

Associate Directorate for ESH&Q P.O. Box 1663, MS K491 Los Alamos, New Mexico 87545 505-667-2211/Fax 505-665-8858

Date: August 4, 2009 Ref: ESH&Q-09-081

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

SUBJECT:

SEMI-ANNUAL MONITORING REPORT FOR JANUARY - JUNE 2009

AIR QUALITY TITLE V OPERATING PERMIT P100-M2

IDEA ID No. 856 - Los Alamos National Laboratory (LANL)

Dear Compliance Reporting Manager:

Enclosed is Los Alamos National Laboratory's Title V Operating Permit Semi-Annual Monitoring Report for the period **January 1 – June 30, 2009** (Enclosure-1). This submission is required by permit condition 4.2 of Operating Permit P100-M2 and is being submitted within the allowed 45 days after the end of the reporting period as specified in permit condition 4.3. No permit deviations or excess emissions were identified during this reporting period.

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 665-2169 or David Paulson at 665-8884.

Sincerely,

J. Chris Cantwell

Associate Director

Environment, Safety, Health & Quality

Enc: a/s

Cy: I.E. Richardson, III, w/o enc., DIR, A100 M. Mallory, w/o enc., PADOPS, A102 S. Fong, w/o enc., DOE-LA-AO, A316

V. George, w/o enc., ENV-DO, J978

P. Wardwell, w/o enc., LC-ESH, A187

D. Wilburn, w/o enc., ENV-EAQ, J978

S. Story, w/o enc., ENV-EAQ, J978

IRM-RMSSO, w/o enc., A150

ENV-EAQ Title V Monitoring Report File

ADESH&Q File



Version 07.03.08

New Mexico Environment Department Air Quality Bureau **Compliance and Enforcement Section** 1301 Siler Road Building B Santa Fe, NM 87507 Phone (505) 476-4300 Fax (505) 476-4375



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c. 🗆	NSPS Requirement (40CFR60)	Regulation:		Section(s): Description:										
D. 🗌	MACT Requirement (40CFR63)	Regulation:		Section(s)	:	Description:								
E. 🗌	NMAC Requirement (20.2.xx) or NESHAP Requirement (40CFR61)	Regulation:		Section(s)	:		Description:							
F. 🗌	Permit or Notice of Intent (NOI) Requirement	Permit No.□:	or NOI No.□	Condition	(s):		Description:							
		NOV No. □: or	r SFO No. 🔲:	Section(s)	:		Description:							
G. 🗌	Requirement of an Enforcement Action	or CD No. □:	or Other □:											
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Title V Report Certification Form

I. Report Type								
☐ Annual Compliance Certification			•	-				
⊠ 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: NN	Л	Zip	: 87545			
Responsible Official (RO): J. Chris Cantwell			505-667-42	Zip: 8/545 505-667-4218 Fax: 505-665-3811				
RO Title: Assoc. Director Environmental, Safety, Health, and			RO e-mail:	can	twe@lanl.gov			
Permit No.: P100M2			Date Permit Issued: July 16, 2007					
Report Due Date (as required by the permit): 08/14/2009	F	Permit A	I number: 8	56				
Time period covered by this Report: From: January 1, 200)9		To: June ?	30, 2	2009			
III. Certification of Truth, Accuracy, and Comple	ete	ness						
I am the Responsible Official indicated above. I, (J. Chris Cantwell) certify that I meet the requirements of 20.2.70.7.AD NMAC. I certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in the attached Title V report are true, accurate, and complete.								
Signature Caule De	Da	nte: <u>8/4/2</u>	.009 .					

Enclosure - 1

Los Alamos National Laboratory's
Title V Operating Permit
Monitoring Report for the period
January 1 – June 30, 2009

LA-UR-09-04659

Approved for public release; distribution is unlimited.

Title:

Title V Semi-Annual Monitoring Report for Permit P100M2 January 2009 through June 2009

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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Title V Semi-Annual Monitoring Report for Permit P100M2

Part 1 – Monitoring Activity Reporting Requirements

4.0 REPORTING

Conditions of 4.0 are pursuant to 20.2.70.302.E NMAC.

- 4.1 Reports of actual emissions from permitted sources in Section 2.0 shall be submitted on a 6 month basis. Reports shall not include emissions from insignificant activities. Emission estimates of criteria pollutants NOx, CO, SO₂, PM and VOCs shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. The reports shall include a comparison of actual emissions that occurred during the 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.
- 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 1st to June 30th and July 1st to December 31st. This condition is pursuant to 20.2.70.302.E.1 NMAC.
- 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.

Attachment 1 Asphalt Plant Opacity Reports

Summary Table, Reports Attached

Month	Read Location	Date	Time	Average Opacity	EPA Method
January	Top of Shaker	01/13/09	9:20 am	0	9 ^(a)
February	Top of Shaker	02/04/09	8:40 am	0	9 ^(a)
March	Top of Shaker	03/11/09	9:16 am	0	9 ^(a)
April	Top of Shaker	04/09/09	8:40 am	0	9 ^(a)
May	Top of Shaker	05/18/09	10:12 am	0	9 ^(a)
June	Top of Shaker	06/05/09	9:55 am	0	9 ^(a)

(a) EPA Method 9 was used. Average opacity for the Asphalt Plant is the sum of the highest consecutive 24 readings divided by 24 (6 minutes of readings). The method is in accordance with 20.2.61 NMAC and conditions 2.1.4.1 and 2.1.4.3 of the Los Alamos National Laboratory (LANL) Operating Permit P100M2.

4									
Los Alamos									
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Height Above Groun	Feet	Height Relative to Ob	Z5 Feet	4	0	0	1	0	
Distance From Obses	ver Feet		om Observer	5	0	0	D	0	
Description of Pinne	(stack exit			6	D	0	0	0	
Description of Phone OLofting OTrappi 20No Plume Present	ng CLeap	ning OFamung OC	anting	7			SE		
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Los Alamos		LOS ALAMOS NATION	AL I	LABORATO	RY (I	ANL)		
Inter-land tree man		VISIBLE EMISSION OBSE		TION FORM	I (6)		TE)		1.0
Source Name:	1	alt Plant		Observation Da	- /	19			
Source Location	17 PM	all land	\neg	Sec					
TA-60 ·	5190	ma Mesa		Min	0	15	30	45	Comments
A Source	D/1	Type of Control Equipment		1	0	0	0	D	
Describe Enussion Poi			-	2	0	0	0	0	
TOP DE M. Height Above Ground		Height Relative to Observer		3	0	0	0	0	
45		Feet		4	0	0	n	0	
Distance From Observ	er Esst	Direction of Source From Observer		5	0	0	0	0	
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Description of Plume (g CLoop	ing Offenning Oconing		7	0	0	0	0	Paragraphic and the state of th
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		***		ETA					2-25-09
	SEXTOC	ATION LINE	- 1	,					

4						
LOS ALAMOS NATIONAL VISIBLE EMISSION OBSERVA	LABORATO	RY (I	ANL	TE		
Source Name: VISIBLE EMISSION OBSERVA	Observation D.		TING	Start	Linte	End Time
LANL Appliedt Plant	6-5	-0	9	09	95-	5/001
Source Location:	Séc Min	0	15	30	45	Сопшент
TA-LO SIGNA SICSA Type of Source Type of Control Equipment	1	0	0	0	0	No state in the state of the st
Asphalt Plant Baghouse	2	0	37	0	N	
Describe Ethissican Point (Top of starts, etc.)	3	0	0		2	
Height Above Ground Level Height Relative to Observer		0	0	0	0	
Distance From Objection Direction of Source From Objection	4	1)	0	0	0	
Direction of Source From Observer	5	0	0	0	0	
Description of Plume (stack exit only)	6	0	10	0	0	
□Lofting □Trapping □Leoping □Faming □Coming DNo Plume Present	7					
Emission Color Finane Type No Pinne Present Communication Figure Officernations	8					
Water Droplets Present? @NO DVES ICVES, droplet plume is @Attached	9	554				
As what pour in the plane was oppoint determined?	10			10.11		
21tt. apove tonot stack	11					
Describe Background (i.e. blue sky: mes, etc.)	12					
Background Color Sky Conditions	13		80.550 51.54			
Wind Speed Wind Direction (provide from to, i.e. from North to South)	14	Personal Property of the Personal Property of	arsia Maga			
5-10 From 46/	15			777		
Ambient Temperature Relative Humiday	16					
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SIN IOCATION INTE	-//		-			

	Notify the Department within 60 days after each calendar quarter of the facility's compliance status with the permitted emission 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 Bureau's Enforcement Section in determining the reliability of the methodology used for demonstrating compliance with the permitted emission rate within 45 days of such a request.
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 will be made available to Department personnel upon request. Reports may be required to be submitted to the Department if inspections of the source indicate noncompliance with this permit or as a means of determining compliance.

- 4.1 Reports of actual emissions from permitted sources in Section 2.0 shall be submitted on a 6 month basis. Reports shall not include emissions from insignificant activities. Emission estimates of criteria pollutants NOx, CO, SO₂, PM and VOCs shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. The reports shall include a comparison of actual emissions that occurred during the 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.

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

Yes Date report submitted: January 29, 2009 & April 22, 2009 (Beryllium Test Facility TA-3-141)
Tracking Numbers: SBR20090003, SBR20090005

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

Comments:

Chemistry and Metallurgy Research Facility (TA-3-29) – This beryllium source was removed from Operating Permit P100M1 as requested by LANL. A letter from NMED-AQB amending the permit was dated July 16, 2007. This amendment resulted in the assignment of Operating Permit No. P100M2.

<u>Sigma Facility (TA-3-66)</u> - A log is maintained showing the number of metallographic specimens used in the polishing operation. Logs are maintained showing the weight of Be samples processed in the electroplating/chemical milling, machining, and arc melting/casting operations. Logs are available on-site for NMED inspection.

2.3 Boilers and Heaters

- 2.3.4 Emissions Monitoring Requirements
- 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.
- 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 measure the total amount of natural gas being used on a monthly basis.
- 2.3.4.3 40 CFR Part 60, Appendix A, Method 9 shall be used to determine compliance with the opacity limitation.

Reporting Requirement

- 2.3.6 Reports shall be submitted in accordance with conditions 4.1 and 4.2.
- 4.1 Reports of actual emissions from permitted sources in Section 2.0 shall be submitted on a 6 month basis. Reports shall not include emissions from insignificant activities. Emission estimates of criteria pollutants NOx, CO, SO₂, PM and VOCs shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. The reports shall include a comparison of actual emissions that occurred during the 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.

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

☐ Yes Date report submitted:

Tracking Number:

⊠ No

Provide comments and identify any supporting documentation as an attachment.

Comments:

- 2.3.4.1 The TA-21 Steam Plant was officially and permanently shut-down as of September 28, 2007. This information was communicated to NMED in a letter dated October 16, 2007.
- 2.3.4.2 Volumetric flow meters are utilized to measure the total amount of natural gas being used by units TA-55-6-BHW-1 and TA-55-6-BHW-2 on a monthly basis. Natural gas usage is summarized in Attachment 2.
- 2.3.4.3 LANL uses 40 CFR Part 60, Appendix A, Method 9 to determine compliance with the opacity limitation.

2.4 Carpenter Shops

- 2.4.4 Emissions Monitoring
- 2.4.4.1 The permittee shall maintain logs of the hours the carpenter shops are in operation.

Reporting Requirement

- 2.4.6 Reports shall be submitted in accordance with conditions 4.1 and 4.2.
- 4.1 Reports of actual emissions from permitted sources in Section 2.0 shall be submitted on a 6 month basis. Reports shall not include emissions from insignificant activities. Emission estimates of criteria pollutants NOx, CO, SO₂, PM and VOCs shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. The reports shall include a comparison of actual emissions that occurred during the 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.

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

☐ Yes	Date report submitted:	Tracking Number:	
⊠ No	Provide comments and identify any	supporting documentation as an attachment.	
Comments	· ×		

2.4.4.1 A log is maintained of the hours of operation for each of the permitted carpenter shops. Hour readings are collected and recorded monthly from hour meters installed on each of the cyclone separators. Hours of operation are provided in **Attachment 3**.

2.5 Chemical Usage

- 2.5.4 Emissions Monitoring/Recordkeeping Requirements
- 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.

Reporting Requirement

- 2.5.5 Reports shall be submitted in accordance with conditions 4.1 and 4.2.
- 4.1 Reports of actual emissions from permitted sources in Section 2.0 shall be submitted on a 6 month basis. Reports shall not include emissions from insignificant activities. Emission estimates of criteria pollutants NOx, CO, SO₂, PM and VOCs shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. The reports shall include a comparison of actual emissions that occurred during the 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.

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

☐ Ye	es Da	te repor	t submitted:
		-	

Tracking Number:

No No

Provide comments and identify any supporting documentation as an attachment.

Comments:

2.5.4.1 Records of chemical purchases are maintained through LANL's facility wide chemical tracking system (ChemLog). The data is used to calculate emissions which are submitted in the Semi-Annual Emission Reports.

Attachment 4 Degreaser Solvent Usage

General Degreaser Information

Degreaser	Type	TA	Solvent		
TA-55-DG-1	Cold Batch	55	Trichloroethyle	ene	
Date Measured	Initial Solvent Level (inches)	Volume Added (liters)	Level Added (inches)	Volume Removed (liters)	Level Removed (inches)
Jan-28-2009	6.00	0.00	0.00	0.00	0.00
Feb-26-2009	6.00	0.00	0,00	0.00	0.00
Mar-17-2009	5.75	3.44	1.75	0.00	0.00
Apr-07-2009	7.50	0.00	0.00	0.00	0.00
Apr-28-2009	7.00	0.00	0.00	13.76	7.00
May-21-2009	0.00	15.73	8.00	0.00	0.00
Jun-22-2009	7.50	0.00	0.00	0.00	0.00

Attachment 5 Internal Combustion Generator Hours of Operation

2009 Standby Generator Hours

						Sec. 1		First 6	First 6 Month Readings		Second 6 Month Readings		
						Previous		6 Month			12 Month		
						Reading	Previous	Reading			Reading		
TA.	Bldg	Manufacturer	MODEL	KW	Fuel Type	Date	Reading	Date	Reading	Hours Run	Date	Reading	Hours R
3	40	Onan Sons	1500DVE15R31374B	150	Diesel	Dec-08	12.8	Jun-09	12.8	0.0			
3	223	Onan Sons	45.0EM-15R/10742D	45	Propane	Dec-08		Jun-09	492.5	0.0			
3	440	Cummins	500FDR5051	260	Diesel	Dec-08	121.8	Jun-09	121.8	0.0	Harrion (o ne
3	440	Cummins	DFGA-5005210	500	Diesel	Dec-08	99.9	Jun-09	107.5	7.6			
3	1076	Cummins	DGBB-5601289	35	Diesel	Dec-08	181.1	Jun-09	195.1	14.0			
3	1400	Cummins	DFEH-5699616	400	Diesel	Dec-08	44	Jun-09	63	19.0	- ser 6	No. To Land	
3	1404	Cummins	DFLC-5554001	1250	Diesel	Dec-08	393.5	Jun-09	417.6	24.1			1
3	1498	Caterpillar	SR-4	600	Diesel	Dec-08	337	Jun-09	347.0	10.0			N
3	2322	Onan Sons	DGDA-5005757	80	Diesel	Dec-08	358.6	Jun-09	364.8	6.2			
16	980	Cummins	KTA50-G2	1100	Diesel	Dec-08	318.6	Jun-09	321	2.4			1000
16	1374	Onan Sons	60ENA	60	Nat. Gas	Dec-08	1125	Jun-09	1161	36.0	STORY		-
35	2	Onan Sons	100DGDB	100	Diesel	Dec-08	115.5	Jun-09	115.5	0.0	THE RES		1
35	402	Cummins	DGCB-5674244	60	Diesel	Dec-08	175	Jun-09	216.0	41.0			
43	1	Cummins	4BT3.9-GC	50	Diesel	Dec-08	392.9	Jun-09	401.3	8.4			
43	1	Onan Sons	DVE	150	Diesel	Dec-08	671.9	Jun-09	700.0	28.1			
46	335	Onan Sons	300DEFCB	300	Diesel	Dec-08	1020	Jun-09	1063.1	43.1			
48	45	Onan Sons	DFCB-5740130	300	Diesel	Dec-08	78.5	Jun-09	103.6	25.1			
50	37	Cummins	680FDR5059FF	500	Diesel	Dec-08	502.9	Jun-09	502.9	0.0			1-17
50	184	Onan Sons	DGFA-568741	150	Diesel	Dec-08	256	Jun-09	291.0	35.0			
50	188	Onan Sons	L940563879	1250	Diesel	Dec-08	149	Jun-09	149.0	0.0			
53	1	Onan Sons	60ENA	60	Nat. Gas	Dec-08	1271	Jun-09	1289.0	18.0	100		
53	2	Kato Eng.	Kamag-14	50	Diesel	Dec-08	194.6	Jun-09	194.6	0.0	Sales of the Control		
53	3N	Onan	15.0JC-18R	15	Propane	Dec-08	362.3	Jun-09	362.6	0.3			
54	412	Olympian	95M-07874-F	500	Diesel	Dec-08	331.7	Jun-09	372.4	40.7			
55	5	Kohler	100RZ71	100	Propane	Dec-08	98.3	Jun-09	115.0	16.7			
55	8	Delco/Detroit	E 7014DD	600	Diesel	Dec-08	840.6	Jun-09	848.9	8.3			
55	364	Onan Sons	1250DFLC-4987	1250	Diesel	Dec-08	134.3	Jun-09	147.8	13.5			
55	28	Onan Sons	40DL6T	40	Diesel	Dec-08	84.6	Jun-09	89.0	4.4			
55	47	Onan Sons	1465	200	Diesel	Dec-08	569	Jun-09	575.0	6.0			
55	142	Cummins	DFEB-4963414	400	Diesel	Dec-08	122.1	Jun-09	137.0	14.9			
59	1	Allis Chalmers	2884-0703	90	Diesel	Dec-08	750	Jun-09	750.0	0.0			
50	yard	Cummins	DFHD-4964979	1000	Diesel	Dec-08	650	Jun-09	657	7.0			
33	93	Murphy	3166-0084	30	Diesel	Dec-08	716	Jun-09	716.0	0.0			
34	1	Onan Sons	250DVG	250	Diesel	Dec-08	178	Jun-09	184.6	6.6			
69	33	Cummins	DFLC-5568730	1250	Diesel	Dec-08	85	Jun-09	100.0	15.0			
33	33	Cullillins	D1 LC-2200130	1250	Diesel	Den-00	0.5	Jun-09	100.0	15.0			0.0

N/R = Not Read	First half average hours per unit	12.9	Second half average hours per unit	\neg
WIK - NOT Keau	i nat han average notas per unit	12.3	accondition average flours per time	

	Permitted Generators								Firs	t Half 20	09	Seco	1		
TA Bldg		Manufacturer	Serial #	MODEL	KW	Fuel Type	Reading 2nd half of previous year		6 Month Reading Date	Reading		12 Month Reading Date	eading		* Total Run Hours
33	290	Kohler	375801	1600ROZD	1600	Diesel	Dec. 08	34.3	Jun-09	35.4	1.1	Dec-09	and a	0	1.1
33	151	Caterpillar	6PK01065	XQ225	225	Diesel	Dec. 08	3307.0	Jun-09	3365.0	58.0	Dec-09		0	58.0
33	209	Kohler	2025460	20EORZ	20	Diesel	Dec. 08	384.1	Jul-09	384.1	0.0	Dec-09	8-86	0	0.0
33	280	Kohler	2025461	20EORZ	20	Diesel	Dec. 08	175.9	Jun-09	176.1	0.2	Dec-09		0	0.2

^{*} The 225 kW and the two 20 kW generators have a limit of 500 hours of operation per year. The 1600 kW unit is limited to 900 hours per year.

Attachment 6 Data Disintegrator Box Throughput

2009 TA-52 Data Disintegrator

	Data Entry		Data Entry
Month	Boxes Shredded	Month	Boxes Shredded
January	92	July	REPORT OF THE PARTY OF
February	55	August	
March	116	September	The state of the s
April	87	October	
May	157	November	
June	117	December	
6 mo. Total:	624	6 mo. Total:	0

Annual Boxes: 624

No. 2195BM1, Condition 3.h.

- 2.9.4.9 At least once each calendar quarter the permittee shall use the method specified in Conditions 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.
- 2.9.4.10 Visible emissions from stationary combustion equipment shall not equal or exceed an opacity of 20%. 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.
- 2.9.4.11 Initial compliance tests are required on Unit TA-3-22 CT-1 for NOx and CO. These tests shall be 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.
- 2.9.4.12 The permittee shall comply with fuel sulfur monitoring requirements at 40 CFR 60.334(h) 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.

Reporting Requirement

- 2.9.6 Reports shall be submitted in accordance with conditions 4.1 and 4.2.
 - This condition is pursuant to 20.2.60.302.E NMAC.
- 4.1 Reports of actual emissions from permitted sources in Section 2.0 shall be submitted on a 6 month basis. Reports shall not include emissions from insignificant activities. Emission estimates of criteria pollutants NOx, CO, SO₂, PM and VOCs shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. The reports shall include a comparison of actual emissions that occurred during the 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.

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

- 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.
- 2.9.4.12 The natural gas used by the combustion turbine meets the definition of natural gas in 60.331(u). The sulfur monitoring 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 for NMED inspection.

Attachment 8 Combustion Turbine Daily and 12-Month Rolling Natural Gas Use

	Jan		Feb		Mar		ar Apr		M	au.	1	ın .	- In	ılv	Δ,	Ja	90	ept	0	ct	N	οv	D.	ec
	Gas			ei)	Gas	al	Gas	101	Gas	ay	Gas	JI:1	Gas	пу	Gas	ay	Gas	pt	Gas	1,1772	Gas	UV	Gas	
Day	Use	Hrs	Gas Use	Hrs		Hrs	Use	Hrs	Use	Hrs	Use	Hrs	Use	Hrs	Use	Hrs	Use	Hrs			Use	Hrs	Use	
1	0	0	0	0	0	0	295	0.9	0	0	0	0												
2	0	0	0	0	0	0	0	0	0	0	0	0												
3	0	0	0	0	0	0	0	0	0	0	0	0												
4	0	0	0	0	13	0.5	0	0	0	0	0	0												
5	0	0	0	0	0	0	0	0	0	0	0	0												
6	3	0	127	0.5	0	0	0	0	0	0	0	0												
7	0	0	0	0	0	0	0	0	0	0	0	0												
8	2	0	0	0	0	0	0	0	3	0	0	0												
9	0	0	0	0	81	0.9	0	0	0	0	0	0									\vdash			
10	0	0	0	0	0	0	0	0	0	0	210	1					_	_			_	_	_	-
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15	0	0	0	0	0	0	19	0.1	0	0	0	0	-											
16	21	1	0	0	0	0	0	0	0	0	0	0												
17	0	0	0	0	0	0	0	0	0	0	0	0												
18	0	0	0	0	0	0	0	0	0	0	0	0												
19	0	0	0	0	565	3	0	0	7	0	0	0												
20	62	1.1	0	0	0	0	0	0	0	0	0	0												
21	8	0	0	0	0	0	0	0	0	0	0	0												
22	0	0	0	0	0	0	0	0	0	0	0	0	_		_						_	_		_
24	0	0	0	0	0	0	103	0.2	0	0	0	0	-				_				-	-	-	\vdash
25	0	0	0	0	0	0	0	0	0	0	1	0										_		-
26	20	0	0	0	0	0	0	0	0	0	0	0										7		
27	0	0	80	0.1	0	0	0	0	0	0	0	0												
28	0	0	0	0	0	0	0	0	0	0	0	0												
29	0	0			0	0	75	0.4	0	0	0	0												
30	0	0			0	0	0	0	0	0	0	0												
31	0	0	0.07		0	0	100		0	0	044	100			_									_
SUM 12-Mo.	116	2.1	207	0.6	984	6.8	492	1.6	114	1	211	1									-		_	_
12-Mo. Iling Gas se (MCF)	as 17039 17246 18201 18693		18689 18485																					

Permit Limit (12 mo rolling): 646 MMSCF or

or 646,000 MCF

Los Alamos Los ALAMOS NATIONAL	LABORATO	RY (L	ANL)		•
VISIBLE EMISSION OBSERVA						
Source Name:	Observation Da			Star:	inte	End Tinie
LANL POWER Plant	1-13-	09	7	10	08	1018
Scurce Location: TA-3-22	Min Sec	0	15	30	4.5	Comments
Type of Source Type of Control Equipment	1	0	0	0	0	
Describe Emission Point (Tou of stack, etc.)	. 2	0	12	0	0	
Height Above Ground Level Height Relative to Observer	3	0	0	0	0	
Height Above Ground Level Height Relative to Observer	4	0	b	0	0	
Distance From Observer 200 Feet Direction of Source From Observer	5	0	0	0	0	
Description of Plante (stack exit only)	6		0		0	
Thofting Trapping Discoping OFanning Oceaning	7	0	0	0	0	
Emission Color Plume Type No Plume Present IContinuous E Fuguire Clintermittent	3	0	0	U	0	
Water Droulets Present?		0	0	0	0	
NO DYES ITYES, dropler plume is CAttached Detached	9	0	0	0	0	
At what your in the plume was opacity determined?	10	0	0	0	0	
Describe Background (i.e. blue sky, nees, etc.)	11					
Backgraying Color Sky Conditions	12					in a second
Wind Speed Wind Direction	13					well and the second sec
4-6 mph (provide from to, i.e. from North to South)	14					
Ambient Temperature Relative Humidity	15				<u> </u>	
Additional Comments Information	16					
Fuel Oil Bum Exercise	17					
The Sac Durry	18					
	19					
Stack SOURCE LAYOUT SKETCH	20					
Phone Draw Arraw in North Direction	Average 10-N	limite (Opacity		Range of	Opacity Readings Max
Sun Diestrica Point	0	9/0	2		09	6 D/0
Wind -	OBSERVER Name—	please . /	print'		Tale	
	Signature	51	one		Eng	Daie
		11	-			
	Observer Oy	mizni	on .			1-13-09
	ENV-EAR	2/0	10	I		e e E
OBSERVER'S POSITION	Certified by		•		- 1	Centricanian Date
•	ETA	-				8-27-08
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LOS ALAMOS NATIONAL L VISIBLE EMISSION OBSERVAT						
	Observation D	STATISTICS AND ADDRESS OF THE PARTY NAMED IN	VIII.	Start	linte	End Time
Fuel Oil # 3 Boler (Power Plant) Scauce Location:	3-17	- 07		10	47	1057
TA-3 SM-22 FOWER HANT	Min	0	15	30	45	Comments
Type of Source Type of Control Equipment	1	6	0	0	0	
#R. Fuel Oil M/A Describe Envision Point (Top of stack, etc.)	2	0	8	8	0	
1 FT. Physe STACK	3	3	6	0	0	AT CHARLES AND THE TOTAL AND T
Height Above Ground Level Height Relative to O'merver Feet	4	6	C	0	0	
Distance From Observer Disection of Source From Observer 200 Feet 1)02.76	5	0	0	0	0	
Description of Plants estack exit only)	6	0	0	0	3	
□Lofting □Trapping □Leoping □Faming □Coning Sto Plume Present	7	0	0	.	0	white the same of
Entition Color Plume Type Roo Plume Present Clear Continuous D Fugitive Dinternation	8	0	0	0		
Water Displets Present? NO GYES MYES, displet plume is GAttacked GDetacked	9	0	0	0	0	
At what point in the plume was opacity determined?	10	3	Ö,		0	*=
Describe Background (i.e. blue dry, trees, etc.)	11					
Blue SKY	12					
Background Color Sky Conditions 3646 Alexander	13					
Wind Speed Wind Direction mph (provide from to, i.e. from North to South)	14					
3/5 Gen 30 ath To No216 1855	15					
52 7 27 %	16					The second of the second
Fuel Del burn exercise	17					
rue on our son	18				-,	
	19					
Stack SOURCE LAYOUT SKETCH	20					
Plume Draw Arrow in North Direction	Average 10-M	inute C	pacity		_	Opacity Readings
Sun Point Point	.) -		,	lin. –	+ Max.
Wind —	OBSERVER (please		-	Title:	Engineer My Technologist
	Signature	4:1	OR	112		Date
		10	7			3/11/09
	Observer Org	anizatio	n)			1 /- /
DBSERVER'S POSITION	Certified by				- r	Certification Date
149	ETA					2-26-09
SUN LOCATION LINE	with the state of	- Vo				

<u>A</u>						
LOS ALAMOS NATIONAL I						
TOY OF THE PROPERTY OF THE PRO	Observation Da		MINU	Stan	Timo	End Time He
Source Name:	11 -	-				17375
Source Location:	9-)- Sec	27		13	27	154
TA-3-22	Min	0	15	30	45	Comments
Type of Source Type of Control Equipment	1	0	0	0	0	
Boiles 4/ Mo Particulate Control Describe Envission Point (Top of stack, etc.)	2	0	0	0	0	
Top of Boyler #1 Stack	3			0	0	
Height Above Ground Level Height Kelative to Observer	4	0	0	0	0	
Distance From Observer Direction of Source From Observer		0	0	0	0	
ZDD Feet E	5	0	0	0	0	
Description of Phune (stack exit only) □Lofting □Trapping □Looping □Fauning □Coning	6	0	0	0	10	
MNo Plume Present Emission Color Plume Type No Plume Present	7	0	0	0	0	
□Continuous □ Fugitive □Intermittent	S	0	0	0	0	
Water Droplets Present? ☑NO □YES If YES, droplet plume is □Attached □Detached	9		0	0	0	
At what point in the plume was opacity determined?	10	0	0	0	0	
21ft. above ton of stack	Telephon Paragraphy (April	0	U	0	0	
Describe Background (i.e. blue sky, trees, etc.)	11			No.		
Background Color Sky Conditions	12					
Klue cfear	13					
Wind Speed Wind Direction (provide from/to, i.e. from North to South)	14	164				
From SW					BOURSE.	
Ambient Temperature Relative Humidity	15			41242		
Additional Comments/Information:	16					
Burner Management	17					
	18					and the second
	19					
Stack SOURCE LAYOUT SKETCH	20		2000 E	ARCIES .		
with Q			O	HODGE.	Water and	SOussiles Brodieses
Plume Emission Draw Arrow in North Direction	Average 10-1	illililite (Opacit		Min.	of Opacity Readings Max. 00
Sun Point	0	10			0	10 0/0
$ W_{\text{ind}} \rightarrow $ $ X $	OBSERVER	(please	print)		Title:	9
	Name	5/0	110	-	E.V	GINEEL
	Signature	210	4			Date
	1 du	LA	5	<i></i>		4-7-009
	Observer Or	e poizht	ion			1
	ENV-	EA	Q			
OBSERVER'S POSITION	Certified by					Certification Date
1.40°	ETA					2-25-09
SUN LOCATION LINE						

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LOS ALAMOS NATIONAL						
Source Name: VISIBLE EMISSION OBSERVA	Observation Da		HINU	LE)	Lanta	End Time
LANC POWER Plant		2-1	1	988888		21763
Source Location:	Sec Sec	100	7	11.	20	1130
TA-3-22	Min	0	15	30	45	Comments
Type of Source Type of Control Equipment Bio 1/ex # / Worlant Reside Control	1	0	0	0	0	that facilities were supported to
Describe Emission Point (Top of stack, etc.)	2	n	0	D	D	
Height Above Ground Level Height Relative to Objerver	3	0	0	D	0	
150 Feet 140 Feet	4	10	0	0	0	
Distance From Observer ZDD Feet Direction of Sounce From Observer	5	0	0	0	n	
Description of Plums (stack exit only) □ Lofting □ Trapping □ Looping □ Founing □ Coning	6	0	0	0	0	
Emission Color Plume Type Witto Plume Present	7	0	b	D	0	
Continuous di Fugitive dintermittent	S	D	n	n	0	
Water Droplets Present? → NO □YES If YES, droplet plume is □Attached □Detached	9	D	0	D	0	The state of the s
At what point in the plume was opacity determined?	10	D	0	0	0	
Describe Background (i.e. blue/sky, trees, etc.)	11	2 5 700				
Background Coher Sky Conditions	12	1663				
Wind Speed Wind Direction	13					
wind Direction Wind Direction Wind	14					
Ambient Temperature Relative Humidity	15					
65 32%	16					
Free Oil onn efercing	17					
fred one our exercise	18					
	19	19136 1916 1916 1916 1916 1916 1916 1916				
Stack SOURCE LAYOUT SKETCH	20					
with Q Plume Draw Arrow in	Average 10-M	limute C	Opacity		Range o	f Opacity Readings
Sim Emission North Direction		01			Min.	Max.
Wind — (X)	OBSERVER	(please	print)		0/	5 010
Wind	Mame:	4			Title:	
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	(h	1	1			V 12 -1
\	1 pre	4	10	we		5-16-07
	Observer Org	ganyzan	on A	3)		
OBSERVER'S POSITION	ENV	1	44			Certification Date
	Certified by					Centification Date
110°40	ETA			149		2-25-01
SUN LOCATION LINE						

	Are there any deviations not yet reported? If No, no further information is required on the Deviation Summary Report. If Yes, answer question 3 below and enter the required information in the Deviation Summary Table.										
	id any of the d mission Form						resulting in excess emiss	sions a comple	ted Excess	Yes	□ No
Dev	riation Sum	ımary Ta	ble for d	eviatio	ons n	ot yet repoi	·ted.				
No.	No. Applicable Requirement (Include Rule Citation)				Caus	se of Deviation		Corrective	Action Taken		
1									37		
2											
3											
4											
Dev	iation Sum	mary Ta	ble (con	t.)							
	Deviation	Started	Deviation	Ended						Did you atta excess form?	emission
No.	Date	Time	Date	Tir	ne	Pollutant	Monitoring Method		Amount of Emiss ions		
1										☐ Yes	□ No
2										Yes	□ No
3										Yes	□ No
4										☐ Yes	□ No