EAQ

Intended for:

Compliance Reporting Manager New Mexico Environment Department Air Quality Bureau 1301 Siler Road, Building B Santa Fe, New Mexico 87507



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### **Part 1 - Permit Requirements Certification Table**

Annual Compliance Certification I	Data for Title V Permit No. P100M1			
Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
1.0 GENERAL CONDITIONS		☐ Continuous	<b>⊠</b> Yes	☐ Yes
1.1.4 The permittee shall furnish any information the Department requests in writing to determine if cause exists for reopening and revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. This information shall be furnished within the time period specified by the Department. Additionally, the permittee shall furnish, upon request by the Department, copies of records required by the permit to be maintained by the permittee.	A compliance inspection by NMED-Air Quality Bureau was conducted the week of September 22, 2008. Information was requested by the inspectors to determine compliance. Requested information was provided to Allan Morris of Air Quality Bureau on October 15, 2008, which was within the time period specified by the inspector.  No additional requests by the Department were made during this certification period.	⊠ Intermittent	□No	⊠ No
1.1.7 In the case where an applicant or permittee has submitted information to the Department under a claim of		☐ Continuous	⊠ Yes	☐ Yes
confidentiality, the Department may also require the applicant or permittee to submit a copy of such information directly to the Administrator of the EPA.	No such request by the Department was made during this certification period.	☑ Intermittent	□ No	⊠ No
1.4 The permittee shall pay fees to the Department consistent with the fee schedule in 20.2.71 NMAC -	Fees in the amount of \$16,920 were submitted to the NMED	☐ Continuous	⊠ Yes	☐ Yes
Operating Permit Emission Fees. The fees will be assessed and invoiced separately from this permit. This condition is pursuant to 20.2.70.302.A.1.e NMAC.	Air Quality Bureau on March 31, 2008, prior to the June 1, 2008 deadline.	✓ Intermittent	□ No	⊠ No
1.5 A responsible official (as defined in 20.2.70 NMAC) shall certify the accuracy, truth and completeness of every	The responsible official, Richard S. Watkins, or the NMED	☐ Continuous	⊠ Yes	☐ Yes
report and compliance certification submitted to the Department as required by this permit. These certifications shall be part of each document. This condition is pursuant to 20.2.70.300.E NMAC.	Air Quality Bureau approved desingee, has certified to the accuracy, truth and completeness of every report and compliance certification submitted to the NMED Air Quality Bureau during this certification period.	⊠ Intermittent	□ No	⊠ No
1.6 Revocation or termination of this permit by the Department terminates the permittee's right to operate this	Los Alamos National Laboratory (LANL) has experianced no	☐ Continuous	⊠ Yes	☐ Yes
facility. This condition is pursuant to 20.2.70.201.B NMAC.	cause for revocation or termination of the right to operate this facility during this certification period.		□ No	⊠ No
1.7. Unon request by the Donorto out the growitter 1.11	LANL submitted the required emission inventory report required under 20.2.73 NMAC on March 21, 2008.	☐ Continuous	⊠ Yes	☐ Yes
1.7 Upon request by the Department, the permittee shall submit an emissions inventory for this facility. This condition is pursuant to 20.2.73 NMAC and 20.2.70.302.A.1 NMAC.	The semi-annual emission inventory reports required under condition 4.1 of the LANL Operating Permit, and under 20.2.70.302.A.1 and 20.2.70.302.E NMAC, were submitted on March 21, 2008 and September 15, 2008.	⊠ Intermittent	□ No	⊠ No

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
1.8 The source will continue to comply with all applicable requirements. For applicable requirements that will become effective during the term of the permit, the source will meet such requirements on a timely basis. This condition is pursuant to sections 300.D.11.c and 302.G.3 of 20.2.70 NMAC.	All current applicable requirements and future requirements imposed by the term of this permit have been and/or will be met.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
1.9 Compliance with this operating permit is sufficient to comply with all NSR permits listed in Table A.1. This condition is pursuant to 20.2.70.302.A.1 NMAC.	All feasible actions to comply with listed NSR permits have been addressed within the scope of the conditions required in operating permit P100. All new NSR permit requirements, not yet included in the operating permit, will be followed and will be added to the operating permit as required.	☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.0 INFORMATION AND REQUIREMENTS FOR EMISSIONS UNITS		☐ Continuous	⊠ Yes	☐ Yes
Information regarding applicable requirements, emission limits, operational requirements, and monitoring requirements, and recordkeeping requirements are provided below for each emissions unit or set of similar units.  The conditions listed are placed upon the permittee pursuant to 20.2.70.302 NMAC.		<b>⊠</b> Intermittent	□ No	⊠ No
Except as otherwise specified, the following monitoring and/or testing requirements shall be used to determine compliance with applicable requirements and emission limits in this permit. Any sampling, whether by portable analyzer or EPA reference method that measures an emission rate greater than an emission limit in this permit may constitute noncompliance with this permit. The Department may require, at its discretion, additional tests pursuant to EPA Reference Methods at any time, including when sampling by portable analyzer measures an emission rate greater than an emission limit in this permit. Such requirement shall not be construed as a determination that the sampling by portable analyzer does not establish noncompliance with this permit and shall not stay enforcement of such noncompliance based on the sampling by portable analyzer.	Only EPA reference methods have been used to determine compliance during this certification period. No measurements were greater than emission limits listed in the LANL Operating Permit.			
2.1 Asphalt Production	No new equipment has been added during this certification	☐ Continuous	⊠ Yes	☐ Yes
All of the process equipment authorized for this source type is listed in the table shown below (emission units that were identified as insignificant or trivial and	period (excluding those identified as insignificant, trivial and not regulated pursuant to the Act).	<b>⊠</b> Intermittent	□ No	⊠ No

Permit Condition # and Permit Condition:			2. Method(s) or other information or other facts used to determine the compliance status:			freque		4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?		
equipment not regulate included):	ed pursuant to the Act a	are not									
Emission Unit No.	Location/Building	Mak	xe/Model	Tyl	pe of Control		n Capacity per hour)				
TA-60-BDM	TA-60	BDN TM2	A Engineerin		clone ghouse	80					
	requirements apply to to NMAC; 40 CFR Part 6 mber GCP3-2195G.		NMAC; 4 GCP-3-21 Emissions basis in ac compared report and Particulate compliance	ANL Asphalt Plant operations meet requirements of 20.2.11 IMAC; 40 CFR Part 60, Subpart I; and NSR Permit No. GCP-3-2195G.  missions are calculated and reported to NMED on a 6-month asis in accordance with permit condition 4.1. Emissions are compared to allowable emission limits in each semi-annual eport and were not exceeded during this certification period. articulate matter (PM) rate (lb/hr) was determined during compliance testing and a report with this value was submitted by NMED on September 22, 2005.				ontinuous ntermittent	⊠ Yes □ No	☐ Yes ⊠ No	
Emission Unit	Allowable Emission I	Limits							1		
	NO <sub>x</sub>	SO <sub>2</sub>	P		СО		VOC		1		
TA-60-BDM	1.0 tpy	1.0 tpy		04 gr/dscf 5.4 lbs/hr	2.6 tpy		1.0 tpy				
2.1.2.1 Visible emissions shall not exhibit an opacity of 20 % or greater.  This condition is pursuant to 40 CFR 50, Paragraphs 1, 7 and 8 of 20.2.70.302.A NMAC.			LANL has certified visible emission (opacity) readers on-site who perform readings using 40 CFR Part 60, Appendix A, Reference Method 9 to determine compliance with the opacity limitation. Visible emission reports are provided to NMED in the semi-annual monitoring reports. No visible emissions exhibited an opacity of 20% or greater during this certification period.				ontinuous ntermittent	⊠ Yes □ No	☐ Yes ⊠ No		
2.1.3 Operational Re 2.1.3.1 Production sha year, 12-month rolling	all not exceed 13,000 to	ons per	Data on as The 12-mo the product exceed the	n on asphalt production is collected on a monthly basis.  12-month rolling total is calculated and compared against production limit set in this permit condition. I. ANI. did not				ontinuous	⊠ Yes □ No	☐ Yes ⊠ No	
	ocess equipment shall n control system to limit o the stack outlet.		The plant	is equipped wi	ith a fugitive dust cemissions to the ex			l	ontinuous ntermittent	⊠ Yes □ No	☐ Yes ⊠ No

Permit Condition # and Permit Condition:	Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
2.1.3.3 Equip and operate all screens, conveyor belts, and transfer points with dust collection and control systems sufficient to prevent opacity from exceeding 20%.	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 reports.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.1.3.4 The baghouse shall be equipped with a device to continuously monitor differential pressure across the baghouse.	The baghouse is equipped with a differential pressure gauge, which continuously monitors differential pressure across the baghouse.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.1.3.5 Total sulfur content shall be no more than 0.75 percent by volume for any natural gas used.	Natural gas is not used by the plant at this time.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.1.3.6 Total sulfur content shall be no greater than 0.5 percent by weight for any propane used.	Total sulfur content is $\leq 0.5$ 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.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes
2.1.3.7 Hours of operation are limited to one-half hour following sunrise, one-half hour before sunset, and those daylight hours in between.	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.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes
2.1.3.8 Hours of operation are limited to 4,380 hours per year.	The Asphalt Plant did not exceed 4,380 hours of operation during this certification period. A log of operating hours is maintained as required by condition 2.1.5.1.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.1.3.9 All unpaved haul roads shall be watered to prevent visible emissions.	In 2006, the haul road was paved. A log of road sweeping is maintained as required by condition 2.1.5.1. Watering of the haul road is no longer performed.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.1.3.10 Plant operations shall be in accordance with NSR permit GCP3-2195G, section III, D,E,F,H,I,K.  The conditions of 2.1.3 are pursuant to Paragraphs 1, 7 and 8 of 20.2.70.302.A NMAC.	An initial location evaluation of this source was performed and placement, including setback and co-location, meets conditions of the NSR permit GCP-3-2195G. Particulate abatement systems are in place with pressure drop monitored to reduce emissions from the plant. A closed loop system is used to recycle baghouse fines. Haul roads are paved and do not require watering. The haul road is periodically swept to prevent visible emissions. Sweeping of the haul road is recorded. No internal combustion engines are used at the plant.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
<ul><li>2.1.4 Emissions Monitoring Requirements</li><li>2.1.4.1 Perform monthly six (6) minute opacity readings for each emission point having opacity greater</li></ul>	LANL has certified opacity readers on-site who perform monthly six minute opacity readings using 40 CFR Part 60, Appendix A, Reference Method 9 to determine compliance with the opacity limit. Potential emission points are determined by EPA Reference Method 22. Opacity reports are	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
than zero as determined by EPA Method 22.	provided to NMED in the Semi-Annual Monitoring Reports.			
2.1.4.2 Monitor the differential pressure (inches of water) across the baghouse by the use of a differential pressure gauge, in accordance with condition IV.C.2 of NSR permit number GCP-3-2195G.	The differential pressure across the bag house is monitored and collected in accordance with condition IV.C.2 of NSR permit GCP-3-2195G.	☐ Continuous ☐ Intermittent	⊠ Yes	☐ Yes ☑ No
2.1.4.3 40 CFR Part 60, Appendix A, Method 9 shall be used to determine compliance with the opacity limitation.  The conditions of Section 2.1.4 are pursuant to	LANL has certified opacity readers on-site who perform opacity readings using 40 CFR Part 60, Appendix A, Reference Method 9 to determine compliance with the opacity limit.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
20.2.70.302.C NMAC. 2.1.5 Recordkeeping	Recordkeeping conditions are met using the following	☐ Continuous	⊠ Yes	Yes
2.1.5.1 The permittee shall comply with all applicable recordkeeping requirements in NSR permit number GCP-3-2195G, section IV.D keeping records of actual hours of operation, production rates, number of haul truck trips daily, fuel sulfur content, tickets of fuel purchased, quantity and frequency of water applied to haul roads, frequency of haul road sweeping, and copies of proposed and performed maintenance.	methods: The production log contains hours of operation, production rates, and number of haul truck trips. The permit binder, located at the facility, contains fuel sulfur content provided by the supplier, tickets of fuel purchased, frequency of haul road sweeping, and copies of proposed and performed maintenance. Haul road watering is no longer performed and has been replaced by sweeping as the road has been paved. These records are kept at the Asphalt Plant.	☑ Intermittent	□ No	⊠ No
2.1.5.2 Keep compliance test results for particulate matter and opacity performed within 60 days of initial startup.	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.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.1.5.3 Maintain results of the monthly six (6) minute opacity readings.	Monthly six (6) minute opacity readings are performed. Results are submitted to NMED with the Semi-Annual Monitoring Reports. Records are also maintained on-site.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.1.5.4 Maintain records of the monitoring of the differential pressure across the baghouse.  The conditions of 2.1.5 are pursuant to Subsection C and Paragraph D(1) of 20.2.70.302 NMAC.	Records of the monitoring of differential pressure across the baghouse are maintained on-site.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.1.6 Reporting  2.1.6.1 Reports shall be submitted in accordance with conditions 4.1 and 4.2.  This condition is pursuant to 20.2.70.302.E NMAC.	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 January 22, 2008 and August 7, 2008. Emissions reports were submitted to NMED on March 21, 2008 and September 15, 2008.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No

1. Permit Cond	lition # and Permit Cond	ition:	2. Method(s) or other in determine the compliant		ion or other facts used to s:	3. What is the frequency of data collection used to determine compliance?		4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
2.2 Beryllium	Activities						Continuous	⊠ Yes	Yes
type is listed in that were identi	ess equipment authorized the table shown below (fied as insignificant or tregulated pursuant to the	emission units rivial and		identifi	ded during this certification ed as insignificant, trivial and ot).		Intermittent	□ No	⊠ No
Emission Unit No.	Locatio	on/Building	Process		Type of Control				
TA-3-29	TA-3-2	9	Chemistry and Metal Research Facility	llurgy	HEPA Filter				
TA-3-66	TA-3-6	6	Sigma Facility		HEPA Filter Lubricating Bath				
TA-3-141	TA-3-1	41	Beryllium Test Facil	lity	Lubricating Bath Cartridge Filtration System HEPA Filter				
TA-16-207	TA-16-	207	Structural Testing		Wet Sanding				
TA-35-87	TA-35-	87	Laser Facility		Enclosed Glovebox				
TA-35-213	TA-35-	213	Target Fabrication F	acility	Pre-Filter HEPA Filter				
TA-55-PF4	TA-55-	PF4	Plutonium Facility		HEPA Filter				
2.2.1 Applicab	le Requirements		T					I	T
2.2.1 Applicab	ie Requirements			_			Continuous	<b>⊠</b> Yes	☐ Yes
emission units:	lowing requirements app 40 CFR Part 61, Subpar rs 632, 634, and 1081.				et requirements of 40 CFR Part Numbers 632, 634 and 1081.		Intermittent	□ No	⊠ No
222 Facincian	T 1 12		Emissions are calculated basis in accordance with	d and re	ported to NMED on a 6-month condition 4.1. Emissions are		Continuous	⊠ Yes	☐ Yes
2.2.2 Emission	Limits		compared to allowable	emission	n limits in each semi-annual its have not been exceeded.	⊠ 1	Intermittent	□ No	⊠ No
Source		Allowable Em	ission Limits						
		Beryllium		Alumin	um				
Chemistry and Facility	d Metallurgy Research	10 gm/24 hr		Not App	blicable				
TA-3-29									
Sigma Facility TA-3-66	y	10 gm/24 hr		Not App	blicable				
Beryllium Tes TA-3-141	st Facility	0.35 gm/24 hr 3.5 gm/yr		Not App	olicable				

Permit Condition # and Permit Condit	tion:	2. Method(s) or other determine the complia	r information or other facts used to ance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
TA-16-207	10 gm/24 hr		Not Applicable			
TA-35-87	10 gm/24 hr		Not Applicable			
Target Fabrication Facility	1.8 x 10 <sup>-04</sup> gm/l	nr	Not Applicable			
TA-35-213	0.36 gm/yr		**			
Plutonium Facility TA-55-PF4						
Machining Operation	0.12 gm/24 hr 2.99 gm/yr		0.12 gm/24 hr 2.99 gm/yr			
Foundry Operation	3.49 x 10 <sup>-5</sup> gm/ 8.73 x 10 <sup>-4</sup> gm/	24 hr yr	3.49 x 10 <sup>-5</sup> gm/24 hr 8.73 x 10 <sup>-4</sup> gm/yr			
This condition is pursuant to 20.2.70.302	.A NMAC.					
2.2.3 Operational Requirements		TA-3-29. NMED wa registration of this soil 2007. Administrative removed this source for TA-3-66: Emissions operations are exhaust prior to entering the achemical milling operation of lubricant baths.  TA-3-141: All procest filtration system prior operations, other than machining operations are exhausted through through HEPA filtratiare conducted in lubric limits were exceeded, maintained in accordance of the program.  TA-16-207: Sanding using a fine grit abras	from machining and arc melt/casting sted through a HEPA filtration system atmosphere. Polishing and electroplating/rations are conducted in aqueous solution assess are exhausted through a HEPA are to entering the atmosphere. Powder a closed glovebox operations, and a cartridge filtration system then ion. Metallographic preparation activities icating baths or equivalent. No process, and the continuous emission monitor is ance with the Laboratory's quality  of beryllium surfaces is performed wet sive.  g and punching of beryllium foil occurs	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No

Permit Condition # and Permit Condition:	Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
	TA-35-213: All processes are exhausted through a HEPA filtration system prior to entering the atmosphere.  TA-55-PF4: All operations are exhausted through the facility's HEPA filtration system (3 filters with a control efficiency of 99.95% each). The non-accessible filter (4th filter with a control efficiency of 99.95%) is replaced when the pressure drop across the filter indicates breakthrough or excessive loading. No process limits were exceeded.			

Source	Operating Requirement	Process Limit	Control Equipment Requirement
Chemistry and Metallurgy Research Facility TA-3-29	Beryllium operations will consist of registered sources in Wing 2.	None	Hood exhaust from the melting operations shall be exhausted through a HEPA filtration system prior to entering the atmosphere.
Sigma Facility TA-3-66	Beryllium operations will consist of registered polishing, electroplating/chemical milling, machining, and arc melting/casting sources.	None	Emissions from machining and arc melting/casting operations shall be exhausted through a HEPA filtration system prior to entering the atmosphere.
			Polishing and electroplating/chemical milling operations shall be conducted in aqueous solution or lubricant bath.

Permit Condition # and Per		2. Method(s) or other informati determine the compliance status	::	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
Beryllium Test Facility TA-3-141	The continuous emission monitor will be maintained in accordance with the Laboratory's quality program.	Beryllium processed by the facility will not exceed 10,000 pounds per calendar year. Beryllium processed by the facility will not exceed 1000 pounds per day.	All processes shall be exhausted through a HEPA filtration syst prior to entering the atmospher.  Powder operations, other than closed glovebox operations, and machining operations, other that the processes used in metallographic preparation shad exhausted through a cartridge filtration system then through the HEPA filtration system.  Metallographic preparation activities shall be conducted in lubricating baths or equivalent.	em re.  and an all be the		
TA-16-207	Beryllium operations consist of wet sanding beryllium material.	None	Sanding of beryllium surfaces performed wet using a fine-gri abrasive.			
TA-35-87	Beryllium operations consist of punching or cutting beryllium foil.	None	All cutting and punching of beryllium foil occurs within an enclosed glovebox.			
Target Fabrication Facility TA-35-213	Beryllium operations will consist of only beryllium machining and associated cleanup activities.	None	All processes shall be exhausted through a HEPA filtration syst prior to entering the atmospher	em		

Permit Condition # and Permit Condition:		determine the compliance status:		3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
Plutonium Facility TA-55-PF4	Regulated beryllium activities will be ducted through the pollution control equipment and out the north or south stack of PF-4.	efficiency of 99.95% each.  The non-accessible filters shall be replaced when the pressure drop across the filter either falls to levels indicating filter breakthrough or increases to levels indicative of excessive loading.		l be op evels		
The conditions of Section	2.2.3 are pursuant to 20.2.70.302			1	<del>1</del>	<del> </del>
		TA-3-29 – Beryllium operations TA-3-29. NMED was notified	of the request to cancel the	☐ Continuous	⊠ Yes	☐ Yes
		registration of this source in a memorandum dated June 15, 2007. No operations were conducted during this certification period.		<b>⊠</b> Intermittent	□ No	⊠ No
		TA-3-66 – Log books are maint number of metallographic speci operation and the weight of sam electroplating/chemical milling, melting/casting operations.	mens used in the polishing uples processed in the			
2.2.4 Emissions Monitorin	ng Requirements	TA-3-141 – The exhaust stack has a built-in sampling system used to continously sample Beryllium emissions. Cartridge and HEPA filters are equipped with differential pressure gauges that measure different pressure when fans are in operation.				
		TA-16-207– Project files of con are maintained.	nponents prepared for testing			
		TA-35-87 – A log of the number	er of filters cut is maintained.			
		TA-35-213 – A copy of the stac available for inspection as well that are used to calculate total e	as a log of hours of operation			
		TA-55-PF4 – The HEPA filtratidifferential pressure gauge that across the HEPA filters. The didaily while the exhaust fans are	measures differential pressure ifferential pressure is verified			

		2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?		
		filter challenge tests are performed and results are submitted to NMED in LANL's Semi-Annual Monitoring Reports.					
Source	Monitoring Requ	nired					
Chemistry and Metallurgy Research Facility TA-3-29	A log shall be ma processed.	intained during operations which indicates the number of Be sampl	es				
Sigma Facility TA-3-66	specimens used in	intained during operations which shows the number of metallograp in the polishing operation and the weight of Be samples processed in smical milling, machining, and arc melting/casting operations.					
Beryllium Test Facility TA-3-141	Facility exhaust s measure berylliur	tack will be equipped with a continuous emission monitor used to n emissions.					
		Cartridge and HEPA filters will be equipped with differential pressure gauges that measure the differential pressure across the cartridge and HEPA filters while the exhaust fans are in operation					
TA-16-207	Project files shall	be maintained of components prepared for testing.					
TA-35-87	A log shall be ma cut.	intained during operations which shows the number of beryllium fi	lters				
Target Fabrication Facility TA-35-213	Records of the sta other data needed	tck emission test results (see Condition 2 of NSR Permit No. 632) a to determine total emissions shall be retained at the source and management of the control of the contr					
Plutonium Facility TA-55-PF4	The HEPA filtrat	ection by the Department.  Ion systems shall be equipped with a differential pressure gauge that erential pressure (inches of water) across the HEPA filters while the n operation.					
		shall be verified by daily HEPA filter pressure drop tests and annuenge tests of accessible filters.	ıal				
The conditions of Section 2.2.4 ar	e pursuant to 20.2.70.3	02.C NMAC.					
		TA-3-29 – Beryllium operations are no longer conducted at TA-3-29. NMED was notified of the request to cancel the	☐ Continuous	⊠ Yes	☐ Yes		
		registration of this source in a memorandum dated June 15, 2007. No operations were conducted during this certification period.	<b>Intermittent</b>	□ No	⊠ No		
2.2.5 Recordkeeping		TA-3-66 – Recordkeeping for this source is specified in condition 2.2.4.					
		TA-3-141– Inventory records are maintained to demonstrate compliance with beryllium process limits and daily differential pressure readings. Process limits have not been exceeded.					

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
	Control equipment maintenance and repair activities are also recorded.			
	TA-16-207 – Recordkeeping for this source is specified in condition 2.2.4.			
	TA-35-87 – Recordkeeping for this source is specified in condition 2.2.4.			
	TA-35-213 – Recordkeeping for this source is specified in condition 2.2.4.			
	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 that contain the quantity and weight of classified parts processed during a 24-hour period and annual rolling total.			

Source	Recordkeeping Required
Chemistry and Metallurgy Research Facility TA-3-29	Recordkeeping for this source is specified in Condition 2.2.4.
Sigma Facility TA-3-66	Recordkeeping for this source is specified in Condition 2.2.4.
Beryllium Test Facility TA-3-141	Generate and maintain beryllium inventory records to demonstrate compliance with the 10,000 pounds of beryllium per calendar year and the 1000 pounds of beryllium per day processing limit.  Record pressure drop across the cartridge and HEPA filters once per day that the exhaust fans are in operation and the facility is occupied.  Record control equipment maintenance and repair activities.
TA-16-207	Recordkeeping for this source is specified in Condition 2.2.4.
TA-35-87	Recordkeeping for this source is specified in Condition 2.2.4.
Target Fabrication Facility TA-35-213	Recordkeeping for this source is specified in Condition 2.2.4.

Permit Condition # and Permit Permit Condition # and Permit Perm	Condition # and Permit Condition:  2. Method(s) or other information or other facts used to determine the compliance status:		3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
Plutonium Facility	Stack emission test re	esults and facility operating parameters including a daily record o			
TA-55-PF4		red across each appropriate HEPA plenum filtration stage, when t			
		HEPA test, a log of the daily pressure drop readings and a control log shall be kept. This documentation shall be provided upon			
	A log of the filter rep personnel upon reque	placement shall be kept and shall be made available to the Departrest.	ment		
	during a 24-hour peri	eep records of the number and weight of classified parts processe od and year using a rolling total. Records shall be made available artment personnel upon request.			
The conditions of Section 2.2.5 are	pursuant to Subsection	C and Paragraph D(1) of 20.2.70.302 NMAC.			
		Emissions and monitoring reports are submitted on a 6-month	☐ Continuous	⊠ Yes	Yes
		basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on January 22, 2008 and August 7, 2008. Emissions reports were submitted to NMED on March 21, 2008 and September 15, 2008.	☐ Intermittent		⊠ No
2.2.6 Reporting 6 t		TA-3-141 quarterly reports were submitted to NMED within 60 days after each calendar quarter. Reports submitted during this certification period were on the following dates: 1/22/2008, 4/28/2008, 7/28/2008, and 10/23/2008. The reports document the compliance status with the permitted emission rate from the beryllium monitoring system.			
		TA-55-PF4 stack emission test results and facility operating parameters are kept on site and are available to NMED-AQB upon request.			
Source		Reporting Required			
Chemistry and Metallurgy Reseat TA-3-29	rch Facility	See condition 4.2.			
Sigma Facility TA-3-66		See condition 4.2.			
Beryllium Test Facility TA-3-141		Anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date.	ed		

Permit Condition # and Permit Condition:	Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
	Actual date of initial startup of each new or modified so within fifteen (15) days after the startup date.	purce		
	Provide the date when each new or modified emission reaches the maximum production rate at which it will o within fifteen (15) days after that date.			
	Notify the Department within 60 days after each calend quarter of the facility's compliance status with the permemission rate from the continuous monitoring system.			
	Provide any data generated by activities described in the Quality Assurance Plan (QAP) that will assist the Air Quality Assurance Plan (QAP) that will assis	Quality bility with		
TA-16-207	See condition 4.2.			
TA-35-87	See condition 4.2.			
Target Fabrication Facility TA-35-213	See conditions 4.1 and 4.2.			
Plutonium Facility TA-55-PF4	Stack emission test results and facility operating parameters be made available to Department personnel upon request.	will		
	Reports may be required to be submitted to the Department inspections of the source indicate noncompliance with this p or as a means of determining compliance.			

The conditions of Section 2.2.6 are pursuant to 20.2.70.302.E NMAC.

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to	3. What is the	4. Was this facility in	5. Were there any
	determine the compliance status:	frequency of data	compliance with this	deviations associated
	*	collection used to	requirement during the	with this requirement
		determine	reporting period?	during the reporting
		compliance?		period?
2.3 Boilers and Heaters	No new equipment has been added during this certification period (excluding those identified as insignificant, trivial and	☐ Continuous	⊠ Yes	☐ Yes
2.3 Doners and neaters	not regulated pursuant to the Act).	<b>Intermittent</b>	□ No	⊠ No

All of the process equipment authorized for this source type is listed in the table shown below (emission units that were identified as insignificant or trivial and equipment not regulated pursuant to the Act are not included):

Emission Unit No.	it No. Location/ Manufacturer/ Model		Maximum Heat Input (nameplate) <sup>1</sup> MMBtu/hr	Type of Control
TA-16-1484-BS-1	TA-16-1484	Sellers 183H.PSH-LN390	7.47	Low-NO <sub>x</sub>
TA-16-1484-BS-2	TA-16-1484	Sellers 183H.PSH-LN390	7.47	Low-NO <sub>x</sub>
TA-48-1-BS-1	TA-48-1	Sellers 15 Seniors-150	6.28	None
TA-48-1-BS-2	TA-48-1	Cleaver Brooks CB-700-150	6.28	None
TA-48-1-BS-6	TA-48-1	Cleaver Brooks CB-700-200 1558	8.40	None
TA-53-365-BHW-1	TA-53-365	Sellers 15 Seniors-2-200-w	8.37	None
TA-53-365-BHW-2	TA-53-365	Sellers 15 Seniors-2-200-w	8.37	None
TA-55-6-BHW-1	TA-55-6	Sellers 350 H.P. W-LN490	14.6	None
TA-55-6-BHW-2	TA-55-6	Sellers 350 H.P. W-LN490	14.6	None
TA-59-1-BHW-1	TA-59-1	Cleaver Brooks CB-700-150	6.28	None
TA-59-1-BHW-2	TA-59-1	Cleaver Brooks CB-700-150	6.28	None
TA-50-2	TA-50-2	Superior MS6-5-1500-S260-M	12.6	None
TA-21-357-1	TA-21-357	Industrial Boiler 3WB350HCG0	12.1	None
TA-21-357-2	TA-21-357	Industrial Boiler 3WB350HCG0	12.1	None

Permit Condition	# and Permit Condition	n:	2. Method(s) or or determine the com			r facts used to	freque collec determ	nat is the ency of data tion used to nine iance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
TA-21-357-3	TA-21-357	Industrial	Boiler	12.1		None				
		3WB350	HCG0							
<sup>1</sup> Emission estimates f	from these units shall b	oe based on the	e maximum heat inpu	t rating dera	ated for altit	ude.				
2.3.1 Applicable Rec	quirements		LANL boiler and l	heater opera	tions meet t	he requirements of		Continuous	⊠ Yes	Yes
2 3 1 1 The followin	g requirements apply t	to these				and 20.2.61 NMAC.				
emission units : 40 C	FR Part 60, Subpart D	c (Units TA-	The only applicable Dc, is the monthly					ntermittent	□ No	⊠ No
55-6-BHW-1 and TA NMAC.	55-6-BHW-2 only); a	and 20.2.61	records for the app	licable TA-	55 boilers is	collected monthly				
TVIVITIE.			and maintained on			1-27 1 7	1			
						MED on a 6-month 4.1. Emissions are		Continuous	⊠ Yes	☐ Yes
2.3.2 Emission Limit	ts					in each semi-annual ellected monthly and		ntermittent	□ No	⊠ No
			emissions calculate							
			limits. Allowable	emission lin	nits have not	been exceeded.				
	T							7		
Source	Allowable Emissio	n Limits								
All Boilers and	NO <sub>x</sub>	CO	PM or PM	10 (tpy)	$SO_2$	VOC		1		
Heaters <sup>1</sup>	(tpy)	(tpy)			(tpy)	(tpy)				
	80	80	50		50	50		1		
<sup>1</sup> Excludes TA-3-22 F	Power Plant addressed	in Condition 2	2.9					_		
							•			
2.3.2.1 Visible emiss opacity of 20%.	sions shall not equal or	r exceed an	LANL has certifie opacity readings u			e who perform dix A, Method 9 to		Continuous	<b>⊠</b> Yes	☐ Yes
			determine complia	nce with the	e opacity lin	nitation. Opacity		ntermittent	□ No	⊠ No
	ction 2.3.2 are pursuan		reports are provide reports. Visible en			-annual monitoring				
	nd 8 of 20.2.70.302.A	NMAC.	opacity during this							
2.3.3 Operational Re	equirements		For units listed un	der this perr	nit conditior	n, a 12-month rolling		Continuous	⊠ Yes	☐ Yes
			total of natural gas	used is calc	culated and	recorded each		ntermittent	□ No	⊠ No
	sage is limited to 870 al, for all boilers listed		month. The rolling			e fuel use limit each onitoring report.		ntel linttellt		
	ers and heaters at LAN		Natural gas usage	limits were	not exceede	d. Boilers at TA-21-				
	nt activities, except en		357 ceased operatiduring this certific			did not operate				
	-357-2, and TA-21-35			•						
	units TA-21-357-1, T tural gas usage is limit					here these boilers are hese units have been		Continuous	⊠ Yes	☐ Yes

ACC Form Part 1 - Permit Number P100M1

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
MMscf/yr and fuel oil usage to 10,000 gal/yr, 12-month rolling total.	removed from service and will no longer be used.		□ No	⊠ No
The conditions of Section 2.3.3 are pursuant to Paragraphs 1, 7 and 8 of 20.2.70.302.A NMAC.				
2.3.4 Emissions Monitoring Requirements		☐ Continuous	⊠ Yes	☐ Yes
2.3.4.1 Emission units TA-21-357-1, TA-21-357-2, and TA-21-357-3: A volumetric flow meter shall be utilized to measure the total amount of natural gas being used on a monthly basis.	The TA-21 Steam Plant (TA-21-357), where these boilers are located, ceased operation in June 2007. These units have been removed from service and will no longer be used.		□ No	⊠ No
2.3.4.2 Emission units TA-55-6-BHW-1 and TA-55-6-BHW-2: A volumetric flow meter shall be utilized to	For units located at TA-55-6, a volumetric flow meter is in	☐ Continuous	⊠ Yes	☐ Yes
measure the total amount of natural gas being used on a monthly basis.	place and used to monitor monthly natural gas use. This information is maintained and available on-site.	<b>Intermittent</b>	□ No	⊠ No
2.3.4.3 40 CFR Part 60, Appendix A, Method 9 shall be used to determine compliance with the opacity		☐ Continuous	⊠ Yes	☐ Yes
limitation.	LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Reference		□ No	⊠ No
The conditions of Section 2.3.4 are pursuant to 20.2.70.302.C NMAC.	Method 9 to determine compliance with the opacity limit.			
	Facility wide natural gas use is collected and recorded on a monthly basis. From the total usage, metered sources are	☐ Continuous	⊠ Yes	☐ Yes
2.3.5 Recordkeeping	subtracted and the difference is apportioned between non- metered boilers and heaters based on fuel or heat input ratings.		□ No	⊠ No
2.3.5.1 All boilers and heaters, including insignificant emission units: Records of total natural gas and fuel oil usage shall be kept on a monthly basis.	Facility wide fuel oil usage for applicable units is collected and recorded on a monthly basis.			
This condition is pursuant to Subsection C and Paragraph D(1) of 20.2.70.302 NMAC.				
2.3.6 Reporting	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL			
2.3.6.1 Reports shall be submitted in accordance with conditions 4.1 and 4.2.	submitted monitoring reports to NMED on January 22, 2008 and August 7, 2008. Emissions reports were submitted to NMED on March 21, 2008 and September 15, 2008.			
This condition is pursuant to 20.2.70.302.E NMAC.				

1. Permit Condition # and Permit Condition:			thod(s) or other tine the complia		ther facts used to		ncy of data on used to ine	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
2.4 Carpenter Shops						ПС	ontinuous	⊠ Yes	Yes
All of the process equipment authorized for this source type is listed in the table shown below (emission units that were identified as insignificant or trivial and equipment not regulated pursuant to the Act are not included):		No new equipment has been added during this certification period (excluding those identified as insignificant, trivial and not regulated pursuant to the Act).			⊠ In	termittent	□ No	⊠ No	
Emission Unit No. Location			Total Exhaus Cubic feet pe		Type of Control				
TA-15-563 TA-15-56	3		5000		None				
TA-3-38 TA-3-38			5471		None				
2.4.2 Emission Limits		Emissions of PM10 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.			ontinuous termittent	⊠ Yes	☐ Yes ⊠ No		
Source Allowable Em	ssion Limits								
PM <sub>10</sub> (tpy)									
TA-15-563 2.81									
TA-3-38 3.07									
This condition is pursuant to 40 CFR 50, 20.1	3 NMAC, Pa	ragrapl	ns 1, 7 and 8 of	20.2.70.302.A N	MAC.				
2.4.3 Operational Requirements					sanding equipment are	□ C	ontinuous	⊠ Yes	Yes
2.4.3.1 Saws, drills, shaping and sanding equipment shall operate at a maximum of 4368 hours per year.		tracked. Hours of operation are collected monthly and provided in the semi-annual monitoring report. These LANL carpenter shops did not exceed 4368 hours of operation during this compliance certification period.		⊠ In	termittent	□ No	⊠ No		
2.4.3.2 Process cyclones shall operate during operations that are vented to the cyclone.	_						ontinuous	⊠ Yes	☐ Yes
The conditions of Section 2.4.3 are pursuant t Paragraphs 1, 7 and 8 of 20.2.70.302.A NMA	)		s cyclones are of to the cyclones		hop operations that are	⊠ In	termittent	□ No	⊠ No

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
2.4.4 Emissions Monitoring		☐ Continuous	⊠ Yes	☐ Yes
2.4.4.1 The permittee shall maintain logs of the hours the carpenter shops are in operation.	A log is maintained with shop hours of operation for each shop. These logs are available on-site.	<b>Intermittent</b>	□ No	⊠ No
This condition is pursuant to 20.2.70.302.C NMAC.				
2.4.5 Recordkeeping		☐ Continuous	⊠ Yes	☐ Yes
2.4.5.1 Record the hours of operation for each shop monthly.	The monthly hours of operation for each shop are recorded and provided to NMED in the Semi-Annual Monitoring Report.	☐ Intermittent	□ No	⊠ No
This condition is pursuant to Subsection C and Paragraph D(1) of 20.2.70.302 NMAC.	Topot.			
2.4.6 Reporting		☐ Continuous	⊠ Yes	☐ Yes
2.4.6.1 Reports shall be submitted in accordance with conditions 4.1 and 4.2.	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 January 22, 2008 and August 7, 2008. Emissions reports were submitted to	⊠ Intermittent	□ No	⊠ No
This condition is pursuant to 20.2.70.302.E NMAC.	NMED on March 21, 2008 and September 15, 2008.			
2.5 Chemical Usage		☐ Continuous	⊠ Yes	☐ Yes
All of the process equipment authorized for this source type is listed in the table shown below (emission units that were identified as insignificant or trivial and equipment not regulated pursuant to the Act are not included):	No new equipment has been added during this certification period (excluding those identified as insignificant, trivial and not regulated pursuant to the Act).	⊠ Intermittent	□ No	⊠ No
Emission Unit No.	Location			
LANL-FW-CHEM	Facility-wide			
2.5.3 Emission Limits		☐ Continuous	⊠ Yes	☐ Yes
2.5.3.1 The contribution of VOC and/or HAPs emissions from chemical usage shall not cause the exceedence of the corresponding facility-wide limit listed below:	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.	☑ Intermittent	□ No	⊠ No
200 tons per year of facility-wide VOCs				

Permit Condition # and Permit Condition:		Method(s) or other information or other facts used to remine the compliance status:	3. What is the frequency of data collection used to determine	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting
			compliance?	reporting period:	period?
8 tons per year of individual facility-wide HAP					
24 tons per year of total facility-wide HAPs					
This condition is pursuant to 40CFR50, Paragraphs 1, 7 and 8 of 20.2.70.302.A NMAC.					
2.5.4 Emissions Monitoring/Recordkeeping Requirements			☐ Continuous	⊠ Yes	☐ Yes
2.5.4.1 Maintain records of chemical purchasing through facility-wide chemical tracking system, and use the data to calculate the emissions on a semiannual basis in accordance with Condition 4.1.	LA1 Che	ility wide chemical purchase records are collected in NL's ChemLog database and used to calculate emissions. mical emission information is submitted to NMED every onths in accordance with permit condition 4.1.	<b>Intermittent</b>	□ No	⊠ No
This condition is pursuant to 20.2.70.302.C NMAC.					
2.5.5 Reporting			☐ Continuous	⊠ Yes	☐ Yes
2.5.5.1 Reports shall be submitted in accordance with conditions 4.1 and 4.2.	basi subi and	ssions and monitoring reports are submitted on a 6-month s in accordance with permit conditions 4.1 and 4.2. LANL mitted monitoring reports to NMED on January 22, 2008 August 7, 2008. Emissions reports were submitted to ED on March 21, 2008 and September 15, 2008.	☐ Continuous	□ No	⊠ No
This condition is pursuant to 20.2.70.302.E NMAC.					
2.6 Degreasers	Na		☐ Continuous	⊠ Yes	☐ Yes
All of the process equipment authorized for this source type is listed in the table shown below (emission units that were identified as insignificant or trivial and equipment not regulated pursuant to the Act are not included):	peri not	new equipment has been added during this certification od (excluding those identified as insignificant, trivial and regulated pursuant to the Act). Degreasers TA-55-DG-2 TA-55-DG-3 did not operate during this certification od.	<b>⊠</b> Intermittent	□ No	⊠ No
	•				
Emission Unit No.		Location/Building	Type of Degreaser		
TA-55-DG-1		TA-55	Ultrasonic Cold Bat		
TA-55-DG-2 TA-55-DG-3		TA-55 TA-55	Ultrasonic Cold Batch Spray Cold Batch	Cn	
1A-33-DO-3		1A-UU	Spray Cold Batch		
<ul><li>2.6.1 Applicable Requirements</li><li>2.6.1.1 The following requirement applies to these</li></ul>		NL degreaser operations met all requirements of 40 CFR 63, Subpart T.	☐ Continuous	⊠ Yes	☐ Yes
2.0.1.1 The following requirement applies to these	1			l .	

ACC Form Part 1 - Permit Number P100M1

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
emission units: 40 CFR Part 63, Subpart T.			□ No	⊠ No
2.6.2 Emission Limits		☐ Continuous	⊠ Yes	☐ Yes
2.6.2.1 The contribution of VOC and/or HAP emissions from chemical usage shall not cause the exceedence of the corresponding facility-wide limit listed below:	Emissions are calculated and reported on a 6- month basis in accordance with permit condition 4.1. Comparison against the	<b>⊠</b> Intermittent	□ No	⊠ No
200 tons per year of facility-wide VOCs 8 tons per year of an individual facility-wide HAP 24 tons per year of total facility-wide HAPs	allowable emission limits is performed at each of these reporting periods. Allowable emissions have not been exceeded.			
This condition is pursuant to 40CFR50, Paragraphs 1, 7 and 8 of 20.2.70.302.A NMAC.				
2.6.3 Operational Requirements	LANL degreaser operations met all requirements of 40 CFR	☐ Continuous	<b>⊠</b> Yes	☐ Yes
2.6.3.1 The facility shall comply with the applicable requirements of 40 CFR Part 63, Subpart T including:	Part 63, Subpart T.	☑ Intermittent	□ No	⊠ No
2.6.3.1.1 Keep degreaser closed with a tight fitting	The degreaser is kept closed with a tight fitting cover when it	☐ Continuous	⊠ Yes	☐ Yes
cover.	is not being used		□ No	⊠ No
2/212 1/2 : 6 1 1 / 6075	A.C. 1. 1. 1. CO.75	☐ Continuous	⊠ Yes	☐ Yes
2.6.3.1.2 Maintain a freeboard ratio of 0.75 or greater.	A freeboard ratio of 0.75 or greater is maintained.	<b>Intermittent</b>	□ No	⊠ No
2.6.3.1.3 Collect and store all waste solvent and wipe	All waste solvent and solvent contaminated wipe rags are	☐ Continuous	⊠ Yes	☐ Yes
rags in closed containers.	collected and stored in closed containers.	<b>Intermittent</b>	□ No	⊠ No
2.6.3.1.4 Perform flushing within the freeboard area		☐ Continuous	⊠ Yes	☐ Yes
only.	Flushing operations are performed within the freeboard area.	☑ Intermittent	□ No	⊠ No
2.6.3.1.5 Allow cleaned parts to drip for 15 seconds or	Cleaned parts are allowed to drip for 15 seconds or until	☐ Continuous	⊠ Yes	☐ Yes
until dripping stops.	dripping stops.		□ No	⊠ No
2.6.3.1.6 Do not exceed the fill line on the solvent	A fill line has been established to prevent the unit from being	☐ Continuous	⊠ Yes	☐ Yes
level.	overfilled.	<b>Intermittent</b>	□ No	⊠ No

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2.6.3.1.7 Wipe up spills immediately.	Spills are wiped up immediately.	☐ Continuous ☐ Intermittent	⊠ Yes  □ No	☐ Yes ☑ No
2.6.3.1.8 Do not create observable splashing with agitation device.	Administrative controls are in place to prevent observable splashing with an agitation device.	☐ Continuous ☐ Intermittent	⊠ Yes	☐ Yes ☑ No
2.6.3.1.9 Keep the degreaser from being exposed to drafts greater than 40 m/sec.	The degreaser is located in a glove box with a set ventilation flow rate. Exhaust flows are set to not exceed 40 m/min.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.6.3.1.10 Do not clean sponges, fabric, wood, or paper.  The conditions of Section 2.6.3 are pursuant to Paragraphs 1, 7 and 8 of 20.2.70.302.A NMAC.	Sponges, fabric, wood, or paper are not cleaned in the degreaser.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.6.4 Emissions Monitoring Requirements  2.6.4.1 Record the amount of solvent added to the degreaser and calculate the emissions on a semi-annual basis in accordance with Condition 4.1.	A computerized 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.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.6.4.2 Complete checklist for work practice standards.  The conditions of Section 2.6.4 are pursuant to 20.2.70.302.C NMAC.	Checklists for work practice standards have been completed for this certification period.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.6.5 Recordkeeping  2.6.5.1 Maintain records of solvent content and work practice checklists.  This condition is pursuant to Subsection C and Paragraph D(1) of 20.2.70.302 NMAC.	A Material Safety Data Sheet (MSDS) is kept and available that describes the content and concentration of the solvent. Records of work practice checklists are also maintained.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
<ul><li>2.6.6 Reporting</li><li>2.6.6.1 Submit notification of initial startup.</li></ul>	Only one of the three permitted degreasers is being used. If other units are brought on-line, NMED will be notified.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.6.6.2 Submit a compliance report 150 days after initial startup.	If an inoperative degreaser should become active, a compliance report will be submitted to the NMED within 150 days after startup.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.6.6.3 Reports shall be submitted in accordance with conditions 4.1 and 4.2.	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 January 22, 2008	☐ Continuous	⊠ Yes	☐ Yes

1 01	deviations associated with this requirement during the reporting period?
The conditions of Section 2.6.6 are pursuant to 20.2.70.302.E NMAC.  and August 7, 2008. Emissions reports were submitted to NMED on March 21, 2008 and September 15, 2008.  Intermittent	⊠ No
In Average of 2007, three additional generators were permitted	☐ Yes
appreted during this contiffection period. These units have	⊠ No
Emission Unit No. Location/ Building Equipment Type Manufacturer/Model Serial No. Nameplate Capacity Fuel Type	
TA-33-G-1         TA-33         Diesel Fired Generator         Kohler/1600 ROZD 71         375801         1600 kW         Diesel	
Standby Generators (see Note 1) Scattered  Natural Gas, Diesel, Propane and Gasoline Fired Generators  Various  Various  See Note 1  Natural Gas, Die Propane and Gas Propane and Gas	
Note 1: See pages 3-50 through 3-54 of the 2002 application.	
	☐ Yes
2.7.1.1 The following requirements apply to emission unit TA-33-G-1: 20.2.61 NMAC and NSR Permit No. 2195F.  TA-33-G-1 meets the requirements of 20.2.61 NMAC and NSR Permit No. 2195F.  Intermittent  No	⊠ No
LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Reference	☐ Yes
	⊠ No
Source Allowable Emission Limits	
TSP PM10 NO <sub>x</sub> CO VOC SO <sub>x</sub>	
TA-33-G-1 pph tpy pph tpy pph tpy pph tpy pph tpy pph tpy	
1.4 0.6 1.4 0.6 40.3 18.1 33.7 15.2 0.7 0.3 5.5 2.5	
2.7.2.1 Visible emissions shall not equal or exceed an opacity of 20%.	

The conditions of Section 2.7.2 are pursuant to 40CFR50, Paragraphs 1, 7 and 8 of 20.2.70.302.A NMAC.

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2.7.3 Operational Requirements		ach stationary standby generator are tracked and wice a year to verify that the average hours per year	☐ Continuous	⊠ Yes	☐ Yes
2.7.3.1 Operation of the LANL stationary standby	limit is not	exceeded. The hours of operation are provided to LANL's Semi-Annual Monitoring Report. The limit	<b>Intermittent</b>	□ No	⊠ No
generator pool is limited to an average of 168 hr/year each to assure non-applicability of 202.74 NMAC, PSD.	of 168 hr/y certificatio	rear average was not exceeded during this			
2.7.3.2 TA-33-G-1 is limited to 12,000 kWh/day and		did not meet or exceed either the daily or annual	☐ Continuous	⊠ Yes	☐ Yes
1,350,000 kWh/year.	kWh limit	during this compliance certification period.	☑ Intermittent	□No	⊠ No
2.7.3.3 TA-33-G-1 is limited at full capacity to eight hours a day between the hours of 7:00 am and 5:00 pm.		s maintained at the generator that records start-up, , and run time. The unit was operated only within	☐ Continuous	⊠ Yes	☐ Yes
The conditions of Section 2.7.3 are pursuant to Paragraphs 1, 7 and 8 of 20.2.70.302.A NMAC.	the allowed certification	d operating times during this compliance n period.	☑ Intermittent	□ No	⊠ No
	evaluated t	ach stationary standby generator is tracked and wice a year to verify that the average hour per year	☐ Continuous	⊠ Yes	☐ Yes
		exceeded. The hours of operation are provided to LANL's Semi-Annual Monitoring Report.	☑ Intermittent	□ No	⊠ No
2.7.4 Emissions Monitoring Requirements	of operation each day.	has a run log to track hourly kWh totals and hours n, as well as the time operation begins and ends. The hourly kWh readings are collected monthly and a rolling total is calculated.			
		-			
Source		Monitoring Required			
Stationary standby Generators		Track and record hours of operation for stationary s annual basis.	tandby generators on a	semi-	
TA-33-G-1		Track hourly and 12-month rolling total kWh.			
111 33 6 1		Record hours of operation and the time operation be	egins and ends each day	7.	
2.7.4.1 40 CFR Part 60, Appendix A, Method 9 shall be used to determine compliance with the opacity	I ANI bog	certified opacity readers on-site who perform	☐ Continuous	⊠ Yes	☐ Yes
limitation.	opacity rea	dings using 40 CFR 60, Appendix A, Method 9 to		□ No	⊠ No
The conditions of Section 2.7.4 are pursuant to 20.2.70.302.C NMAC.	determine	compliance with the opacity limitation.			
2.7.5 Recordkeeping	Recordkee	ping requirements are specified at condition 2.7.4.	☐ Continuous	⊠ Yes	☐ Yes
2.7.5.1 Recordkeeping for this source category is	<u> </u>	•			

Permit Condition # and	Permit Cond	ition:	determine the compliance status:				3. What is the frequency of collection used determine compliance?	data	4. Was this facili compliance with t requirement durin reporting period?	his	5. Were there any deviations associated with this requirement during the reporting period?	
specified at Condition 2.7.4	specified at Condition 2.7.4.								ittent	□No		⊠ No
This condition is pursuant t Paragraph D(1) of 20.2.70.2		C and										
2.7.6 Reporting			Emi	issions and monitoring	reports are submit	ted on a 6-mo	onth	☐ Contin	uous	⊠ Yes		Yes
2.7.6.1 Reports shall be sulconditions 4.1 and 4.2.  This condition is pursuant t			sub and	is in accordance with pe mitted monitoring repor August 7, 2008. Emiss IED on March 21, 2008	rts to NMED on Ja ions reports were s	nuary 22, 20 submitted to		⊠ Interm	ittent	□ No		⊠ No
2.8 Data Disintegrator								☐ Contin	uous	⊠ Yes		☐ Yes
All of the process equipmen				new equipment has bee				☐ Interm		□ No		□ No
type is listed in the table sh that were identified as insig				od (excluding those ide regulated pursuant to the		icant, trivial	and	Intern	пиени	NO		NO
equipment not regulated pu included):					,							
meraded).	h					1						<u> </u>
	Emission Unit No.	Unit Type				Type of Equipm	Control nent					
	TA-52-11	Data Disintegrator/ strial Shredde		du Security Engineered Machinery 1424/11892 9/2002 2001 1200 lb/hr control cloth tu		e w/ 75% efficiency and be filters w/95% efficiency						
2.8.1 Applicable Requirem	nents		LAI	NL Data Disintegrator o	operations meet re	quirements o	f	☐ Continuous		⊠ Yes		☐ Yes
2.8.1.1 NSR Permit Number	er 2195H.			R Permit No. 2195H.	•	•		<b>⊠</b> Interm	ittent	□ No		⊠ No
				issions are calculated ar				☐ Contin	uous	⊠ Yes		☐ Yes
2.8.2 Emission Limits				accordance with permit condition 4.1. A comparison against the allowable emission limits is performed at each of these reporting periods. Allowable emission limits were not exceeded.						□ No		⊠ No
							•					
Source		Allowable Emiss	ion Li	imits								
TA-52-11	,	TSP (pph)		TSP (tpy)	PM10 (pph)		]	PM10 (tpy)	PM10 (tpy)			
	2	2.3		9.9	2.3		Ġ	9.9				

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PM10 and TSP emissions limits shown in above Table are	e after controls.			
This condition is pursuant to 40 CFR 50 and Paragraphs 1	, 7 and 8 of 20.2.70.302.A NMAC.			
2.8.4 Emissions Monitoring		☐ Continuous	⊠ Yes	☐ Yes
2.8.4.1 The permittee shall maintain a log of the number of boxes of media that are destroyed and calculate the emissions on a semiannual basis in accordance with Condition 4.1. This condition is pursuant to 20.2.70.302.C NMAC.	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.	⊠ Intermittent	□ No	⊠ No
2.8.4.2 The permittee shall perform regular maintenance and repair on the cyclone and cloth tube	LANL has a service contract in place with the manufactures	☐ Continuous	⊠ Yes	☐ Yes
filter(s) per manufacturer's recommendations. This condition was brought forward from NSR Permit No. 2195H Condition 1.d.	recommended local service company to perform regular maintenance and repair on the cyclone and cloth tube filter per manufacturer's recommendation.	✓ Intermittent	□ No	⊠ No
2.8.5 Recordkeeping	A log is kept of the number of boxes of media that are	☐ Continuous	⊠ Yes	Yes
2.8.5.1 Record the number of boxes of media that are destroyed monthly.	destroyed monthly.		□ No	⊠ No
2.8.5.2 The permittee shall maintain adequate records	Records are maintained to demonstrate compliance with manufacturer's recommended repair and maintenance	☐ Continuous	⊠ Yes	☐ Yes
on site to demonstrate compliance with manufacturer's recommended repair and maintenance schedules for the cyclone and the cloth tube filter(s). This condition was brought forward from NSR Permit No. 2195H, Condition 4a.	schedules for the cyclone and cloth tube filter.	⊠ Intermittent	□ No	⊠ No
2.8.6 Reporting	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL	☐ Continuous	⊠ Yes	☐ Yes
2.8.6.1 Report shall be submitted in accordance with conditions 4.1 and 4.2. This condition is pursuant to 20.2.70.302.E NMAC.	submitted monitoring reports to NMED on January 22, 2008 and August 7, 2008. Emissions reports were submitted to NMED on March 21, 2008 and September 15, 2008.	☑ Intermittent	□ No	⊠ No
2.8.7 Compliance		☐ Continuous	⊠ Yes	☐ Yes
2.8.7.1 If any compliance testing is required, it shall be conducted in accordance with EPA Reference Methods 1 through 4, Method 5 for TSP, and contained in CFR Title 40 Part 60 Appendix A. For combined TSP and PM10, testing shall be in accordance with 40 CFR 51, Appendix M, Method 201. Alternative test method(s) may be used if the Department approves the change. This condition was brought forward from NSR Permit No. 2195H, Condition 6.b, as amended.	No compliance test was required or performed during this compliance certification period.	⊠ Intermittent	□ No	⊠ No

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2.9 Power Plant at Technical Area 3  All of the process equipment authorized is listed in the table shown below (emis were identified as insignificant or trivial not regulated pursuant to the Act are no	No new equipment has been added during this certification period (excluding those identified as insignificant, trivial and not regulated pursuant to the Act).				inuous mittent	⊠ Yes □ No	☐ Yes ⊠ No	
Emission Unit No.	<b>Equipment Typ</b>	e	Make/Serial No.	Year of Manuf.		Capacity	L	
TA-3-22-1	Boiler		Edgemoor Iron Works/ 4008	1950		178.5 MM	1Btu/hr	
TA-3-22-2	Boiler		Edgemoor Iron Works/ 4009	1950		178.5 MM	fBtu/hr	
TA-3-22-3	Boiler		Union/11804	1951		178.5 MM	1Btu/hr	
TA-3-22 CT-1	Combustion Turk	oine	Rolls-Royce/RB211- 6761 DLE	2003		24.6 MW		
F-1	Flue Gas Recircu	ılation Fan	Robinson Industries	2001		1800 rpm		
F-2	Flue Gas Recircu	ılation Fan	Robinson Industries	2001		1800 rpm		
F-3	Flue Gas Recircu	ılation Fan	Robinson Industries	2001		1800 rpm		
The boiler and turbine capacity listed l	has been derated for	or altitude from the n	naximum heat input rating.					
2.9.1.1 The boilers (Units TA-3-22-1, TA-3-22-2, TA-3-22-3) are subject to 20.2.33 and 20.2.34 NMAC. The combustion turbine (Unit TA-3-22 CT-1) is subject to 40 CFR Part 60 Subpart A and 40 CFR Part 60 Subpart GG. The boilers and the turbine are subject to 20.2.61			rs are in compliance with the (Gas Burning Equipment – .34 NMAC (Oil Burning Edu). The combustion turbine is 60 Subpart A and 40 CFR Felers and turbine are in composmoke and Visible Emission 195-BM1.	☐ Cont		⊠ Yes □ No	☐ Yes ⊠ No	
2.9.2 Emission Limits		Compliance with the were determined of September 2002.  Compliance with the emission limit was performed in October 1975.						

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					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.										
	Allowa	able Emis	sion Lin	nits											
Source	NOx		СО		SOx		TSP		PM <sub>10</sub>		VOC		1		
Bource	(lb/hr)		(lb/hr	)	(lb/hr)	)	(lb/hr)	)	(lb/hr)		(lb/hr)				
	Gas	Oil	Gas	Oil	Gas	Oil	Gas	Oil	Gas	Oil	Gas	Oil			
TA-3-22-1	10.2	11.3	7.0	6.5	1.1	9.6	1.3	4.3	1.3	3.0	1.0	0.3			
TA-3-22-2	10.2	11.3	7.0	6.5	1.1	9.6	1.3	4.3	1.3	3.0	1.0	0.3			
TA-3-22-3	10.2	11.3	7.0	6.5	1.1	9.6	1.3	4.3	1.3	3.0	1.0	0.3			
Boilers Combined <sup>1</sup>	60.2 tp	у	41.3 t	ру	7.9 tp	y	8.4 tpy	y	8.2 tpy		5.6 tpy				
TA-3-22 CT-1 (lb/hr)	23.8		170.9		1.4		1.6		1.6		1.0				
TA-3-22 CT-1 (tpy) <sup>1,2</sup>	33.2		19.8		1.9		2.3		2.3		-				
Annual emission li 2 "-" notation implie						nt to NSR	Permit N	No. 2195	5BM1, Ta	ble 2.2, N	ote 1.		╝		
2.9.2.1 Nitrogen didb/MMBtu of heat in 22-2, and TA-3-22-This condition was	nput from 1 3 when bur brought for	Units TA- ning natu	3-22-1, T ral gas o	ΓA-3- r oil.	in Sept		02, demo	nstrate	that NO2	ormed on the			Continuous ntermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.2.2 Nitrogen ox 22 CT-1 shall not ex	o. 2195BM1, Condition 2.b. O.2.2 Nitrogen oxide emissions from the Unit TA-3-CT-1 shall not exceed 25 ppmv at 15% O <sub>2</sub> . This indition was brought forward from NSR Permit No.			An initial emission compliance test was performed on October 5, 2007. The Nitrogen Oxide emission concentration was shown to be less than 25 ppmv at 15% Oxygen.							Continuous ntermittent	⊠ Yes	☐ Yes ⊠ No		
2.9.3 Operational R 2.9.3.1 Units TA-3- shall either use pipe no more than 2 grain	equirement -22-1, TA- line quality	3-22-2 an / natural g	gas conta	ining	to LAN no mor checke	NL will be re than 2 g ed/analyze	e pipeline grains of ed prior to	quality total sul	. Pipeline fur per 10 n delivery	es that gas quality ga 0 scf. Fue to verify by weight	s contains el oil is it	:   L C	Continuous ntermittent	⊠ Yes □ No	☐ Yes ⊠ No

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cubic foot or No. 2 fuel oil that is not a blend containing waste oils or solvents and contains less than or equal to 0.05% sulfur by weight. This condition was brought forward from NSR Permit No. 2195BM1, Condition 1.g.				
2.9.3.2 Units TA-3-22-1, TA-3-22-2 and TA-3-22-3 combined shall not use more than 2,000 MMscf of natural gas in any 365 day period or more than 500,000 gallons of No. 2 fuel oil in any 365 day period. These conditions were brought forward from NSR Permit No. 2195BM1, Conditions 1.g.i and 1.g.ii.	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 12 month rolling totals for each fuel are provided in LANL's Semi-Annual Monitoring Report.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.3.3 A volumetric flow meter shall be connected to the facility or to Units TA-3-22-1, TA-3-22-2 and TA-3-22-3 so that the total amount of natural gas being used by the boilers can be continually recorded. This condition was brought forward from NSR Permit No. 2195BM1, Condition 1.h.	A flow meter is used to measure natural gas flowing to all 3 boilers as a combined total. The flow rate is continually recorded.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.3.4 Unit TA-3-22 CT-1 shall use pipeline quality natural gas containing no more than 2 grains of total sulfur per 100 standard cubic feet. Unit TA-3-22 CT-1 shall not use more than 646 MM standard cubic feet (SCF) of natural gas in any 365 day period. These conditions were brought forward from NSR Permit No. 2195BM1, Conditions 1.i and 1.j.	The natural gas transportation 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. A 365 day rolling total for natural gas is maintained and reviewed to verify usage does not exceed 646 MMscf. The rolling total is provided in LANL's Semi-Annual Monitoring Report.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.3.5 A volumetric fuel flow meter shall be connected to Unit TA-3-22 CT-1 so that the total amount of natural gas being used can be continually recorded. Although the facility is not subject to 40 CFR Part 75, Federal Acid Rain requirements, the flow meter shall meet the initial certification requirements of 40 CFR Part 75, Appendix D 2.1.5 and the quality assurance requirements of 40 CFR Part 75, Appendix D 2.1.6. This condition was brought forward from NSR Permit No. 2195BM1, Condition 1.k.	A volumetric flow meter is used to measure natural gas flowing to the combustion turbine. The flow rate is continually recorded. The flow meter meets both the initial certification requirements and quality assurance requirements specified in this condition.	☐ Continuous  ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.3.6 Unit TA-3-22 CT-1 shall be equipped with Rolls-Royce Dry Low Emissions (DLE) control technology (pre-mix, lean-burn series staged combustion system) to control NOx emissions. This condition was brought forward from NSR Permit No. 2195BM1, Condition 1.e.	The Dry Low Emissions (DLE) control technology is an integral part of the combustion turbine design. The DLE control was evaluated during start-up and determined to be working as designed.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.3.7 Unit TA-3-22 CT-1 shall be operated at no less than 100% full load, except for minimal periods during startup and shutdown conditions. This condition was brought forward from NSR Permit No. 2195BM1, Condition 1.f.	The combustion turbine is operated at no less than 100% load, except for start-up and shut-down periods. An operation log is used to track the load of the unit.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ☑ No

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2.9.3.8 Hours of operation, including start-up and shut-down times, of Units TA-3-22-1, TA-3-22-2, TA-3-22-3 and TA-3-22 CT-1 shall be monitored and recorded daily. This condition was brought forward from NSR Permit No. 2195BM1, Condition 1.1.  The conditions of Section 2.9.3 are pursuant to Paragraphs 1, 7 and 8 of 20.2.70.302.A NMAC.	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. The combustion turbine hours of operation, including start and stop times, are monitored and recorded each day of turbine operation.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.4 Emissions Monitoring Requirements  2.9.4.1 Total fuel oil consumption shall be monitored so that combined fuel oil usage of Units TA-3-22-1, TA-3-22-2 and TA-3-22-3 can be calculated on a rolling 365-day total. This condition was brought forward from NSR Permit No. 2195BM1, Condition 3.a.	Data on fuel oil use is electronically collected and calculated as a 365 day rolling total.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.4.2 Natural gas consumption shall be monitored so that combined natural gas usage of Units TA-3-22-1, TA-3-22-2 and TA-3-22-3 can be calculated on a rolling 365-day total. This condition was brought forward from NSR Permit No. 2195BM1, Condition 3.b.	Volumetric flow meters with correctors are in place at the facility to monitor natural gas flow to the boilers. The gas consumption monitored at this meter is electronically collected and is used to calculate a 365 day rolling total.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.9.4.3 Natural gas consumption shall be monitored so that natural gas usage for Unit TA-3-22 CT-1 can be calculated on a rolling 365-day total. This condition was brought forward from NSR Permit No. 2195BM1, Condition 3.f.	A volumetric flow meter with corrector is in place at the facility to monitor natural gas flowing to the turbine. The gas consumption data from this meter is continually monitored and is used to calculate a 365 day rolling total.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.9.4.4 A certification of total sulfur content of the No. 2 fuel oil used by Units TA-3-22-1, TA-3-22-2 and TA-3-22-3 shall be obtained from the supplier whenever No. 2 fuel oil is delivered to the facility. This condition was brought forward from NSR Permit No. 2195BM1, Condition 3.c.	No fuel oil deliveries to the plant were made during this compliance certification period. 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.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.4.5 If the certification as specified by Condition 2.9.4.4 is not available at delivery, the permittee shall analyze the No. 2 fuel oil to determine the total sulfur content. The analysis shall be conducted using Department approved methods and standards for determining total sulfur content of No. 2 fuel oil. This condition was brought forward from NSR Permit No. 2195BM1, Condition 3.d.	No fuel oil deliveries to the plant were made during this compliance certification period. 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.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.4.6 The operating load of Unit TA-3-22 CT-1 specified by Condition 2.9.3.7 shall be monitored and recorded hourly during normal operations of that unit. Periods of startup and shutdown shall not be included in the hourly monitoring but shall be recorded separately. This condition was brought forward from NSR Permit	The operating load of the combustion turbine is monitored and recorded hourly during normal operations. Start up and shut down times are recorded separately.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No

Permit Condition # and Permit Condition:	Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
No. 2195BM1, Condition 3.e.				
2.9.4.7 Compliance with NOx pound per hour emission limits for Unit TA-3-22 CT-1 shall be determined by multiplying the daily total natural gas firing rate for the unit (expressed in thousands of SCF), as recorded pursuant to Condition 2.9.5.3, by the manufacturer's guaranteed emission rate of 0.1029 pounds NOx per thousand SCF of gas burned (applicable for worst-case conditions of negative 18 degrees Fahrenheit) and divided by the number of hours of operation of the unit during that day as recorded pursuant to Condition 2.9.3.8. Compliance with NOx annual emission limits for Unit TA-3-22 CT-1 shall be determined by multiplying the 365 day total natural gas firing rate for the unit (expressed in thousands of SCF), as recorded pursuant to Condition 2.9.5.3, by the manufacturer's guaranteed emission rate of 0.1029 pounds NOx per thousand SCF of gas burned (applicable for annual average conditions of 47.9 degrees Fahrenheit). This condition was brought forward from NSR Permit No. 2195BM1, Condition 3.g.	An emission spreadsheet, containing the calculation found in this permit condition, is used to calculate the NOx pound per hour (pph) and ton per year (tpy) emission rates. This data is compared with the permit emission limits listed in permit condition 2.9.2. On October 22 and October 23, 2008, the static emission factor and calculation in this condition resulted in a deviation. LANL has been working with the NMED-AQB permitting group to modify the permit to remove this condition and replace it with a condition that represents actual emissions. It was agreed that the current emission factor and calculation in this condition do not provide a reasonable estimate of emissions from the combustion turbine. Using an emission factor derived from data in the initial compliance test, conducted on October 5, 2007, emissions for the two days were determined to be much lower than the 23.8 pph permit limit. For October 22nd, using the compliance test emission factor resulted in 11.9 pph, as compared to the calculation in this permit condition which resulted in 24.3 pph. For October 23rd, the compliance test emission factor resulted in 12.5 pph, as compared to 25.4 pph using the calculation in this permit condition. By using the compliance test data, which contains actual emission results, no excess emission occurred. The permit modification request submitted to NMED consists of replacing the calculation in this permit condition with an annual emission test.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	⊠ Yes □ No
2.9.4.8 Compliance with CO pound per hour emission	An emission spreadsheet, containing the calculation found in	☐ Continuous	⊠ Yes	⊠ Yes
limits for Unit TA-3-22 CT-1 shall be determined by	this permit condition, is used to calculate the CO pound per			
multiplying the daily total natural gas firing rate for the unit (expressed in thousands of SCF), as recorded pursuant to Condition 2.9.5.3, by the manufacturer's guaranteed emission rate of 0.731 pounds CO per thousand SCF of gas burned (applicable for worst-case conditions of negative 18 degrees Fahrenheit), and divided by the number of hours of operation of the unit during that day as recorded pursuant to Condition 2.9.3.8). Compliance with CO annual emission limits for Unit TA-3-22 CT-1 shall be determined by multiplying the 365 day total natural gas firing rate for the unit (expressed in thousands of SCF), as recorded pursuant to Condition 2.9.5.3, by the manufacturer's guaranteed emission rate of 0.0613 pounds CO per thousand SCF of gas burned (applicable for annual average conditions of 47.9 degrees Fahrenheit). This condition was brought forward from NSR Permit No. 2195BM1, Condition 3.h.	hour (pph) and ton per year (tpy) emission rates. This data is compared with the permit emission limits listed in permit condition 2.9.2. On October 22 and October 23, 2008, the static emission factor and calculation in this condition resulted in a deviation. LANL has been working with the NMED-AQB permitting group to modify the permit to remove this condition and replace it with a condition that represents actual emissions. It was agreed that the current emission factor and calculation in this condition do not provide a reasonable estimate of emissions from the combustion turbine. Using an emission factor derived from data in the initial compliance test, conducted on October 5, 2007, emissions for the two days were determined to be much lower than the 170.9 pph permit limit. For October 22nd, using the compliance test emission factor resulted in 2.5 pph, as compared to the calculation in this permit condition which resulted in 173 pph. For October 23rd, the compliance test emission factor resulted in 2.6 pph, as compared to 180 pph using the calculation in this permit	<b>⊠</b> Intermittent	□ No	□ No

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	condition. By using the compliance test data, which contains actual emission results, no excess emission occurred. The permit modification request submitted to NMED consists of replacing the calculation in this permit condition with an annual emission test.			
2.9.4.9 At least once each calendar quarter the permittee shall use the method specified in Conditions		☐ Continuous	⊠ Yes	☐ Yes
2.9.4.7 and 2.9.4.8 to determine compliance of Unit TA-3-22 CT-1 with the hourly and annual emission limits specified in this permit. This condition was brought forward from NSR Permit No. 2195BM1, Condition 3.i.	The calculations in conditions 2.9.4.7 and 2.9.4.8 were performed at least once each calendar quarter since the start-up of the combustion turbine on September 23, 2007.	⊠ Intermittent	□ No	⊠ No
2.9.4.10 Visible emissions from stationary combustion equipment shall not equal or exceed an opacity of 20%.		☐ Continuous	⊠ Yes	☐ Yes
Use of pipeline quality natural gas fuel as defined in Conditions 2.9.3.1 and 2.9.3.4 constitutes compliance with 20.2.61 NMAC unless opacity exceeds 20%. At such time as No. 2 fuel oil as defined in Condition 2.9.3.1 is used, opacity shall be measured in accordance with the procedures at 40 CFR 60, Appendix A, Method 9. Opacity measurements shall continue on a quarterly basis per calendar year for each effected unit until such time as pipeline quality natural gas is used. This condition is pursuant to 20.2.61 NMAC and NSR Permit No. 2195BM1, Condition 2.c.	Pipeline quality natural gas fuel is used at the plant, as indicated in the gas transportation contract. Each time a boiler is started on No. 2 fuel oil, or a malfunction occurs while using No. 2 fuel oil, opacity readings are taken. 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 readings are provided to NMED in the Semi-Annual Monitoring Reports. Visible emissions did not equal or exceed the 20% limit during this certification period.	⊠ Intermittent	□ No	⊠ No
2.9.4.11 Initial compliance tests are required on Unit TA-3-22 CT-1 for NOx and CO. These tests shall be		<b>⊠</b> Continuous	<b>⊠</b> Yes	☐ Yes
conducted within sixty (60) days after the unit achieves the maximum normal production. If the maximum normal production rate does not occur within one hundred twenty (120) days of source startup, then the tests must be conducted no later than one hundred eighty (180) days after initial startup of the source. The tests shall be conducted in accordance with EPA Reference Methods 1 through 4, Method 7E for NOx, and Method 10 for CO contained in CFR Title 40, Part 60, Appendix A, and with the requirements of Subpart A, General Provisions, 60.8(f). Alternative test method(s) may be used if the Department approves the change. The permittee shall submit a testing protocol to the Department at least thirty (30) days prior to the test date, and provide notification to the Department at least thirty (30) days prior to the test date. This condition was brought forward from NSR Permit No. 2195BM1, Condition 6.b and General Condition 13.	An initial compliance test for NOx and CO was performed on the combustion turbine within 60 days following the unit achieving maximum normal production. The unit achieved its maximum normal production rate on September 27, 2007, and the compliance test was performed on October 5, 2007. The test report was provided to NMED on October 22, 2007. The test consisted of the EPA test methods identified in this permit condition.	☐ Intermittent	□ No	⊠ No
2.9.4.12 The permittee shall comply with fuel sulfur monitoring requirements at 40 CFR 60.334(h)	The natural gas used by the combustion turbine meets the definition of natural gas in 60.331(u). The sulfur monitoring	<b>⊠</b> Continuous	⊠ Yes	☐ Yes

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applicable to Unit TA-3-22 CT-1 by making the required demonstration which shows the fuel combusted in the turbine meets the definition of natural gas at 40 CFR 60.331(u).  The conditions of Section 2.9.4 are pursuant to 20.2.70.302.C NMAC.	requirement is met under 40 CFR 60.334(h)(3)(i), which allows the use of a current and valid transportation contract that specifies the maximum total sulfur content is 20 grains per 100 scf or less. The transportation contract specifies a sulfur content not to exceed 2 grains of total sulfur per 100 scf. A copy of the transportation contract is available at the facility.	☐ Intermittent	□ No	⊠ No
2.9.5 Recordkeeping		☐ Continuous	⊠ Yes	Yes
2.9.5.1 Daily total fuel oil used by Units TA-3-22-1, TA-3-22-2 and TA-3-22-3 shall be recorded monthly to be used to calculate a 365 day rolling total.	Fuel oil use is tracked electronically to provide a monthly record of daily and 365 day rolling totals.	☐ Intermittent	□ No	⊠ No
2.9.5.2 Daily total natural gas consumption used by Units TA-3-22-1, TA-3-22-2 and TA-3-22-3 shall be	Daily natural gas consumption is recorded monthly and is used	☐ Continuous	⊠ Yes	☐ Yes
recorded monthly to be used to calculate a 365 day rolling total.	to calculate a 365 day rolling total.	☐ Intermittent	□ No	⊠ No
2.9.5.3 Daily total natural gas consumption used by	Daily natural gas consumption is recorded monthly and is used	☐ Continuous	⊠ Yes	☐ Yes
Unit TA-3-22 CT-1 shall be recorded monthly to be used to calculate a 365 day rolling total.	to coloulate a 265 day rolling total	<b>Intermittent</b>	□ No	⊠ No
2.9.5.4 Records shall be kept to verify the total sulfur content of the No. 2 fuel oil used by Units TA-3-22-1, TA-3-22-2 and TA-3-22-3. Fuel supplier certifications shall be kept which include the name of the oil supplier and a statement that the sulfur content of the oil delivered contains less than or equal to 0.05% sulfur by weight. This condition was brought forward from NSR Permit No. 2195BM1, Conditions 4.a and 4.a.i.	No fuel oil deliveries were made to the Power Plant during this compliance certification period.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.5.5 If the permittee analyzes the fuel oil, records shall be kept which show the name of the oil supplier, the location of the oil where the sample was taken for analysis, the method used to determine the sulfur content of the oil and the results of the analysis for the sulfur content. This condition was brought forward from NSR Permit No. 2195BM1, Condition 4.a.ii.	No fuel oil deliveries were made to the Power Plant during this compliance certification period.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.5.6 Records of the operating load of Unit TA-3-22 CT-1 shall be maintained as required by Condition 2.9.4.6.	An hour tracking log is used at the combustion turbine to record start time, stop time, operating hours, and normal hourly operating load.			
2.9.5.7 The permittee shall keep records of	Records of the measurement and monitoring data required by	☐ Continuous	⊠ Yes	☐ Yes
measurements and monitoring data required by Condition 2.9.4.7.	condition 2.9.4.7 are maintained and available at the facility.	☑ Intermittent	□ No	⊠ No

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2.9.5.8 The permittee shall keep records of measurements and monitoring data required by Condition 2.9.4.8.	Records of the measurement and monitoring data required by condition 2.9.4.8 are maintained and available at the facility.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.5.9 Quarterly records required by Condition 2.9.4.9 shall be kept on site and shall be made available to Department personnel upon request.	Quarterly records required by condition 2.9.4.9 are maintained and available at the facility.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.5.10 Records shall be kept to verify that the natural gas being consumed by Units TA-3-22-1, TA-3-22-2, TA-3-22-3 and TA-3-22 CT-1 is pipeline quality natural gas (less than or equal to 2 grains of total sulfur per 100 standard cubic foot). This condition is brought forward from NSR Permit 2195BM1, Condition 4b. In addition, the permittee shall record dates and duration of use of any fuels other than pipeline quality natural gas and the corresponding opacity measurements.	The natural gas transportation 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. 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, or when a malfunction occurs.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.5.11 Records of initial compliance tests and any other emission tests required by the Department shall be maintained for the Unit TA-3-22 CT-1.	The initial compliance test report for the combustion turbine is maintained and available at the facility.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.9.5.12 Unit TA-3-22 CT-1 shall comply with the recordkeeping requirements of 40 CFR 60.7 and maintain a record referenced by 40 CFR 60.334(h) demonstrating the fuel combusted meets the definition of natural gas.  The conditions of Section 2.9.5 are pursuant to Subsection C and Paragraph D(1) of 20.2.70.302 NMAC.	The combustion turbine is in compliance with the record keeping requirements of 40 CFR 60.7 and a copy of the transportation contract is maintained that specifies the maximum total sulfur content is 20 grains per 100 scf or less as required by 40 CFR 60.334(h).	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
2.9.6 Reporting  2.9.6.1 Reports shall be submitted in accordance with conditions 4.1 and 4.2.  This condition is pursuant to 20.2.60.302.E NMAC.	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 January 22, 2008 and August 7, 2008. Emissions reports were submitted to NMED on March 21, 2008 and September 15, 2008.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
2.10 Facility Wide Emission Limits  2.10.1 The total allowable emissions from this facility, excluding trivial activities, are shown in the following	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	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No

Permit Condition # and Permit Condition:	determine the complian		3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
table. LANL has accepted facility-wide allowable emission limits for criteria pollutants and hazardous air pollutants (HAPs) as shown below.		2008 and September 15, 2008. No sceeded during this certification period.			
Total Allowable Criteria Pollutant and HAP Emission	Limits				
Pollutant		Emission Limit (tons per year)			
Nitrogen Oxides (NO <sub>x</sub> )		245			
Carbon Monoxide (CO)		225			
Volatile Organic Compounds (VOCs)		200			
Sulfur Dioxide (SO <sub>2</sub> )		150			
Particulate Matter (PM)		120			
Hazardous Air Pollutants (HAPs)		24 combined / 8 individual			
2.10.2 20.2.72 NMAC shall apply to any construction		group has a review process for	☐ Continuous	⊠ Yes	☐ Yes
or modification of existing equipment that triggers the applicability criteria in section 200 of 20.2.72 NMAC.	projects applicable to 2	fication projects. This process identifies 20.2.72 NMAC.	☑ Intermittent	□ No	⊠ No
<b>3.0 RECORDKEEPING</b> Conditions of 3.0 are pursuant to 20.2.70.302.D NMAC.	December of the control of the contr	1 Constitution in Assemblication of Mississel			
3.1 All sampling activities and measured data required	measured data. These	d for all required sampling activities and records are available on site. The			
by this permit for the emission units in this facility shall be recorded. The minimum information to be included	primary measuring activisible emissions evalu	ivity applicable to this section is the actions.	☐ Continuous	⊠ Yes	☐ Yes
in these records is:			<b>☐</b> Intermittent	□ No	⊠ No
3.1.1 equipment identification (include make, model		ail is identified in the Operating Permit	☐ Continuous	⊠ Yes	☐ Yes
and serial number for all tested equipment and emission controls), date, and time of sampling or measurements,	included on the test rec	nd time of sampling or measurement is cord.	☑ Intermittent	□No	⊠ No
2.1.2 data analysaa waxa narfarra d	Compline description	t records include the data of analysis	☐ Continuous	⊠ Yes	☐ Yes
3.1.2 date analyses were performed,	Sampling/measuremen	ampling/measurement records include the date of analyses.		□ No	⊠ No

ACC Form Part 1 - Permit Number P100M1

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
3.1.3 analytical or test methods used,	Sampling/measurement records include the test methods used.	☐ Continuous	<b>⊠</b> Yes	☐ Yes
3.1.3 analytical of test methods used,	Sampling/measurement records include the test methods used.		□ No	⊠ No
3.1.4 results of analyses or tests,	Sampling/measurement records include the results of the	☐ Continuous	<b>∑</b> Yes	☐ Yes
5.1.4 Testitis of analyses of tests,	evaluation.		□ No	⊠ No
3.1.5 operating conditions existing at the time of	Sampling/measurement records include operating conditions	☐ Continuous	<b>⊠</b> Yes	☐ Yes
sampling or measurement,	and time of sampling or measurement.	<b>⊠</b> Intermittent	□ No	⊠ No
3.1.6 name and title of persons who performed the analyses.		☐ Continuous	⊠ Yes	☐ Yes
,	Sampling/measurement records include the name and title of the person who performed the evaluation.	<b>Intermittent</b>	□ No	⊠ No
Conditions of 3.1 are pursuant to 20.2.70.302.D.1 NMAC.	P			
3.2 The permittee shall keep copies of all monitoring and measurement data, equipment calibration and		☐ Continuous	⊠ Yes	Yes
maintenance records, other supporting information, and reports required by this permit for at least five (5) years	All monitoring and measurement records required by the permit are kept for a minimum of five years. Each record	<b>⊠</b> Intermittent	□ No	⊠ No
from the time the data was gathered or the reports were written. Each record shall show clearly to which	includes the emission unit or piece of equipment it applies to. All records contain the date of data collection, and the date the			
emission unit and or piece of monitoring equipment it applies, and the date the data was gathered. This	data was gathered.			
condition is pursuant to 20.2.70.302.D.2 NMAC.  3.3 The permittee shall keep a record describing off		☐ Continuous	⊠ Yes	Yes
permit changes made at this source that result in emissions of a regulated air pollutant subject to an	Records of any change to permitted emission units that might alter regulated air pollutant emissions is kept on file for	<del></del>	_	_
applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from	review. If an increase is expected or has occurred, the change in emissions will be calculated and retained as a record and, if	<b>∑</b> Intermittent	□ No	⊠ No
those changes. This condition is pursuant to 20.2.70.302.I.2 NMAC.	required, reported to NMED.			
<b>4.0 REPORTING</b> Conditions of 4.0 are pursuant to 20.2.70.302.E NMAC.		☐ Continuous	⊠ Yes	Yes
4.1 Reports of actual emissions from permitted sources	Actual emissions from permitted sources are calculated and compared with the facility-wide emission limits twice a year.		□ No	⊠ No
in Section 2.0 shall be submitted on a 6 month basis.	Emission reports are submitted on a 6-month basis. LANL submitted emission reports to NMED on March 21, 2008 and			
Reports shall not include emissions from insignificant activities. Emission estimates of criteria pollutants NOx,	September 15, 2008. Reports do not include insignificant activities or fugitive emissions of criteria pollutants. Fugitive			
CO, SO <sub>2</sub> , PM and VOCs shall not include fugitive emissions. Emission estimates of HAPs shall include	emissions from HAPs are included. No emission limits were			
fugitive emissions. The reports shall include a	exceeded during this certification period.			

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reporting period with the facility-wide allowable emission limits specified in Section 2.10 of this permit.				
4.2 Reports of all required monitoring activities shall be submitted on a semiannual basis. All instances of deviation from permit requirements, including emergencies, shall be clearly identified in these reports. The conditions of 4.1 and 4.2 are pursuant to 20.2.70.302.E.1 NMAC.	Monitoring reports are submitted on a 6-month basis. LANL submitted monitoring reports to NMED on January 22, 2008 and August 7, 2008. No deviations from the permit conditions occurred during this certification period.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
4.3 The report required by Condition 4.1 shall be submitted within 90 days from the end of the reporting period. The semiannual report required by Condition 4.2 shall be submitted within 45 days from the end of the reporting period. The reporting periods are January 1 <sup>st</sup> to June 30 <sup>th</sup> and July 1 <sup>st</sup> to December 31 <sup>st</sup> . This condition is pursuant to 20.2.70.302.E.1 NMAC.	All reports required under this section were submitted prior to the reporting deadlines during this certification period.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
4.4 The permittee shall submit reports of all deviations (including emergencies) from permit requirements to the Department when they occur. The permittee shall communicate initial notice of the deviation to the Department within twenty-four (24) hours of the start of the first business day following the start of the occurrence via telephone or facsimile. Within ten (10) calendar days of the start of the first business day following the start of the occurrence, written notice using the Excess Emissions Form (attached to this permit) shall be submitted to the Department. This condition is pursuant to 20.2.70.302.E.2. NMAC.	No deviations occurred during this certification period.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
5.0 COMPLIANCE  5.1 The conditions of Section 5.1 are pursuant to 20.2.70.302.E.3 NMAC. The permittee shall submit compliance certification reports certifying the compliance status of this facility with respect to all permit terms and conditions, including applicable requirements. These reports shall be made on the current version of the Department's Compliance Certification Report Form (attached to this permit) and submitted to the Department and to EPA at least every 12 months. The reporting period is each calendar year; provided however, that the first report will only include those months within the year subsequent to permit issuance. This report is due no later than January 30 <sup>th</sup> following the reporting period.  5.1.1 For sources that have submitted air dispersion modeling that demonstrates compliance with state and	This complaince certification report meets the requirements of permit condition 5.1. For most sources listed in the permit, air dispersion modeling has been submitted.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No

Permit Condition # and Permit Condition:	Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
federal ambient air quality standards, in accordance with 20.2.70.300.D.10 NMAC or 20.2.72.203.A.4 NMAC, compliance with the terms and conditions of this permit regarding source emissions and operation shall be deemed to be compliance with state and federal ambient air quality standards (20.2.3NMAC NMAAQS and 40CFR50 NAAQS).				
5.2 Conditions of 5.2 are pursuant to 20.2.70.302.G.1 NMAC. The permittee shall allow representatives of the Department, upon presentation of credentials and other documents as may be required by law, which includes proper clearances when required, to do the following:	A compliance inspection by the NMED-Air Quality Bureau was conducted the week of September 22, 2008. LANL will make every effort to assist NMED with any reasonable request to verify compliance with this permit.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
5.2.1 enter the permittee's premises where a source or emission unit is located, or where records that are required by this permit to be maintained are kept,	LANL made arrangements for representatives of the Department to access the location of each emission unit and to veiw all required records during this certification period.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
5.2.2 have access to and copy, at reasonable times, any records that are required by this permit to be maintained,	Records required by the permit were provided to the Department as requested during the inspection.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
5.2.3 inspect any facilities, equipment (including monitoring and air pollution control equipment), work practices or operation regulated or required under the permit,	LANL made arrangements for representatives of the Department to access the location of each emission unit and to veiw all required records during this certification period.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
5.2.4 sample or monitor any substances or parameters for the purpose of assuring compliance with this permit or applicable requirements or as otherwise authorized by the federal Act.	Sampling or monitoring will be allowed if requested. No sampling or monitoring by the Department was requested during this certification period.	☐ Continuous ☐ Intermittent	⊠ Yes	☐ Yes ⊠ No
5.2.5 The Department recognizes that the permittee operates under security restrictions imposed by the Atomic Energy Act (42 USC 2011 <i>et seq.</i> ) and the regulations promulgated thereunder as well as other federal laws and regulations. The Department agrees it will abide by those laws and regulations in access to property and records. Nothing in this permit condition shall be construed to deny access authorized by the Air Quality Control Act.	LANL will make every effort to provide unclassified documents to be used for verifying compliance with permit conditions. LANL will continue to work with the department to provide the proper security clearance needed to access emission units located in classified areas.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
5.3 A copy of this permit shall be kept at the permitted facility and shall be made available to Department personnel for inspection upon request. This condition is pursuant to 20.2.70.302.G.3 NMAC.	A copy of this permit is available at the facility. It will be made available upon request.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
6.0 EMERGENCIES  Conditions of 6.0 are pursuant to 20.2.70.304 NMAC.  6.1 An "emergency" means any situation arising from	No emergency situations occurred during this reporting period.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
sudden and reasonably unforeseeable events beyond the control of the permittee, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, or careless or improper operation.				
6.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations contained in this permit if the permittee has demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:		☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
(a) An emergency occurred and that the permittee can identify the cause(s) of the emergency;				
(b) This facility was at the time being properly operated;	No emergency situations occurred during this reporting period.			
(c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;				
(d) The permittee fulfilled notification requirements under Condition 4.4 of this permit. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.				
6.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has	No emergency situations occurred during this reporting	☐ Continuous	⊠ Yes	☐ Yes
the burden of proof.	period.	☐ Intermittent	□ No	⊠ No
6.4 This provision is in addition to any emergency or upset provision contained in any applicable		☐ Continuous	⊠ Yes	☐ Yes
requirement, except that this facility shall not be subject to the provisions of 20.2.7 NMAC (Excess Emissions during Malfunction, Startup, Shutdown, or Scheduled Maintenance) for permit terms and conditions issued solely under 20.2.70 NMAC, and not as a result of any	No emergency situations occurred during this reporting period.	<b>⊠</b> Intermittent	□ No	⊠ No

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
other applicable requirement.		•		
7.0 PERMIT REOPENING AND REVOCATION  7.1 This permit will be reopened and revised when any one of the following conditions occurs, and may be revoked and reissued when 7.1.3 or 7.1.4 occurs.  Conditions of 7.1 are pursuant to 20.2.70.405.A.1 NMAC.  7.1.1 Additional requirements under the federal Act become applicable to this source three (3) or more years before the expiration date of this permit. If the effective date of the requirement is later than the expiration date of this permit, then the permit is not required to be reopened unless the original permit or any of its terms and conditions has been extended due to the Department's failure to take timely action on a request by the permittee to renew this permit.  7.1.2 Additional requirements, including excess emissions requirements, become applicable to this source under Title IV of the federal Act (the acid rain program). Upon approval by the Administrator, excess emissions offset plans will be incorporated into this permit.  7.1.3 The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the terms and conditions of the permit.	An application for permit renewal was submitted in April, 2008. All changes needed or required were included in this renewal application. A need to reopen, revise, revoke, or reissue the permit has not been identified by the Department. The last amendment to the LANL Operating Permit was made on July 16, 2007, which assigned a new permit number of P100M2. This amendment retired the beryllium operations at the Chemistry and Metallurgy Research Facility at Technical Area TA-3-29.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
7.1.4 The Department or the Administrator determines that the permit must be revised or revoked and reissued to assure compliance with an applicable requirement.				
7.2 Proceedings to reopen or revoke this permit shall affect only those parts of this permit for which cause to reopen or revoke exists. Emissions units for which permit conditions have been revoked shall not be operated until new permit conditions have been issued for them. This condition is pursuant to 20.2.70.405.A.2 NMAC.	A need to reopen, revise, revoke, or reissue the permit has not been identified by the Department.	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
8.0 STRATOSPHERIC OZONE This condition is pursuant to 20.2.70.302.A.1 NMAC.  8.1 The permittee shall comply with the following standards for recycling and emissions reductions	A stratospheric ozone protection program is in place at LANL. LANL, through our internal maintenance group, as well as other outside contractors, use appropriately certified technicians and certified recycling and recovery equipment. LANL refrigeration technicians, as well as other outside	☐ Continuous  ☑ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to determine the compliance status:	3. What is the frequency of data collection used to determine compliance?	4. Was this facility in compliance with this requirement during the reporting period?	5. Were there any deviations associated with this requirement during the reporting period?
pursuant to 40CFR82, Subpart F:  8.1.1 Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to subsection 82.156.  8.1.2 Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to subsection 82.158.	contractors, are trained and follow LANL procedures to ensure that required service practices found in 40 CFR 82.156 (Subpart F) are followed.			
8.1.3 Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to subsection 82.161.				
8.2 The permittee shall comply with the standards for servicing of motor vehicle air conditioners pursuant to 40 CFR Part 82, Subpart B.	Motor vehicle air conditioners (MVAC) are serviced at LANL by LANL refrigerant technicians pursuant to 40 CFR part 82, Subpart B. These technicians comply with EPA standards for servicing motor vehicle air conditioners.	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
8.3 The permittee shall comply with the standards for servicing and maintaining equipment that contains halons pursuant to 40 CFR Part 82, Subpart H.	LANL refrigeration technicians maintain the halon systems. These technicians comply with the standards for servicing and maintaining equipment containing halons pursuant to 40 CFR Part 82, Subpart H.	☐ Continuous	⊠ Yes	☐ Yes ⊠ No
9.0 RADIONUCLIDE NESHAPS The conditions of Section 9 are pursuant to 20.2.70.302.A NMAC  9.1 The permittee shall comply with the requirements of 40 CFR Part 61, Subpart H – NESHAP for 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, is 10 millirem per year. The projected emissions from 2008 result in less than 1.0 millirem off-site.  The annual report summarizing 2008 radionuclide emissions will be issued before June 30, 2009. The 2007 report, designated LA-14365, is available to NMED upon request.  In 2008, emissions from 26 stacks were continuously monitored. Also, LANL evaluated emissions from over 50 non-monitored sources and operated 30 ambient air monitoring stations to meet Subpart H requirements.	⊠ Continuous  ☐ Intermittent	⊠ Yes □ No	☐ Yes ⊠ No
9.2 The permittee shall comply with the requirements of 40 CFR Part 61, Subpart Q – NESHAP for Radon Emissions from DOE Facilities.	LANL has a radionuclide NESHAP team that is devoted to compliance with 40 CFR Part 61, which includes Subpart Q (emissions of radon from DOE facilities), as applicable. LANL performed evaluations on the sources applicable under this subpart and has determined that radon emission levels are below applicable thresholds. This information was provided to EPA, who in turn provided LANL with a memorandum of	☐ Continuous ☑ Intermittent	⊠ Yes □ No	☐ Yes ☑ No

## Version 03.11.08

Permit Condition # and Permit Condition:	2. Method(s) or other information or other facts used to	3. What is the	4. Was this facility in	5. Were there any
	determine the compliance status:	frequency of data	compliance with this	deviations associated
	r	collection used to	requirement during the	with this requirement
		determine	reporting period?	during the reporting
		compliance?		period?
	understanding in agreement with LANL's findings.			
10.0 1.00000000000000000000000000000000				
10.0 ASBESTOS NESHAP		Continuous	₩ was	□ Voc
This condition is pursuant to 20.2.70.302.A NMAC.	LANL has a program in place to meet the requirements found	☐ Continuous	⊠ Yes	☐ Yes
	in the Asbestos NESHAP standard 40 CFR Part 61, Subpart			
This condition is pursuant to 20.2.70.302.A NMAC.	1	☐ Continuous ☐ Intermittent	⊠ Yes □ No	☐ Yes ☑ No
	in the Asbestos NESHAP standard 40 CFR Part 61, Subpart			

ACC Form Part 1 - Permit Number P100M1 LA-UR-09-00349 Page 42 of 42

## Part 2

## **ACC Deviation Summary Report for Permit P-100M1**

1. A form	⊠ Yes	□ No				
2. I Sem form devi	☐ Yes	⊠ No				
3. I repo	☐ Yes	⊠ No				
De						
No.	Applicable Requirement (Include Rule Citation)					
1	Operating permit P100M2 conditions 2.9.4.7 and 2.9.4.8. 20.2.72.210.B.4 NMAC	TA-3-22 CT-1	An emission spreadsheet, containing the calculations found in permit conditions 2.9.4.7 and 2.9.4.8, is used to calculate the NOx and CO pound per hour (pph) and ton per year (tpy) emission rates. This data is compared with the permit emission limits listed in permit condition 2.9.2. On October 22 and October 23, 2008, the static emission factors and calculations in these conditions resulted in a deviation. LANL has been working with the NMED-AQB permitting group to modify the permit to remove these conditions and replace them with conditions that represent actual	The permit modificatio NMED consists of repl these permit conditions test.	acing the calcul	ation in

3				de Fe fa as w Fe re co w	etermined to be much for October 22nd, using actor resulted in 11.9 accompared to the calculation of the cal	sions for the two days were lower than the permit limits. In the compliance test emission pph of NOx and 2.5 pph of CO, culation in this permit condition pph of NOx and 173 pph of CO. compliance test emission factor NOx and 2.6 pph of CO, as ation in these permit conditions pph NOx and 180 pph CO. By est data, which contains actual cess emissions occurred.				
5										
Deviation Summary Table (cont.)										
	Deviation	Started	Deviation	Ended					Did you attach an excess emission form?	
No.	Date	Time	Date	Time	Pollutant	Monitoring Method		Amount of Emissions		
1	10/22/2008	12:00 AM	10/23/200 8	11:59 PM	NOx & CO	Emission Calculation (values in "A of Emissions" column use compliatest data to estimate.)		Oct. 22 11.9 pph NOx 2.5 pph CO	☐ Yes ⊠ No	

				Oct. 23 12.5 pph NOx 2.6 pph CO		
2					☐ Yes	□ No
3					☐ Yes	□ No
4					☐ Yes	□ No
5					☐ Yes	□ No