LA-UR-16-20166
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| | |
|---|---|
| Title: | ADESH-16-006 2015 Annual Compliance Certification P100-R2 report |
| Author(s): | Ramanathan, Brinda |
| Intended for: | Air Quality Compliance report to NMED<br>Environmental Programs |
| Issued: | 2016-08-29 (rev.1) |

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

Version 05.02.13

| NMED USE ONLY | |
|---|---|
| TEMPO | |

# REPORTING SUBMITTAL FORM

| NMED USE ONLY | |
|---|---|
| Staff | |
| Admin | |

PLEASE NOTE: ® - Indicates required field

## SECTION I - GENERAL COMPANY AND FACILITY INFORMATION

| | | | | | |
|---|---|---|---|---|---|
| **A. ® Company Name:** Los Alamos National Security, LLC | | | **D. ® Facility Name:** Los Alamos National Laboratory | | |
| **B.1 ® Company Address:** P.O. Box 1663 MS J978 | | | **E.1 ® Facility Address:** Same as Company | | |
| **B.2 ® City:** Los Alamos | **B.3 ® State:** NM | **B.4 ® Zip:** 87545 | **E.2 ® City:** | **E.3 ® State:** | **E.4 ® Zip:** |
| **C.1 ® Company Environmental Contact:** Anthony R. Grieggs | **C.2 ® Title:** ENV-CP Group Leader | | **F.1 ® Facility Contact:** Steven L. Story | **F.2 ® Title:** Air Quality Compliance Team Leader | |
| **C.3 ® Phone Number:** (505) 665-0451 | **C.4 ® Fax Number:** (505) 665-8858 | | **F.3 ® Phone Number:** (505) 665-2169 | **F.4 ® Fax Number:** (505) 665-8858 | |
| **C.5 ® Email Address:** grieggst@lanl.gov | | | **F.5 ® Email Address:** story@lanl.gov | | |
| **G. Responsible Official: (Title V only):** Michael T. Brandt | **H. Title:** Associate Director for ESH | | **I. Phone Number:** (505) 667-4218 | **J. Fax Number:** (505) 665-3811 | |

| K. ® AI Number: | L. Title V Permit Number: | M. Title V Permit Issue Date: | N. NSR Permit Number: | O. NSR Permit Issue Date: |
|---|---|---|---|---|
| 856 | P100-R2 | February 27, 2015 | 2195 | various |

**P. Reporting Period:** From: 02/27/2015 To: 12/31/2015

## SECTION II – TYPE OF SUBMITTAL (check one that applies)

| | | | | |
|---|---|---|---|---|
| A. ☒ | **Title V Annual Compliance Certification** | **Permit Condition(s):** All | **Description:** LANL 2015 Annual Compliance Certification Report for P100-R2 | |
| B. ☐ | **Title V Semi-annual Monitoring Report** | **Permit Condition(s):** | **Description:** | |
| 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:** |
| G. ☐ | **Requirement of an Enforcement Action** | **NOV No. ☐: or SFO No. ☐: or CD No. ☐: or Other ☐:** | **Section(s):** | **Description:** |

## SECTION IV - CERTIFICATION

**After reasonable inquiry, I** Michael T. Brandt (name of reporting official) **certify that the information in this submittal is true, accurate and complete.**

| ® Signature of Reporting Official: | ® Title: | ® Date | ® Responsible Official for Title V? |
|---|---|---|---|
| | Associate Director for ESH | 11/25/16 | ☒ Yes ☐ No |

Reviewed By: _____ Date Reviewed: _____

Los Alamos
NATIONAL LABORATORY
EST.1943

*Environment Safety & Health*
PO Box 1663, MS K491
Los Alamos, New Mexico 87545
(505) 667-4218/Fax (505) 665-3811

*Date*: JAN 26 2016
*Symbol*: ADESH-16-006
*LAUR*: 16-20166
*Locates Action No:* N/A

Manager, Compliance and Enforcement Section
New Mexico Environment Department
Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505-1816

Dear Compliance & Enforcement Manager:

**Subject: Annual Compliance Certification report for 2015-Title V Operating Permit P100-R2 IDEA ID No. 856-Los Alamos National Laboratory (LANL)**

Enclosed is Los Alamos National Laboratory's Title V Operating Permit Annual Compliance Certification report for the time period February 27–December 31, 2015. Title V renewal permit P100-R2 superseded Title V Operating Permit P100-R1-M3 on February 27, 2015. A separate Annual Compliance Certification report for P100-R1-M3 is submitted concurrently, and includes the reporting period from January 1–February 26, 2015.

This report is required by permit condition A109.C of Title V Operating Permit P100-R2, and is being submitted by January 30, 2016, 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 the U.S. EPA Region 6.

One permit deviation occurred during this reporting period in applicable requirement A1307.D. Specifically, the deviation occurred when the combustion turbine unit TA-3-22-CT-1 operated at less than 80%–100% load. The unit operated at less than 80% load on three (3) consecutive days, December 1, 2, and 3, 2015, with the operating load ranging 75%–80%. There were no excess emissions. Corrective action has been taken to address this deviation. All combustion turbine operators were required to review the startup/shutdown procedure for operating the combustion turbine, with emphasis on the requirement to maintain the load above 80% during the operation of the combustion turbine.

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

Sincerely,

Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety, and Health

MTB:SLS:RB/lm

Enclosure: 1. Los Alamos National Laboratory's Title V Operating Permit P100-R2 Annual Compliance Certification Report, February 27–December 31, 2015

Cy: Steve Thompson, USEPA/Region 6, Dallas, TX
Hai Shen, EM-SG, (E-File)
Richard Kacich, DIR, (E-File)
Kirsten Laskey, EM-LA, (E-File)
Adrienne Nash, NNSA Field Office, (E-File)
Craig Leasure, PADOPS, (E-File)
Amy De Palma, PADOPS, (E-File)
Michael T. Brandt, ADESH, (E-File)
John P. McCann, ENV-DO, (E-File)
Steven L. Story, ENV-CP, (E-File)
Kathleen Gorman, ENV-ES, (E-File)
Brinda Ramanathan, ENV-CP, (E-File)
Marjorie B. Stockton, ENV-CP, (E-File)
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Env-correspondence@lanl.gov

# ENCLOSURE 1

Los Alamos National Laboratory's Title V Operating Permit P100-R2

Annual Compliance Certification Report,

February 27–December 31, 2015

ADESH-16-006

LA-UR-16-20166

Date: JAN 26 2016

# 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 | State: NM | Zip: 87545 |
| Responsible Official (RO): Michael T. Brandt | Phone: 505-667-4218 | Fax: 505-665-3811 |
| RO Title: Associate Director - Environment, Safety, and Health | RO e-mail: mtbrandt@lanl.gov | |
| Permit No.: P100-R2 | Date Permit Issued: February 27, 2015 | |
| Report Due Date (as required by the permit): 01/30/2016 | Permit AI number: 856 | |
| Time period covered by this Report: From: February 27, 2015 | To: December 31, 2015 | |

## III. Certification of Truth, Accuracy, and Completeness

I am the Responsible Official indicated above. I, (Michael T. Brandt) 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  Date: 1/25/16

# Part 1 - Permit Requirements Certification Table

| Annual Compliance Certification Data for Title V Permit No. P100R2 | | | | |
|---|---|---|---|---|
| 1. 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? |
| **FACILITY SPECIFIC REQUIREMENTS**<br><br>**A101 Permit Duration (expiration)**<br><br>A. The term of this permit is five (5) years. It will expire five years from the date of issuance. Application for renewal of this permit is due twelve (12) months prior to the date of expiration. (20.2.70.300.B.2 and 302.B NMAC) | Operating permit P100-R2 was issued on February 27, 2015, and will expire on February 27, 2020. The application for renewal is due February 27, 2019. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A101 Permit Duration (expiration)**<br><br>B. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate beyond the expiration date, provided that a timely renewal application is submitted no later than twelve (12) months prior to the expiration date. (20.2.70.400.D NMAC) | Los Alamos National Laboratory (LANL) operated in compliance with operating permit P100-R1-M3 until February 26, 2015. The renewal operating permit P100-R2 was issued on February 27, 2015, and is valid until February 27, 2020.<br><br>The next operating permit renewal application is due February 27, 2019. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A102 Facility: Description**<br><br>B. This Laboratory is located at UTM Zone 13, UTMH 380.790 km, UTMV 3970.800 km, in and adjacent to Los Alamos, New Mexico in Los Alamos County. | The facility description and location provided in this permit condition are correct. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A103 Facility: Applicable Regulations**<br><br>**A.** The permittee shall comply with all applicable sections of the requirements listed in Table 103.A | See specific sections under each source category for compliance with applicable requirements. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|

**Table 103.A: Applicable Requirements**

| Applicable Requirements | Federally Enforceable | Unit No. |
|---|---|---|
| NSR Permit Nos: 632, 634-M2, 1081-M1, 1081-M1-R1, 1081-M1-R3, 1081-M1-R5, 1081-M1-R6, 2195B-M2, 2195F-R4, GCP-3-2195G, 2195H, 2195N-R2 and 2195P-R2 | X | As referenced in this permit. |
| 20.2.7 NMAC Excess Emissions | X | Entire Facility |
| 20.2.11 NMAC Asphalt Process Equipment | X | TA-60-BDM |
| 20.2.33 NMAC Gas Burning Equipment – Nitrogen Dioxide | X | TA-3-22-1, TA-3-22-2, TA3-22-3 |
| 20.2.34 NMAC Oil Burning Equipment – Nitrogen Dioxide | X | TA-3-22-1, TA-3-22-2, TA3-22-3 |
| 20.2.60 NMAC Open Burning | X | Entire Facility |
| 20.2.61 NMAC Smoke and Visible Emissions | X | All stationary combustion sources (except TA-60-BDM) |
| 20.2.65 NMAC Smoke Management | X | Entire Facility |
| 20.2.70 NMAC Operating Permits | X | Entire Facility |
| 20.2.71 NMAC Operating Permit Emission Fees | X | Entire Facility |
| 20.2.72 NMAC Construction Permits | X | As referenced in NSR Permit Nos. 632, 634-M2, 1081-M1, 1081-M1-R1, 1081-M1-R3, 1081-M1-R5, 1081-M1-R6, 2195B-M2, 2195F-R4, GCP-3-2195G, 2195H, 2195N, 2195N-R1, and 2195P-R2 |
| 20.2.73 NMAC Notice of Intent and Emissions Inventory Requirements | X | Entire Facility |

| 1. 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? |
|---|---|---|---|---|---|
| 20.2.77 NMAC New Source Performance Standards | X | Sources subject to 40 CFR 60 | | | |
| 20.2.78 NMAC NESHAPs | X | Sources subject to 40 CFR 61 | | | |
| 20.2.82 NMAC MACT Standards for Source Categories of HAPS | X | Sources subject to 40 CFR 63 | | | |
| 40 CFR 50 National Ambient Air Quality Standards | X | Entire Facility | | | |
| 40 CFR 60, Subpart A, General Provisions | X | All sources subject to any NSPS Subpart | | | |
| 40 CFR 60, Subpart Dc, NSPS for Small Industrial-Commercial-Institutional Steam Generating Units | X | TA-55-6-BHW-1, TA-55-6-BHW-2, RLUOB-BHW-1 through RLUOB-BHW-4 | | | |
| 40 CFR 60, Subpart I, NSPS for Hot Mix Asphalt Facilities | X | TA-60-BDM | | | |
| 40 CFR 60, Subpart GG, NSPS for Stationary Gas Turbines | X | TA-3-22 CT-1 | | | |
| 40 CFR 60, Subpart IIII, NSPS for Stationary Compression Ignition Reciprocating Internal Combustion Engines | X | RLUOB-GEN-1 through RLUOB-GEN-3, TA-48-GEN-1, TA-55-GEN-1, TA-55-GEN-2 and TA-55-GEN-3 | | | |
| 40 CFR 61, Subpart A, General Provisions | X | All sources subject to any NESHAPs Subpart | | | |
| 40 CFR 61, Subpart C, NESHAP for Beryllium | X | TA-3-141, TA-35-213, TA-55-PF4, TA-3-66 | | | |
| 40 CFR 61, Subpart H, NESHAP for Radionuclides other than Radon from DOE Facilities | X | Entire Facility | | | |
| 40 CFR 61, Subpart M, NESHAP for Asbestos | X | Entire Facility | | | |

| 1. 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? |
|---|---|---|---|---|---|
| 40 CFR 61, Subpart Q, NESHAP for Radon Emissions from DOE Facilities | X | Entire Facility | | | |
| 40 CFR 63, Subpart A, General Provisions | X | All sources subject to any MACT Subpart | | | |
| 40 CFR 63, Subpart T, MACT for Halogenated Solvent Cleaning | X | TA-55-DG-1 | | | |
| 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (MVAC) | X | Entire Facility | | | |
| 40 CFR 82, Subpart F, Recycling and Emission Reduction | X | Entire Facility | | | |
| 40 CFR 82, Subpart H, Halon Emissions Reduction | X | Entire Facility | | | |
| 40 CFR 82, Subpart I, Ban on Refrigeration and Air Conditioning Appliances Containing HCFCS. | X | Entire Facility | | | |
| **A103 Facility: Applicable Regulations**<br><br>C. Compliance with the terms and conditions of this permit regarding source emissions and operation that were included in NSR permits 632, 634, 1081, 2195B, 2195F, 2195H, 2195N, and 2195P demonstrate compliance with national ambient air quality standards specified at 40 CFR 50, which were applicable at the time air dispersion modeling was performed for those NSR Permits. | See each source category for applicable regulations. | | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A104 Facility: Regulated Sources**<br><br>A. Source category specific Regulated Equipment Tables are included in sections A600 through A1400 under the Equipment Specific Requirements part of this permit. The Regulated Equipment Tables list all of the process equipment authorized for this facility. Emission units that were identified as | See each source category for regulated equipment. | | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| insignificant or trivial activities (as defined in 20.2.70.7 NMAC) and equipment not regulated pursuant to the Act are not included. | | | | |
| **A105 Facility: Control Equipment**<br><br>A. Source category specific Control Equipment Tables are included in sections A601 through A1401 under the Equipment Specific Requirements part of this permit. The Control Equipment Tables list all the pollution control equipment required for this facility. Each emission point is identified by the same number that was assigned to it in the permit application. | See each source category for control equipment. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A106 Facility: Allowable Emissions**<br><br>A. Source category specific Allowable Emissions are established in sections A602 through A1402 under the Equipment Specific Requirements part of this permit. Table 106.A below shows a summary of these emission limits, which are subject to permit fees. (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC and NSR Permit Nos. 632, 634-M2, 1081-M1, 1081-M1-R1, 1081-M1-R3, 1081-M1-R5, 1081-M1-R6, 2195B-M2, 2195F-R4, GCP-3-2195G, 2195H, 2195N-R2, and 2195P-R2). | Source-specific and facility-wide emissions are calculated on a semi-annual basis and compared to the limits listed in the referenced table. No emission limits have been exceeded during this certification period. Actual emissions are included in the emission inventory reports submitted to the New Mexico Environment Department (NMED) Air Quality Bureau (AQB). | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 106.A: Allowable Emissions per Source Category**

| Source Category (Section No.) | [1]$NO_x$ tpy | CO tpy | VOC tpy | $SO_2$ tpy | TSP tpy | $PM_{10}$ tpy | $PM_{2.5}$ tpy |
|---|---|---|---|---|---|---|---|
| Asphalt Production (A600) | 50.0[5] | 30.0[5] | 50.0[5] | 50.0 | 50.0[5] | -[2] | - |
| Beryllium Activities (A700) | - | - | - | - | - | - | - |
| External Combustion (A800) | 80.0 | 80.0 | 50.0 | 50.0 | 50.0 | 50.0 | 1.6[3] |

| 1. 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? |
|---|---|---|---|---|---|---|
| Chemical Usage (A900) | - | - | *[4] | - | - | - |
| Degreasers (A1000) | - | - | * | - | - | - |
| Internal Combustion (A1100) | 20.85 | 16.8 | 0.5 | 2.66 | - | - |
| Data Disintegrator (A1200) | - | - | - | - | 9.9 | 9.9 |
| Power Plant (A1300) | 90.8 | 93.7 | 4.3 | 9.1 | 9.4 | 9.2 |
| Open Burning (A1400) | - | - | - | - | - | - |

1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as $NO_2$

2 "-" indicates the application represented that emissions of this pollutant are not expected *or* that allowable emission limits have not been previously established for this pollutant and source category.

3 This PM2.5 total represents the RLUOB boilers only; PM2.5 emission limits have not been established for any other external combustion sources.

4 "*" indicates the application represented that emissions of this pollutant are expected and are included in the facility-wide allowable emissions limit established in Condition A106.B. Annual VOC emission limits for these individual source categories have not been established.

5 These are voluntary emission limits that are less than the applicable limits in the Asphalt production permit, GCP-3-2195G. Limits are taken to reduce total emission in Table 106.A to below the facility-wide allowable emissions in Table 106.B

| | | | | |
|---|---|---|---|---|
| **A106 Facility: Allowable Emissions**<br><br>B. Facility-wide emissions for criteria pollutants, VOC, and HAPs from all emission units, combined, shall not exceed the limits in Table 106.B. | Source-specific and facility-wide emissions are calculated on a semi-annual basis and compared to the limits listed in the referenced table. No emission limits have been exceeded during this certification period. Actual emissions are included in the emission inventory reports submitted to the NMED AQB. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 106.B: Facility-Wide Allowable Emissions[1]**

| **Facility-Wide** | **[2]$NO_x$ tpy** | **CO tpy** | **VOC tpy** | **$SO_2$ tpy** | **TSP tpy** | **$PM_{10}$ tpy** | **$PM_{2.5}$ tpy** | **Any Individual HAP** | **Total HAPs** |
|---|---|---|---|---|---|---|---|---|---|
| Sum of emissions from all sources | 245.0 | 225.0 | 200.0 | 150.0 | 120.0 | 120.0 | 120.0 | 8.0 | 24.0 |

1Title V annual fee assessments are based on the allowable facility-wide emission limits in Table 106.B.

2Nitrogen dioxide emissions include all oxides of nitrogen expressed as $NO_2$

| | | | | |
|---|---|---|---|---|
| **A106 Facility: Allowable Emissions** | Source-specific and facility-wide emissions are calculated on a semi-annual basis and compared to | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
|---|---|---|---|---|
| C. The permittee shall maintain records of the Facility-Wide annual emissions totals for each pollutant listed in Table 106.B. The record shall include estimated actual emissions from all sources on a semiannual and calendar year basis. | the limits listed in the referenced table. No emission limits have been exceeded during this certification period. Actual emissions are included in the emission inventory reports submitted to the NMED AQB. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |
| **A107 Facility: Allowable Startup, Shutdown, & Maintenance (SSM) and Malfunction Emissions**<br><br>A. Separate allowable startup, shutdown, and maintenance (SSM) emission limits are not required for this facility since the SSM emissions are predicted to be less than the limits established in Table 106.A. The permittee shall maintain records in accordance with Condition B109.E. | Emissions from SSM are not expected to be significantly different from normal operating emissions. No malfunctions with control equipment occurred during this certification period and excess emissions did not occur. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A108 Facility: Hours of Operation**<br><br>A. The operating hours for this facility are established under each source category in sections A604 through A1404 under the Equipment Specific Requirements part of this permit. As applicable, monitoring, recordkeeping, and reporting provisions are specified to demonstrate compliance with allowable hours of operation that are also established under each source category in sections A604 through A1404. | Compliance with the hours of operation for each source is covered under each source category. A tracking mechanism is in place for each source with an operating hour limit. Operating hour limits have not been exceeded during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A109 Facility: Reporting Schedules**<br><br>A. A Semi-Annual Report of monitoring activities is due within 45 days following the end of every 6-month reporting period. The six month reporting periods start on January 1st and July 1st of each year. | The semi-annual monitoring reports submitted during this certification period were submitted within the allowed 45 days.<br><br>The semi-annual monitoring report for P100-R1-M3, for July 1–December 31, 2014, was submitted on January 29, 2015. The renewal operating permit | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| | P100-R2 was issued on February 27, 2015. This permitting action required the submittal of two semi-annual monitoring reports for the first half of 2015.<br><br>The P100-R1-M3 semi-annual monitoring report for January 1–February 26, 2015, was submitted on August 12, 2015. A separate semi-annual monitoring report for permit P100-R2 for February 27, 2015–June 30, 2015, was submitted concurrently on August 12, 2015.<br><br>The P100-R2 semi-annual monitoring report for July 1–December 31, 2015 will be submitted within the allowed 45 days, which is after the submission deadline of this annual compliance report. | | | |
| **A109 Facility: Reporting Schedules**<br><br>B. A Semi-Annual Report of actual emissions from all permitted sources unless otherwise specified in this permit is due within 90 days following the end of every 6-month reporting period as defined at Condition A109.A. Emission estimates of pollutants NOx, CO, SO2, VOC, TSP, PM10, and PM2.5 shall not include fugitive emissions. Emission estimates of HAPs shall include fugitive emissions. Emission estimates shall not include Insignificant or Trivial Activities, except that facility-wide emissions from all natural gas combustion sources shall be estimated. The reports shall include a comparison of actual emissions that occurred during the reporting period with the facility-wide allowable emission limits at Table 106.B. | The semi-annual emissions reports submitted during this certification period were submitted as required, within the allowed 90 days. These reports were for the periods of July 1–December 31, 2014 (submitted March 24, 2015) and January 1–June 30, 2015 (submitted September 22, 2015). The July 1–December 31, 2015 report will be submitted within the allowed 90 days, which is after the submission deadline of this compliance certification report. The reports include a comparison of actual emissions with the allowable emission limits. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| **A109 Facility: Reporting Schedules**<br><br>C. The Annual Compliance Certification Report is due within 30 days of the end of every 12-month reporting period. The 12-month reporting period starts on January 1st of each year. | The 2014 annual compliance certification report was submitted to NMED AQB and EPA on January 29, 2015, within 30 days of the 12-month reporting period ending on December 31, 2014. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A109 Facility: Reporting Schedules**<br><br>D. The permittee shall post start-up notifications required by 20.2.72.212(B) NMAC and 40 CFR Parts 60, 61 or 63, to the permittee's Electronic Public Reading Room at http://eprr.lanl.gov/oppie/service. | No new permitted source was started up in calendar year 2015, and a start-up notification was not required. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A110 Facility: Fuel Sulfur Requirements**<br><br>A. Sulfur requirements are defined by source category, as applicable, in sections A605 through A1405 under the Equipment Specific Requirements part of this permit. | See each source category. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A111 Facility: 20.2.61 NMAC Opacity**<br><br>A. Opacity requirements are defined by source category, as applicable, in sections A606 through A1406 under the Equipment Specific Requirements part of this permit. | See each source category. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A113 Other Provisions**<br>(20.2.70.302.G.3 NMAC)<br><br>A. To verify Insignificant Activity 1.a and 1.b status of the TA-54 MDA L Soil Vapor Extraction System (SVE), the permittee shall perform the following actions.<br>(1) At least once every 3 months, the permittee shall calculate and record the tons of VOC and HAP emissions | The emissions from SVE units (East and west) are calculated and provided as described below:<br><br>(1) The emissions in tons are calculated and recorded. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| from both SVE units (east and west) using data collected from the SVE stack monitoring system and periodic sampling of the SVE stack gas. The record shall include both measured individual HAPs and total HAPs. These calculations and records shall begin upon startup of the SVE system and shall continue for a period of no less than 12-months to determine the actual ton per year emissions.<br>(2) The permittee shall report the available tons of HAPs (individual and total) and total VOC emissions data in the Semi-Annual reports required in Condition A109.A.<br>(3) Within 45 days of collecting 12 months of emissions data, the permittee shall submit the final ton per year VOC and HAPs emissions, the calculations, and the supporting data to AQB's Permit Programs Manager that verifies the Insignificant Activity status of TA-54 MDA L SVE. This submittal shall also cite the Title V Insignificant activity number that applies to the SVE units. Within 30 days of receipt of the submittal, the AQB will complete a review of the information and respond to the permittee in writing. Once AQB provides a written response of this Insignificant source verification, the monitoring, calculations, and reporting of the SVE system emissions no longer applies. | (2) The available tons of individual and total HAPs and total VOC emissions are calculated and provided in the semi-annual reports.<br><br>(3) The final tons per year VOC and HAPs emissions are due within 45 days after 12 months of emissions data are collected. The final report will be submitted as specified in this section. | | | |

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|---|---|---|---|---|
| **A115 Radionuclide NESHAP**<br><br>A. The permittee shall comply with the requirements of 40 CFR 61, Subpart H – NESHAP for 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 all LANL sources for this certification period are below the 10 millirem off-site limit.<br><br>The annual report summarizing 2014 radionuclide emissions was submitted to EPA on June 22, 2015, and is available to the NMED upon request. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A115 Radionuclide NESHAP**<br><br>B. The permittee shall comply with the requirements of 40 CFR 61, Subpart Q – NESHAP for Radon Emissions from DOE Facilities. | 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, which in turn provided LANL with a memorandum of understanding in agreement with LANL's findings. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A116 Asbestos NESHAP**<br><br>A. The permittee shall comply with the requirements of 40 CFR 61, Subpart M-NESHAP for Asbestos. | LANL is in compliance with all requirements of 40 CFR 61, Subpart M for this compliance certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A117 Stratospheric Ozone**<br><br>A. The permittee shall comply with the standards for servicing of motor vehicle air conditioners pursuant to 40 CFR 82, Subpart B. | Motor vehicle air conditioners (MVAC) are serviced, pursuant to 40 CFR part 82, Subpart B, by certified LANL refrigeration technicians. These technicians comply with EPA standards for servicing motor vehicle air conditioners. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A117 Stratospheric Ozone**<br><br>B. The permittee shall comply with the standards for servicing and maintaining and disposing equipment containing refrigerants pursuant to 40 CFR, Subpart F. | A stratospheric ozone protection program is in place at LANL. LANL, through our internal maintenance group, as well as other outside contractors, uses only certified technicians and certified recycling and recovery equipment. LANL's refrigeration technicians, as well as other outside contractors, are trained and follow LANL procedures to ensure that required service practices in 40 CFR 82, Subpart F, are followed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| **A117 Stratospheric Ozone**<br><br>C. The permittee shall comply with the standards for servicing and maintaining equipment that contains halons pursuant to 40 CFR 82, Subpart H. | Certified 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**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A117 Stratospheric Ozone**<br><br>D. The permittee shall comply with the standards on the ban on refrigeration and air-conditioning appliances containing HCFCs pursuant to 40 CFR 82, Subpart I. | LANL has a process in place to ensure that the standards on the ban of refrigeration and air-conditioning appliances containing HCFCs pursuant to 40 CFR 82, Subpart I, are met. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **EQUIPMENT SPECIFIC REQUIREMENTS**<br><br>**A600 Regulated Sources – Asphalt Production**<br><br>A. Table 600.A lists all of the process equipment authorized for this source category. Emission units that were identified as insignificant or trivial activities (as defined in 20.2.70.7 NMAC) and equipment not regulated pursuant to the Act are not included. | No new equipment has been added, or changes made, to the listed equipment in this source category during this certification period (excluding those identified as insignificant, trivial and not regulated pursuant to the Act). | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 600.A: Regulated Sources List**

| Unit No. | Source Description/Location | Make<br>Model | Serial No. | Capacity | Manufacture Date |
|---|---|---|---|---|---|
| TA-60-BDM | Hot Mix Asphalt Plant, TA-60 | BDM Engineering<br>TM2000 | unknown | 60 tph | After 6/11/1973 |

| | | | | |
|---|---|---|---|---|
| **A601 Control Equipment – Asphalt Production** | No new equipment has been added, or changes made, to the listed equipment in this source | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
|---|---|---|---|---|
| A. Table 601.A lists all of the pollution control equipment required for the applicable regulated equipment in this source category. Each emission point is identified by the same number that was assigned to it in the permit application. | category during this certification period. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |

**Table 601.A: Control Equipment List**

| Control Equipment Unit No. | Control Description | Pollutant being controlled | Control for Unit No.[1] |
|---|---|---|---|
| TA-60-BDM | Drum Dryer Cyclone Baghouse 99.97% efficiency | TSP | TA-60-BDM |

[1]Control for unit number refers to a unit number from the Regulated Sources List

| | | | | |
|---|---|---|---|---|
| **A602 Emission Limits – Asphalt Production**<br><br>A. Table 602.A lists the emission units, and their allowable emission limits. (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC; 20.2.11 NMAC; 40 CFR 60, Subpart I; NSR Permit GCP-3-2195G) | LANL asphalt plant operations meet the requirements of 20.2.11 NMAC; 40 CFR Part 60, Subpart I; and NSR Permit No. GCP-3-2195G, Rev 1.<br><br>Emissions are calculated and reported to NMED on a six-month basis in accordance with permit condition A109.B. Emissions are compared to the allowable emission limits in each semi-annual report and were not exceeded during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 602.A: Allowable Emissions**

| Unit No. | NOx tpy | SO2 tpy | PM | CO tpy | VOC tpy |
|---|---|---|---|---|---|
| TA-60-BDM (dryer stack only) | 50.0[1] | 50.0 | 0.04 gr/dscf<br>33.8 lb/hr<br>50.0[1] tpy | 30.0[1] | 50.0[1] |

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|---|---|---|---|---|
| 1 Voluntary emission limits that are less than the applicable limits in GCP-3-2195G. Limits taken to reduce total emission in Table 106.A to below the facility-wide allowable emissions in Table 106.B | | | | |
| **A603 Applicable Requirements – Asphalt Production**<br><br>A. The permittee shall comply with all applicable sections of the requirements listed in Table 603.A. | LANL asphalt plant operations comply with the applicable requirements listed in the referenced table. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 603.A: Applicable Requirements**

| Applicable Requirements | Federally Enforceable | Unit No. |
|---|---|---|
| NSR Permit GCP-3-2195G | X | TA-60-BDM |
| 20.2.11 NMAC Asphalt Process Equipment | X | TA-60-BDM |
| 40 CFR 60, Subpart A | X | TA-60-BDM |
| 40 CFR 60, Subpart I | X | TA-60-BDM |

| | | | | |
|---|---|---|---|---|
| **A604 Operational Limitations – Asphalt Production**<br><br>A. The permittee shall meet the requirements of NSR permit no. GCP-3-2195G, including the requirements in this permit. | The asphalt plant operates in accordance with the requirements in the current operating permits and the conditions specified in NSR permit no. GCP-3-2195G. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A604 Operational Limitations – Asphalt Production**<br><br>B. The equipment in this source category is authorized to operate during those daylight hours occurring between one-half hour after sunrise and through one-half hour before sunset each day of the year. Annual hours of operation are limited to 4380 hrs/y. This limitation on operating hours does not apply to the use of the hot oil heater or the loading | The asphalt plant operates within the allowed daylight hours. To aid operators, a current sunrise/sunset chart is maintained at the plant. A log of start up and shut down times and operating hours is kept as required by the operating permit and GCP-3-2195G permit.<br><br>The asphalt plant did not exceed 4,380 hours of operation during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| and/or hauling of asphalt products or materials. Monitoring, recordkeeping, and reporting for operational hours shall be conducted according to NSR Permit GCP-3-2195G. | | | | |
| **A605 Fuel Requirements – Asphalt Production**<br><br>A. Asphalt Plant Combustion Sources<br><br>**Requirement**: Combustion sources located at the asphalt plant shall combust only those fuels allowed under condition III.A.3 of the NSR Permit GCP-3-2195G. | Pipeline quality natural gas is used for combustion; natural gas is one of the fuels allowed under condition III.A.3 of the NSR permit GCP-3-2195G. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: N/A<br><br>**Recordkeeping**: The permittee shall meet the recordkeeping requirements of GCP-3 and maintain records in accordance with Section B109. | Natural gas use is metered, the monthly meter readings are recorded, and the records are maintained. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emissions and monitoring reports are submitted on a semi-annual basis in accordance with permit conditions A109 and B110. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **607 Asphalt Production – Other**<br><br>A. Asphalt Plant Baghouse – Differential Pressure<br><br>**Requirement**: The baghouse shall be equipped with a device to continually measure the pressure drop across the baghouse. | The baghouse is equipped with a data-logger to continually monitor the differential pressure across the baghouse. The data are used to confirm proper operation of the unit. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The permittee shall monitor the differential pressure (inches of water) across the filters by the use of a differential pressure gauge. Pressure gauge readings and the time period the rotary dryer drum operates shall be | A data-logger is in place and monitors the differential pressure across the baghouse filters when the rotary dryer drum is operating. The data are used to confirm proper operation of the unit. Additionally, a chart-recorder records differential | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| recorded by a datalogger each time the rotary dryer drum is operating. The pressure data shall confirm whether the filter(s) are operating within the unit's specifications. | pressure readings, and serves as a backup when remote data-transmission is interrupted during leased phone-line problems or during updates to the existing system. The plant operator routinely monitors and records the baghouse differential pressure daily at the start and end of plant operation. | | | |
| **Recordkeeping**: The permittee shall manually record the baghouse pressure drop readings at least once each day the rotary drum dryer operates and maintain records of all baghouse differential pressure readings in accordance with Section B109. | The plant operator manually records the baghouse differential pressure daily at the start and end of each plant operation. Recordkeeping conditions are met using a data-logger that records the differential presure across the filters during plant operation. Additionally, a chart recorder is in place to record differential pressure readings during plant operation and serves as a backup when remote data-transmission is interrupted during leased phone-line problems or during updates to the existing system. These records together are used to confirm proper plant operation and are maintained on site. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a semi-annual basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **607 Asphalt Production – Other**<br><br>B. Asphalt Plant Baghouse - Stack Height (Unit TA-60-BDM)<br><br>**Requirement:** The rotary dryer/baghouse exhaust stack shall be no less than 10 meters in height. | The height of the asphalt plant stack is no less than 10 meters. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring:** N/A<br><br>**Recordkeeping**: The permittee shall maintain records in accordance with Section B109. | Measurements of stack height have been made to verify compliance. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a semi-annual basis in accordance with permit condition A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **607 Asphalt Production – Other**<br><br>C. Asphalt Plant Baghouse – Opacity<br><br>**Requirement**: Visible emissions from the rotary dryer/baghouse exhaust stack shall not exhibit an opacity of 20% or greater averaged over a (6) minute period. | LANL has certified visible emission (opacity) readers on-site who perform readings in accordance with 40 CFR Part 60, Appendix A, Reference Method 9 to determine compliance with the opacity limit. No visible emissions exhibited an opacity of 20% or greater during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: During periods of drum dryer operation, the permittee shall perform six (6) minute opacity readings on the rotary dryer/baghouse stack. Opacity readings shall be performed at least once per month during any month the drum dryer operates. The observations shall be conducted according to 40 CFR 60, Appendix A, Method 9. | LANL has certified visible emission readers on-site who perform monthly six minute opacity readings, in accordance with 40 CFR Part 60, Appendix A, Reference Method 9, to determine compliance with the opacity limit. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall maintain records of all opacity observations and in accordance with Section B109. | Opacity records are maintained on-site and are provided to NMED in the semi-annual monitoring reports. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a semi-annual basis in accordance with permit conditions A109 and B110. For more information, see the methods used to determine compliance for condition A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **607 Asphalt Production – Other**<br><br>D. Asphalt Plant Baghouse – Fines Cleanout<br><br>**Requirement:** The permittee shall sequester or | Baghouse fines are removed from the baghouse and cyclone by a screw conveyor. The removed fines are recycled into the asphalt production process via a closed loop system. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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|---|---|---|---|---|
| remove particulates collected by the control equipment to prevent wind-blown particulate emissions. Recycled baghouse fines shall be recycled into the drum mixer via a closed-loop system. | | | | |
| **Monitoring:** N/A<br><br>**Recordkeeping**: The permittee shall maintain records in accordance with Section B109. | Opacity records are maintained on-site and provided to NMED in the semi-annual monitoring reports. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting:** The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Opacity records are provided to NMED in the semi-annual monitoring reports. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **607 Asphalt Production – Other**<br><br>E. Asphalt Plant Production Rate (Unit TA-60-BDM)<br><br>**Requirement**: To avoid Compliance Assurance Monitoring (CAM) requirements under 40 CFR 64, the asphalt plant shall limit uncontrolled potential PM emissions by limiting asphalt production to less than or equal to 6,000 tons per year. | The asphalt plant production rate did not exceed 6,000 tons per year. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring:** The permittee shall monitor the total daily production rate. | Daily production rate is monitored and recorded on a monthly log sheet. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall calculate a weekly rolling, 12-month total production rate and maintain records in accordance with Section B109. | The weekly rolling, 12-month total production is calculated and compared against the production limit set in this permit condition. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a semi-annual basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| **607 Asphalt Production – Other**<br><br>F. Asphalt Plant Operations – General<br><br>**Requirement**: The permittee shall:<br>1) Install, operate, and maintain equipment in accordance with standard operating procedures, and<br>2) equip and operate the asphalt processing equipment such as screens, conveyor belts, and conveyor transfer points with dust control systems to control particulate matter emissions, and<br>3) operate the Plant in accordance with NSR Permit GCP-3-2195G, Section III, A, B, C, D, E, F, and H.<br>4) Ensure that no visible emissions from the facility are observed crossing the perimeter of the restricted area for no more than 5 minutes during any 2 consecutive hours during facility operations. | The procedures to comply with the general requirements for the asphalt plant operation are described below:<br><br>1) Operation and maintenance requirements are contained in LANL's internal procedures that are followed by plant operation staff.<br><br>2) Dust collection and control systems are in place, on screens, conveyor belts, and transfer points, to control particulate matter emissions.<br><br>3) The asphalt plant is operated in accordance with the permit conditions.<br><br>4) Both EPA reference methods 9 and 22 are used at the plant to determine the extent of visible emissions. During this certification period, the asphalt plant did not emit fugitive dust that exceeded the five (5) minutes of visible emissions during any two (2) consecutive hours of operation. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring:** The permittee shall perform all monitoring required under NSR Permit GCP-3-2195G. | All monitoring required under NSR Permit GCP-3-2195G was performed during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall maintain records of all standard operating procedures, records of all maintenance and/or replacement of dust control systems, and all records required under NSR Permit GCP-3-2195G, | Recordkeeping conditions are met using the following methods: Copies of standard operating procedures and maintenance records are available on site; the plant operation log contains the start time, stop time, differential pressures, and total | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
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| Section IV.B, and including records of actual hours of operation, records of all required monitoring, daily and weekly total asphalt production and the weekly rolling 12 month total production, number of haul truck trips daily including materials delivery and product, frequency of haul road sweeping, and copies of the applicant's proposed maintenance requirements and records demonstrating conformance with said requirements. The permittee shall maintain records of all compliance test results for total suspended particulates (TSP), particulate matter (PM10), nitrogen oxides, carbon monoxide, and records of all opacity/visible emissions observations performed. | hours of operation; production amounts are summed daily, weekly, monthly, and rolling 12 month total is calculated; and number of truck trips are recorded. Records located at the facility include opacity measurements, baghouse differential pressure data during plant operation, fuel delivery tickets, frequency of road sweeping, and a procedure that outlines required maintenance. | | | |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a semi-annual basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **607 Asphalt Production – Other**<br><br>G. Asphalt Plant Fugitive Dust<br><br>**Requirement:** Fugitive dust emissions from asphalt processing equipment, including the system used to recycle fabric filter fines, shall exhibit no more than five (5) minutes of visible emissions during any two consecutive hours. This condition does not apply to fugitive dust emissions from other support operations such as storage piles, front end loaders, or materials handling around the asphalt process equipment. | Both EPA reference methods 9 and 22 are used at the plant to determine the extent of visible emissions. During this certification period, the asphalt plant did not emit fugitive dust that exceeded 5 minutes of visible emissions during any two (2) consecutive hours. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| **Monitoring**: The permittee shall perform a Method 22 test at least once per month on all screens, conveyor drop points, and hoppers during the months the asphalt plant operates. The duration of the test shall be a minimum of ten (10) minutes. If visible emissions are observed for more than two (2) minutes, the Method 22 test shall continue for two (2) hours or until scheduled operation of the plant ends. | Both EPA reference methods 9 and 22 are used at the plant to determine the extent of visible emissions. Method 22 readings are taken at least once per month when the plant is operating. These readings are provided to NMED in the semi-annual monitoring reports. No visible emissions were observed for more than two (2) minutes during any Method 22 test during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping:** The permittee shall maintain records of all equipment standard operating procedures, records of all maintenance and/or replacement of dust control systems, results of all visible emissions observations, and all records required under NSR Permit GCP-3-2195G. | The plant standard operating procedure, maintenance and repair records, and visible emission observations are maintained on site. All other records required under the NSR permit are also available on site. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting:** The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a semi-annual basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A700 Regulated Sources – Beryllium Activities**<br>A. Table 700.A lists all of the process equipment authorized for this source category. Emission units that were identified as insignificant or trivial activities (as defined in 20.2.70.7 NMAC) and equipment not regulated pursuant to the Act are not included. | No new equipment has been added to this source category during this certification period (excluding those identified as insignificant, trivial or not regulated pursuant to the Act). | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 700.A: Regulated Sources List**

| Unit No. | Location/ Building | Process Description |
|---|---|---|

| 1. 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? |
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| | | |
|---|---|---|
| TA-3-66 | TA-3-66 | Sigma Facility - Electroplating and Chemical Milling; Metallographic Operations; and Machining and Arc Melting/Casting |
| TA-3-141 | TA-3-141 | Beryllium Technology Facility |
| TA-35-213 | TA-35-213 | Target Fabrication Facility |
| TA-55-PF4 | TA-55-PF4 | Plutonium Facility |

| | | | | |
|---|---|---|---|---|
| **A701 Control Equipment – Beryllium Activities**<br><br>A. Table 701.A lists all of the pollution control equipment required for the applicable regulated equipment in this source category. Each emission point is identified by the same number that was assigned to it in the permit application. | No new control equipment has been added to this source category during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 701.A: Control Equipment List**

| Control Equipment Unit No.[1] | Location/Building | Process Description | Pollutant being controlled | Type of Control |
|---|---|---|---|---|
| TA-3-66 | TA-3-66 | Sigma Facility Electroplating and Chemical Milling and Metallographic Operations | Beryllium Particulate Matter | Aqueous Solution or Lubricant Bath |
| | | Sigma Facility Machining and Arc Melting/Casting | Beryllium Particulate Matter | HEPA Filter 99.95% Efficiency |
| TA-3-141 | TA-3-141 | Beryllium Technology Facility | Beryllium Particulate Matter | Lubricating Bath/Cartridge Filtration System/HEPA Filter 99.95% Efficiency |
| TA-35-213 | TA-35-213 | Target Fabrication Facility | Beryllium Particulate Matter | Pre-Filter 48% Efficiency, HEPA Filter 99.95% Efficiency |
| TA-55-PF4 | TA-55-PF4 | Plutonium Facility | Beryllium and | 4-Stage HEPA Filter |

| 1. 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? |
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|---|---|---|---|---|
| | | | Aluminum Particulate Matter | 99.95% Efficiency |

[1]Control for unit number refers to a unit number from the Regulated Sources List

| | | | | |
|---|---|---|---|---|
| **A702 Emission Limits – Beryllium Activities**<br><br>A. Table 702.A lists the emission units, and their allowable emission limits. (40 CFR 61, Subpart C; NSR Permits 632; 634-M2; 1081-M1, 1081M1-R1, 1081-M1-R3, 1081-M1-R5, and 1081-M1-R6) | Emissions are calculated and reported to NMED on a six-month basis in accordance with permit condition A109.B. Emissions are compared to allowable emission limits in each semi-annual report. Allowable emission limits were not exceeded during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 702.A: Allowable Emissions**

| Source | Beryllium Particulate Matter | Aluminum Particulate Matter |
|---|---|---|
| Sigma Facility<br>TA-3-66 | 10 gm[1]/24 hr | N/A |
| Beryllium Technology Facility<br>TA-3-141 | 0.35 gm/24 hr<br>3.5 gm/yr | N/A |
| Target Fabrication Facility<br>TA-35-213 | $1.8 \times 10^{-04}$ gm/hr<br>0.36 gm/yr | N/A |
| Plutonium Facility<br>TA-55-PF-4<br>Machining Operation | 0.12 gm/24 hr<br>2.99 gm/yr | 0.12 gm/24 hr<br>2.99 gm/y |

| 1. 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? |
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| | | |
|---|---|---|
| Plutonium Facility<br>TA-55-PF-4<br>Foundry Operation | 3.49 x $10^{-05}$ gm/24 hr<br>8.73 x $10^{-04}$ gm/yr | 3.49 x $10^{-05}$ gm/24 hr<br>8.73 x $10^{-04}$ gm/y |

1 gm = gram

| | | | | |
|---|---|---|---|---|
| **A703 Applicable Requirements – Beryllium Activities**<br>A. The permittee shall comply with all applicable sections of the requirements listed in Table 703.A. | LANL beryllium operations meet requirements of 40 CFR Part 61, Subpart C, and NSR Permit Numbers 632, 634 and 1081. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Part A Table 703.A: Applicable Requirements**

| **Applicable Requirements** | **Federally Enforceable** | **Unit No.** |
|---|---|---|
| NSR Permits 632; 634-M2; 1081-M1, 1081M1-R1, 1081-M1-R3, 1081-M1-R5, and 1081-M1-R6 | X | All Beryllium Sources Listed in Table 700.A per applicable permit |
| 40 CFR 61, Subpart C | X | All Beryllium Sources Listed in Table 700.A |

**A704 Operational Limitations – Beryllium Activities**

A. The equipment/operations in this source category are authorized to operate any time during the year. No monitoring, recordkeeping, or reporting requirements are required to demonstrate compliance with its hours of operation.

| | | | | |
|---|---|---|---|---|
| **A707 Other – Beryllium Activities**<br>A. Operational Requirements – Beryllium Activities | TA-3-66 - Polishing and electroplating/chemical milling operations are conducted in aqueous solution or lubricant bath. Emissions from machining and arc melt/casting operations are exhausted through a HEPA filtration system prior to entering the atmosphere.<br><br>TA-3-141 - The continuous emission monitor is | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| | maintained in accordance with LANL's quality program. No process limits were exceeded during this certification period.<br>All processes are exhausted through a HEPA filtration system prior to entering the atmosphere. Powder operations, other than closed glovebox operations, and machining operations, other than metallographic preparation, are exhausted through a cartridge filtration system then through HEPA filtration. Metallographic preparation activities are conducted in lubricating baths or equivalent.<br><br>TA-35-213 - All processes are exhausted through a HEPA filtration system prior to entering the atmosphere.<br><br>TA-55-PF4 - All beryllium activities are ducted through the facility's pollution control equipment and out the north or south stack of PF-4. Weld cutting, weld dressing, and metallography operations are controlled using 4 HEPA filters with a control efficiency of 99.95% each. The non-accessible filter is replaced when the pressure differential across the filter indicates breakthrough or excessive loading.<br><br>No process limits were exceeded during this certification period.<br><br>The electric furnace did not operate during this certification period. | | | |

| Source | Operating Requirements | Process Limits | Control Equipment Requirements |
|---|---|---|---|

| 1. 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? |
|---|---|---|---|---|---|---|
| Sigma Facility<br><br>TA-3-66 | Beryllium operations will consist of registered metallographic operations, electroplating /chemical milling, and relocated machining, and arc melting/casting sources. | None | Metallographic operations and electroplating /chemical milling operations shall be conducted in aqueous solution or lubricant bath.<br><br>Emissions from machining and arc melting/casting operations shall be exhausted through a HEPA filtration system prior to entering the atmosphere. | | | |
| Beryllium Technology Facility<br><br>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 system prior to entering the atmosphere.<br><br>Powder operations, other than closed glovebox operations, and machining operations, other than the processes used in metallographic preparation shall be exhausted through a cartridge filtration system then through the HEPA filtration system.<br><br>Metallographic preparation activities shall be conducted in lubricating baths or equivalent.<br><br>(NSR permit 634-M2) | | | |
| Target Fabrication Facility<br><br>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 system prior to entering the atmosphere. | | | |
| Plutonium Facility<br><br>TA-55-PF4 | Regulated beryllium activities will be ducted through the pollution control equipment and out the north or south stack of PF-4.<br><br>(NSR Permit 1081-M1- | 44 pounds of beryllium (20 kg) in any 24 hour period;<br><br>1100 pounds/year (500 kg/year) using a rolling total. | Weld cutting, weld dressing, metallography, and electric furnace operations shall be controlled with 4 HEPA filters with a control efficiency of 99.95% each.<br><br>(NSR Permit 1081-M1-R1, Condition 3, partial, revised) | | | |

| 1. 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? |
|---|---|---|---|---|
| R3, Specific Condition 1.b., partial, revised)<br><br>The electric furnace shall be enclosed in a glove box, have a maximum operating temperature of 1600 degrees centigrade, and an inside volume space less than 1.1 cubic feet.<br><br>(NSR Permit 1081-M1-R6, Specific Condition 1.d., partial, revised) | (NSR Permit 1081-M1-R3, Specific Condition 1.c.)<br><br>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.<br><br>(NSR Permit 1081-M1-R1, Condition 3, partial, revised) | | | |
| **A707 Other – Beryllium Activities**<br><br>B. Emissions Monitoring Requirements – Beryllium Activities | TA-3-66 – Log books are maintained for monitoring the number of metallographic specimens used in the polishing operation and the weight or volume of samples processed in the electroplating/chemical milling, machining, and arc melting/casting operations.<br><br>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 differential pressure when exhaust fans are in operation.<br><br>TA-35-213 – A copy of stack emission test results as well as other data needed to determine total emissions are retained at the source and are available for inspection.<br><br>TA-55-PF4 – The HEPA filtration system contains | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| | a differential pressure gauge that measures differential pressure across the HEPA filters while the exhaust fans are in operation. The control efficiency is verified by daily HEPA filter pressure drop tests. Annual HEPA filter challenge tests have been performed during this certification period and results are submitted in semi-annual monitoring report.<br>The electric furnace did not operate during this certification period. | | | |

| **Source** | **Monitoring Requirements** |
|---|---|
| Sigma Facility<br><br>TA-3-66 | A log shall be maintained during operations, which shows the number of metallographic specimens used in the metallographic operation and the weight or volume of Be samples processed in the electroplating/chemical milling, machining, and arc melting/casting operations. |
| Beryllium Technology Facility<br><br>TA-3-141 | Facility exhaust stack will be equipped with a continuous emission monitor used to measure beryllium emissions.<br><br>Cartridge and HEPA filters shall be equipped with differential pressure gauges that measure the differential pressure across the cartridge and HEPA filters while the exhaust fans are in operation. (NSR permit 634-M2) |
| Target Fabrication Facility<br><br>TA-35-213 | Records of the stack emission test results (see Condition 2 of NSR Permit No. 632) and other data needed to determine total emissions shall be retained at the source and made available for inspection by the Department. |
| Plutonium Facility<br><br>TA-55-PF4 | The HEPA filtration systems shall be equipped with a differential pressure gauge that measures the differential pressure (inches of water) across the HEPA filters while the exhaust fans are in operation.<br><br>(NSR Permit 1081-M1-R3, Condition 11)<br><br>Control efficiency shall be verified by daily HEPA filter pressure drop tests and annual HEPA filter challenge tests of accessible filters. |

| 1. 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? |
|---|---|---|---|---|
| | (NSR Permit 1081-M1-R1, Condition 3, partial, revised)<br><br>The furnace temperature shall be continuously monitored and the flow rate from the glove box containing the furnace shall be measured once during each metal melt operation.<br><br>(NSR Permit 1081-M1-R6, Condition 11, revised) | | | |
| **A707 Other – Beryllium Activities**<br><br>C. Recordkeeping Requirements – Beryllium Activities | TA-3-66 – Recordkeeping for this source is specified in condition A707.B.<br><br>TA-3-141– Inventory records are maintained to demonstrate compliance with beryllium process limits. Records of pressure drop across the cartridge and HEPA filters are performed daily when the exhaust fans are in operation and the facility is occupied. Control equipment maintenance and repair activities are recorded.<br><br>TA-35-213 – Recordkeeping for this source is specified in condition A707.B.<br><br>TA-55-PF4 – A copy of the stack emission test results are retained at the source and available for inspection. The annual HEPA filter test reports and daily differential pressure readings are provided in the semi-annual monitoring report and are available on site for inspection. Filter replacement and control equipment maintenance and repair records are kept and available on site for inspection. Process records are available that contain the number and weight of classified parts processed during a 24-hour period and annual rolling total.<br><br>The electric furnace did not operate during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| | | | | |

| 1. 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? |
|---|---|---|---|---|

| Source | Recordkeeping Requirements |
|---|---|
| Sigma Facility<br><br>TA-3-66 | Recordkeeping for this source is specified in Condition A707.B. |
| Beryllium Technology Facility<br><br>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.<br><br>Record pressure drop across the cartridge and HEPA filters once per day that the exhaust fans are in operation and the facility is occupied.<br><br>Record control equipment maintenance and repair activities. (NSR permit 634-M2) |
| Target Fabrication Facility<br><br>TA-35-213 | Recordkeeping for this source is specified in Condition A707.B. |
| Plutonium Facility<br><br>TA-55-PF4 | Stack emission test results and facility operating parameters including a daily record of the pressure drop measured across each appropriate HEPA plenum filtration stage, when the exhaust fans are operating.<br><br>(NSR Permit 1081-M1-R3, Condition 9, partial, revised)<br><br>A copy of the annual HEPA test, a log of the daily pressure drop readings and a control equipment maintenance log shall be kept. This documentation shall be provided upon request.<br><br>(NSR Permit 1081-M1-R1, Condition 3, partial, revised)<br><br>A log of the filter replacement shall be kept and shall be made available to the Department personnel upon request.<br><br>(NSR Permit 1081-M1-R1, Condition 3, partial, revised)<br><br>The permittee shall keep records of the number and weight of classified parts processed during a 24-hour period and year using a rolling total. Records shall be made available to properly cleared Department personnel upon request. |

| 1. 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? |
|---|---|---|---|---|
| | (NSR Permit 1081-M1-R3, Condition 9, partial, revised)<br><br>The permittee shall for each use of the furnace record the following operating parameters: metal type, theoretical melting point of the metal, metal melt duration once melting is commenced, maximum furnace temperature and glove box flow rate.<br><br>(NSR Permit 1081-M1-R6, Condition 9, partial, revised)<br><br>A record of the furnace's internal volume shall be maintained at the facility.<br><br>(NSR Permit 1081-M1-R6, Condition 9, partial, revised) | | | |
| **A707 Other – Beryllium Activities**<br><br>D. Reporting Requirements – Beryllium Activities | All Beryllium Sources - Emission and monitoring reports are submitted on a six-month basis in accordance with permit condition A109. For more information, see the methods used to determine compliance for Section A109 in this report.<br><br>Quarterly beryllium reports, containing continuous monitoring system data from the Beryllium Technology Facility, are also submitted to NMED. Reports during this certification period were submitted within 60 days following each calendar quarter. For the February 27-December 31, 2015 reporting period for permit P100-R2, the reports were submitted on April 10, 2015; July 22, 2015; and October 23, 2015.<br><br>There were no new or modified emission sources during the certification period.<br><br>There were no requests made by the Air Quality Bureau's Enforcement Section during the certification period to determine the reliability of the methodology for demonstrating compliance with the permitted emission rate. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|

| **Source** | **Reporting Requirements** |
|---|---|
| Sigma Facility<br><br>TA-3-66 | The permittee shall submit reports described in Section A109 and in accordance with Section B110. |
| Beryllium Technology Facility<br><br>TA-3-141 | Anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date.<br><br>Actual date of initial startup of each new or modified source within fifteen (15) days after the startup date.<br><br>Provide the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.<br><br>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.<br><br>Provide any data generated by activities described in the Quality Assurance Project Plan (QAPP) 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.<br><br>The permittee shall submit reports described in Section A109 and in accordance with Section B110. |
| Target Fabrication Facility<br><br>TA-35-213 | The permittee shall submit reports described in Section A109 and in accordance with Section B110. |
| Plutonium Facility<br><br>TA-55-PF4 | Stack emission test results and facility operating parameters will be made available to Department personnel upon request.<br><br>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.<br><br>The permittee shall submit reports described in Section A109 and in accordance with Section |

| 1. 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? |
|---|---|---|---|---|
| B110. | | | | |
| **A800 Regulated Sources – External Combustion**<br>A. Table 800.A lists all of the process equipment authorized for this source category. | There were no changes to the list of permitted boilers during this compliance certification period. RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 800.A: Regulated Sources List**

| **Emission Unit[3]** | **Location/ Building** | **Manufacturer/ Model/Serial Number** | **Date of Construction, Modification, or Reconstruction[1]** | **Maximum Heat Input (nameplate)[2] MMBtu/hr** |
|---|---|---|---|---|
| TA-16-1484-BS-1 | TA-16-1484 | Sellers<br>183H.P.-SH-LN390<br>S/N 100848-B | 1995 | 7.47 |
| TA-16-1484-BS-2 | TA-16-1484 | Sellers<br>183H.P.-SH-LN390<br>S/N 100848-A | 1995 | 7.47 |
| TA-53-365-BHW-1 | TA-53-365 | Sellers<br>15 Seniors-2-200-w<br>S/N 99031-1 | 1988 | 8.37 |
| TA-53-365-BHW-2 | TA-53-365 | Sellers<br>15 Seniors-2-200-w<br>S/N 99031-2 | 1988 | 8.37 |
| TA-55-6-BHW-1 | TA-55-6 | Sellers<br>350 H.P. W-LN490<br>S/N 101319-B | 2001 | 14.6 |
| TA-55-6-BHW-2 | TA-55-6 | Sellers<br>350 H.P. W-LN490<br>S/N 101319-A | 1998 | 14.6 |
| RLUOB-BHW-1 | TA-55-440 | Unilux<br>ZF1100W<br>SN A1874 | 2009 | 11.0 |
| RLUOB-BHW-2 | TA-55-440 | Unilux<br>ZF1100W<br>SN A1875 | 2009 | 11.0 |

| 1. 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? |
|---|---|---|---|---|

| | | | | |
|---|---|---|---|---|
| RLUOB-BHW-3 | TA-55-440 | Unilux ZF1100W SN A1876 | 2009 | 11.0 |
| RLUOB-BHW-4 | TA-55-440 | TBD | TBD | 11.0 |

1 Construction, Modification, or Reconstruction as defined according to 40 CFR 60.
2 Emission estimates from these units shall be based on the maximum heat input rating, derated for altitude.
3 Emission Units in this table are all boilers.

| | | | | |
|---|---|---|---|---|
| **A801 Control Equipment – External Combustion**<br><br>A. Table 801.A lists all of the pollution control equipment required for the applicable regulated equipment in this source category. Each emission point is identified by the same number that was assigned to it in the permit application. | No new control equipment was added, and no changes were made during this compliance certification period. Unit RLUOB-BHW-4 has not yet been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 801.A: Control Equipment List**

| Control Equipment Unit No.[1] | Location/Building | Control Description | Pollutant being controlled |
|---|---|---|---|
| TA-16-1484-BS-1 | TA-16-1484 | Low-NOx Burner | NOx |
| TA-16-1484-BS-2 | TA-16-1484 | Low-NOx Burner | NOx |
| TA-53-365-BHW-1 | TA-53-365 | none | none |
| TA-53-365-BHW-2 | TA-53-365 | none | none |
| TA-55-6-BHW-1 | TA-55-6 | Low-NOx Burner | NOx |
| TA-55-6-BHW-2 | TA-55-6 | Low-NOx Burner | NOx |
| RLUOB-BHW-1 | TA-55-440 | Low-NOx Burner[2] | NOx |
| RLUOB-BHW-2 | TA-55-440 | Low-NOx Burner | NOx |
| RLUOB-BHW-3 | TA-55-440 | Low-NOx Burner | NOx |
| RLUOB-BHW-4 | TA-55-440 | Low-NOx Burner | NOx |

1 Control for unit number refers to a unit number from the Regulated Sources List
2 Low-NOx burners are required for Units RLUOB-BHW-1 through -4 by NSR Permit 2195N-R2, Specific Condition 1.f.

| | | | | |
|---|---|---|---|---|
| **A802 Emission Limits – External** | | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
|---|---|---|---|---|
| **Combustion**<br><br>A. Table 802.A lists specific emission units and their allowable emission limits. (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC; 40 CFR 60, Subpart Dc). | Emissions are calculated and reported to NMED on a six-month basis in accordance with permit condition A109.B. Emissions are compared to the allowable emission limits in each semi-annual report. Allowable emission limits were not exceeded during this certification period. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |

**Table 802.A: Allowable Emissions**

| **Unit No.** | **[1]$NO_x$ tpy** | **CO tpy** | **VOC tpy** | **$SO_2$ tpy** | **TSP tpy** | **$PM_{10}$ tpy** |
|---|---|---|---|---|---|---|
| Combined annual emissions for all units listed in Table 800.A [2] | 80.0 | 80.0 | 50.0 | 50.0 | 50.0 | 50.0 |

1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as $NO_2$

2 Excludes TA-3-22 Power Plant addressed in Section A1300.

| | | | | |
|---|---|---|---|---|
| **A802 Emission Limits – External Combustion**<br><br>B. Table 802.B lists specific emission units and their allowable emission limits. (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC; 40 CFR 60, Subpart Dc; NSR Permit 2195N-R2) | Emissions are calculated and reported to NMED on a six-month basis in accordance with permit condition A109.B. Emissions are compared to the allowable emission limits in each semi-annual report. Allowable emission limits were not exceeded during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 802.B: Allowable Emissions**

| **Unit No.** | **[1]$NO_x$ pph** | **$NO_x$ tpy** | **CO pph** | **CO tpy** | **VOC pph** | **VOC tpy** | **$SO_2$ pph** | **$SO_2$ tpy** | **TSP pph** | **TSP tpy** | **$PM_{10}$ pph** | **$PM_{10}$ tpy** | **$PM_{2.5}$ pph** | **$PM_{2.5}$ tpy** |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| RLUOB-BHW-1 (GAS) | 0.7 | 2.9 | 1.1 | 4.8 | --[2] | -- | 0.1 | 0.3 | 0.1 | 0.4 | 0.1 | 0.4 | 0.1 | 0.4 |

| 1. 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? |
|---|---|---|---|---|

| | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| RLUOB-BHW-1 (OIL) | 1.6 | | 0.5 | | -- | -- | 5.8 | | 0.3 | | 0.2 | | 0.2 | |
| RLUOB-BHW-2 (GAS) | 0.7 | 2.9 | 1.1 | 4.8 | -- | -- | 0.1 | 0.3 | 0.1 | 0.4 | 0.1 | 0.4 | 0.1 | 0.4 |
| RLUOB-BHW-2 (OIL) | 1.6 | | 0.5 | | -- | -- | 5.8 | | 0.3 | | 0.2 | | 0.2 | |
| RLUOB-BHW-3 (GAS) | 0.7 | 2.9 | 1.1 | 4.8 | -- | -- | 0.1 | 0.3 | 0.1 | 0.4 | 0.1 | 0.4 | 0.1 | 0.4 |
| RLUOB-BHW-3 (OIL) | 1.6 | | 0.5 | | -- | -- | 5.8 | | 0.3 | | 0.2 | | 0.2 | |
| RLUOB-BHW-4 (GAS) | 0.7 | 2.9 | 1.1 | 4.8 | -- | -- | 0.1 | 0.3 | 0.1 | 0.4 | 0.1 | 0.4 | 0.1 | 0.4 |
| RLUOB-BHW-4 (OIL) | 1.6 | | 0.5 | | -- | -- | 5.8 | | 0.3 | | 0.2 | | 0.2 | |
| All boilers – Oil[4] | N/A | 2.9 | N/A | 0.9 | -- | -- | N/A | 10.4 | N/A | 0.5 | N/A | 0.3 | N/A | 0.3 |
| Combined Total[3] | | 14.5 | | 20.1 | | -- | | 11.6 | | 2.1 | | 1.9 | | 1.9 |

1Nitrogen dioxide emissions include all oxides of nitrogen expressed as $NO_2$

2The "--" symbol indicates a value that was considered negligible and not permitted under NSR 2195N-R2.

3The annual tpy combined emission totals represent enforceable emission limit caps for all 4 boilers combined, fired with any combination of allowed fuel types.

| 1. 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? |
|---|---|---|---|---|
| 4 Tpy emission cap for any combination of oil fired boilers. | | | | |
| **A802 Emission Limits – External Combustion**<br><br>C. Units RLUOB-BHW-1 through - 4 shall not emit oxides of nitrogen in excess of 30 ppmv, corrected to 3% oxygen on a dry basis. This emissions limitation applies to natural gas fuel only. (NSR Permit 2195N-R2, Specific Condition 1.f., partial, revised) | Nitrogen oxides (NOx) concentrations were analyzed during the initial compliance test for the RLUOB boilers: RLUOB-BHW-1; RLUOB-BHW-2; and RLUOB-BHW-3. RLUOB-BHW-4 has not been installed. NOx emissions from the tested boilers were well under the 30 ppmv limit on a dry basis. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A803 Applicable Requirements – External Combustion**<br><br>A. The permittee shall comply with all applicable sections of the requirements listed in Table 803.A. | Emission units listed in the referenced table meet the applicable requirements listed. RLUOB-BHW-4 has not been installed. Monthly fuel monitoring is recorded on all listed emission units. The fuel monitoring records are collected monthly and maintained on-site. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 803.A: Applicable Requirements**

| **Applicable Requirements** | **Federally Enforceable** | **Unit No.** |
|---|---|---|
| NSR Permit 2195N-R2 | X | RLUOB-BHW-1 through -4 |
| 20.2.61 NMAC Smoke and Visible Emissions | X | All combustion sources |
| 40 CFR 60, Subpart Dc | X | TA-55-6-BHW-1, TA-55-6-BHW-2, RLUOB-BHW-1 through -4 |

| | | | | |
|---|---|---|---|---|
| **A804 Operational Limitations – External Combustion**<br><br>A. All external combustion equipment except Units RLUOB-BHW-1 through -4 when operating with fuel oil is authorized to operate any time during the year. No monitoring, recordkeeping, or reporting requirements are | Fuel oil was not used during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| required to demonstrate compliance with its hours of operation. | | | | |
| **A804 Operational Limitations – External Combustion**<br><br>B. Units RLUOB-BHW-1 through -4 shall be operated on fuel oil for no more than 48 hours per year per boiler for non-emergency maintenance and readiness testing. This condition establishes exemption from 40 CFR 63, Subpart JJJJJJ. | Hours of operation for each boiler are tracked by facility personnel. Fuel oil was not used during this certification period. RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A804 Operational Limitations – External Combustion**<br><br>C. Total annual fuel oil consumption for Units RLUOB-BHW-1 through -4 shall not exceed 289,100 gallons on a rolling 365-day total basis. | Total annual fuel oil use is tracked using a rolling 365-day total basis and is compared to the fuel use limit. Fuel oil was not used during this certification period. RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A805 Fuel Sulfur Requirements – External Combustion**<br><br>A. All Boilers and Heaters (except Units RLUOB-BHW-1 through -4)<br><br>**Requirement:** All boilers and heaters, except Units RLUOB-BHW-1 through -4 and the Power Plant addressed in Section A1300 shall combust only natural gas containing no more than 2 grains of total sulfur per 100 dry standard cubic feet. | A natural gas transportation contract is in place and stipulates that the natural gas provided to LANL will be pipeline quality and contain no more than 3/4 grains of total sulfur per 100 dry standard cubic feet, well below the permit requirement of 2 grains per 100 dry standard cubic feet (scf). | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: None.<br><br>**Recordkeeping**: The permittee shall demonstrate compliance with the natural gas limit on total sulfur content by maintaining records of a current, valid purchase contract, | A natual gas transportation contract is in place and stipulates that the natural gas provided to LANL will be pipeline quality and contain no more than 3/4 grains of total sulfur per 100 dry scf. A copy of the contract is available on-site. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| tariff sheet or transportation contract for the gaseous fuel, or fuel gas analysis, specifying the allowable limit or less. If fuel gas analysis is used, the analysis shall not be older than one year. | | | | |
| R**eporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance with Section B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A805 Fuel Sulfur Requirements – External Combustion**<br><br>B. Units RLUOB-BHW-1 through -4<br><br>**Requirement**: Units RLUOB-BHW-1 through -4 shall combust either natural gas containing no more than 2.0 grains of total sulfur per 100 dry standard cubic feet or No. 2 fuel oil containing no more than 0.5 wt% total sulfur. (NSR Permit 2195N-R2, Specific Condition 1.c.) | A natural gas transportation contract is in place and stipulates that the natural gas provided to LANL will be pipeline quality and contain no more than 3/4 grains of total sulfur per 100 dry scf.<br><br>A purchase contract is in place for fuel oil. The contract requires that all fuel oil have a sulfur content less than or equal to 0.05% sulfur by weight. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: None.<br><br>**Recordkeeping**: The permittee shall demonstrate compliance with the natural gas limit and/or fuel oil limit on total sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the gaseous or liquid fuel, or fuel analysis, specifying the allowable limit or less. If a fuel analysis is used, the analysis shall not be older than one year. (NSR Permit 2195N-R2, Specific Condition 3.c., revised) Alternatively, compliance may be demonstrated by keeping a receipt or invoice | LANL is in compliance with this requirement, since a natural gas transportation contract is in place that stipulates the total sulfur content in fuel. Delivery receipts for fuel oil, if used, are kept and identify the fuel oil as Ultra-Low Sulfur Diesel (ULSD). | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| from a commercial fuel supplier with each fuel delivery, which shall include the delivery date, the fuel type delivered, and amount of fuel delivered, and the maximum sulfur content of the fuel. | | | | |
| **Reporting:** The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A806 20.2.61 NMAC Opacity – External Combustion**<br><br>A. All Boilers and Heaters (except Units RLUOB-BHW-1 through -4)<br><br>**Requirement:** Exhaust emissions from these external combustion sources shall not exceed 20% opacity averaged over a 10-minute period. | LANL has certified visible emission readers on-site who perform observations using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limitation. Visible emissions did not exceed 20% opacity during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: Use of natural gas fuel meeting the requirement at Condition A805.A constitutes compliance with 20.2.61 NMAC unless opacity exceeds 20% averaged over a 10-minute period. When any visible emissions are observed during steady state operation and are determined to be not due to condensed water vapor only, opacity shall be measured over a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Method 9 as required by 20.2.61.114 NMAC. | Condition A805.A. is met by using pipeline quality natural gas as combustion fuel. LANL has a facility-wide gas transportation contract in-place that requires the natural gas provided to LANL be pipeline quality and contain no more than 3/4 grains of total sulfur per 100 dry scf.<br><br>Opacity did not exceed 20% over a 10-minute period, and no visible emissions were observed during steady state operations during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall record dates of any opacity measurements and the corresponding opacity readings. | A standard form is used for all opacity measurements. The form includes the date of measurement and percent opacity observed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall report dates of any opacity measurements and the | Opacity measurements are included in the semi-annual monitoring reports. Emission and monitoring reports are submitted on a six-month | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
|---|---|---|---|---|
| corresponding opacity readings. The permittee shall submit reports described in Section A109 and in accordance with Section B110. | basis as described in Section A109 and in accordance with Section B110. See Section A109 in this report. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |
| **A806 20.2.61 NMAC Opacity – External Combustion**<br><br>B. Units RLUOB-BHW-1 through -4: Natural Gas-Fired<br><br>**Requirement**: Exhaust emissions from these external combustion sources shall not exceed 20% opacity averaged over a 10-minute period. | Opacity did not exceed 20% over a 10-minute period, and no visible emissions were observed during steady state operations during this certification period. The unit RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: Use of natural gas fuel meeting the requirement at Condition A805.A constitutes compliance with 20.2.61 NMAC unless opacity exceeds 20% averaged over a 10-minute period. When any visible emissions are observed during steady state operation and are determined to be not due to condensed water vapor only, opacity shall be measured over a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Method 9 as required by 20.2.61.114 NMAC. | Condition A805.A. is met because the natural gas transportation contract stipulates that gas provided to LANL be pipeline quality and contain no more than 3/4 grains of total sulfur per 100 dry scf.<br><br>Opacity did not exceed 20% over a 10-minute period, and no visible emissions were observed during steady state operations during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall record dates of any opacity measurements and the corresponding opacity readings. | A standard form is used for all opacity measurements. The form includes the date of measurement and opacity observed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting:** The permittee shall report dates of any opacity measurements and the corresponding opacity readings. The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Opacity measurements are included in the semi-annual monitoring reports. Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance with Section B110. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A806 20.2.61 NMAC Opacity – External Combustion** | Fuel oil was not used during this certification period. Opacity did not exceed 20% over a 10-minute period, and no visible emissions were | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| C. Units RLUOB-BHW-1 through -4: Fuel Oil-Fired<br><br>**Requirement**: Exhaust emissions from these external combustion sources shall not exceed 20% opacity averaged over a 10-minute period. | observed during steady state operations during this certification period. | | | |
| **Monitoring**: The permittee shall perform a least one (1) opacity observation each day that fuel oil is used to fire any of Units RLUOB-BHW-1 through -4. Opacity shall be measured over a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Method 9 as required by 20.2.61.114 NMAC. (NSR Permit 2195N-R2, Specific Condition 3.d., revised) | Fuel oil was not used during this certification period and opacity measurements were not recorded. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall record dates of any opacity measurements and the corresponding opacity readings. (NSR Permit 2195N-R2, Specific Condition 4.b., revised) | A standard form is used for all opacity measurements. The form includes the date of measurement and opacity observed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall report dates of any opacity measurements and the corresponding opacity readings. The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Opacity measurements are included in the semi-annual monitoring reports. Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance with Section B110. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A807 Other – External Combustion**<br><br>A. Natural Gas Fuel Usage (Sources listed in Table 800.A except RLUOB-BHW-1 through -4)<br><br>**Requirement:** The combined natural gas fuel usage shall be limited to 870 MMscf/y. This limitation shall apply to all boilers and heaters listed in Table 800.A except Units | For units listed under this permit condition, a 12-month rolling total of natural gas used is calculated and recorded each month. The rolling total is compared to the fuel use limit each month and provided in the semi-annual monitoring report. Natural gas usage limits were not exceeded. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| RLUOB-BHW-1 through -4, but including all other boilers and heaters at the Facility that qualify as Title V Insignificant Activities. | | | | |
| **Monitoring**: The permittee shall monitor the monthly total volumetric flow of natural gas to Units TA-55-6-BHW-1 and TA-55-6-BHW-2 through use of a totalizing flow meter. | These units have a volumetric flow meter in place which is used to monitor monthly natural gas use. This information is maintained and available on-site. Natural gas usage for these units is provided in the semi-annual monitoring report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall:<br>1) Calculate the monthly rolling 12-month total natural gas fuel usage for the emission units listed in Table 800.A except Units RLUOB-BHW-1 through -4.<br>2) Calculate the actual emissions rate for the emission units listed in Table 800.A except Units RLUOB-BHW-1 through -4. The calculation shall be based on the actual fuel usage of Units equipped with individual flow meters and the Facility-Wide metered or estimated natural gas usage.<br>3) Calculate the semiannual and annual total emissions rate (tons/year) for this source category and compare them to the emission limits in Table 802.A. The permittee shall maintain records in accordance with Section B109. | 1) A 12-month rolling total of natural gas used is calculated and recorded each month. The rolling total is compared to the fuel use limit each month and provided in the semi-annual monitoring report. Natural gas usage limits were not exceeded.<br>2) The actual emission rate is calculated for the units listed in Table 800.A. This calculation uses data from individual unit flow meters and facility-wide metered natural gas.<br>3) The emission rate is calculated semi-annually and annually for this source category and compared to the permit limits. Records are maintained electronically and in paper form. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis as decribed in Section A109 and in accordance with Section B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A807 Other – External Combustion** | The initial compliance test was used to show | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
|---|---|---|---|---|
| B. Natural Gas and Fuel Oil Usage (Units RLUOB-BHW-1 through -4)<br><br>**Requirement**: The permittee shall comply with the emission limits in Table 802.B for each fuel type. | compliance with the emission limits for natural gas use. Vendor data are also used to determine compliance with emission limits for fuel oil and natural gas. All concentrations and emission rates were below permitted limits in Table 802.B. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |
| **Monitoring**: The permittee shall:<br>1) Monitor the monthly total volumetric flow of natural gas to Units RLUOB-BHW-1 through -4 using a totalizing flow meter. (NSR Permit 2195N-R2, Specific Condition 3.a., partial, revised)<br>2) Monitor the daily fuel oil consumption during which any of the 4 RLUOB boilers are fired with this fuel type. (NSR Permit 2195N-R2, Specific Condition 3.a, partial, revised)<br>3) Monitor the hours of operation for each boiler when fired on fuel oil and during non-emergency maintenance and readiness testing. | 1) A totalizing flow meter is in place and measures natural gas used by the RLUOB boilers. The monthly total volumetric flow of natural gas to RLUOB-BHW-1, RLUOB-BHW-2, and RLUOB-BHW-3 is monitored. RLUOB-BHW-4 has not been installed.<br>2) Daily fuel oil consumption is monitored using fuel tank readings and individual meter readings. Fuel oil was not used during this certification period.<br>3) The hours of operation of each boiler is recorded by facility personnel each time a boiler is run on fuel oil. The purpose for running the boiler is also monitored and recorded. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall:<br>1) Calculate and record the annual fuel oil usage for Units RLUOB-BHW-1 through -4 as a daily rolling 365-day total.<br>2) Calculate and record the semiannual and calendar year total emissions rate (tons/year) for each fuel type and for the combination of both fuels compare to the emission limits in Table 802.B.<br>3) Record the annual hours of operation of each boiler when fired on fuel oil during non-emergency maintenance and readiness testing and compare to the limitation at Condition A804.B. | 1) Annual fuel oil usage is calculated and recorded as a daily rolling 365-day total.<br><br>2) The emissions rate is calculated on a semi-annual and annual basis for each fuel type and for both fuels combined. Emissions are compared to permit limits.<br><br>3) Annual hours of operation for each boiler are recorded when fired on fuel oil during non-emergency use. The total hours are compared to the hour limit in Condition A804.B. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| 4) The permittee shall maintain records in accordance with Section B109. | 4) Records are maintained in accordance with condition B109. | | | |
| **Reporting:** The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance with Section B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A807 Other – External Combustion**<br><br>C. 40 CFR 60, Subpart Dc (Units TA-55-6-BHW-1, TA-55-6-BHW-2, RLUOB-BHW-1 through -3)<br><br>**Requirement**: The units are subject to 40 CFR 60, Subpart Dc and the permittee shall comply with the following applicable requirements:<br>1. When combusting oil in the affected boilers, meet the 0.5 weight percent fuel sulfur standard in 40 CFR 60.42c(d). This standard applies at all times per §60.42c(i). The permittee shall demonstrate compliance per the requirements of §60.42c(h). | Units TA-55-6-BHW-1, TA-55-6-BHW-2, RLUOB-BHW-1, RLUOB-BHW-2 and RLUOB-BHW-3 meet the requirements of 40 CFR Part 60, Subparts A and Dc. RLUOB-BHW-4 has not been installed.<br><br>Notification requirements were met through source startup notifications and initial permit applications.<br><br>1. LANL purchases ULSD fuel oil which meets the sulfur content requirement. The sulfur content and tracking data are included in the semi-annual monitoring reports that are submitted to NMED AQB. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The permittee shall comply with the fuel supplier certification requirements in 40 CFR 60.46c(e). The permittee shall monitor fuel usage to meet the recordkeeping requirements of 40 CFR 60.48c(g). | LANL complies with the fuel sulfur certification requirements; the facility-wide fuel contract is included in the semi-annual monitoring report submitted to NMED AQB. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall comply with the recordkeeping requirements of 40 CFR 60.48c(c), (f) and (g) 40 CFR 60.7(b) and (f) and maintain the records according to §60.48c(i) except when records are required to be maintained for a longer time period in accordance with Section B109. | Records are kept for hours of operation, annual maintenance, and fuel sulfur content.<br>No excess emissions occurred during this certification period.<br>Fuel sulfur content and fuel use records are maintained on site for at least five years as required by the operating permit. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall comply with the initial notification requirements of 40 CFR | Initial notifications are made to NMED upon boiler start-up. Reports are submitted according to | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
|---|---|---|---|---|
| 60.48c(a) and 40 CFR 60.7(a)(1), (a)(4) and (g) and the periodic reporting requirements of 40 CFR 60.48c(b), (d), (e)(11) and (f). Reports shall be submitted according to §60.48c(j). The reporting period may be modified to coincide with the Semi-Annual reporting period in Section A109. The permittee shall report in accordance with Section B110. | 40CFR60.48c(j). The reporting period is each six-month period and reports are submitted to coincide with the semi-annual reporting period in Section A109 and in Section B110 of permit P100-R2. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |
| **A807 Other – External Combustion**<br><br>D. 40 CFR 60, Subpart Dc (New Unit RLUOB-BHW-4)<br><br>**Requirement**: This unit is subject to 40 CFR 60, Subpart Dc and the permittee shall comply with the following applicable requirements:<br>1. When combusting oil in the affected boilers, meet the 0.5 weight percent fuel sulfur standard in 40 CFR 60.42c(d), and (g). This standard applies at all times per §60.42c(i). The permittee shall demonstrate compliance per the requirements of §60.42c(h).<br>2. For new boiler RLUOB-BHW-4, the permittee shall demonstrate initial compliance with the SO2 standard through a certification from the fuel supplier per 40 CFR 60.44c(h). | RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The permittee shall comply with the fuel supplier certification requirements in 40 CFR 60.46c(e).<br>The permittee shall monitor fuel usage to meet the recordkeeping requirements of 40 CFR 60.48c(g). | RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall comply with the recordkeeping requirements of 40 | RLUOB-BHW-4 has not been installed. | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
|---|---|---|---|---|
| CFR 60.48c(c), (f) and (g) and 40 CFR 60.7(b) and (f) and maintain the records according to §60.48c(i) except when records are required to be maintained for a longer time period in accordance with Section B109. | | ☒ **Intermittent** | ☐ **No** | ☒ **No** |
| **Reporting**: The permittee shall comply with the initial notification requirements of 40 CFR 60.48c(a) and 40 CFR 60.7(a)(1), (a)(3) and (g) and the periodic reporting requirements of 40 CFR 60.48c(b), (d), (e)(11) and (f). Reports shall be submitted according to §60.48c(j). The reporting period may be modified to coincide with the Semi-Annual reporting period in Section A109. | RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A807 Other – External Combustion**<br><br>E. Initial Compliance Testing (Units RLUOB-BHW-4)<br><br>**Requirement**: Initial compliance tests are required for boiler, Unit RLUOB-BHW-4. The tests shall be conducted for NOx and CO while burning natural gas fuel only. This condition applies only if boiler Unit RLUOB-BHW-4 is not an identical make and model to boiler units RLUOB-BHW-1 through -3. (NSR Permit 2195N-R2, Specific Condition 6.a., revised) | RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring:** The permittee shall conduct EPA Method tests for CO and NOx within six (6) months of any new boiler start up. Method 19 may be used for determining stack flow rates. This requirement supersedes Condition B111.A(2). Initial compliance testing shall be conducted in accordance with Section B111. | RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| **Recordkeeping**: The permittee shall maintain records in accordance with Section B109. | RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall report in accordance with Section B110 and Section B111. | RLUOB-BHW-4 has not been installed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A807 Other – External Combustion**<br><br>F. Operational Inspection (Sources listed in Table 800.A)<br><br>**Requirement**: Compliance with the allowable emission limits in Table 802.A shall be demonstrated by performing periodic inspections to ensure proper operations. | Annual inspections are conducted on permitted boilers to ensure proper boiler operations. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The permittee shall conduct annual operational inspections to determine that the boilers are operating properly. The operational inspections shall include operational checks for indications of insufficient excess air, or too much excess combustion air. These operational checks shall include observation of common physical indications of improper combustion, including indications specified by the boiler manufacturer, and indications based on operational experience with these units. | LANL has on-site facility-wide annual boiler maintenance procedures for hotwater boilers and steam boilers in accordance with the recommended manufacturer's specifications. LANL's fireside-waterside procedures include annual operational inspections to ensure proper combustion.<br>Annual operational inspections were conducted for all the permitted boilers and the inspection reports available on-site and will be furnished upon request. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall maintain records of operational inspections, describing the results of all operational inspections noting chronologically any adjustments needed to bring the boilers into compliance. The permittee shall maintain records in accordance with Section B109. | Records of operational inspections are maintained on-site. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| **Reporting**: The permittee shall report in accordance with Section B110.<br><br>Within ninety (90) days of permit issuance, the permittee shall submit for Department approval a procedure which the permittee will use to carry out the operational inspections. The permittee may at any time submit revisions for Department approval. | Procedures for annual operational inspections were submitted on May 14, 2015 (SBR20150006) within 90 days of permit P100-R2 issuance. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A900 Regulated Sources – Chemical Usage**<br><br>A. Table 900.A lists all of the process equipment authorized for this source category. | | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 900.A: Regulated Sources List**

| Unit No. | Source Description/Location | Emission Type |
|---|---|---|
| LANL-FW-CHEM | Chemical Usage, Facility-wide (except RLUOB) | VOC, HAPs, TAPs |
| RLUOB-CHEM | Chemical Usage, Bldg. TA-55-400 (the laboratory portion only of this RLUOB building) | VOC, HAPs, TAPs |

| | | | | |
|---|---|---|---|---|
| **A902 Emission Limits – Chemical Usage**<br><br>A. Table 902.A lists the emission units, and their allowable emission limits. (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC, NSR Permit 2195N-R2). | There are no changes to the emission units and allowable emissions. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 902.A: Allowable Emissions**

| Unit No. | VOC/HAPs tpy |
|---|---|
| LANL-FW-CHEM | --[1] |
| RLUOB-CHEM | 3.75[1] |

| 1. 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 The VOC emissions from this source category are included in the facility-wide allowable emissions limit established in Table 106.B: 200 tpy VOC, 8.0 tpy per individual HAP, and 24.0 tpy of combined total HAPs. Any VHAPs that are also defined as a VOC shall be included in the VOC total. | | | | |
| **A903 Applicable Requirements – Chemical Usage**<br><br>A. The permittee shall comply with all applicable sections of the requirements listed in Table 903.A. | The RLUOB-CHEM is in compliance with the applicable requirements in this section. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 903.A: Applicable Requirements**

| **Applicable Requirements** | **Federally Enforceable** | **Unit No.** |
|---|---|---|
| NSR Permit 2195N-R2 | X | RLUOB-CHEM |

**A904 Operational Limitations – Chemical Usage**

A. The Chemical Usage source category is authorized for continuous operation. No monitoring, recordkeeping, or reporting requirements are required to demonstrate compliance with continuous hours of operation.

| | | | | |
|---|---|---|---|---|
| **A904 Operational Limitations – Chemical Usage**<br><br>B. For Unit RLUOB-CHEM, the permittee shall obtain a NSR permit revision prior to the use of any TAP that is expected to be emitted in excess of the stack-height-corrected screening levels at 20.2.72.502 NMAC. (NSR Permit 2195N-R2, Specific Condition 1.i, revised) | Chemical use is tracked and emissions are calculated monthly to determine TAP emissions for RLUOB-CHEM. If TAP emissions are expected to exceed screening levels, an NSR permit revision would be requested. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A907 Other – Chemical Usage**<br><br>A. Emission calculations (Unit LANL-FW-CHEM)<br><br>**Requirement**: The permittee shall comply with the facility-wide VOC and HAP emission limits at Table 106.B. | Facility-wide emissions did not exceed the VOC or HAP emission limits in Table 106.B. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| **Monitoring**: The permittee shall monitor facility-wide chemical purchasing and site location using an electronic chemical tracking system. The quantity of chemicals that are vented to the atmosphere shall be estimated on a semi-annual basis, and categorized as VOC, HAP, or a combination of these categories. | Facility-wide chemical purchase records are collected in LANL's ChemDB database and used to calculate emissions. Chemical emission information is submitted to NMED AQB every six-months as specified in Section A109.B. The semi-annual emissions report for the first half of 2015 (January 1–June 30) was submitted to NMED on September 22, 2015, within 90 days of the end of the reporting period. The semi-annual emission report for the second half of 2015 (July 1–December 31) is due within 90 days after December 31, 2015, after the submission of this ACC. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall record the quantity of total VOC emitted and the quantity of each individual and total HAPs on a semi-annual basis. These records shall be maintained in accordance with Section B109. | Records of facility-wide VOC and HAPs emissions are submitted with the semi-annual emissions report and the records are maintained at the site. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting:** The permittee shall submit reports described in Section A109 and in accordance with Section B110. With respect to individual HAPs, reports shall include any HAP emitted in a quantity greater than 0.5 tons per year. | Facility-wide VOC and HAP emissions are calculated, recorded, and reported on a six-month basis as described in Section A109 and in accordance with Section B110. The semi-annual emission report includes individual HAPs emitted in a quantity greater than 0.5 tons per year. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A907 Other – Chemical Usage**<br><br>B. Emission calculations (Unit RLUOB-CHEM)<br><br>**Requirement:** The permittee shall comply with the source-specific VOC emission limit at Table 902.A and the facility-wide VOC and HAP emission limits at Table 106.B. (NSR Permit 2195N-R2, Specific Condition 2.a., | The RLUOB-CHEM facility activities started operations in May 2014.<br><br>Chemical purchasing for the facility are monitored using an electronic chemical tracking system (ChemDB) and emissions are calculated. The VOC and HAPs emissions are below the allowable emission limits. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| revised) | | | | |
| **Monitoring**: The permittee shall monitor chemical purchasing for the RLUOB-CHEM facility using an electronic chemical tracking system. The quantity of chemicals that are vented to the atmosphere shall be estimated on a monthly basis, and categorized as VOC, HAP, TAP, or a combination of these categories. (NSR Permit 2195N-R2, Specific Condition 4.c., revised) | The quantities of chemicals that are vented to the atmosphere are estimated on a monthly basis and are categorized as VOC, HAP, TAP, or a combination of these categories. The quantities of chemicals are provided in the semi-annual emissions reports. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall record the quantity of total VOC and TAP, each individual HAP,and the total HAPs emitted on a monthly rolling, 12-month total basis. These records shall be maintained in accordance with Section B109. (NSR Permit 2195N-R2, Specific Condition 4.c., revised) | The quantity of total VOC and TAP, individual HAP, and the total HAPs emitted are recorded on a monthly rolling, 12–month total basis. Records are maintained in accordance with Section B109. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. With respect to individual HAPs, reports shall include any HAP emitted in a quantity greater than 0.5 tons per year. | Emission and monitoring reports are submitted on a six-month basis, and compliance certification on an annual basis as described in Section A109 and in accordance with Section B110. The semi-annual emission report includes individual HAPs emitted in a quantity greater than 0.5 tons per year. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1000 Regulated Sources – Degreasers**<br><br>A. Table 1000.A lists all of the process equipment authorized for this source category. | No new process equipment has been added for this source category during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1000.A: Regulated Sources List**

| Unit No. | Source Description/Location | Emissions Type |
|---|---|---|
| TA-55-DG-1 | Ultrasonic Cold Batch | VOCs, HAPs |

| | | | | |
|---|---|---|---|---|
| **A1002 Emission Limits –Degreasers** | Emissions are calculated and reported on a six-month basis in accordance with permit condition | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
|---|---|---|---|---|
| A. Table 1002.A lists the emission units, and their allowable emission limits. (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC). | A109.B. Comparison against the allowable emission limits is performed at each of these reporting periods. Allowable emission limits were not exceeded during this certification period. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |

**Table 1002.A: Allowable Emissions**

| **Unit No.** | **VOC/HAPs tpy** |
|---|---|
| TA-55-DG-1 | --[1] |

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

| | | | | |
|---|---|---|---|---|
| **A1003 Applicable Requirements – Degreasers**<br><br>A. The permittee shall comply with all applicable sections of the requirements listed in Table 1003.A. | The LANL degreaser operation met all requirements of 40 CFR Part 63, Subpart T during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1003.A: Applicable Requirements**

| **Applicable Requirements** | **Federally Enforceable** | **Unit No.** |
|---|---|---|
| 40 CFR 63, Subpart T National Emission Standards for Halogenated Solvent Cleaning | X | TA-55-DG-1 |

**A1004 Operational Limitations – Degreasers**

A. The Degreasers source category is authorized for continuous operation. No monitoring, recordkeeping, or reporting requirements are required to demonstrate compliance with continuous hours of operation.

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| **A1007 Other – Degreasers**<br><br>A. Operational Requirements (Degreasers)<br><br>**Requirement**: The permittee shall comply | Operational requirements for the degreaser are met as described below: | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
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| with the applicable requirements according to 40 CFR 63, Subpart T, including, but not limited to:<br><br>1) Ensure the degreaser is closed with a tight fitting cover whenever not in use, and<br><br>2) Maintain a freeboard ratio of 0.75 or greater, and<br><br>3) Collect and store all waste solvent and wipe rags in closed containers, and<br><br>4) Perform flushing within the freeboard area only, and<br><br>5) Allow cleaned parts to drip for 15 seconds or until dripping stops, and<br><br>6) Do not exceed the fill line on the solvent level, and<br><br>7) Wipe up spills immediately, and<br><br>8) Do not create observable splashing with agitation device, and<br><br>9) Ensure that the degreaser is not exposed to drafts greater than 40 meters/min, and<br><br>10) Do not clean sponges, fabric, wood, or paper. | 1) The degreaser is kept closed with a tight fitting cover when it is not being used.<br><br>2) A freeboard ratio of 0.75 or greater is maintained.<br><br>3) All waste solvent and solvent contaminated wipe rags are collected and stored in closed containers.<br><br>4) Flushing operations are performed only within the freeboard area.<br><br>5) Cleaned parts are allowed to drip for 15 seconds or until dripping stops.<br><br>6) The fill line has not been exceeded.<br><br>7) Spills are wiped up immediately.<br><br>8) Administrative controls are in place to prevent observable splashing with an agitation device.<br><br>9) The degreaser is located in a glove box with a set ventilation flow rate. Exhaust flows do not exceed 40 meters/min.<br><br>10) Sponges, fabric, wood, or paper are not cleaned in the degreaser. | | | |
| **Monitoring**: The permittee shall monitor and record the amount of solvent added to the degreaser. | A database 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 six-month basis as described in Section A109.B. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall: | | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
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| 1) Calculate the actual emissions rate (pounds/month) of VOC and HAPs based on the quantity of solvent lost to evaporation on a monthly basis.<br>2) Calculate the semi-annual emissions rate (tons/year) for this source category and add to the facility-wide emission rates in Table 106.B.<br>3) Maintain records of the degreaser solvent content and quantity added and work practice checklists.<br>4) The permittee shall maintain records in accordance with Section B109. | 1) The actual emission rate (pounds/month) of VOC and HAPs is calculated by the database when data are entered.<br>2) The semi-annual emissions (tons/year) are also calculated by the database. These emissions are included in the facility-wide totals.<br>3) Records of solvent content and quantity added are maintained on-site. Checklists for work practice standards have been completed for this certification period.<br>4) Records for this source category are maintained in accordance with Section B109. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |
| **Reporting:** The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance Section B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1100 Regulated Sources – Internal Combustion**<br>A. Table 1100.A lists all of the process equipment authorized for this source category. | No new equipment have been added or changes made to the equipment. Table 1100.A. lists the current internal combustion equipment authorized at the facility. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1100.A: Regulated Sources List**

| Unit No. | Source Location | Source Type[1] | Generator Make/ Model | Generator Serial No. | Capacity | Engine Make/Model | Engine Serial No. | Manufacture Date |
|---|---|---|---|---|---|---|---|---|

| 1. 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? |
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| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| TA-33-G-1P | TA-33 | CI-RICE, Portable Generator | Cummins/ DFHD | H010276941 | 1490 hp | Cummins/QST30-G5-NR1 | 37199764 | 2001 | |
| TA-33-G-2 | TA-33, TA-36 and TA-39 | CI-RICE, Portable Generator | Kohler/ 20EORZ | 2025460 | 36 hp | YANMAR 4TNE84T-EKRW | 52993 | 2003 | |
| TA-33-G-3 | TA-33, TA-36 and TA-39 | CI-RICE, Portable Generator | Kohler/ 20EORZ | 2025461 | 36 hp | YANMAR 4TNE84T-EKRW | 52992 | 2003 | |
| TA-33-G-4 | TA-33, TA-36 and TA-39 | CI-RICE, Portable Generator | Caterpillar/ SR4B | 6PK01065 | 316 hp | Caterpillar/3306 | 8JJ00615 | 1999 | |
| RLUOB-GEN-1 | TA-55-00585 (RLUOB) | CI-RICE Stationary Generator | Cummins/ DFLE-5754172 | I06970810 | 2220 hp | Cummins/KTA50G9 | 25314401 | 9/06 | |
| RLUOB-GEN-2 | TA-55-0584 (RLUOB) | CI-RICE Stationary Generator | Cummins/ DFLE-5754172 | I06970811 | 2220 hp | Cummins/KTA50G9 | 25314399 | 9/06 | |
| RLUOB-GEN-3 | TA-55-0583 (RLUOB) | CI-RICE Stationary Generator | Cummins/ DFLE-5754172 | I06970812 | 2220 hp | Cummins/KTA50G9 | 33165566 | 9/06 | |
| TA-48-GEN-1 | TA-48-1 | CI-RICE Stationary Generator | Cummins/150DSGAC | L100178636 | 250 hp | QSB7-G3 NR3 | 73176927 | 2010 | |

| 1. 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? |
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| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| TA-55-GEN-1 | TA-55-PF10 | CI-RICE<br>Stationary Generator | Whisper Watt/DCA 25SSiU4F<br>DF-027012 | 7150008 | 40.2 hp | ISUZU<br>Model: BZ-4LE2T | 4LE2-298868 | 2014 |
| TA-55-GEN-2 | TA-55-PF11 | CI-RICE<br>Stationary Generator | Whisper Watt/DCA 25SSIU4F<br>DF-027012 | 7150066 | 40.2 hp | ISUZU<br>Model: BZ-4LE2T | 4LE2-299432 | 2014 |
| TA-55-GEN-3 | TA-55-371 | CI-RICE<br>Stationary Generator | Caterpillar/ SR4B-6D | G5C03702 | 1335 hp | Caterpillar/C 32 | SYCO5263 | 2009 |

1. Portable units are subject to NSPS or NESHAP requirements if they fail to meet the definition of a Nonroad engine as defined in 40 CFR 1068.30.

| | | | | |
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| **A1102 Emission Limits – Internal Combustion**<br><br>A. Table 1102.A lists the emission units, and their allowable emission limits. (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC; NSR permit 2195F-R4 and 2195P) | No new process equipment has been added or changes made to this source category during this certification period. Allowable emissions were not exceeded. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
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## Table 1102.A: Allowable Emissions

| Unit No. | $NO_x$ pph | $NO_x$ tpy | CO pph | CO tpy | VOC pph | VOC tpy | $SO_2$ pph | $SO_2$ tpy | TSP pph | TSP tpy | $PM_{10}$ pph | $PM_{10}$ tpy |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| TA-33-G-1P | 40.3 | 18.1 | 33.7 | 15.2 | 0.7 | 0.3 | 5.5 | 2.5 | 1.4 | 0.6 | 1.4 | 0.6 |
| TA-33-G-2 | 0.83 | 0.21 | 0.2 | 0.1 | 0.1 | --[1] | -- | -- | -- | -- | -- | -- |
| TA-33-G-3 | 0.83 | 0.21 | 0.2 | 0.1 | 0.1 | --[1] | -- | -- | -- | -- | -- | -- |
| TA-33-G-4 | 9.33 | 2.33 | 5.7 | 1.4 | 0.75 | 0.2 | 0.6 | 0.16 | -- | -- | -- | -- |

1 The VOC emissions from this source category are included in the facility-wide allowable emissions limit established in condition A106.B: 200 tpy VOC, 8.0 tpy per individual HAP, and 24.0 tpy of combined HAPs.

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| **A1103 Applicable Requirements – Internal Combustion**<br><br>A. The permittee shall comply with all applicable sections of the requirements listed in Table 1103.A. | LANL is in compliance with the applicable requirements. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1103.A: Applicable Requirements**

| Applicable Requirements | Federally Enforceable | Unit No. |
|---|---|---|
| NSR Permit 2195F-R4 | X | TA-33-G-1P |
| NSR Permit 2195P and 2195-P3, 2195P-R1 and 2195P-R3 | X | TA-33-G-2 through -4 |
| NSR Permit 2195N-R1 (Admin NOE) | X | RLUOB-GEN-1 through -3 |
| 20.2.61 NMAC Smoke and Visible Emissions | X | All Internal Combustion Sources |
| 20.2.77 New Source Performance Standards | X | Applicable to RLUOB-GEN-1 through -3, TA-48-GEN-1, TA-55-GEN-1 TA-55-GEN-2 and TA-55-GEN-3 |
| 40 CFR 60, Subpart A, General Provisions | X | Applicable to RLUOB-GEN-1 through -3, |

| 1. 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? |
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| 40 CFR 60 Subpart IIII, Stationary CI-RICE | X | TA-48-GEN-1, TA-48-GEN-1, TA-55-GEN-1 TA-55-GEN-2 and TA-55-GEN-3 | | |
| 40 CFR 89, Control of Emissions from New and In-Use Nonroad Compression Ignition Engines | X | TA-33-G-2 through -4 | | |
| **A1104 Operational Limitations – Internal Combustion**<br><br>A. Hours of Operation and Emission Limits for Unit TA-33-G-1P<br><br>**Requirements**:<br>1) Unit TA-33-G-1P is limited to eight (8) hours of daily operation at full capacity. Operation shall occur between the hours of 7:00 AM and 5:00 PM. (NSR Permit 2195F-R4, Condition A1104.A)<br>2) Unit TA-33-G-1P is limited to the emissions limits stated in Table 1102.A. (NSR Permit 2195F-R4, Condition A1104.A) | 1) Unit TA-33-G-1-P operated in accordance with the permit requirements and the operation was limited to eight (8) hours per day and between the hours of 7:00 AM and 5:00 PM.<br><br>2) Unit TA-33-G-1-P's emissions are less than the allowable limits stated in Table 1102.A., and is in compliance with the permit conditions. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The permittee shall monitor the time(s) of operation each day, and the daily and monthly rolling 12-month total hours of operation for Unit TA-33-G-1P using a non-resettable hour meter. Hours that do not represent hours the unit is operated at the TA-33 site may be monitored separately for subsequent subtraction from the daily and monthly rolling 12-month totals | The daily and monthly total hours of operations are monitored with a non-resettable hour meter. The rolling 12-month total hours of operation are calculated and recorded. Hours of operation at TA-33 and operation at locations elsewhere at LANL, are monitored separately. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall maintain the following records and in accordance with Section B109:<br>1) The permittee shall keep records of the time(s) of operation each day, and the daily, monthly, and the monthly rolling 12-month total hours of operation of the genset listed | 1) The genset has a non-resettable hour meter that monitors the number of hours operated. A log book is used to record daily hours of operation when the | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
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| above, as indicated on the non-resettable hour meter. The permittee may record and subtract hours of operation that do not represent operating hours at the TA-33 site.<br>2) The permittee shall calculate the annual emissions of all criteria and hazardous air pollutants from Unit TA-33-G-1P. The permittee may subtract emissions that are not the result of operations at TA-33. | equipment operates. The monthly and the monthly rolling 12-month total hours of operation are calculated in a spreadsheet. Operations at areas outside TA-33 are recorded.<br><br>2) The annual emissions of criteria and HAPs are calculated based on the hours of operation. Emissions from locations elsewhere at LANL are subtracted from emissions from the TA-33 site. The unit operated only at TA-33 during this certification period | | | |
| **Reporting:** The permittee shall submit reports in accordance with Section B110. | Reports are submitted as required by permit conditions. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1104 Operational Limitations – Internal Combustion**<br><br>B. Hours of Operation and Emission Limits for Units TA-33-G-2 through -4<br><br>**Requirements:**<br>1) Units TA-33-G-2 through -4 are authorized to operate 500 hours per generator per calendar year. (NSR Permit 2195P, Specific Condition 1.b.)<br>2) Units TA-33-G-2 through -4 shall each be certified to be in compliance with applicable non-road emission standards in 40 CFR 89. (NSR Permit 2195P, Specific Condition 1.c.) | Compliance with the hourly operational limitations and emission requirements are described below:<br><br>1) The hour meter readings are collected twice a year to verify that the hour limit is not being approached. The operating hour limits for these units were not exceeded during this certification period.<br>2) Certificates of compliance with applicable non-road emission standards are maintained on site. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring:** The permittee shall monitor the total hours of operation for each genset, Units TA-33-G-2 through -4, using a non-resettable hour meter. | Daily and semi-annual hour of operation are monitored using a non-resettable hour meter. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping:** The permittee shall:<br>1) Record the total hours operation of the | 1) Records of total operating hours for the gensets are maintained on a semi-annual basis. | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
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| gensets listed above, as indicated on the non-resettable hour meter. (NSR Permit 2195P, Specific Condition 4.a., revised)<br>2) Calculate and record the semi-annual emissions of criteria and hazardous air pollutants from each genset, Units TA-33-G-2 through -4.<br>3) Maintain a copy of the engine certification to the applicable non road emission standards in 40 CFR 89. (NSR Permit 2195P, Specific Condition 4.c.) | 2) Emissions from the gensets are calculated and recorded semi-annually and annual totals are calculated.<br><br>3) A copy of the engine certification to the applicable non-road emission standards is maintained on-site. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance with Section B110. See Section A109 in this report for details. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1105 Fuel Sulfur Requirements – Internal Combustion**<br><br>A. Fuel Sulfur Requirement for Unit TA-33-G-1P<br><br>**Requirement**: Unit TA-33-G-1P while in use at TA-33 shall combust only diesel fuel containing no more than 500 ppmw total sulfur. | Only ULSD fuel is used in this unit. LANL has a purchase contract in place to only purchase ULSD fuel containing less than 15 ppm sulfur. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: None.<br><br>**Recordkeeping**: The permittee shall demonstrate compliance with the limit on total fuel sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the fuel, or fuel analysis, specifying the fuel grade and certification or allowable sulfur limit. If fuel analysis is used, the analysis shall not be older than one year. Alternatively, compliance may | Only ULSD fuel is used in this unit. LANL has a purchase contract in place to only purchase ULSD fuel containing less than 15 ppm sulfur.<br>A copy of the purchase contract is available on-site. In addition, receipt and/or invoices from fuel suppliers are kept when deliveries are made. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
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| be demonstrated by keeping a receipt or invoice from a commercial fuel supplier with each fuel delivery, which shall include the delivery date, the fuel type delivered, and amount of fuel delivered, and the maximum sulfur content of the fuel. | | | | |
| **Reporting:** The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance with Section B110. See Section A109 in this report for details. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1106 20.2.61 NMAC Opacity – Internal Combustion**<br><br>A. CI-RICE - TA-33-G-1P, TA-33-G-2, TA-33-G-3, TA-33-G-4, RLUOB-GEN-1, RLUOB-GEN-2, RLUOB-GEN-3, TA-48-GEN-1, TA-55-GEN-1 TA-55-GEN-2 and TA-55-GEN-3<br><br>**Requirement**: Visible emissions from the stacks of the above listed sources shall not equal or exceed an opacity of 20 percent. | No unit subject to this requirement exceeded 20% opacity during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: During steady state operation, opacity shall be measured over a 10-minute period in accordance with the procedures at 40 CFR 60, Appendix A, Method 9 as required by 20.2.61.114 NMAC. Opacity measurements shall be conducted on a quarterly basis per calendar year as qualified by the Section B108.D monitoring provisions. This requirement excludes Insignificant and Trivial Activities. | The applicable CI-RICE units operated less than 10% of each monitoring period (less than 219 hours each quarter) during this certification period. Section B108.D(2) of the permit allows reduced frequency of opacity monitoring if an applicable unit operates less than 10% of the monitoring period (calendar quarter). If the unit operates greater than 10% of the monitoring period, the unit will have an opacity observation performed on it, otherwise an opacity observation is performed at least once during the five year term of the permit. Opacity observations were not required during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
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| **Recordkeeping**: The permittee shall maintain records of all Method 9 observations, and in accordance with Section B109. | Records of Method-9 observations are maintained in accordance with Section 109. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall report date, time, and results of all Method 9 observations. The permittee shall submit reports described in Section A109 and in accordance with Section B110. | The date, time, and results of all Method 9 observations are submitted as described in Section 109 and in accordance with Section 110. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1107 Other – Internal Combustion**<br><br>A. 40 CFR 60, Subpart IIII (Emergency Generators Units RLUOB-GEN-1 through -3)<br><br>**Requirement**: The units are subject to 40 CFR 60, Subpart IIII and the permittee shall comply with the applicable emissions standards and fuel requirements in §60.4205(a), §60.4206 and §60.4207(b) and Table 1102.B. In addition the permittee shall follow the compliance requirements stated in §60.4211(a, b, and f) and the general provisions of 40 CFR 60 Subpart A as required in §60.4218. | The manufacturer's emissions certifications required by 40 CFR §60.4205(a) are available on-site.<br><br>Diesel sulfur requirements of 15 ppm are met by the LANL's fuel contract and the policy of purchasing ULSD fuel.<br><br>Manufacturer's certifications for non-road engines are on-site to demonstrate compliance with emission standards; The hours of non-emergency operations, including maintenance checks and readiness testing of such units, are limited to 100 hours per year. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: None<br><br>**Recordkeeping**: The permittee shall maintain records in accordance with Section B109.. | Hours of non-emergency and emergency operations are recorded during generators' operation. The units subject to this condition operated less than 100 hours per year on non-emergency operations and maintenance checks. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall comply with all applicable reporting requirements of 40 CFR 60, Subpart A as required in §60.4218 and in accordance with Section B110. | The hours of operations are recorded and reported as required by §60.4218 and in accordance with Section B110. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| **A1107 Other – Internal Combustion**<br>B. 40 CFR 60, Subpart IIII (Emergency Generators Unit TA-48-GEN-1, TA-55-GEN-1 TA-55-GEN-2 and TA-55-GEN-3)<br>**Requirement**: The units are subject to 40 CFR 60, Subpart IIII and the permittee shall comply with the applicable emissions standards and fuel requirements in §60.4205(b), §60.4202(a)(2), §60.4206 and §60.4207(b) and Table 1102.B. In addition the permittee shall follow the compliance requirements stated in §60.4211(a, c and f) and the general provisions of 40 CFR 60 Subpart A as required in §60.4218. | Diesel sulfur requirements of 15 ppm are met by the LANL contract and policy of purchasing ULSD fuel.<br>The units subject to requirements in this section have engines that are EPA Tier 1 certified. The certification is provided by the engine manufacturer indicating compliance with the standard.<br>The manufacturer's emissions certifications as required by §60.4205(a) for non-road engine are maintained on-site to demonstrate compliance with the EPA standards; maintenance checks and readiness testing of such units is limited to 100 hours per year. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: None<br>**Recordkeeping**: The permittee shall maintain records in accordance with Section B109. | The non-emergency and emergency operating hours are recorded at the facility during generators' operation. The units subject to this condition operated less than 100 hours annually on maintenance and readiness checks. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall comply with all applicable reporting requirements of 40 CFR 60, Subpart A as required in §60.4218 and in accordance with Section B110. | The hours of operations are reported in accordance with Section B110. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1200 Regulated Sources – Data Disintegrator**<br>A. Table 1200.A lists all of the process | No new process equipment has been added and no changes were made to this source category during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| equipment authorized for this source category. | | | | |

**Table 1200.A: Regulated Sources List**

| Unit No. | Source Description | Manufacturer | Model No./ Serial No. | Manufacture Date | Capacity |
|---|---|---|---|---|---|
| TA-52-11 | Data Disintegrator/ Industrial Shredder | Security Engineered Machinery | 1424/11892 | 9/2002 | 1200 lb/hr |

| | | | | |
|---|---|---|---|---|
| **A1201 Control Equipment – Data Disintegrator**<br><br>A. Table 1201.A lists all of the pollution control equipment required for the applicable regulated equipment in this source category. Each emission point is identified by the same number that was assigned to it in the permit application. | No new pollution control equipment were added and no changes were made to this source category during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1201.A: Control Equipment List**

| Control Equipment Unit No./Location[1] | Control Description | Efficiency | Pollutant being controlled |
|---|---|---|---|
| TA-52-11 | Cyclone and cloth tube filters | 98.75% | TSP/PM10 |

1 Control for unit number refers to a unit number from the Regulated Sources List

| | | | | |
|---|---|---|---|---|
| **A1202 Emission Limits – Data Disintegrator**<br><br>A. Table 1202.A lists the emission units, and their allowable emission limits. | Emissions are calculated and reported on a six-month basis as described in Section A109.B. A comparison against the allowable emission limits is performed at each of these reporting periods. Allowable emission limits were not exceeded. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC; NSR Permit 2195H). | | | | |

**Table 1202.A: Allowable Emissions**

| Unit No. | TSP pph | TSP tpy | PM10 pph | PM10 tpy |
|---|---|---|---|---|
| TA-52-11 | 2.3 | 9.9 | 2.3 | 9.9 |

1 PM10 and TSP emissions limits are after controls.

| | | | | |
|---|---|---|---|---|
| **A1203 Applicable Requirements – Data Disintegrator**<br><br>A. The permittee shall comply with all applicable sections of the requirements listed in Table 1203.A. | LANL data disintegrator operations meet the requirements of NSR Permit No. 2195H. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1203.A: Applicable Requirements**

| Applicable Requirements | Federally Enforceable | Unit No. |
|---|---|---|
| NSR Permit No: 2195H | X | TA-52-11 |

| | | | | |
|---|---|---|---|---|
| **A1204 Operational Limitations – Data Disintegrator**<br><br>A. Operational Throughput Limitation (Unit Data Disintegrator)<br><br>**Requirement**: The Unit Data Disintegrator is limited processing no more than 25,000 boxes or 565 tons per year media. To avoid Compliance Assurance Monitoring (CAM) requirements under 40 CFR 64, the Data Disintegrator shall limit uncontrolled potential PM emissions by limiting media processing no more than 25,000 boxes or 565 | 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 AQB in the semi-annual monitoring reports.<br><br>The Data Disintegrator did not process more than 25,000 boxes or exceed 565 tons per year in the certification period | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| tons per year. | | | | |
| **Monitoring**: The permittee shall perform the monitoring required in Condition A1207.A. | Please see Condition A1207.A. Monitoring | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall perform the recordkeeping required in Condition A1207.A. | Please see Conditions A1207.A. Recordkeeping. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall perform the reporting required in Condition A1207.A. | Please see Condition A1207.A. Reporting | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1207 Other – Data Disintegrator**<br>A. Emission calculations (Data Disintegrator)<br>**Requirement**: The permittee shall calculate Data Disintegrator emissions based on the records of the number of boxes of media that are destroyed. | 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 AQB in the semi-annual monitoring reports. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The permittee shall monitor the quantity of media destroyed on a monthly basis. The total weight shall be based on a previously determined average box weight. This average weight determination shall be maintained as part of the records for this facility. | A log is kept to monitor the number of boxes of media that are destroyed each month. The average box weight has been determined and is maintained as part of the facility records. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall calculate the actual emissions rate (tons per reporting period) for the emission units listed in Table 1200.A on a semi-annual basis. The emission rate in tons per year shall be calculated by summing the emissions from the previous reporting period with the current | The actual emissions rate is calculated for the emission unit on a semi-annual basis and is included in the semi-annual emissions report. These records are maintained on site. The emission rate in tons per year is calculated by summing the emissions from the previous reporting period with the current period. The emissions are compared to the allowable emissions for the unit. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| period. Records shall be maintained in accordance with Section B109. | | | | |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance with permit conditions Section B110. See Section A109 in this report for details. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1207 Other – Data Disintegrator**<br><br>B. Cyclone/Cloth Tube Filters (Data Disintegrator)<br><br>**Requirement**: The permittee shall perform regular maintenance and repair on the cyclone and cloth tube filter(s) per manufacturer's recommendations. (NSR Permit 2195H, Specific Condition 1.d.) | Preventive maintenance and repair are performed on the data disintegrator cyclone and cloth tube filters per manufacturer's recommendations. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring:** N/A<br><br>**Recordkeeping**: The permittee shall maintain adequate records on site to demonstrate compliance with manufacturer's recommended repair and maintenance schedules for the cyclone and the cloth tube filter(s). (NSR Permit 2195H, Specific Condition 4.a.) Records shall be maintained in accordance with Section B109. | Records of maintenance performed on the unit are available on-site. Manufacturer recommended repair and maintenance procedures are also available on site. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance with Section B110. See Section A109 in this report for details. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1207 Other – Data Disintegrator**<br><br>C. Compliance Testing (Data Disintegrator) | No compliance test was required or performed during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| **Requirement**: If upon notification by the Department, compliance testing is required, it shall be conducted in accordance with EPA Reference Methods 1 through 4, Method 5 for TSP, and conducted in accordance with 450 CFR 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. (NSR Permit 2195H, Specific Condition 6.b., revised) | | | | |
| **Monitoring**: N/A<br><br>**Recordkeeping**: The permittee shall maintain records in accordance with Section B109. | No compliance test was required or performed during this certification period. No records have been generated. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis as described in Section A109 and in accordance with Section B110. See Section A109 in this report for details. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1300 Regulated Sources – TA-3 Power Plant**<br><br>A. Table 1300.A lists all of the process equipment authorized for this source category. | No new process equipment has been added to this facility during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1300.A: Regulated Sources List**

| **Unit No.** | **Source Description** | **Manufacturer** | **Model No./ Serial No.** | **Year of Manufacture** | **Capacity** |
|---|---|---|---|---|---|
| TA-3-22-1 | Boiler | Edgemoor Iron Works | 4008 | 1950 | 178.5 MMBtu/hr |

| 1. 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? |
|---|---|---|---|---|

| | | | | | |
|---|---|---|---|---|---|
| TA-3-22-2 | Boiler | Edgemoor Iron Works | 4009 | 1950 | 178.5 MMBtu/hr |
| TA-3-22-3 | Boiler | Union Iron Works | 11804 | 1952 | 178.5 MMBtu/hr |
| TA-3-22-CT-1 | Combustion Turbine | Rolls Royce | RB211-6761DLE/ | 2003 | 27 MW |

| | | | | |
|---|---|---|---|---|
| **A1301 Control Equipment – TA-3 Power Plant**<br><br>A. Table 1301.A lists all the pollution control equipment required for this source category. Each emission point is identified by the same number that was assigned to it in the permit application. | No new pollution control equipment has been added to this facility during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1301.A: Control Equipment List:**

| Control Equipment Unit No. | Control Description | Manufacturer | Year of Manufacture | Pollutant being controlled | Control for Unit No.[1] |
|---|---|---|---|---|---|
| F-1 | Flue Gas Recirculation Fan, 1800 rpm | Robinson Industries | 2001 | NOx | TA-3-22-1 |
| F-2 | Flue Gas Recirculation Fan, 1800 rpm | Robinson Industries | 2001 | NOx | TA-3-22-2 |
| F-3 | Flue Gas Recirculation Fan, 1800 rpm | Robinson Industries | 2001 | NOx | TA-3-22-3 |
| TA-3-22-CT-1 | Rolls-Royce DLE System | Rolls-Royce | 2003 | NOx | TA-3-22-CT-1 |

[1]Control for unit number refers to a unit number from the Regulated Equipment List

| | | | | |
|---|---|---|---|---|
| **A1302 Emission Limits – TA-3 Power Plant** | Emissions are calculated and reported on a six- | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

| 1. 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? |
|---|---|---|---|---|
| A. Table 1302.A lists the emission units, and their allowable emission limits. (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC; 40 CFR 60, Subparts A and GG; NSR Permit 2195B-M2). | month basis in accordance with permit condition A109.B. A comparison against the allowable emission limits is performed at each of these reporting periods. Allowable emission limits were not exceeded during this certification period. | ☒ **Intermittent** | ☐ **No** | ☒ **No** |

**Table 1302.A: Allowable Emissions**

| Unit No. | NOx[1] | | CO | | VOC | | SOx | | TSP | | PM10 | | PM2.5 | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Gas | Oil | Gas | Oil | Gas | Oil | Gas | Oil | Gas | Oil | Gas | Oil | Gas | Oil |
| TA-3-22-1 (lb/hr) | 10.2 | 11.3 | 7.0 | 6.5 | 1.0 | 0.3 | 1.1 | 9.6 | 1.3 | 4.3 | 1.3 | 3.0 | 1.3 | 2.0 |
| TA-3-22-2 (lb/hr) | 10.2 | 11.3 | 7.0 | 6.5 | 1.0 | 0.3 | 1.1 | 9.6 | 1.3 | 4.3 | 1.3 | 3.0 | 1.3 | 2.0 |
| TA-3-22-3 (lb/hr) | 10.2 | 11.3 | 7.0 | 6.5 | 1.0 | 0.3 | 1.1 | 9.6 | 1.3 | 4.3 | 1.3 | 3.0 | 1.3 | 2.0 |
| Boilers Combined (tpy) | 31.5 | | 21.5 | | 2.8 | | 4.9 | | 4.7 | | 4.4 | | 4.2 | |
| TA-3-22-CT-1 (lb/hr) | 23.8 | | 29.0 | | 0.6 | | 1.7 | | 1.9 | | 1.9 | | 1.9 | |
| TA-3-22-CT-1 (tpy) | 59.4 | | 72.3 | | 1.5 | | 4.2 | | 4.8 | | 4.8 | | 4.8 | |
| TA-3-22-CT-1 (ppm) | 25 ppmvd @ 15% O2 | | N/A | | N/A | | N/A | | N/A | | N/A | | N/A | |

1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as $NO_2$.

| | | | | |
|---|---|---|---|---|
| **A1302 Emission Limits – TA-3 Power Plant**<br><br>B. NOx emissions (all oxides of nitrogen | Results from source compliance tests performed on the boilers demonstrate that nitrogen dioxide emissions do not exceed 0.3 lb/MMBtu of heat | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| expressed as NO2) from the boilers (Units TA-3-22-1 through -3) shall not exceed 0.3 lb/MMBtu of heat input when burning natural gas or oil as required by 20.2.33 and 20.2.34 NMAC. (NSR Permit 2195B-M2, Specific Condition A106.B) | input. | | | |
| **A1302 Emission Limits – TA-3 Power Plant**<br><br>C. For the Combustion Turbine (Unit TA-3-22-CT-1), the permittee shall comply with the NSPS Subpart GG NOx emissions limitation of 110.4 ppmv at 15% O2, dry basis (40 CFR 63.332(a)(1) and NSR Permit 2195B-M2, Specific Condition A106.C). | The NOx emission concentrations and rates have been measured through emission stack testing and compared to the allowable emission limit for several years. NOx concentrations are consistently below the NSPS Subpart GG, NOx emission limit. The test reports are available on-site and have been provided to NMED in previous semi-annual monitoring reports. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1302 Emission Limits – TA-3 Power Plant**<br><br>D. For the Combustion Turbine (Unit TA-3-22-CT-1), the permittee shall comply with the NSPS Subpart GG SO2 emissions limitation of 0.015% by volume at 15% O2 dry basis or through use of any fuel not exceeding 8000 ppmw total sulfur. (40 CFR 60.333 and NSR Permit 2195B-M2, Specific Condition A106.D) | The Combustion Turbine only uses natural gas. The natural gas transportation contract stipulates that gas provided to LANL will be pipeline quality and contain no more than 3/4 grains of total sulfur per 100 dry scf, which is just under 26 ppmw. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1303 Applicable Requirements – TA-3 Power Plant**<br><br>A. The permittee shall comply with all applicable sections of the requirements listed in Table 1303.A. | All units listed in this section comply with the requirements listed in the table. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1303.A: Applicable Requirements**

| **Applicable Requirements** | **Federally Enforceable** | **Unit No.** |
|---|---|---|

| 1. 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? |
|---|---|---|---|---|
| 20.2.33 NMAC Gas Burning Equipment – Nitrogen Dioxide | X | TA-3-22-1 through -3 | | |
| 20.2.34 NMAC Oil Burning Equipment – Nitrogen Dioxide | X | TA-3-22-1 through -3 | | |
| 20.2.61 Smoke and Visible Emissions | X | All combustion sources | | |
| 40 CFR 60, Subpart A | X | TA-3-22-CT-1 | | |
| 40 CFR 60, Subpart GG | X | TA-3-22-CT-1 | | |
| NSR Permit No: 2195B-M2 | X | All Power Plant sources | | |
| **A1304 Operational Limitations – TA-3 Power Plant**<br><br>A. This source category is authorized to operate at any time of the day or night on any day of the year. No monitoring, recordkeeping, or reporting requirements are required to demonstrate compliance with continuous hours of operation. | | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1304 Operational Limitations – TA-3 Power Plant**<br><br>B. Units TA-3-22-1 through -3 shall be operated on fuel oil for no more than 48 hours per year per boiler for non-emergency maintenance and readiness testing. This condition establishes exemption from 40 CFR 63, Subpart JJJJJJ | Fuel oil was not used during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1305 Fuel Sulfur Requirements – TA-3 Power Plant**<br><br>A. Boilers (Units TA-3-22-1 through -3)<br><br>**Requirement:** External combustion sources at the TA-3 Power Plant shall combust only | Fuel sulfur content requirement is met through the natural gas transportation contract which stipulates that gas provided to LANL will be pipeline quality with a total sulfur content of no more than 3/4 grains of total sulfur per 100 scf.<br><br>Fuel oil is under a purchase contract and only | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| natural gas containing no more than 2 gr/100 scf total sulfur or No. 2 fuel oil containing no more than 0.05 wt% total sulfur. (NSR Permit 2195B-M2, Specific Condition A110.A) | ULSD fuel is delivered to the facility. ULSD fuel contains less than 0.0015 wt% total sulfur.<br><br>A copy of the transportation contract and purchase contract are kept on-site. | | | |
| **Monitoring**: N/A<br><br>**Recordkeeping**: The permittee shall demonstrate compliance with the limit on total fuel sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the gaseous or liquid fuel, or fuel analysis, specifying the fuel grade and certification or allowable sulfur limit. If fuel analysis is used, the analysis shall not be older than one year. Alternatively, compliance may be demonstrated by keeping a receipt or invoice from a commercial fuel supplier with each fuel delivery, which shall include the delivery date, the fuel type delivered, and amount of fuel delivered, and the maximum sulfur content of the fuel. | The natural gas transportation contract and fuel oil purchase contract copies are kept on-site.<br><br>The natural gas transportation contract stipulates that gas provided to LANL will be pipeline quality with a total sulfur content of no more than 3/4 grains of total sulfur per 100 scf.<br><br>Only ULSD is delivered to the facility. ULSD contains less than 0.0015 wt% total sulfur. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1305 Fuel Sulfur Requirements – TA-3 Power Plant**<br><br>B. Combustion Turbine (Unit TA-3-22-CT-1)<br><br>**Requirement**: The combustion turbine at the TA-3 Power Plant shall combust only natural gas containing no greater than 2 gr/100 scf total sulfur. (NSR Permit 2195B-M2, Specific | The natural gas transportation contract stipulates that gas provided to LANL will be pipeline quality with a total sulfur content of no more than 3/4 grains of total sulfur per 100 scf. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| Condition A110.B) | | | | |
| **Monitoring:** N/A<br>**Recordkeeping**: The permittee shall demonstrate compliance with the limit on total fuel sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, or fuel analysis, specifying the fuel grade and certification or allowable sulfur limit. If fuel analysis is used, the analysis shall not be older than one year. (NSR Permit 2195B-M2, Specific Condition A110.B and 40 CFR 60.334(h)) | The natural gas transportation contract stipulates that gas provided to LANL will be pipeline quality with a total sulfur content of no more than 3/4 grains of total sulfur per 100 scf. This sulfur content is in compliance with the requirement that the power plant shall combust only natural gas containing no greater than 2 grain/100 scf total sulfur. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1306 20.2.61 NMAC Opacity – TA-3 Power Plant**<br><br>A. Sources Combusting Natural Gas<br><br>**Requirement:** All combustion units shall not exceed 20% opacity. (NSR Permit 2195B-M2, Specific Condition A111.A) | 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. The opacity limit was not exceeded during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: Use of natural gas fuel meeting the requirement at Condition A1305.A or B constitutes compliance with 20.2.61 NMAC unless opacity exceeds 20% averaged over a 10-minute period. When any visible emissions are observed during steady state operation and are determined to be not due to condensed water vapor only, opacity shall be measured over a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Method 9 as required by 20.2.61.114 NMAC. | Natural gas fuel meets the requirement at Condition A1305.A and B. The opacity limit was not exceeded during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
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| **Recordkeeping**: The permittee shall record dates of any opacity measures and the corresponding opacity readings. | A standard form is used for all opacity measurements. The form includes the date of measurement and percent opacity observed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall report dates of any opacity measures and the corresponding opacity readings. The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Opacity measurement records are included in the semi-annual monitoring reports. Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1306 20.2.61 NMAC Opacity – TA-3 Power Plant**<br>B. Boilers Combusting No. 2 Fuel Oil<br>**Requirement**: All combustion units shall not exceed 20% opacity. (NSR Permit 2195B-M2, Specific Condition A111.B) | 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. The opacity limit was not exceeded during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring:** During steady state operation, opacity shall be measured over a 10-minute period in accordance with the procedures at 40 CFR 60, Appendix A, Method 9 as required by 20.2.61.114 NMAC. Opacity measurements shall be conducted on a quarterly basis per calendar year whenever the boiler(s) are operational during the monitoring period. This requirement is subject to the monitoring provisions of Condition B108.D. | Opacity is read at least once a quarter when boilers are combusting fuel oil and when required by monitoring provisions in condition B108.D. Opacity readings are measured over a 10-minute period and in accordance with 40 CFR 60, Appendix A, Method 9. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping:** The permittee shall maintain records of all Method 9 observations, and in accordance with Section B109. | A standard form is used for all opacity measurements. The form includes the date and time of measurement and percent opacity observed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall report date, time, and results of all Method 9 observations. The permittee shall submit | Opacity measurements are included in the semi-annual monitoring reports. Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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| reports described in Section A109 and in accordance with Section B110. | and B110. | | | |
| **A1307 Other – TA-3 Power Plant**<br><br>A. Emission calculations (TA-3 Power Plant)<br><br>**Requirement**: The permittee shall comply with the hourly and annual emission limits at Table1302.A. and Conditions A1302.B, C, and D for the combustion turbine and boilers. The boiler annual emission limit shall be expressed as the combined emissions from all 3 boilers. (NSR Permit 2195B-M2, Specific Condition A801.A) | All emission calculations required by this section are performed for the units listed. The units have not exceeded the hourly and annual emission limits. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The permittee shall perform the following calculations on a monthly basis:<br>1) Calculate the average hourly emissions rates (pph) for each emissions unit based on the monthly total fuel consumption and monthly actual hours of operation.<br>2) Calculate the actual annual emissions rates (tpy) for all emissions units based on the monthly rolling 12-month total fuel consumption and the monthly rolling 12-month total hours of operation.<br>3) All NOx emission rates for the boilers shall also be calculated in terms of lb/MMBtu heat input.<br>(NSR Permit 2195B-M2, Specific Condition A801.A) | Emission spreadsheets are in place for each of the units. These spreadsheets calculate all required emissions and are used for monitoring and reporting purposes.<br><br>1) The average hourly emission rates are calculated for each unit.<br><br>2) The actual annual emission rates are calculated for each unit.<br><br>3) The boiler emission rates are calculated using lb/MMBtu as the units for heat input.<br><br>No emission limits were exceeded during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall maintain records in accordance with Section B109. | Records are maintained in accordance with Section B109. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
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| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1307 Other – TA-3 Power Plant**<br><br>B. Fuel Usage (Boilers, Units TA-3-22-1 through -3)<br><br>**Requirement**: Combined boiler operation shall not consume more than 1000 MMscf of natural gas and no more than 500,000 gallons of No. 2 fuel oil in any 12-month period. Volumetric natural gas fuel flow shall be measured using gas flowmeters installed on the natural gas fuel inlet to each respective unit (3 separate gas flowmeters). Fuel oil usage shall be measured using a single inventory meter located at a storage tank that is dedicated for use by the TA-3 power plant boilers. (NSR Permit 2195B-M2, Specific Condition A803.A, revised) | The combined boiler natural gas use did not exceed the permitted allowable limits in any 12-month period All fuel use data are tracked monthly in a spreadsheet used for emission calculations.<br><br>Natural gas fuel meters are in place on each of the boilers. Fuel oil is measured using an inventory meter on the storage tank. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The liquid fuel flow rate shall be continuously monitored whenever liquid fuel is combusted. The natural gas fuel flow rate for each boiler shall be continuously monitored whenever natural gas is combusted. The hours of operation of each boiler shall be continuously monitored. (NSR Permit 2195B-M2, Specific Condition A803.A, revised) | Both natural gas and fuel oil are continuously monitored when being combusted. Hours of operation of each boiler are continuously monitored. This data are collected monthly from the power plant operations staff. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall record the monthly total of liquid fuel (gallons) for all boilers combined and gaseous fuel (scf) for each boiler on a monthly basis, to include a monthly total. Annual fuel usage shall be calculated and recorded on a monthly rolling | A monthly and 12-month rolling total of both natural gas and fuel oil use are recorded and reviewed monthly to verify usage does not exceed allowable limits. The 12-month rolling totals for each fuel are provided in LANL's semi-annual monitoring report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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| 12-month total basis. The permittee shall record the hours of operation of each boiler on a monthly basis, to include a monthly total. The record shall include the monthly rolling 12-month total hours of operation for all 3 boilers combined. The permittee shall maintain records in accordance with Section B109. (NSR Permit 2195B-M2, Specific Conditon A803.A, revised) | Total hours of operation of each boiler are recorded monthly and included in a monthly rolling 12-month total hours for all boilers combined. | | | |
| **Reporting:** The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1307 Other – TA-3 Power Plant**<br>C. Fuel Usage (Combustion Turbine, Unit TA-2-22-CT-1)<br>**Requirement**: The combustion turbine shall not consume more than 1400 MMscf of natural gas in any 12-month period. Volumetric flow shall be measured using a gas fuel flowmeter installed on the fuel inlet of the combustion turbine. (NSR Permit 2195B-M2, Specific Condition A802.A) | A 12-month rolling total for natural gas use is maintained and reviewed to verify usage does not exceed 1400 MMscf. The rolling total is provided in LANL's semi-annual monitoring report.<br>The natural gas flowmeter is installed on the turbine fuel inlet. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The natural gas fuel flow rate for the combustion turbine shall be continuously monitored whenever natural gas is combusted. (NSR Permit 2195B-M2, Specific Condition A802.A) | The fuel flowmeter continuously measures natural gas being delivered to the combustion turbine. | ☒ **Continuous**<br>☐ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall record the daily total of gaseous fuel (scf) for the turbine on a monthly basis, to include a monthly total. Annual fuel usage shall be calculated and recorded on a monthly rolling | The daily and monthly total fuel use are collected and recorded monthly in a spreadsheet used for calculating emissions. The data are used to calculate the 12-month rolling total fuel use.<br>Daily hours are also collected monthly and entered | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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| 12-month total basis. The permittee shall record the daily hours of operation of the combustion turbine on a monthly basis, to include a monthly total. The record shall include the monthly total hours and monthly rolling 12-month total hours of operation. The permittee shall maintain records in accordance with Section B109. (NSR Permit 2195B-M2, Specific Condition A802.A) | into the spreadsheet. A 12-month rolling total hours of operation is calculated using this information. | | | |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1307 Other – TA-3 Power Plant**<br><br>D. Load Requirement (Combustion Turbine, Unit TA-3-22-CT-1)<br><br>**Requirement**: The combustion turbine shall be operated at no less than 80% and no greater than 100% load as determined by the manufacturer's supplied algorithm, except for minimal periods during startup and shutdown conditions. The permittee shall follow the manufacturer's recommended startup/shutdown procedures in order to minimize the duration of these events. (NSR Permit 2195B-M2, Specific Condition A802.B) | The combustion turbine operated at less than 80% load on three (3) consecutive days on December 1, 2, and 3, 2015. The percentage of operational load varied from 75%-80% load on these days. Maximum load is highly dependent on ambient temperature. At colder temperatures the unit is capable of operating at higher load, and therefore the 80% maximum load requirement changes. The operators did not adjust the set load to account for the drop in temperature on these days. Load range is calculated by the turbine operating system and is manually recorded during each operation.<br><br>Corrective action was taken by requiring all combustion turbine operators to re-train to the startup/shutdown procedure with emphasis on the load requirement.<br><br>Startup/shutdown procedures are in place and are followed by the unit operators. | ☐ **Continuous**<br>☒ **Intermittent** | ☐ **Yes**<br>☒ **No** | ☒ **Yes**<br>☐ **No** |
| **Monitoring:** The operating load of the combustion turbine shall be monitored once daily during normal operations of that unit. | The load is monitored and recorded at least once daily during normal operations. | ☐ **Continuous** | ☒ **Yes** | ☐ **Yes** |

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| (NSR Permit 2195B-M2, Specific Condition A802.B) | | ☒ **Intermittent** | ☐ **No** | ☒ **No** |
| **Recordkeeping**: The permittee shall record the daily monitored operating load for the combustion turbine. The permittee shall maintain a record of the manufacturer's recommended startup/shutdown procedure and the manufacturer's criteria for the determination of turbine load. The permittee shall maintain a record for each startup/shutdown or malfunction event for the combustion turbine. The record shall include the date, the start/end time and duration for each event, which is defined as the length of time the combustion turbine is operating at less than 80% or greater than 100% load. For any malfunction event, the record shall also include the nature of the malfunction and any corrective action taken. The permittee shall maintain records in accordance with Section B109. (NSR Permit 2195B-M2, Specific Condition A802.B) | The load is recorded at least once daily during normal operations. and the recorded data are maintained on site.<br><br>Startup/shutdown procedures are in place and are followed by the unit operators.<br><br>Each time the unit is started or shutdown the data are entered into a manual log which is maintained on-site. The record includes the date, start/end times, and duration.<br><br>No malfunctions occurred during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1307 Other – TA-3 Power Plant**<br><br>E. Control Device Operation (Boilers, Units TA-3-22-1 through -3)<br><br>**Requirement**: Each boiler (Units TA-3-22-1 through -3) shall only be operated with a properly operating flue gas recirculation fan (Units F-1 through -3, respectively). Any malfunction of the flue gas recirculation system | When a boiler is in operation, the associated FGR fan is operating. A fan speed indicator is located on the control panel in operator control room. This fan speed is monitored and recorded during boiler operation. No malfunctions of the FGR systems occurred during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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| during boiler operation may be subject to the excess emissions requirements of 20.2.7 NMAC. (NSR Permit 2195B-M2, Specific Condition A803.B) | | | | |
| **Monitoring**: The flue gas recirculating fans shall be inspected for proper operation and maintenance once during each calendar month that the unit was operating. (NSR Permit 2195B-M2, Specific Condition A803.B) | The FGR fans are inspected for proper operation and maintenance each month the unit is operating. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall record all inspections of the flue gas recirculating fans and any event during which a fan malfunctions. The record shall include the date, time, name of operator conducting the inspection, and any discrepancies noted. For malfunction events, the record shall also include the nature and duration of the malfunction, and any corrective action taken. The permittee shall maintain records in accordance with Section B109. (NSR Permit 2195B-M2, Specific Condition A803.B) | Records of inspection and maintenance of the FGR fans are completed monthly. No malfunctions occurred during this certification period.<br><br>All inspection records contain the required data found in this section. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1307 Other – TA-3 Power Plant**<br><br>F. Control Device Operation (Combustion Turbine, Unit TA-3-22-CT-1)<br><br>**Requirement:** The combustion turbine shall be equipped with Rolls-Royce Dry Low Emissions (DLE) control technology (pre-mix, lean-burn series staged combustion system) to control NOx emissions. (NSR Permit 2195B-M2, Specific Condition A802.C) | The Dry Low Emissions (DLE) control technology is an integral part of the combustion turbine design. The DLE control was evaluated during unit start-up and determined to be working as designed. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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| **Monitoring:** N/A<br><br>**Recordkeeping:** The permittee shall maintain a record of the DLE system associated with the combustion turbine. The permittee shall maintain records in accordance with Section B109. (NSR Permit 2195B-M2, Specific Condition A802.C) | Manufacturer's data are available on the DLE system. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports described in Section A109 and in accordance with Section B110. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit condition A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1307 Other – TA-3 Power Plant**<br><br>G. 40 CFR 60, Subparts A and GG (Combustion Turbine, Unit TA-3-22-CT-1)<br><br>**Requirement**: The combustion turbine is subject to 40 CFR 60, Subpart GG and the permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A and Subpart GG. (NSR Permit 2195B-M2, Specific Condition A802.D) | The combustion turbine is in compliance with 40 CFR Part 60 Subpart A and 40 CFR Part 60 Subpart GG. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The permittee shall comply with the monitoring and testing requirements of 40 CFR 60.334 and 60.335. (NSR Permit 2195B-M2, Specific Condition A802.D) | The combustion turbine is in compliance with the monitoring and test requirements of 40 CFR 60.334 and 60.335. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall comply with the recordkeeping requirements of 40 CFR 60.334 and 40 CFR 60.7. (NSR Permit 2195B-M1-R2, Specific Condition A802.D) | The combustion turbine is in compliance with the record keeping requirements of 40 CFR 60.334 and 60.7. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall comply with the reporting requirements of 40 CFR 60.7. (NSR Permit 2195B-M1-R2, Specific Condition A802.D) | The combustion turbine is in compliance with the reporting requirements of 40 CFR 60.7. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
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| **A1307 Other – TA-3 Power Plant**<br><br>H. Periodic Emissions Tests (Combustion Turbine, Unit TA-3-22-CT-1)<br><br>**Requirement**: The permittee shall comply with the allowable emission limits at Table A1302.A, including the NOx ppmv limitation. (NSR Permit 2195B-M2, Specific Condition A802.E) | The annual test for this certification period was last conducted on December 16, 2014; the test results demonstrated that the actual emissions were less than the allowable emissions. An annual test was not required for this certification period because the unit was operated less than 10% of the time during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Monitoring**: The permittee shall test using a portable analyzer or EPA Reference Methods subject to the requirements and limitations of Section B108, General Monitoring Requirements. For periodic testing of NOx and CO emissions tests shall be carried out as described below.<br><br>Test results that demonstrate compliance with the NOx and CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits.<br><br>(1) The test period shall be annually, based on a calendar year.<br>(2) The tests shall continue based on the existing testing schedule.<br>(3) All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period.<br>(4) The permittee shall follow the General Testing Procedures of Section B111.<br>(5) Performance testing required by 40 CFR 60, Subpart GG or 40 CFR 60, Subpart KKKK may be used to satisfy these periodic testing | 1) The test was performed as required following the monitoring requirements of Section B108.<br><br>2) Test results demonstrated compliance with NOx and CO emission limits.<br><br>3) The test was last performed on December 16, 2014 in compliance with the specified annual testing period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

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| requirements if they meet the requirements of this condition and are completed during the specified monitoring period. | | | | |
| **Recordkeeping**: The permittee shall maintain records in accordance with Section B109. The permittee shall also record the results of the periodic emissions tests, including the turbine's fuel flow rate and horsepower at the time of the test, and the type of fuel fired (natural gas, field gas, etc.).<br><br>If a combustion analyzer is used to measure excess air in the exhaust gas, records shall be kept of the make and model of the instrument and instrument calibration data. If an ORSAT apparatus or other gas absorption analyzer is used, the permittee shall record all calibration results.<br><br>The permittee shall also keep records of all raw data used to determine exhaust gas flow and of all calculations used to determine flow rates and mass emissions rates. | Records of the periodic emissions test will include all data required by this section. All data are included in the final test report which is provided to NMED AQB as part of the semi-annual monitoring report.<br><br>A combustion analyzer is used for this periodic emissions test. Instrument and calibration data are included in the final test report. An ORSAT or other similar gas absorption analyzer was not used.<br><br>Raw data and calculations are included in the final test report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall report in accordance with Section B109, B110, and B111. | Emission and monitoring reports are submitted on a six-month basis in accordance with permit conditions A109 and B110. See Section A109 in this report. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **A1400 Regulated Sources – Open Burning**<br><br>A. Table 1400.A lists all of the process equipment authorized for this source category. | No open burning occurred during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1400.A: Regulated Sources List**

| Unit No./Location | Source Description |
|---|---|

| 1. 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? |
|---|---|---|---|---|
| Facility-Wide Open Burning | All open lands within LANL property boundary | | | |
| **A1402 Emission Limits – Open Burning**<br><br>A. Table 1402.A lists the emission units, and their allowable emission limits. (40 CFR 50; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC; 20.2.60 NMAC; 20.2.65 NMAC). | No open burning occurred during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table1402.A: Allowable Emissions**

| Unit No. | Individual HAP[1] (tpy) | Total HAPs[1] (tpy) |
|---|---|---|
| Facility-Wide Open Burning | 8.0 | 24.0 |

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

| | | | | |
|---|---|---|---|---|
| **A1403 Applicable Requirements – Open Burning**<br><br>A. The permittee shall comply with all applicable sections of the requirements listed in Table 1403.A. | No open burning occurred during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

**Table 1403.A: Applicable Requirements**

| Applicable Requirements | Federally Enforceable | Unit No. |
|---|---|---|
| 20.2.60 NMAC Open Burning | X | Facility-Wide Open Burning |
| 20.2.65 NMAC Smoke Management | X | Facility-Wide Open Burning |

**A1404 Operational Limitations – Open Burning**

A. This source category is authorized to operate at any time of the day or night on any day of the year. No monitoring, recordkeeping, or reporting requirements are required to demonstrate compliance with continuous hours of operation.

| 1. 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? |
|---|---|---|---|---|
| **A1407 Other – Open Burning**<br><br>A. Operational<br><br>**Requirement**: The permittee shall comply with the applicable requirements of 20.2.60 NMAC and 20.2.65 NMAC, including, but not limited to:<br><br>1) Prior to initiating a burn consisting of vegetative material, the permittee shall submit to the Department a sampling and analysis plan and upon approval conduct representative sampling of the intended burn material and analyze samples for radionuclides, target analyte list (TAL) inorganic elements, polychlorinated biphenyls (PCBs), and high explosives (HE); and<br><br>2) The permittee shall submit to the Department a background concentration report for the contaminants listed in Condition A1407.A, Requirement (1). The report shall indicate locations where background concentrations were taken and compare sample results with background concentrations of the constituents; and<br><br>3) The permittee shall not burn vegetative material which includes any contaminant above the relevant background concentration; and<br><br>4) Upon receiving Department approval, the permittee shall conduct public notification in a display ad in at least four newspapers: Los Alamos Monitor, Rio Grande Sun, Santa Fe | No open burning occurred during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

| 1. 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? |
|---|---|---|---|---|
| New Mexican, and the Albuquerque Journal, no less than 21 days in advance of a planned burn. | | | | |
| **Monitoring**: The permittee shall monitor all open burning as required by Department regulation or burn approval. | No open burning occurred during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Recordkeeping**: The permittee shall maintain records of all sampling and analysis plans and any representative sampling conducted. Records shall be kept in accordance with Section B109. | No open burning occurred during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |
| **Reporting**: The permittee shall submit reports as outlined in the Condition 1407.A Requirements, as described in Section A109, and in accordance with Section B110. | No open burning occurred during this certification period. | ☐ **Continuous**<br>☒ **Intermittent** | ☒ **Yes**<br>☐ **No** | ☐ **Yes**<br>☒ **No** |

# PART 1 B General Conditions

| **1. Have these General Conditions been met during this reporting period?**<br><br>***If the section Heading is marked as N/A no remarks are required.***<br>***Check only one box per subject heading.***<br>***Explain answers in remarks row under subject heading.*** | 2. Was this facility in compliance with this requirement during the reporting period? | | 3. Does not apply |
|---|---|---|---|
| **B100 Introduction**<br>A. N/A | ☐ **Yes** Explain Below | ☐ **No** Explain Below | ☒ **N/A** Explain Below |
| **REMARKS:** | | | |
| **B101 Legal**<br><br>A. Permit Terms and Conditions (20.2.70 sections 7, 201.B, 300, 301.B, 302, 405 NMAC)<br><br>(1) The permittee shall abide by all terms and conditions of this permit, except as allowed under Section 502(b)(10) of the Federal Act, and 20.2.70.302.H.1 NMAC. Any permit noncompliance is grounds for enforcement action, and significant or repetitious noncompliance may result in termination of this permit. Additionally, noncompliance with federally enforceable conditions of this permit constitutes a violation of the Federal Act. (20.2.70.302.A.2.a NMAC)<br><br>(2) Emissions trading within a facility (20.2.70.302.H.2 NMAC)<br><br>(a) The Department shall, if an applicant requests it, issue permits that contain terms and conditions allowing for the trading of emissions increases and decreases in the permitted facility solely for the purpose of complying with a federally enforceable emissions cap that is established in the permit in addition to any applicable requirements. Such terms and conditions shall include all terms and conditions required under 20.2.70.302 NMAC to determine compliance. If applicable requirements apply to the requested emissions trading, permit conditions shall be issued only to the extent that the applicable requirements provide for trading such increases and decreases without a case-by-case approval.<br><br>(b) The applicant shall include in the application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The Department shall not include in the emissions trading provisions any emissions units for which emissions are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall require compliance with all applicable requirements.<br><br>(3) It shall not be a defense for the permittee in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (20.2.70.302.A.2.b NMAC) | ☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below |

(4) If the Department determines that cause exists to modify, reopen and revise, revoke and reissue, or terminate this permit, this shall be done in accordance with 20.2.70.405 NMAC. (20.2.70.302.A.2.c NMAC)

(5) 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. (20.2.70.302.A.2.f NMAC)

(6) A request by the permittee that this permit be modified, revoked and reissued, or terminated, or a notification by the permittee of planned changes or anticipated noncompliance, shall not stay any conditions of this permit. (20.2.70.302.A.2.d NMAC)

(7) This permit does not convey property rights of any sort, or any exclusive privilege. (20.2.70.302.A.2.e NMAC)

(8) In the case where an applicant or permittee has submitted information to the Department under a claim of confidentiality, the Department may also require the applicant or permittee to submit a copy of such information directly to the Administrator of the EPA. (20.2.70.301.B NMAC)

(9) The issuance of this permit, or the filing or approval of a compliance plan, does not relieve the permittee from civil or criminal liability for failure to comply with the state or Federal Acts, or any applicable state or federal regulation or law. (20.2.70.302.A.6 NMAC and the New Mexico Air Quality Control Act NMSA 1978, Chapter 74, Article 2)

(10) If any part of this permit is challenged or held invalid, the remainder of the permit terms and conditions are not affected and the permittee shall continue to abide by them. (20.2.70.302.A.1.d NMAC)

(11) A responsible official (as defined in 20.2.70.7.AE NMAC) shall certify the accuracy, truth and completeness of every report and compliance certification submitted to the Department as required by this permit. These certifications shall be part of each document. (20.2.70.300.E NMAC)

(12) Revocation or termination of this permit by the Department terminates the permittee's right to operate this facility. (20.2.70.201.B NMAC)

(13) The permittee shall continue to comply with all applicable requirements. For applicable requirements that will become effective during the term of the permit, the permittee shall meet such requirements on a timely basis. (Sections 300.D.10.c and 302.G.3 of 20.2.70 NMAC)

B. Permit Shield (20.2.70.302.J NMAC)

(1) Compliance with the conditions of this permit shall be deemed to be compliance with any applicable requirements existing as of the date of permit issuance and identified in Table 103.A. The requirements in Table 103.A are applicable to this facility with specific requirements identified for individual emission units.

| | | | |
|---|---|---|---|
| (2) The Department has determined that the requirements in Table 103.B as identified in the permit application are not applicable to this source, or they do not impose any conditions in this permit.<br><br>(3) This permit shield does not extend to administrative amendments (Subsection A of 20.2.70.404 NMAC), to minor permit modifications (Subsection B of 20.2.70.404 NMAC), to changes made under Section 502(b)(10), changes under Paragraph 1 of subsection H of 20.2.70.302 of the Federal Act, or to permit terms for which notice has been given to reopen or revoke all or part under 20.2.70.405 and 20.2.70.302J(6).<br><br>(4) This permit shall, for purposes of the permit shield, identify any requirement specifically identified in the permit application or significant permit modification that the department has determined is not applicable to the source, and state the basis for any such determination. (20.2.70.302.A.1.f NMAC)<br><br>C. The owner or operator of a source having an excess emission shall, to the extent practicable, operate the source, including associated air pollution control equipment, in a manner consistent with good air pollutant control practices for minimizing emissions. (20.2.7.109 NMAC). The establishment of allowable malfunction emission limits does not supersede this requirement. | | | |

**REMARKS:**

Title V permit P100-R2 superseded P100-R1-M3 on February 27, 2015. This compliance certification for P100-R2 covers the time period February 27–December 31, 2015.
A separate Annual Compliance Certification for Title V permit P100-R1-M3 is concurrently provided for the certification period from January 1–February 26, 2015.
There was no emissions trading at this facility during this certification period.
A compliance inspection by NMED AQB was conducted on May 11-12, 2015.
There were no excess emissions during this certification period.
All required reports and compliance certifications were certified by the Responsible Official.

| **B102 Authority** | ☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below |
|---|---|---|---|
| A. This permit is issued pursuant to the federal Clean Air Act ("Federal Act"), the New Mexico Air Quality Control Act ("State Act") and regulations adopted pursuant to the State and Federal Acts, including Title 20, New Mexico Administrative Code, Chapter 2, Part 70 (20.2.70 NMAC) - Operating Permits.<br><br>B. This permit authorizes the operation of this facility. This permit is valid only for the named permittee, owner, and operator. A permit modification is required to change any of those entities. | | | |

| | | | |
|---|---|---|---|
| C. The Department specifies with this permit, terms and conditions upon the operation of this facility to assure compliance with all applicable requirements, as defined in 20.2.70 NMAC at the time this permit is issued. (20.2.70.302.A.1 NMAC)<br><br>D. Pursuant to the New Mexico Air Quality Control Act NMSA 1978, Chapter 74, Article 2, all terms and conditions in this permit, including any provisions designed to limit this facility's potential to emit, are enforceable by the Department. All terms and conditions are enforceable by the Administrator of the United States Environmental Protection Agency ("EPA") and citizens under the Federal Act, unless the term or condition is specifically designated in this permit as not being enforceable under the Federal Act. (20.2.70.302.A.5 NMAC)<br><br>E. The Department is the Administrator for 40 CFR Parts 60, 61, and 63 pursuant to the Modification and Exceptions of Section 10 of 20.2.77 NMAC (NSPS), 20.2.78 NMAC (NESHAP), and 20.2.82 NMAC (MACT). | | | |
| **REMARKS:**<br><br>LANL operations were in compliance with all terms and conditions of the permit during this certification period. | | | |
| **B103 Annual Fee**<br>The permittee shall pay Title V fees to the Department consistent with the fee schedule in 20.2.71 NMAC - Operating Permit Emission Fees. The fees will be assessed and invoiced separately from this permit. (20.2.70.302.A.1.e NMAC) | ☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below |
| **REMARKS:**<br><br>Title V fees for 2014 was submitted to NMED Air Quality Bureau on April 24, 2015. | | | |
| **B104 Appeal Procedures**<br>(20.2.70.403.A NMAC)<br><br>A. Any person who participated in a permitting action before the Department and who is adversely affected by such permitting action, may file a petition for a hearing before the Environmental Improvement Board ("board"). The petition shall be made in writing to the board within thirty (30) days from the date notice is given of the Department's action and shall specify the portions of the permitting action to which the petitioner objects, certify that a copy of the petition has been mailed or hand-delivered, and attach a copy of the permitting action for which review is sought. Unless a timely request for a hearing is made, the decision of the Department shall be final. The petition shall be copied simultaneously to the Department upon receipt of the appeal notice. If the petitioner is not the applicant or | ☐ **Yes** Explain Below | ☐ **No** Explain Below | ☒ **N/A** Explain Below |

| | | | |
|---|---|---|---|
| permittee, the petitioner shall mail or hand-deliver a copy of the petition to the applicant or permittee. The Department shall certify the administrative record to the board. Petitions for a hearing shall be sent to:<br><br>Secretary, New Mexico Environmental Improvement Board<br>1190 St. Francis Drive, Runnels Bldg. Rm N2153<br>Santa Fe, New Mexico 87502 | | | |
| **REMARKS:** | | | |
| | | | |
| **B105 Submittal of Reports and Certifications**<br><br>A. Stack Test Protocols and Stack Test Reports shall be submitted electronically to Stacktest.AQB@state.nm.us or as directed by the Department.<br><br>B. Excess Emission Reports shall be submitted as directed by the Department. (20.2.7.110 NMAC)<br><br>C. Compliance Certification Reports, Semi-Annual monitoring reports, compliance schedule progress reports, and any other compliance status information required by this permit shall be certified by the responsible official and submitted to the mailing address below, or as directed by the Department:<br><br>Manager, Compliance and Enforcement Section<br>New Mexico Environment Department<br>Air Quality Bureau<br>525 Camino de los Marquez, Suite 1<br>Santa Fe, NM 87505-1816<br><br>D. Compliance Certification Reports shall also be submitted to the Administrator at the address below (20.2.70.302.E.3 NMAC):<br><br>Chief, Air Enforcement Section<br>US EPA Region-6, 6EN-AA | ☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below |

| | | | |
|---|---|---|---|
| 1445 Ross Avenue, Suite 1200<br>Dallas, TX 75202-2733 | | | |

**REMARKS:**

B105.A. The annual stack testing for the TA-03 combustion turbine was last conducted on December 16, 2014. All stack test protocols and stack test reports were submitted as specified.

B105.B. There were no excess emissions during this certification period. LANL submitted a letter to NMED AQB on January 15, 2015 stating that there were no excess emissions in 2014.

B105.C and D. All required compliance certifications and semi-annual emissions and monitoring reports were submitted to NMED and EPA on time as required.

# PART 1 B General Conditions

| **B106 NSPS and/or MACT Startup, Shutdown, and Malfunction Operations** | ☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below |
|---|---|---|---|
| A. If a facility is subject to a NSPS standard in 40 CFR 60, each owner or operator that installs and operates a continuous monitoring device required by a NSPS regulation shall comply with the excess emissions reporting requirements in accordance with 40 CFR 60.7(c).<br><br>B. If a facility is subject to a NSPS standard in 40 CFR 60, then in accordance with 40 CFR 60.8(c), operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.<br><br>C. If a facility is subject to a MACT standard in 40 CFR 63, then the facility is subject to the requirement for a Startup, Shutdown and Malfunction Plan (SSM) under 40 CFR 63.6(e)(3), unless specifically exempted in the applicable subpart. (20.2.70.302.A.1 and A.4 NMAC) | | | |

**REMARKS:**

B106.A. LANL operates equipment subject to 40 CFR 60; however, no continuous monitoring is required.
B106.B. There were no excess emissions during SSM during this certification period.

| **B107 Startup, Shutdown, and Maintenance Operations** | ☐ **Yes** Explain Below | ☐ **No** Explain Below | ☒ **N/A** Explain Below |
|---|---|---|---|
| A. The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (20.2.7.14.A NMAC) | | | |

**REMARKS:**
Per Permit Condition A107 - Allowable SSM emissions limits are not imposed at this time. All SSM emissions are within or less than standard operating emission levels. LANL sources do not have increased emissions during routine or predictable startup, shutdown, or maintenance, which require a plan under 20.2.7.14.A. No permit limit or applicable threshold was exceeded during this certification period. Operating procedures are in place to minimize emissions during SSM events.

# PART 1 B General Conditions

# PART 1 B General Conditions

| B108 General Monitoring Requirements (20.2.70. 302.A and C NMAC) | ☒ Yes Explain Below | ☐ No Explain Below | ☐ N/A Explain Below |
|---|---|---|---|
| A. These requirements do not supersede or relax requirements of federal regulations. | | | |
| B. The following monitoring and/or testing requirements shall be used to determine compliance with applicable requirements and emission limits. Any sampling, whether by portable analyzer or EPA reference method, that measures an emission rate over the applicable averaging period greater than an emission limit in this permit constitutes 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; but 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. | | | |
| C. If the emission unit is shutdown at the time when periodic monitoring is due to be accomplished, the permittee is not required to restart the unit for the sole purpose of performing the monitoring. Using electronic or written mail, the permittee shall notify the Department's Enforcement Section of a delay in emission tests prior to the deadline for accomplishing the tests. Upon recommencing operation, the permittee shall submit any pertinent pre-test notification requirements set forth in the current version of the Department's Standard Operating Procedures For Use Of Portable Analyzers in Performance Test, and shall accomplish the monitoring. | | | |
| D. The requirement for monitoring during any monitoring period is based on the percentage of time that the unit has operated. However, to invoke monitoring period exemptions at B108.D(2), hours of operation shall be monitored and recorded. | | | |
| (1) If the emission unit has operated for more than 25% of a monitoring period, then the permittee shall conduct monitoring during that period. | | | |
| (2) If the emission unit has operated for 25% or less of a monitoring period then the monitoring is not required. After two successive periods without monitoring, the permittee shall conduct monitoring during the next period regardless of the time operated during that period, except that for any monitoring period in which a unit has operated for less than 10% of the monitoring period, the period will not be considered as one of the two successive periods. | | | |
| (3) If invoking the monitoring period exemption in B108.D(2), the actual operating time of a unit shall not exceed the monitoring period required by this permit before the required monitoring is performed. For example, if the | | | |

monitoring period is annual, the operating hours of the unit shall not exceed 8760 hours before monitoring is conducted. Regardless of the time that a unit actually operates, a minimum of one of each type of monitoring activity shall be conducted during the five year term of this permit.

E. The permittee is not required to report a deviation for any monitoring or testing in a Specific Condition if the deviation was authorized in this General Condition B108.

F. For all periodic monitoring events, except when a federal or state regulation is more stringent, three test runs shall be conducted at 90% or greater of the unit's capacity as stated in this permit, or in the permit application if not in the permit, and at additional loads when requested by the Department. If the 90% capacity cannot be achieved, the monitoring will be conducted at the maximum achievable load under prevailing operating conditions except when a federal or state regulation requires more restrictive test conditions. The load and the parameters used to calculate it shall be recorded to document operating conditions and shall be included with the monitoring report.

G. When requested by the Department, the permittee shall provide schedules of testing and monitoring activities. Compliance tests from previous NSR and Title V permits may be re-imposed if it is deemed necessary by the Department to determine whether the source is in compliance with applicable regulations or permit conditions.

H. If monitoring is new or is in addition to monitoring imposed by an existing applicable requirement, it shall become effective 120 days after the date of permit issuance. For emission units that have not commenced operation, the associated new or additional monitoring shall not apply until 120 days after the units commence operation. All pre-existing monitoring requirements incorporated in this permit shall continue to apply from the date of permit issuance. All monitoring periods, unless stated otherwise in the specific permit condition or federal requirement, shall commence at the beginning of the 12 month reporting period as defined at condition A109.B.

**REMARKS:**

B108.B. The annual stack testing requirement for the TA-03 combustion turbine was last completed on December 16, 2014. No testing was conducted during this compliance certification period.

B108.C. & D. Opacity readings were taken at the asphalt plant monthly when the plant was operating. All testing and monitoring were completed in compliance with all requirements.

Section B108.D.(2) of the permit allows reduced frequency of opacity monitoring if the unit operates less than 10% of the monitoring period (calendar quarter). The applicable CI-RICE units operated less than 10% of each monitoring period (less than 219 hours each quarter) during this certification period. If the unit operates greater than 10% of the monitoring period, the unit will have an opacity observation performed on it, otherwise an opacity observation will be

performed within five (5) years of the issuance date of the current operating permit P100-R2. Opacity measurements conducted during this certification period will be submitted with the next semi-annual monitoring report.

# PART 1 B General Conditions

| B109 **General Recordkeeping Requirements** (20.2.70.302.D.1 NMAC) | ☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below |
|---|---|---|---|

A. The permittee shall maintain records to assure and verify compliance with the terms and conditions of this permit and any applicable requirements that become effective during the term of this permit. The minimum information to be included in these records is (20.2.70.302.D.1 NMAC):

(1) equipment identification (include make, model and serial number for all tested equipment and emission controls);

(2) date(s) and time(s) of sampling or measurements;

(3) date(s) analyses were performed;

(4) the company or entity that performed the analyses;

(5) analytical or test methods used;

(6) results of analyses or tests; and

(7) operating conditions existing at the time of sampling or measurement.

B. The permittee shall keep records of all monitoring data, equipment calibration, maintenance, and inspections, Data Acquisition and Handling System (DAHS) if used, reports, and other supporting information required by this permit for at least five (5) years from the time the data was gathered or the reports written. Each record shall clearly identify the emissions unit and/or monitoring equipment, and the date the data was gathered. (20.2.70.302.D.2 NMAC)

C. If the permittee has applied and received approval for an alternative operating scenario, then the permittee shall maintain a log at the facility, which documents, contemporaneously with any change from one operating scenario to another, the scenario under which the facility is operating. (20.2.70.302.A.3 NMAC)

D. The permittee shall keep a record describing off permit changes made at this source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. (20.2.70.302.I.2 NMAC)

E. Unless otherwise indicated by Specific Conditions, the permittee shall keep the following records for malfunction emissions and routine and predictable emissions during startup, shutdown, and scheduled maintenance (SSM):

(1) The owner or operator of a source subject to a permit, shall establish and implement a plan to minimize emissions during routine or predictable startup, shutdown, and scheduled maintenance through work practice standards and good air pollution control practices. This requirement shall not apply to any affected facility defined in and subject to an emissions standard and an equivalent plan under 40 CFR Part 60 (NSPS), 40 CFR Part 63 (MACT), or an equivalent plan under 20.2.72 NMAC - Construction Permits, 20.2.70 NMAC - Operating Permits, 20.2.74 NMAC - Permits - Prevention of Significant Deterioration (PSD), or 20.2.79 NMAC - Permits - Nonattainment Areas. (20.2.7.14.A NMAC) The permittee shall keep records of all sources subject to the plan to minimize emissions during routine or predictable SSM and shall record if the source is subject to an alternative plan and therefore, not subject to the plan requirements under 20.2.7.14.A NMAC.

(2) If the facility has allowable SSM emission limits in this permit, the permittee shall record all SSM events, including the date, the start time, the end time, a description of the event, and a description of the cause of the event. This record also shall include a copy of the manufacturer's, or equivalent, documentation showing that any maintenance qualified as scheduled. Scheduled maintenance is an activity that occurs at an established frequency pursuant to a written protocol published by the manufacturer or other reliable source. The authorization of allowable SSM emissions does not supersede any applicable federal or state standard. The most stringent requirement applies.

(3) If the facility has allowable malfunction emission limits in this permit, the permittee shall record all malfunction events to be applied against these limits. The permittee shall also include the date, the start time, the end time, and a description of the event. **Malfunction means** any sudden and unavoidable failure of air pollution control equipment or process equipment beyond the control of the owner or operator, including malfunction during startup or shutdown. A failure that is caused entirely or in part by poor maintenance, careless operation, or any other preventable equipment breakdown shall not be considered a malfunction. (20.2.7.7.E NMAC) The authorization of allowable malfunction emissions does not supersede any applicable federal or state standard. The most stringent requirement applies. This authorization only allows the permittee to avoid submitting reports under 20.2.7 NMAC for total annual emissions that are below the authorized malfunction emission limit.

(4) The owner or operator of a source shall meet the operational plan defining the measures to be taken to mitigate source emissions during malfunction, startup or shutdown. (20.2.72.203.A(5) NMAC)

**REMARKS:**
B109.A and B. Records are maintained for all required sampling activities and measured data. These records are available on-site. The primary measuring activities applicable to this section are the visible emissions evaluations and emissions stack testing.

# PART 1 B General Conditions

B109.C. and D. No alternative operating scenarios, or, off permit changes occurred at this facility during this certification period.

B109.E. Per Permit Condition A 107 - Allowable SSM emission limits are not imposed at this time. All SSM emissions are at or below standard operating emission limits. LANL sources do not have increased emissions during routine or predictable startup, shutdown, or maintenance, which require a plan under 20.2.7.14.A. No permit limit or applicable threshold was exceeded during this certification period. Operating procedures are in place to minimize emissions during SSM events. The facility does not have allowable malfuction emission limits.

# PART 1 B General Conditions

| **B110** **General Reporting Requirements** (20.2.70.302.E NMAC) | ☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below |
|---|---|---|---|
| A. Reports of required monitoring activities for this facility shall be submitted to the Department on the schedule in section A109. Monitoring and recordkeeping requirements that are not required by a NSPS or MACT shall be maintained on-site or (for unmanned sites) at the nearest company office, and summarized in the semi-annual reports, unless alternative reporting requirements are specified in the equipment specific requirements section of this permit. | | | |
| B. Reports shall clearly identify the subject equipment showing the emission unit ID number according to this operating permit. In addition, all instances of deviations from permit requirements, including those that occur during emergencies, shall be clearly identified in the reports required by section A109. (20.2.70.302.E.1 NMAC) | | | |
| C. The permittee shall submit reports of all deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. These reports shall be submitted as follows: | | | |
| (1) Deviations resulting in excess emissions as defined in 20.2.7.7 NMAC (including those classified as emergencies as defined in section B114.A) shall be reported in accordance with the timelines specified by 20.2.7.110 NMAC and in the semi-annual reports required in section A109. (20.2.70.302.E.2 NMAC) | | | |
| (2) All other deviations shall be reported in the semi-annual reports required in section A109. (20.2.70.302.E.2 NMAC). | | | |
| D. The permittee shall submit reports of excess emissions in accordance with 20.2.7.110.A NMAC. | | | |
| E. Results of emission tests and monitoring for each pollutant (except opacity) shall be reported in pounds per hour (unless otherwise specified) and tons per year. Opacity shall be reported in percent. The number of significant figures corresponding to the full accuracy inherent in the testing instrument or Method test used to obtain the data shall be used to calculate and report test results in accordance with 20.2.1.116.B and C NMAC. Upon request by the Department, CEMS and other tabular data shall be submitted in editable, MS Excel format. | | | |
| F. At such time as new units are installed as authorized by the applicable NSR Permit, the permittee shall fulfill the notification requirements in the NSR permit. | | | |
| G. Periodic Emissions Test Reporting: The permittee shall report semi-annually a summary of the test results. | | | |

H. The permittee shall submit an emissions inventory for this facility annually. The emissions inventory shall be submitted by the later of April 1 or within 90 days after the Department makes such request. (20.2.73 NMAC and 20.2.70.302.A.1 NMAC)

I. Emissions trading within a facility (20.2.70.302.H.2 NMAC)

(1) For each such change, the permittee shall provide written notification to the department and the administrator at least seven (7) days in advance of the proposed changes. Such notification shall state when the change will occur and shall describe the changes in emissions that will result and how these increases and decreases in emissions will comply with the terms and conditions of the permit.

(2) The permittee and department shall attach each such notice to their copy of the relevant permit.

# PART 1 B General Conditions

**REMARKS:**
B110.A. Monitoring reports are submitted on a six-month basis.
LANL submitted the 2015H1 semi-annual monitoring report for P100-R2 on August 12, 2015. NMED requested revised dates on forms for 2015H1 submission; the re-submission of requested forms was submitted on August 20, 2015.
B110.B. The monitoring reports submitted identify the subject equipment showing the emissions unit ID number defined in operating permit P100-R2.
One deviation occurred during this certification period for P100-R2. This deviation occurred when the combustion turbine load fell below 80% to 75% on three days in December 2015.
B110.C. One deviation with operating load requirement for the combustion turbine occurred during this certification period for P100-R2.
B110.D. No excess emissions occurred during this certification period.
B110.E. Emission tests and monitoring results are reported in pounds per hour and tons per year. Opacity readings are reported in percent.
B110.F. All notification requirements under NSR permits have been met.
B110.G. Emissions testing was not conducted during this reporting period.
B110.H. The annual emission inventory required under 20.2.73 NMAC was submitted electronically via NMED's online reporting tool, AEIR, on March 23, 2015.
B110.I. There was no emissions trading during this certification period.
B110.J. All non-NSPS and non-MACT monitoring and recordkeeping are maintained on-site and are summarized in the semi-annual monitoring reports.

| **B111 General Testing Requirements** | ☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below |
|---|---|---|---|
| A. Compliance Tests | | | |
| (1) Compliance test requirements from previous permits (if any) are still in effect, unless the tests have been satisfactorily completed. Compliance tests may be re-imposed if it is deemed necessary by the Department to determine whether the source is in compliance with applicable regulations or permit conditions. (20.2.72 NMAC Sections 210.C and 213) | | | |
| (2) Compliance tests shall be conducted within sixty (60) days after the unit(s) achieve the maximum normal production rate. 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. | | | |
| (3) Unless otherwise indicated by Specific Conditions or regulatory requirements, the default time period for each test run shall be **at least** 60 minutes and each performance test shall consist of three separate runs using the applicable test method. For the purpose of determining compliance with an applicable emission limit, the arithmetic mean of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an | | | |

irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Department approval, be determined using the arithmetic mean of the results of the two other runs.

(4) Testing of emissions shall be conducted with the emissions unit operating at 90 to 100 percent of the maximum operating rate allowed by the permit. If it is not possible to test at that rate, the source may test at a lower operating rate, subject to the approval of the Department.

(5) Testing performed at less than 90 percent of permitted capacity will limit emission unit operation to 110 percent of the tested capacity until a new test is conducted.

(6) If conditions change such that unit operation above 110 percent of tested capacity is possible, the source must submit a protocol to the Department within 30 days of such change to conduct a new emissions test.

B. EPA Reference Method Tests

(1) All compliance tests required by this permit, unless otherwise specified by Specific Conditions of this permit, shall be conducted in accordance with the requirements of 40 CFR 60, Subpart A, General Provisions, and the following EPA Reference Methods as specified by 40 CFR 60, Appendix A:

(a) Methods 1 through 4 for stack gas flowrate

(b) Method 5 for TSP

(c) Method 6C and 19 for $SO_2$

(d) Method 7E for $NO_X$ (test results shall be expressed as nitrogen dioxide ($NO_2$) using a molecular weight of 46 lb/lb-mol in all calculations (each ppm of $NO/NO_2$ is equivalent to 1.194 x 10-7 lb/SCF)

(e) Method 9 for opacity

(f) Method 10 for CO

(g) Method 19 may be used in lieu of Methods 1-4 for stack gas flowrate upon approval of the Department. A justification for this proposal must be provided along with a contemporaneous fuel gas analysis (preferably on the day of the test) and a recent fuel flow meter calibration certificate (within the most recent quarter).

(h) Method 7E or 20 for Turbines per 60.335 or 60.4400

(i) Method 29 for Metals

(j) Method 201A for filterable $PM_{10}$ and $PM_{2.5}$

(k) Method 202 for condensable PM

(l) Method 320 for organic Hazardous Air Pollutants (HAPs)

(m) Method 25A for VOC reduction efficiency

(n) Method 30B for Mercury

(2) Alternative test method(s) may be used if the Department approves the change.

C. Periodic Monitoring and Portable Analyzer Requirements

(1) Periodic emissions tests (periodic monitoring) may be conducted in accordance with EPA Reference Methods or by utilizing a portable analyzer. Periodic monitoring utilizing a portable analyzer shall be conducted in accordance with the requirements of ASTM D 6522-00. However, if a facility has met a previously approved Department criterion for portable analyzers, the analyzer may be operated in accordance with that criterion until it is replaced.

(2) Unless otherwise indicated by Specific Conditions or regulatory requirements, the default time period for each test run shall be **at least** 20 minutes.

Each performance test shall consist of three separate runs. The arithmetic mean of results of the three runs shall be used to determine compliance with the applicable emission limit.

(3) Testing of emissions shall be conducted in accordance with the requirements at Section B108.F.

(4) During emissions tests, pollutant, O2 concentration and fuel flow rate shall be monitored and recorded. This information shall be included with the test report furnished to the Department.

(5) Pollutant emission rate shall be calculated in accordance with 40 CFR 60, Appendix A, Method 19 utilizing fuel flow rate (scf) and fuel heating value (Btu/scf) obtained during the test.

D. Test Procedures:

(1) The permittee shall notify the Department's Program Manager, Compliance and Enforcement Section at least thirty (30) days before the test to afford a representative of the Department an opportunity to be present at the test. (40CFR 60.8(d))

(2) Equipment shall be tested in the "as found" condition. Equipment may not be adjusted or tuned prior to any test for the purpose of lowering emissions, and then returned to previous settings or operating conditions after the test is complete.

(3) Contents of test notifications, protocols and test reports shall conform to the format specified by the Department's Universal Test Notification, Protocol and Report Form and Instructions. Current forms and instructions are posted to NMED's Air Quality web site under Compliance and Enforcement Testing.

(4) The permittee shall provide (a) sampling ports adequate for the test methods applicable to the facility, (b) safe

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| sampling platforms, (c) safe access to sampling platforms and (d) utilities for sampling and testing equipment.<br>(5) The stack shall be of sufficient height and diameter and the sample ports shall be located so that a representative test of the emissions can be performed in accordance with the requirements of EPA Method 1 or ASTM D 6522-00 as applicable.<br>(6) Where necessary to prevent cyclonic flow in the stack, flow straighteners shall be installed<br>(7) Unless otherwise indicated by Specific Conditions or regulatory requirements, test reports shall be submitted to the Department no later than 30 days after completion of the test. | | | |

**REMARKS:**

B111.A. EPA reference methods are used during all required compliance testing/sampling.

B111.B. The annual stack testing requirement for the TA-03 combustion turbine was last completed on December 16, 2014. All stack test protocols and stack test reports were submitted as specified. No other stack testing was performed during this certification period.

B111.C. All test procedures are followed as specified. EPA reference methods were used to observe visible emissions from various sources at LANL. All testing was done following applicable EPA Methods and NMED Test Procedures.

| **B112 Compliance** | ☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below |
|---|---|---|---|
| A. The Department shall be given the right to enter the facility at all reasonable times to verify the terms and conditions of this permit. Required records shall be organized by date and subject matter and shall at all times be readily available for inspection. The permittee, upon verbal or written request from an authorized representative of the Department who appears at the facility, shall immediately produce for inspection or copying any records required to be maintained at the facility. Upon written request at other times, the permittee shall deliver to the Department paper or electronic copies of any and all required records maintained on site or at an off-site location. Requested records shall be copied and delivered at the permittee's expense within three business days from receipt of request unless the Department allows additional time. Required records may include records required by permit and other information necessary to demonstrate compliance with terms and conditions of this permit. (NMSA 1978, Section 74-2-13)<br>B. A copy of the most recent permit(s) issued by the Department shall be kept at the permitted facility or (for unmanned sites) at the nearest company office and shall be made available to Department personnel for inspection | | | |

upon request. (20.2.70.302.G.3 NMAC)

C. Emissions limits associated with the energy input of a Unit, i.e. lb/MMBtu, shall apply at all times unless stated otherwise in a Specific Condition of this permit. The averaging time for each emissions limit, including those based on energy input of a Unit (i.e. lb/MMBtu) is one (1) hour unless stated otherwise in a Specific Condition of this permit or in the applicable requirement that establishes the limit. (20.2.70.302.A.1 and G.3 NMAC)

D. 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 pre-populated Compliance Certification Report Form that is provided to the permittee by the Department, and shall be submitted to the Department and to EPA at least every 12 months. For the most current form, please contact the Compliance Reports Group at email:reportsgroup.aqb@state.nm.us. For additional reporting guidance see http://www.nmenv.state.nm.us/aqb/enforce_compliance/TitleVReporting.htm. (20.2.70.302.E.3 NMAC)

E. The permittee shall allow representatives of the Department, upon presentation of credentials and other documents as may be required by law, to do the following (20.2.70.302.G.1 NMAC):

(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;

(2) have access to and copy, at reasonable times, any records that are required by this permit to be maintained;

(3) inspect any facilities, equipment (including monitoring and air pollution control equipment), work practices or operations regulated or required under this permit; and

(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.

**REMARKS:**

B112.A. All required records are maintained on-site and available for review upon request. LANL cooperates with all Department inspections and provides access to facilities and copies of records as requested. The most recent NMED inspection was conducted on May 11–12, 2015.
B112.B. Copies of the most recent permit are kept at the facility.
B112.C. Emissions are monitored, or calculated using the energy input of the unit with one hour averaging times, as specified.
B112.D. Compliance certification reports are completed and submitted as required. This compliance certification report meets this requirement.
B112.E. For sources listed in the permit, required air dispersion modeling was submitted.
B112.F. A compliance inspection by NMED - Air Quality Bureau was conducted on May 11–12, 2015. Information was requested by the inspector to verify compliance. Requested information and documentation was provided. LANL makes every effort to assist NMED with any reasonable request to verify compliance with this permit.

# PART 1 B General Conditions

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| **B113 Permit Reopening and Revocation**<br><br>A. This permit will be reopened and revised when any one of the following conditions occurs, and may be revoked and reissued when A(3) or A(4) occurs. (20.2.70.405.A.1 NMAC)<br><br>(1) Additional applicable requirements under the Federal Act become applicable to a major 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.<br><br>(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.<br><br>(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.<br><br>(4) The Department or the Administrator determines that the permit must be revised or revoked and reissued to assure compliance with an applicable requirement.<br><br>B. 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. (20.2.70.405.A.2 NMAC) | ☐ **Yes** Explain Below | ☐ **No** Explain Below | ☒ **N/A** Explain Below |
| **REMARKS:**<br><br>A need to reopen, revise, revoke, or reissue the permit has not been identified by the Department. | | | |
| **B114 Emergencies**<br>(20.2.70.304 NMAC) | ☐ **Yes** Explain Below | ☐ **No** Explain Below | ☒ **N/A** Explain Below |

A. An "emergency" means any situation arising from 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.

B. 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:

(1) An emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) This facility was at the time being properly operated;

(3) 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; and

(4) The permittee submitted notice of the emergency to the Department within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirement of 20.2.70.302.E.2 NMAC. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

C. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

D. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

**REMARKS:**

No emergency situations occurred during this certification period that caused any impact to air emission sources under this permit.

**B115 Stratospheric Ozone**
(20.2.70.302.A.1 NMAC)

☒ **Yes** Explain Below | ☐ **No** Explain Below | ☐ **N/A** Explain Below

A. If this facility is subject to 40 CFR 82, Subpart F, the permittee shall comply with the following standards for recycling and emissions reductions:

| | | | |
|---|---|---|---|
| (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices, except for motor vehicle air conditioners (MVAC) and MVAC-like appliances. (40 CFR 82.156)<br>(2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment. (40 CFR 82.158)<br>(3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program. (40 CFR 82.161) | | | |

**REMARKS:**

A stratospheric ozone protection program is in place. 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 contractors, are trained and follow LANL procedures to ensure that required service practices found in 40 CFR 82, Subpart F, are followed.

| **B116** **Acid Rain Sources** (20.2.70.302.A.9 NMAC) | ☐ **Yes** Explain Below | ☐ **No** Explain Below | ☒ **N/A** Explain Below |
|---|---|---|---|
| A. If this facility is subject to the federal acid rain program under 40 CFR 72, this section applies.<br>B. Where an applicable requirement of the Federal Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Federal Act, both provisions are incorporated into this permit and are federally enforceable.<br>C. Emissions exceeding any allowances held by the permittee under Title IV of the Federal Act or the regulations promulgated thereunder are prohibited.<br>D. No modification of this permit is required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit modification under any other applicable requirement.<br>E. The permittee may not use allowances as a defense to noncompliance with any other applicable requirement.<br>F. No limit is placed on the number of allowances held by the acid rain source. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Federal Act.<br>G. The acid rain permit is an enclosure of this operating permit. | | | |

# PART 1 B General Conditions

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**REMARKS:**

This facility is not subject to the federal acid rain program under 40 CFR 72.

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|---|---|---|---|
| **B117** **Risk Management Plan**<br>(20.2.70.302.A.1 NMAC)<br><br>A. If this facility is subject to the federal risk management program under 40 CFR 68, this section applies.<br><br>B. The owner or operator shall certify annually that they have developed and implemented a RMP and are in compliance with 40 CFR 68.<br><br>C. If the owner or operator of the facility has not developed and submitted a risk management plan according to 40 CFR 68.150, the owner or operator shall provide a compliance schedule for the development and implementation of the plan. The plan shall describe, in detail, procedures for assessing the accidental release hazard, preventing accidental releases, and developing an emergency response plan to an accidental release. The plan shall be submitted in a method and format to a central point as specified by EPA prior to the date specified in 40 CFR 68.150.b. | ☐ **Yes** Explain Below | ☐ **No** Explain Below | ☒ **N/A** Explain Below |

**REMARKS:**

This facility is not subject to the federal risk management program under 40 CFR 68. The volume of chemicals on-site at LANL is tracked through a centralized chemical management system and specific queries are done monthly on the list of chemicals subject to Section 112r of 40 CFR 68 to ensure LANL does not approach or exceed threshold quantities that could trigger the requirement for a Risk Management Plan.

**Part 2**

# ACC Deviation Summary Report for Permit P100R2

| | |
|---|---|
| 1. Are there any deviations identified in Part 1, Column 5. If NO, no further information is required on Part 2 of this form. If YES, answer question 2 below. | ☒ **Yes** ☐ **No** |
| 2. Have all deviations identified in Part 1, Column 5 been reported to the NMED as required by 20.2.7 NMAC or in a Semi-Annual Monitoring Report (20.2.70.302.E.1 NMAC)? If Yes, no further information is required on Part 2 of this form. If No, answer question 3 below and enter the required information in the Deviation Summary Table for each deviation not yet reported to the NMED. | ☐ **Yes** ☒ **No** |
| 3. Did any of the deviations result in excess emissions? For excess emissions deviations that have not previously been reported per requirements of 20.2.7 NMAC, a completed Excess Emission Form for each deviation must be attached to this report. | ☐ **Yes** ☒ **No** |

## Deviation Summary Table for deviations not yet reported.

| No. | Applicable Requirement (Include Rule Citation) | Emission Unit ID(s) | Cause of Deviation | Corrective Action Taken |
|---|---|---|---|---|
| 1 | A1307.D. | TA-3-22-CT-1 | The combustion turbine operated at less than 80% load on three (3) consecutive days in early December 2015. The percentage of operation load varied from 75-80% load on these days. In each instance, the load was constant and the unit continued to operate in low NOx mode. Maximum load is highly dependent on ambient temperature. At colder temperatures the unit is capable of operating at higher loads, and therefore the 80% minimum load requirement changes. On December 1, 2, and 3 ambient temperatures ranged from 27 deg F to 40 deg F and operators did not adjust the set load to account for the drop in temperature. | The Startup/shutdown Procedure for operating the combustion turbine (Procedure No. UI-PROC-60-10-507-R3) was reviewed and clearly includes the requirement for maintaining the load above 80% during operation of this unit. All combustion turbine operators were required to review this procedure with an emphasis on the load requirement. |
| 2 | | | | |

# PART 1 B General Conditions

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| 3 | | | | |
| 4 | | | | |
| 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 | 12/1/2015 | 9:00 | 12/1/2015 | 23:58 | CO, NOx | Daily Log Sheets | No excess emissions | ☐ **Yes** ☒ **No** |
| 2 | 12/2/2015 | 9:00 | 12/2/2015 | 23:09 | CO, NOx | Daily Log Sheets | No excess emissions | ☐ **Yes** ☒ **No** |
| 3 | 12/3/2015 | 9:00 | 12/3/2015 | 10:00 | CO, NOx | Daily log sheets | No excess emissions | ☐ **Yes** ☒ **No** |
| 4 | | | | | | | | ☐ **Yes** ☐ **No** |
| 5 | | | | | | | | ☐ **Yes** ☐ **No** |