Operating Permit
Annual Compliance Certification Report Form

April 30 – December 31, 2004

(PART 1)

Identifying Information

Source Name: Los Alamos National Laboratory County: Los Alamos .

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

Responsible Official: Carolyn A. Mangeng Ph No. (505) 667-0079 Fax No. (505) 665-1812
Technical Contact: Steven L. Story Ph No. (505) 665-2169 Fax No. (505) 665-8858
Principal Company Product or Business: National Security and Nuclear Weapons Research Primary SIC Code: 9711

Permit No. P100 {IDEA/Tempo ID No. 856} Permit Issued Date: April 30, 2004

Certification of Truth, Accuracy, and Completeness

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

Signature_____ Date: _____

Title: Associate Director (Acting) , Technical Services Directorate

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Annual Compliance Certification Data for State Permit No. P100			
Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency continuous (C) or intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.1 Asphalt Production			
	The Asphalt Plant did not operate during calendar year 2004. Anticipated start-up of this plant is early 2005.	N/A	N/A
2.2 Beryllium Activities	LANL conducted self inspections of all beryllium operations from 1/5/05 to 1/11/05.		
2.2.2 Emission Limits	Emissions are calculated and reported to NMED on a 6 month basis in accordance with permit condition 4.1. Emissions are compared to the allowable emission limits in each semi-annual report.	I	Yes
2.2.3 Operational	Some beryllium operations have process limits and pollution control equipment requirements. LANL completed self inspections of beryllium operations from 1/6/05 to 1/11/05. No process limits were exceeded and required pollution control equipment is used.	I	Yes
2.2.4 Monitoring	TA-3-29 – A log of samples processed is maintained. TA-3-66 – Log books are maintained showing the number of specimens used and the weight of samples processed in these operations. TA-3-141 – The exhaust stack has a continuous emission monitor; the cartridge and HEPA filters are equipped with differential pressure gauges that measure differential pressure when the fans are in operation TA-16-207– Project files of components prepared for testing are maintained. No beryllium components were used between 4/30/04 and 12/31/04. TA-35-87 – A log of filters cut is maintained. TA-35-213 – A copy of the stack emission test is available for inspection. TA-55-PF4 – The HEPA filtration system	I	Yes

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	contains a differential pressure gauge that measures the differential pressure across the HEPA filters. The differential pressure is verified daily. Annual HEPA filter challenge tests are performed and results are submitted in LANL's semi-annual monitoring report.		
2.2.5 Recordkeeping	TA-3-29 – Recordkeeping for this source is specified in condition 2.2.4. TA-3-66 – Recordkeeping for this source is specified in condition 2.2.4. TA-3-141 – LANL maintains logs to demonstrate compliance with beryllium process limits and daily differential pressure readings. Control equipment maintenance is 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, are recorded and available at the facility. A copy of annual HEPA filter test reports and daily differential pressure readings are kept. Filter change out records are also kept. Process records are available of the quantity and weight of classified parts processed daily and annually.	I	Yes
2.2.6 Reporting	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted our first monitoring report on August 15, 2004, and our first emissions report on September 28, 2004 to NMED. TA-3-141 quarterly reports were submitted to NMED within 60 days after each calendar	I	Yes

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	quarter. Results for 2004 were submitted 5/25/04, 7/29/04 and 11/8/04. A report was also submitted 2/9/04, which was before the Title V permit was issued.		
2.3 Boilers and Heaters			
2.3.2 Emission Limits	Emissions are calculated and reported to NMED on a 6 month basis in accordance with permit condition 4.1. Emissions are compared to the allowable emission limits in each semi-annual report. In addition, fuel use records are collected monthly and emissions calculated to verify compliance with the emission limits.	I	Yes
2.3.2.1 of the permit	***LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 as required by the Operating Permit.*** Opacity reports are provided to NMED in the semi-annual monitoring report. An opacity measurement was performed on the TA-21 boilers and the opacity did not exceed the standard.	I	Yes
2.3.3 Operational 2.3.3.1 of the permit	For units listed under this permit condition, a 12-month rolling total of natural gas used is calculated and recorded each month. The rolling total is compared to the fuel use limit each month. Natural gas usage limits were not exceeded.	I	Yes
2.3.3.2 of the permit	For units located at TA-21-357, a 12-month rolling total of natural gas and fuel oil use is calculated and recorded each month. The rolling totals are compared to the fuel use limits in this permit. Natural gas and fuel oil limits were not exceeded.	I	Yes
2.3.4 Monitoring 2.3.4.1 of the permit	For units located at TA-21-357, a volumetric flow meter is in place and used to monitor monthly natural gas use. The readings from this flow meter are reported monthly and included in LANL's Gas Usage Report.	I	Yes

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2.3.4.2 of the permit	For units located at TA-55-6, a volumetric flow meter is in place and used to monitor monthly natural gas use. The readings from this flow meter are reported monthly and included in LANL's Gas Usage Report.	I	Yes
2.3.4.3 of the permit	***LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 as required by the Operating Permit.*** Opacity reports are provided to NMED in the semi-annual monitoring report.		
2.3.5 Recordkeeping 2.3.5.1 of the permit	Facility wide natural gas use is collected on a monthly basis and distributed in the LANL Gas Usage Report. From the total usage, metered sources are subtracted and the difference is apportioned between non-metered boilers and heaters based on fuel or heat input ratings.	I	Yes
2.3.6 Reporting 2.3.6.1 of the permit	Emission and monitoring reports are submitted to NMED on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted a monitoring report on August 15, 2004, and a emissions report on September 28, 2004.	I	Yes
2.4 Carpenter Shops	TA-15-563 Carpenter Shop did not operate during CY 2004. The following statements only apply to the TA-3-38 Carpenter Shop, which was inspected on 12/14/04.		
2.4.2 Emission Limits	Emissions of PM_{10} are calculated and reported on a 6 month basis in accordance with permit condition 4.1. Emissions are compared to the allowable emission limits in each semi-annual report.	I	Yes
2.4.3 Operational 2.4.3.1 of the permit	Hourly use of saws, drills, shaping and sanding equipment are tracked using the cyclone operation log book. Hours of operation are collected monthly and compared to the maximum annual hour limit.	I	Yes
2.4.3.2 of the permit	Process cyclones are operated during shop operations.	I	Yes

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2.4.4 Monitoring 2.4.4.1 of the permit	The log book of cyclone operations is used to record the hours of shop operation.	I	Yes
2.4.5 Recordkeeping 2.4.5.1 of the permit	The log book of cyclone operations is used to record the hours of shop operation.	I	Yes
2.4.6 Reporting 2.4.6.1 of the permit	Emission and monitoring reports are submitted to NMED on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted a monitoring report on August 15, 2004, and a emissions report on September 28, 2004.	I	Yes
2.5 Chemical Usage			
2.5.3 Emission Limits 2.5.3.1 of the permit	Facility wide emissions from chemical use are calculated and reported on a 6 month basis in accordance with permit condition 4.1. A comparison against the allowable emission limits is performed at each of these reporting periods. Facility wide emission limits have not been exceeded.	I	Yes
2.5.4 Monitoring 2.5.4.1 of the permit	Facility wide chemical purchase records are collected in LANL's ChemLog database and used to calculate emissions. Chemical emission information is submitted to NMED every 6-months in accordance with permit condition 4.1.	I	Yes
2.5.5 Reporting 2.5.5.1 of the permit	Emission and monitoring reports are submitted to NMED on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted a monitoring report on August 15, 2004, and a emissions report on September 28, 2004.	I	Yes
2.6 Degreasers			
2.6.2 Emission Limits 2.6.2.1 of the permit	Emissions are calculated and reported on a 6 month basis in accordance with permit condition 4.1. Comparison against the allowable emission limits is performed at each of these reporting periods.	I	Yes

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2.6.3 Operational 2.6.3.1 of the permit	2.6.3.1.1 - The degreaser has a cover that closes tightly. An administrative control is in place to close the lid after use. 2.6.3.1.2 - The freeboard ratio is maintained through administrative controls, the use of a liquid depth measuring device, and a solvent fill line. 2.6.3.1.3 - All waste solvent and solvent contaminated rags are stored in closed containers appropriate for the chemical. 2.6.3.1.4 - Administrative controls are in place to allow flushing in the freeboard area only. 2.6.3.1.5 – Administrative controls are in place to allow cleaned parts to drip for 15 seconds or until dripping stops. 2.6.3.1.6 - A fill line has been established to prevent the unit from being overfilled. 2.6.3.1.7 - Administrative controls are in place to immediately clean up all spills. 2.6.3.1.8 – Administrative controls are in place to prevent splashing with an agitation device. 2.6.3.1.9 – The degreaser is located in an enclosure (glove box) with a set ventilation flow rate. Exhaust flows are set to not exceed 40 m/sec. 2.6.3.1.10 – Administrative controls are in place to prevent the contamination or cleaning of absorbent materials such as sponges, fabric, wood, or paper.	I	Yes
2.6.4 Monitoring 2.6.4.1 of the permit	A computerized software system is used to track the amount of degreaser solvent added, removed, and loss. This system is used to calculate emissions, which are reported on a 6-month basis in accordance with permit condition 4.1.	I	Yes
2.6.4.2 of the permit	A checklist is used to verify all work practice standards are in place and being performed.	I	Yes
2.6.5 Recordkeeping 2.6.5.1 of the permit	A Material Safety Data Sheet (MSDS) is kept and available that describes the content and	I	Yes

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	concentration of the solvent. The work practice standards checklist is kept as a record at the operating location.		
2.6.6 Reporting 2.6.6.1 of the permit	Only one of the three permitted degreasers is being used. If other units are brought on-line, NMED will be notified.	I	Yes
2.6.6.2 of the permit	If a stored unit should become active, a compliance report will be submitted to the NMED 150 days after startup.	I	Yes
2.6.6.3 of the permit	Emission and monitoring reports are submitted to NMED on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted a monitoring report on August 15, 2004, and a emissions report on September 28, 2004.	I	Yes
2.7 Internal Combustion			
2.7.2 Emission Limits	The TA-33-G-1 generator did not operate in calendar year 2004.	N/A	N/A
2.7.2.1 of the permit	The TA-33-G-1 generator did not operate in calendar year 2004.	N/A	N/A
2.7.3 Operational 2.7.3.1 of the permit	Hours of each stationary standby generator are tracked and evaluated twice a year to verify that the average hour per year limit is not exceeded.	I	Yes
2.7.3.2 of the permit	The TA-33-G-1 generator did not operate in calendar year 2004.	N/A	N/A
2.7.3.3 of the permit	The TA-33-G-1 generator did not operate in calendar year 2004.	N/A	N/A
2.7.4 Monitoring	Hours of each stationary standby generator are tracked and evaluated twice a year to verify that the average hour per year limit is not exceeded. The TA-33-G-1 generator did not operate in 2004.	I	Yes
2.7.4.1 of the permit	***LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 as required by the Operating Permit.*** Opacity reports are provided to NMED in the semi-annual monitoring report.	I	Yes

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2.7.5 Recordkeeping 2.7.5.1 of the permit	Recordkeeping requirements are specified at condition 2.7.4.	I	Yes
2.7.6 Reporting 2.7.6.1 of the permit	Emission and monitoring reports are submitted to NMED on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted a monitoring report on August 15, 2004, and an emissions report on September 28, 2004.	I	Yes
2.8 Paper Shredder	LANL conducted a self-inspection of this source on 12/14/04.		
2.8.2 Emission Limits 2.8.2.1 of the permit	Emissions are calculated and reported on a 6 month basis in accordance with permit condition 4.1. A comparison against the allowable emission limits is performed at each of these reporting periods.	I	Yes
2.8.4 Monitoring 2.8.4.1 of the permit	A log is kept to record the number of boxes of paper/media shredded.	I	Yes
2.8.5 Recordkeeping 2.8.5.1 of the permit	A log is kept of the number of boxes of paper/media that are shredded. These numbers are entered into a spreadsheet to calculate monthly emissions.	I	Yes
2.8.6 Reporting 2.8.6.1 of the permit	Emission and monitoring reports are submitted to NMED on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted a monitoring report on August 15, 2004, and a emissions report on September 28, 2004.	I	Yes
2.9 Power Plant (TA-3-22)	LANL conducted a self-inspection of this source on 12/13/04.		
2.9.2 Emission Limits	Compliance with the pound per hour emission limits was determined during source compliance tests performed in September 2002. The test results were provided to NMED. Emissions are also calculated and reported to the NMED on a 6 month basis in accordance with permit condition 4.1. Comparison against the 12-month rolling total emission limits is	I	Yes

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	performed each month and at each of these reporting periods.		
2.9.2.1 of the permit	Results from source compliance tests performed on the boilers in September 2002, demonstrate that NO_2 emissions do not exceed 0.3 lbs per MMBtu.	I	Yes
2.9.2.2 of the permit	***LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 as required by the Operating Permit.*** Opacity reports are provided to NMED in the semi-annual monitoring report. Visible emissions did not equal or exceed an opacity of 20%.	I	Yes
2.9.3 Operational 2.9.3.1 of the permit	The natural gas supply contract states that gas provided to LANL will be pipeline quality. The page from the contract containing this information is kept at the plant. Pipeline quality gas contains no more than 2 grains of total sulfur per 100 scf. Sulfur content in fuel oil is checked/analyzed prior to or upon delivery to verify it is less than 0.05%.	I	Yes
2.9.3.2 of the permit	A 365 day rolling total for both natural gas and fuel oil use is maintained and reviewed to verify usage does not exceed 2,000 MMscf and 500,000 gallons respectively. These rolling totals were verified to be in place, and below permit limits, by the LANL air quality group on December 13, 2004.	I	Yes
2.9.4 Monitoring 2.9.4.1 of the permit	Flow meters with correctors are in place at the facility. The correctors are periodically inspected and calibrated to maintain accuracy. The flow data from this meter is collected electronically daily. Data from the meters was verified by the LANL air quality group on December 13, 2004.	I	Yes
2.9.4.2 of the permit	Data on fuel use is electronically collected and calculated in a 365 day rolling total. Data on fuel oil use was verified by the LANL air quality group on December 13, 2004.	I	Yes

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2.9.4.3 of the permit	Due to recent changes put in place by NSR permit 2195BM1, this semiannual compliance stack test requirement is no longer valid. The new natural gas use limit is 2000 MMscf.	I	Yes
2.9.4.4 of the permit	***LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 as required by the Operating Permit.*** Opacity reports are provided to NMED in the semi-annual monitoring report.	I	Yes
2.9.5 Recordkeeping 2.9.5.1 of the permit	Fuel oil use is tracked electronically daily and as a 365 day rolling total. This record was verified by the LANL air quality group on December 13, 2004.	I	Yes
2.9.5.2 of the permit	No deliveries to the plant were made in 2004. Sulfur content in fuel oil is checked/analyzed prior to or upon delivery to verify it is less than 0.05%. A record of analysis of the last delivery was verified by the LANL air quality group on December 13, 2004.	I	Yes
2.9.5.3 of the permit	An electronic record of natural gas use is maintained. This record includes a 365 day rolling total. This record was verified to be in place by the LANL air quality group on December 13, 2004.	I	Yes
2.9.5.4 of the permit	The natural gas supply contract states that gas provided to LANL will be pipeline quality. The page from the contract containing this information is kept at the plant. Pipeline quality gas contains no more than 2 grains of total sulfur per 100 scf.	I	Yes
2.9.6 Reporting 2.9.6.1 of the permit	Emission and monitoring reports are submitted to NMED on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted a monitoring report on August 15, 2004, and a emissions report on September 28, 2004.	I	Yes
2.10 Rock Crusher			

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	The Rock Crusher did not operate during calendar year 2004 and will be removed from the Title V Operating Permit during the next revision.	N/A	N/A
2.11 Facility Wide Emission Limits			
2.11.1 of the permit	Facility-wide actual emissions are calculated and compared with the facility-wide emission limits twice a year. Semi-annual emission reports are submitted to the NMED in accordance with permit condition 4.1.	I	Yes
2.11.2 of the permit	The LANL air quality group has a review process for construction and modification projects. This process identifies projects applicable to 20.2.72 NMAC.	I	Yes
8.0 Stratospheric Ozone			
8.1 Subpart F	A stratospheric ozone protection program is in place at LANL. LANL, through our maintenance subcontractor KSL, uses appropriately certified technicians and certified recycling and recovery equipment. KSL follows LANL procedures to demonstrate that required service practices found in 40 CFR 82, Subpart F are followed.	I	Dev
8.2 Subpart B	Motor vehicle air conditioners (MVAC) are serviced at LANL by KSL pursuant to 40 CFR part 82, subpart B.	I	Yes
8.3 Subpart H	KSL maintains LANL halon systems. KSL technicians are appropriately trained and do not vent halon during maintenance, service, repair, or disposal.	I	Yes
9.0 Open Burning			
TA-11-OB-2003	No open burning occurred at this site during calendar year 2004.	N/A	Yes
TA-14-OB-2003	No open burning occurred at this site during calendar year 2004.	N/A	Yes

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TA-16-OB-2003	LANL maintains a burn log for TA-16 activities. NMED was notified before each burn and permit limits were not exceeded.	I	Yes
TA-36-OB-2003	No open burning occurred at this site during calendar year 2004.	N/A	Yes
10.0 Radionuclide NESHAPs			
10.1 Subpart H – *Emissions of radionuclides other than radon from DOE facilities.*	LANL has a radionuclide NESHAP team that is devoted to compliance with 40 CFR Part 61, Subpart H (Emissions of radionuclides other than radon from DOE facilities). The EPA limit for radionuclide emissions, corresponding to a maximum off-site dose of 10 millirem per year. Emissions from 2004 will result in approximately 2 millirem off-site. The annual report summarizing 2004 emissions will be issued before June 30, 2005. The 2003 report, LA-14155-PR, is available on the ENV-MAQ web site (http://www.airquality.lanl.gov/pdf/RadAir/LA-14155-PR.pdf). In 2004, emissions from 28 stacks were continuously monitored. Also, LANL evaluated emissions from over 50 non-monitored sources and operated 18 ambient air monitoring stations to meet Subpart H requirements.	I	Yes
10.2 Subpart Q – *Emissions of radon from DOE facilities.*	LANL has a radionuclide NESHAP team that is devoted to compliance with 40 CFR Part 61, which includes compliance with Subpart Q (emissions of radon from DOE facilities). LANL operations do not meet the criteria described in Subpart Q which require compliance with this standard. EPA Region 6 has confirmed this with LANL and the NMED at the Title V Open House Feb. 25, 2003.	I	Yes
11.0 Asbestos NESHAP			
11.1 Subpart M	LANL has a program in place to meet the requirements found in the Asbestos NESHAP	I	Yes

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	standard 40 CFR Part 61, Subpart M. LANL submitted quarterly reports to NMED during 2004 summarizing asbestos activities and provided asbestos notifications as required. NMED routinely performs inspections of asbestos work at LANL.		Note: NMED issued KSL an NOV for asbestos work performed at LANL in March 2004.

Instructions to
Operating Permits
Annual Compliance Certification

(PART 2 Instructions)

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Annual Compliance Certification Data Element:

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

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

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

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

   In identifying the compliance status of each term and condition of the permit, a source shall certify intermittent compliance when basing its certification on methods or other information providing intermittent data, and on methods or

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

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

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

Deviation Summary Report

(PART 4)

Deviation Report — Permit No. P100

No	Emission Unit ID	Poll	Applicable Requirement (Include Rule Citation)	Monitoring Method (Include Rule Citation)	Monitoring Frequency	Total # of Deviations
1	N/A	HCFC-22	Permit Condition 8.1 40 CFR 82 Subpart F	N/A	N/A	1

	Deviation Started		Deviation Ended				
No	Date	Time	Date	Time	# of Days	Cause of Deviation	Corrective Action Taken
1	06/23/04	unknown	06/23/04	unknown	N/A	On June 23, 2004, while scoping a job to disconnect three pad mounted heating, ventilation and air conditioning units (HVAC), a KSL supervisor discovered that the refrigerant lines for the HVAC units were improperly cut and a condenser was missing. The three HVAC units, which were connected to trailers being donated to BIA and intended for reuse, contained approximately 20 pounds of HCFC-22.	An occurrence investigation (ALO-LA-LANL-PHYSTECH-2004-0002) was conducted to determine the cause of the deviation. LANL was unable to determine who improperly cut the refrigerant lines and removed one of the units. LANL reported the missing unit to the Los Alamos Police Department (LAPD Report No. 204-917).