

LA-UR-19-28543

Approved for public release; distribution is unlimited.

Title: Title V Semi-Annual Emissions Report for Permit P100-R2M3 January 1,

2019 - June 30, 2019

Author(s): Whetham, Walter Wiley

Intended for: Environmental Regulatory Document

Issued: 2019-10-24 (rev.1)



Title V Semi-Annual Emissions Report for Permit P100-R2M3 January 1, 2019 - June 30, 2019

Title V Semi-Annual Emissions Report AI 856, Permits P100-R2M3 January 1, 2019 - June 30, 2019

Emission Reporting Requirements

A109 Facility: Reporting Schedules

- 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.
- 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

Specific Emissions Reports:

A600 Asphalt Production

A602 Emission Limits - Asphalt Production

Unit No.	Nox tpy	SO ₂ tpy	PM tpy	CO tpy	VOC tpy
TA-60-BDM	50.0	50.0	50.0	30.0	50.0

Reporting Requirement

A607 F The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

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

	Yes	Date report submitted:	Tracking Number:
	163	Date report submitted:	t racking Number:
x	No Provi	de comments and identify any supporting docume	entation as an attachment.

Comments:

Asphalt Plant TA-60-BDM	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A602 A) (tons per year)
NOx	0.0023			50.0
SO ₂	0.0009			50.0
PM	0.0014			50.0
CO	0.0809			30.0
voc	0.0015			50.0
HAPs	0.0014			No Source Permit Limit

A700 Beryllium Activities

A702 Emission Limits - Beryllium Activities

Source	Beryllium Particulate Matter	Aluminum Particulate Matter	
Sigma Facility	10 gm/24 hr	N/A	
TA-3-66			
Beryllium Technology			
Facility	3,5 gm/yr	N/A	
TA-3-141			
Target Fabrication			
Facility	0,36 gm/yr	N/A	
TA-35-213			
Plutonium Facility			
TA-55-PF-4	2,99 gm/yr	2,99 gm/yr	
Machining Operation			
Plutonium Facility			
TA-55-PF-4	8.73X10 ⁻⁰⁴ gm/yr	8.73X10 ⁻⁰⁴ gm/yr	
Foundry Operation		****	

Reporting Requirement

A707 D The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

Has this rep	Has this reporting requirement been met during this reporting period with a separate reporting submittal? Answer Yes or No below,							
	Yes	Date report sub	mitted:		Tracking Number:			
x	No Pro	ovide comments and identif	fy any supporting do	ocumentation as an	attachment.			
Comments:	To meet cond	ition of 5,f in NSR permit #6 lity: first quarter report, May	34-M2, LANL subm	ited the following qu	arterly beryllium emissions			

A700 Beryllium Activities - continued

Comments:

Source	Pollutant	January - June Emissions	July - December Emissions	Annual Emissions	Permit Limits (Condition A702 A)
Sigma Facility TA-3-66 ⁽¹⁾	Beryllium (grams)	2.80E-07			10 gm/24 hr
Beryllium Technology Facility TA-3-141 ⁽²⁾	Beryllium (grams)	0,0034			3.5 gm/yr
Target Fabrication Facility TA-35-213 ⁽³⁾	Beryllium (grams)	< 0.00944		-	0.36 gm/yr
Plutonium Facility TA-55-PF4	Beryllium (grams)	< 1.495			2.99 gm/yr
Machining Operation ⁽⁴⁾	Aluminum (grams)	< 1.495			2.99 gm/yr
Plutonium Facility TA-55-PF4	Beryllium (grams)	0			8.73 x 10 ⁻⁴ gm/yr
Foundry Operation ⁽⁵⁾	Aluminum (grams)	0			8.73 x 10 ⁻⁴ gm/yr
Beryllium Total ⁽⁵⁾ (to		< 1.69E-06			
Aluminum Total (to	ns) =	< 1.65E-06			

Notes: (1) Emissions from the Sigma Facility are from electroplating, chemical milling, and metallographic operations. (2) Emission values shown for the Beryllium Technology Facility are from actual stack emission measurements which are submitted to NMED quarterly. (3) Emissions for the Target Fabrication Facility are from initial compliance testing of that source and calculated based on a conservative assumption of 8 hour work days. Log books were checked to verify that work days were much less than 8 hours. (4) Emissions for the Plutonium Facility are calculated based on permitted throughputs, Log books were checked to verify that throughputs were much less than permitted values. (5) The Plutonium Facility foundry operations did not operate during the first 6 months of 2019.

A800 External Combustion

A802 Emission Limits - External Combustion

Unit No.	NOx tpy	CO tpy	VOC tpy	SO ₂ tpy	TSP tpy	PM ₁₀ tpy
All Boilers	80.0	80.0	50.0	50.0	50.0	50.0

Unit No.	NOx tpy	CO tpy	SO ₂ tpy	TSP tpy	PM ₁₀ tpy	PM ₂₅ tpy
RLUOB-BHW-1 (gas)	2.9	4.8	0,3	0.4	0.4	0,4
RLUOB-BHW-2 (gas)	2.9	4.8	0.3	0.4	0.4	0,4
RLUOB-BHW-3 (gas)	2.9	4.8	0.3	0.4	0.4	0.4
RLUOB-BHW-4 (gas)	2,9	4.8	0.3	0.4	0.4	0,4
RLUOB Boilers (oil)	2.9	0.9	10.4	0.5	0.3	0.3
RLUOB Boilers Total	14.5	20,1	11.6	2.1	1.9	1.9

Reporting Requirement

A807 B The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

Has this reporting requirement been met during this reporting period with a separate reporting submittal? Answer Yes or No below	Has this reporting re-	auirement been met	during this reporting	period with a separate	reporting submittal?	? Answer Ye	es or No below
--	------------------------	--------------------	-----------------------	------------------------	----------------------	-------------	----------------

Yes Date report submitted: Tracking Number:

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

Comments:

Boilers	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 A) (tons per year)
NOx	12.37			80
SO₂	0,08			50
TSP	0.99			50
PM-10	0.99			50
CO	9,97			80
VOCs	0,70			50
HAPs	0.24			No Source Limit

Note: The emissions shown in this table includes all exempt, non-exempt, metered, and non-metered boilers at LANL except for the TA-3-22 Power Plant boilers. The Power Plant boilers can be found under Section A1300 of this report.

A800 External Combustion - continued

RLUOB-BHW-1 (Gas)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0,0057			2.9
SO ₂	0,0001			0.3
TSP	0,0010			0.4
PM-10	0.0010			0.4
PM-2.5	0,0010			0.4
CO	0,0073			4.8
VOCs	0,0050			No Source Limit
HAPs	3.64E-04			No Source Limit

RLUOB-BHW-2 (Gas)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.0057			2.9
SO₂	0.0001			0.3
TSP	0,0010			0.4
PM-10	0.0010		N	0.4
PM-2.5	0,0010			0.4
со	0.0073			4.8
VOCs	0.0050			No Source Limit
HAPs	3.64E-04			No Source Limit

RLUOB-BHW-3 (Gas)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.0057			2.9
SO ₂	0.0001			0.3
TSP	0.0010			0.4
PM-10	0.0010			0.4
PM-2.5	0,0010			0.4
CO	0,0073			4.8
VOCs	0.0050			No Source Limit
HAPs	3.64E-04			No Source Limit

RLUOB-BHW-4 (Gas)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0			2,9
SO ₂	0			0.3
TSP	0			0.4
PM-10	0			0.4
PM-2.5	0			0.4
СО	0			4.8
VOCs	0			No Source Limit
HAPs	0			No Source Limit

Note: The RLUOB-BHW-4 boiler has not been installed.

A800 External Combustion - continued

RLUOB Boilers Totals (OII)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0			2.9
SO ₂	0			10.4
TSP	0			0.5
PM-10	0			0.3
PM-2.5	0			0.3
CO	0			0.9
VOCs	0			No Source Limit
HAPs	0			No Source Limit

Note: The RLUOB boilers did not operate on fuel oil during the first 6 months of 2019.

RLUOB Boilers Totals (Gas and Oil)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.0172			14.5
SO ₂	0.0003			11.6
TSP	0.0029			2.1
PM-10	0.0029			1.9
PM-2.5	0,0029			1.9
СО	0.0220			20.1
VOCs	0.0149			No Source Limit
HAPs	1.09E-03			No Source Limit

A900 Chemical Usage

A902 Emission Limits - Chemical Usage

Unit No.	VOC/HAPs tpy
LANL-FW-CHEM	**!
CMRR-CHEM	3,75 '

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.

Reporting Requirement

- A907 A The permittee shall submit reports described in Section A109 and in accordance with B110. With respect to individual HAPs, reports shall include any HAP emitted in quantity greater than 0.5 tons per year.
- A109 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

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

Yes	Date report submitted:	Tracking Number:

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

Comments:

X

Chemical Usage LANL-FW-CHEM VOCs HAPs		January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)
		6.46 2.46			Source limits refer
					to facility-wide
Individual HAPs greater than 0.5 tons	Methanol	0.61			limits.

Chemical Usage CMRR-CHEM	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)
HAPs	0.0023			3.76
VOCs	0.0000			3.75
TAPs	0.0511			No Source Limit

A1000 Degreasers

A1002 Emission Limits - Degreasers

Unit No.	VOC/HAPs tpy
TA-55-DG-1	## N

Reporting Requirement

A1007 A The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

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

	Yes	Date report submitted:	Tracking Number:
x	No 1	Provide comments and identify any supporting docum	nentation as an attachment.

Comments:

Degreaser TA-55-DG-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1002 A) (tons per year)
VOCs	0.022			Source limits refer
HAPs	0.022			to facility-wide limits.

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.

A1100 Internal Combustion

A1102 Emission Limits - Internal Combustion

Unit No.	NOx tpy	CO tpy	VOC tpy	SO ₂ tpy	TSP tpy	PM ₁₀ tpy
TA-33-G-1P	18.1	15.2	0.3	2.5	0.6	0.6
TA-33-G-2	0.21	0.1	i	1744	201	***
TA-33-G-3	0.21	0.1	'	255	W:	
TA-33-G-4	2.33	1.4	0.2	0.16	840	

¹ The VOC emissions from this source category are included in the facility-wide allowable emissions limit established in condition 106.B: 200 tpy VOC, 8.0 tpy per individual HAP, and 24.0 tpy of combined total HAPs.

Reporting Requirement

- A1107 A 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.
- A109 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

Has this reporting requirement	been met during this reporting per	riod with a separate reporting submittal?	Answer Yes or No below.
--------------------------------	------------------------------------	---	-------------------------

				_
	Yes	Date report submitted:	Tracking Number:	
- I	N/ D			

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

Comments:

Generator TA-33-G-1P	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1102 A) (tons per year)
NOx	1.49			18.1
SO ₂	0.04			2.5
TSP	0.05			0.6
PM ₁₀	0.05			0.6
co	0.15			15.2
voc	0.11			0.3
HAPs	0.0004			No Source Limit

Generator TA-33-G-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1102 A) (tons per year)
NOx	0.0047			0.21
SO ₂	0,0003			Not Required
TSP	0.0003			Not Required
PM ₁₀	0,0003			Not Required
со	0.0014			0.1
voc	0.0004			Not Required
HAPs	1,52E-06			No Source Limit

A1100 Internal Combustion- continued

Generator TA-33-G-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1102 A) (tons per year)
NOx	0			0.21
SO₂	0			Not Required
TSP	0			Not Required
PM ₁₀	0			Not Required
со	0			0.1
voc	0			Not Required
HAPs	0			No Source Limit

Note: The TA-33-G-3 generator did not operate during the first 6 months of 2019.

Generator TA-33-G-4	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1102 A) (tons per year)
NOx	0.029			2.33
SO ₂	0.002			0.16
TSP	0.002			Not Required
PM ₁₀	0.002			Not Required
со	0.018			1.4
voc	0.002			0.2
HAPs	9.51E-06			No Source Limit

Generator RLUOB-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.0034			Superior Superior
SO ₂	0.0001			No Source Specific
TSP	0.0002			
PM ₁₀	0.0002			Emission Limits for the CMRR
СО	0.0042			Generators
voc	0.0005			
HAPs	9.64E-07			

Generator RLUOB-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.245			
SO ₂	0.006			No Source Specific
TSP	0.014			
PM ₁₀	0.012			Emission Limits for the CMRR
СО	0.304			Generators
voc	0.035			
HAPs	7.04E-05			

A1100 Internal Combustion- continued

Generator RLUOB-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0,203			1 10 10 10 10 10 10 10 10 10 10 10 10 10
SO ₂	0.005			MANAGE E
TSP	0,012			No Source Specific
PM ₁₀	0.010			Emission Limits for the CMRR
СО	0,252			Generators
voc	0,029			
HAPs	5.83E-05			

Generator TA-48-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0			
SO ₂	0			
TSP	0			No Source Specific
PM ₁₀	0			Emission Limits for the TA-48
со	0			Generator
voc	0			
HAPs	0			

Note: The TA-48-GEN-1 generator did not operate during the first 6 months of 2019.

Generator TA-55-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0			
SO ₂	0			No Source Specific
TSP	0			
PM ₁₀	0			Emission Limits for the TA-55
co	0			Generators
voc	0			
HAPs	0			

Note: The TA-55-GEN-1 generator did not operate during the first 6 months of 2019.

Generator TA-55-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0			3. 24 /0 n S = 1
SO ₂	0			
TSP	0			No Source Specific
PM ₁₀	0			Emission Limits for the TA-55
co	0			Generators
voc	0			
HAPs	0			

Note: The TA-55-GEN-2 generator did not operate during the first 6 months of 2019.

A1100 Internal Combustion- continued

Generator TA-55-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.207			And the latest the same
SO ₂	0.003			on all the man
TSP	0.006			No Source Specific
PM ₁₀	0.006			Emission Limits for the TA-55
СО	0.045			Generators
voc	0.006			
HAPs	3,77E-05			

A1200 Data Disintegrator

A1202 Emission Limits - Data Disintegrator

Unit No.	TSP tpy	PM10 tpy
TA-52-11	9.9	9.9

Reporting Requirement

A1207 A The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

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

Yes	Date report submitted:	Tracking Number:	

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

Comments:

X

Data Disintegrator TA-52-11	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1202 A) (tons per year)
TSP	0.011			9.9
PM10	0.010			9.9

A1300 TA-3 Power Plant

A1302 Emission Limits - TA-3 Power Plant

All TA-3 Powe	er Plant Boilers Co	mbined (TA-33-1, T	ΓA-33-2, TA-33-3)			
NOx tpy	CO tpy	VOC tpy	SOx tpy	TSP tpy	PM ₁₀ tpy	PM2.5 tpy
31.5	21.5	2.8	4.9	4.7	4.4	4.2

TA-3 Power P	lant Turbine (TA-3	3-22-CT-1)				
NOx tpy	CO tpy	VOC tpy	SOx tpy	TSP tpy	PM ₁₀ tpy	PM2.5 tpy
59.4	72,3	1.5	4.2	4.8	4.8	4.8

Reporting Requirement

A1307 A The permittee shall submit reports described in Section A109 and in accordance with B110.

A109 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

Has this reporting requirement be	een met during this report	ting period with a separate	e reporting submittal? Answer	r Yes or No below.

Yes	Date report submitted:	Tracking Number:

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

Comments:

X

Boilers TA-3-22-1, TA-3-22-2, TA-3-22-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limit (Condition A1302 A) (tons per year)
NOx	5.95			31.5
SOx	0.06			4.9
TSP	0.78			4.7
PM ₁₀	0.78			4.4
PM _{2.5}	0.78			4.2
со	4.11			215
voc	0.56			2.3
HAPs	0.19			No Source Limit

Combustion Turbine TA-3-22 CT-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limit (Condition A1302 A) (tons per year)
NOx	0.62			59.4
SOx	0.04			4.2
TSP	0.08			4.8
PM ₁₀	0.08			4.8
PM _{2.5}	0.08		V-	4.8
со	0.13			72.3
voc	0.03			1.5
HAPs	0.02			No Source Limit

A1400 Open Burning

A1402 Emission Limits - Open Burning

Unit No.	Individual HAP' (tpy)	Total HAPs1(tpy)
Facility-Wide Open Burning	8.0	24.0

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

Reporting Requirement

- A1407 A The permittee shall submit reports as outlined in the Condition 1407.A Requirements, as described in Section A109, and in accordance with Section B110.
- A109 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 criteria 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 and the Soil Vapor Extraction equipment at Material Disposal Area L 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.

	estima		nd the Soil Vapor Extraction equipment at Material Disposal Area L shall be actual emissions that occurred during the reporting period with the facility-
Has this repo	rting requi	irement been met during this reporting period v	vith a separate reporting submittal? Answer Yes or No below.
	Yes	Date report submitted:	Tracking Number:
[x]	No	Provide comments and identify any support	rting documentation as an attachment.
Comments: No open burn	ng activitie	es took place during the first 6 months of 2019,	
			=

A1500 Evaporative Sprayers

A1502 Emission Limits - Evaporative Sprayers

Unit No.	HAPs tpy
TA-60-EVAP-1	X+
TA-60-EVAP-2	** J
TA-60-EVAP-3	55. ¹
TA-60-EVAP-4	7.1
TA-60-EVAP-5	w.l.

Hazardous air pollutants (HAPs) from the evaporative coolers are included in and subject to the individual and total HAP facility-wide emission limits in Table 106.B: 8.0 tpy per individual HAP, and 24.0 tpy of combined total HAPs.

Reporting Requirement

A1507 A The permittee shall submit reports described in Section A109 and in accordance with B111₁₁

A109 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 criteria 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.

Has this rep	Has this reporting requirement been met during this reporting period with a separate reporting submittal? Answer Yes or No below,								
		E							
	Yes	Date report submitted:	Tracking Number:						
119-1-11									
lx.	No Provide comments and identify any supporting documentation as an attachment.								

Comments:

Evaporative Sprayer TA-60-EVAP-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychorinated biphenyls	7.07E-10			18 THE R. P. S. L.
Chloroform	4.31E-06			- Value Care
Chloromethane	7.90E-06			Source limits refer
Bromoform	8.97E-07			to facility-wide
Cyanide Compounds	3.88E-05			limits.
Manganese Compounds	1.69E-05			
Antimony Compounds	1.13E-05			
TOTAL HAPs	2.06E-04			H. Dr (1172)

Evaporative Sprayer TA-60-EVAP-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychorinated biphenyls	3.18E-10			
Chloroform	1.94E-06			Y 100 Y
Chloromethane	3.55E-06			Source limits refer
Bromoform	4.04E-07			to facility-wide
Cyanide Compounds	1.74E-05			Tirrits.
Manganese Compounds	7.59E-06			ENTER STATE OF THE
Antimony Compounds	5.08E-06			
TOTAL HAPs	9.27E-05			prisolve for some

A1500 Evaporative Sprayers - continued

Evaporative Sprayer TA-60-EVAP-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychorinated biphenyls	0			
Chloroform	0			
Chloromethane	0			Source limits refer
Bromoform	0			to facility-wide
Cyanide Compounds	0			limits.
Manganese Compounds	0			
Antimony Compounds	0			Str. (New York)
TOTAL HAPs	0			

Note: The TA-60-EVAP-3 evaporative sprayer did not operate during the first six months of 2019.

Evaporative Sprayer TA-60-EVAP-4	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychorinated biphenyls	4.14E-10			
Chloroform	2.52E-06			
Chloromethane	4.62E-06			Source limits refer
Bromoform	5.25E-07			to facility-wide
Cyanide Compounds	2.27E-05			limits.
Manganese Compounds	9.88E-06			ke
Antimony Compounds	6.61E-06			5.0 (5.0)
TOTAL HAPs	1.21E-04			

Evaporative Sprayer TA-60-EVAP-6	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychorinated biphenyls	0			
Chloroform	0			4
Chloromethane	0			Source limits refer
Bromoform	0			to facility-wide
Cyanide Compounds	0			limits.
Manganese Compounds	0			
Antimony Compounds	0			
TOTAL HAPs	0			

Note: The TA-60-EVAP-5 evaporative sprayer did not operate during the first six months of 2019.

A102 Facility Wide Emission Limits

Table 102.A: Total Potential Criteria Pollutant Emissions from Entire Facility

Pollutant	Emissions (tons per year)
Nitrogen Oxides (NOx)	245.0
Carbon Monoxide (CO)	225.0
Volatile Organic Carbons (VOC)	200,0
Sulfur Dioxide (SO ₂)	150.0
Total Particulate Matter (TSP)	120.0
Particulate Mater less than 10 microns (PM ₁₀)	120,0
Particulate Mater less than 2,5 microns (PM ₂₅)	120.0

Table 102.B: Total Potential HAPs that exceed 1.0 tons per year

Pollutant	Emissions (tons per year)
Individual HAP	8.0
Total HAPs	24.0

Reporting Requirement

A109 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 criteria 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.

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

Yes Date report submitted: Tracking Number:

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

Comments:

X

Pollutant	January - June Emissions (tons)	July - December Emissions (tons)	2019 Annual Emissions (tons)	Facility Wide Permit Limits (Condition A102) (tons per year)
Nitrogen Oxides	21.13			245
Carbon Monoxide	15.06			225
Volatile Organic Carbons	7.96			200
Sulfur Dioxide	0.24			150
Total Particulate Matter	1.95			120
Particulate Matter less than 10 microns	1.94			120
Particulate Matter less than 2.5 microns	0.87			120
Hazardous Air Pollutants	2.93			24