

LA-UR-20-28680

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Title: IDEA ID 856 – Los Alamos National Laboratory 2020 Third Quarter
Beryllium Emissions Report July 1–September 30, 2020, Air Quality
Permit No. 634-M2

Author(s): Carretti, Vincent Anthony

Intended for: Environmental Regulatory Document
 - NMED
 - Air quality
 - Reading Room
 - Air Quality

Issued: 2020-10-28 (rev.1)

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*Environment, Safety, Health, Quality,
Safeguards, and Security*

PO Box 1663, K491
Los Alamos, New Mexico 87545
(505) 667-4218

Symbol: ESHQSS: 20-075
LAUR: 20-28680
Locates Action No: N/A
Date: 10/28/2020

Mr. David Feather
Compliance Reporting Manager
New Mexico Environment Department, Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505-1816

Subject: IDEA ID 856 – Los Alamos National Laboratory 2020 Third Quarter Beryllium Emissions Report July 1–September 30, 2020, Air Quality Permit No. 634-M2

Dear Mr. Feather:

Attached is a copy of the sampling data for the **third quarter of calendar year 2020**. The attached emissions data were obtained from the continuous air monitor installed on the main exhaust stack at the Beryllium Technology Facility (BTF) at Los Alamos National Laboratory (LANL). This submission of the quarterly emissions data, collected from this source, is required by permit condition 5.f of the New Mexico Environment Department (NMED) New Source Review (NSR) Air Quality Permit #634-M2 dated October 30, 1998. This quarterly report is transmitted within the allowed 60 days after the end of the calendar quarter, as specified in NSR permit and incorporated in Title V permit P100-R2M4.

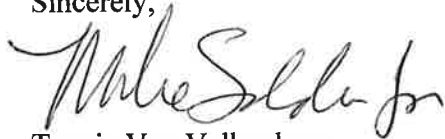
Air Quality Permit #634-M2 condition #2 requires that the beryllium stack emissions from the BTF shall not exceed 0.35 grams in a 24-hour time period and shall not exceed 3.5 grams per year. For this reporting period, the current quarterly data and the total emissions for calendar year 2020 were obtained from the attached data sheet and summarized in the following table.

Reporting Period	Description of Data	Beryllium Emission Rate	NSR 634-M2/Title V P100-R2M4 Permit Limit
2020Q3	Highest daily emission rate	1.75×10^{-5} gm/24 hours	0.35 gm/24 hours
2020Q3	Total amount for 2020Q3	8.54×10^{-4} gm	N/A
2020Q3	Total amount for 2020	3.33×10^{-3} gm	3.5 gm/year

In addition, on the Attachment 1 datasheet, you will note that between 07/08/2020 – 09/16/2020, stack samples remained in the sample collector for two weeks, instead of one week, due to changes in operation schedules due to COVID-19. Beginning on 09/16/2020, stack samples resumed the normal weekly schedule. Based on the above summary table and Attachment 1 datasheet, the beryllium emissions are well below the permit limit and LANL is in compliance with condition #2 of NMED Air Quality Permit #634-M2.

If you have questions or comments regarding this submittal or would like to discuss this in greater detail, please feel free to contact Aaron M. Dailey at (505) 667-7276 or Vincent A. Carretti at (505) 665-1658.

Sincerely,



Taunia Van Valkenburg
Group Leader

TVV/AMD/VAC:jdm

Attachment(s): Attachment 1 Beryllium 2020 Stack Emissions

Copy: Adrienne L. Nash, NA-LA, adrienne.nash@nnsa.doe.gov
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**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**



Version 07.20.18

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: Triad National Security, LLC					D. ® Facility Name: Los Alamos National Laboratory					
B.1 ® Company Address: P.O Box 1663 MS K491					E.1 ® Facility Address: Same as Company					
B.2 ® City: Los Alamos			B.3 ® State: NM	B.4 ® Zip: 8 7 5 4 5			E.2 ® City:		E.3 ® State:	E.4 ® Zip:
C.1 ® Company Environmental Contact: Tania S. Van Valkenburg			C.2 ® Title: Group Leader, EPC-CP			F.1 ® Facility Contact: Aaron M. Dailey			F.2 ® Title: Meteorology & Air Quality Team Leader	
C.3 ® Phone Number: (505) 665-9827			C.4 ® Fax Number: (505) 665-8858			F.3 ® Phone Number: (505) 667-7276			F.4 ® Fax Number: NA	
C.5 ® Email Address: tauniav@lanl.gov					F.5 ® Email Address: adailey@lanl.gov					
G. Responsible Official: (Title V only): Michael J. Weis			H. Title: Manager			I. Phone Number: (505) 667-5015			J. Fax Number: NA	
K. ® AI Number: 856		L. Title V Permit Number: P100-R2M4		M. Title V Permit Issue Date: 07/18/2019		N. NSR Permit Number: 634-M2		O. NSR Permit Issue Date: 10/30/1998		
P. Reporting Period: From: July 1, 2020 To: September 30, 2020										

Do NOT submit NSPS OOOO or OOOOa well completion or flowback notifications to the Air Quality Bureau. See <https://www.env.nm.gov/air-quality/notices-and-faqs-for-compliance-and-enforcement/> for explanation.

SECTION II - TYPE OF SUBMITTAL (check one that applies)				
<input type="checkbox"/>	Title V Annual Compliance Certification	Permit Condition(s):	Description:	
<input type="checkbox"/>	Title V Semi-Annual Monitoring Report	Permit Condition(s):	Description:	
<input type="checkbox"/>	NSPS Requirement (40CFR60)	Regulation:	Section(s):	Description:
<input type="checkbox"/>	MACT Requirement (40CFR63)	Regulation:	Section(s):	Description:
<input type="checkbox"/>	NMAC Requirement (20.2.xx) or NESHAP Requirement (40CFR61)	Regulation:	Section(s):	Description:
<input checked="" type="checkbox"/>	Permit or Notice of Intent (NOI) Requirement	Permit No. <input checked="" type="checkbox"/> or NOI No. <input type="checkbox"/> 634-M2	Condition(s): 5.f	Description: 2020Q3 Report containing beryllium emissions data from the continuous air monitor of the exhaust stack, due within 60 days after calendar quarter.
<input type="checkbox"/>	Requirement of an Enforcement Action	NOV No. <input type="checkbox"/> or SFO No. <input type="checkbox"/> or CD No. <input type="checkbox"/> or Other <input type="checkbox"/>	Section(s):	Description:

SECTION III - CERTIFICATION			
After reasonable inquiry, I <u>Tania S. Van Valkenburg</u> certify that the information in this submittal is true, accurate and complete. <small>(Name of Certifier)</small>			
® Signature of Certifier: 	® Title: Group Leader, EPC-CP	® Date: 10/28/2020	® Responsible Official for Title V? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Reviewed By: _____

Date Reviewed: _____

ATTACHMENT 1
Beryllium 2020 Stack Emissions

ESHQSS: 20-075

LA-UR-20-28680

Date: 10/28/2020

Los Alamos National Laboratory
TA-03-0141 Beryllium 2020 Stack Emissions

TA-03-0141 **StackID: 03014101**

Sampling dates

Period #: 1

12/19/2019	-	01/09/2020
01/09/2020	-	01/16/2020
01/16/2020	-	01/23/2020
01/23/2020	-	01/30/2020

Period #: 2

01/30/2020	-	02/06/2020
02/06/2020	-	02/13/2020
02/13/2020	-	02/20/2020
02/20/2020	-	02/27/2020

Period #: 3

02/27/2020	-	03/05/2020
03/05/2020	-	03/12/2020
03/12/2020	-	03/19/2020
03/19/2020	-	03/31/2020

Emissions (g)

Weekly(1)	Daily(2)
<i>Sum of weekly results must be <3.5 g/year</i>	<i>Cannot Exceed 0.35 g/day</i>

< 1.22E-04	< 5.84E-06
< 1.22E-04	< 1.70E-05
< 1.22E-04	< 1.80E-05
< 1.22E-04	< 1.74E-05

Period 1 Sum: < 4.88E-04

< 1.22E-04	< 1.76E-05
< 1.22E-04	< 1.75E-05
< 1.22E-04	< 1.75E-05
< 1.22E-04	< 1.75E-05

Period 2 Sum: < 4.88E-04

< 1.22E-04	< 1.75E-05
< 1.22E-04	< 1.75E-05
< 1.22E-04	< 1.75E-05
< 1.22E-04	< 1.00E-05

Period 3 Sum: < 4.88E-04

1st Quarter Total: 1.46E-03	HDER 1.80E-05
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^a HDER = Highest Daily Emission Rate

Los Alamos National Laboratory
TA-03-0141 Beryllium 2020 Stack Emissions

TA-03-0141 **StackID: 03014101**

Sampling dates

Emissions (g)

Weekly(1)	Daily(2)
<i>Sum of weekly results must be <3.5 g/year</i>	<i>Cannot Exceed 0.35 g/day</i>

Period #: 4

03/31/2020	04/15/2020
04/15/2020	04/29/2020

$< 1.22E-04$	$< 8.25E-06$
$< 1.22E-04$	$< 8.74E-06$

Period 4 Sum: < 2.44E-04

Period #: 5

04/29/2020	05/13/2020
05/13/2020	05/27/2020
05/27/2020	06/10/2020

$< 1.43E-04$	$< 1.02E-05$
$< 1.84E-04$	$< 1.32E-05$
$< 1.97E-04$	$< 1.41E-05$

Period 5 Sum: < 5.24E-04

Period #: 6

06/10/2020	06/24/2020
06/24/2020	07/08/2020

$< 1.22E-04$	$< 8.75E-06$
$< 1.22E-04$	$< 8.71E-06$

Period 6 Sum: < 2.44E-04

2nd Quarter Total: 1.01E-03 ^aHDER 1.41E-05

^a HDER = Highest Daily Emission Rate

**Los Alamos National Laboratory
TA-03-0141 Beryllium 2020 Stack Emissions**

TA-03-0141 StackID: 03014101

Sampling dates

Emissions (g)

Weekly(1)	Daily(2)
<i>Sum of weekly results must be <3.5 g/year</i>	<i>Cannot Exceed 0.35 g/day</i>

Period #:	7
07/08/2020	07/22/2020
07/22/2020	08/06/2020
< 1.22E-04	< 8.71E-06
< 1.22E-04	< 8.12E-06
Period 7 Sum: < 2.44E-04	

Period #:	8
08/06/2020	08/19/2020
08/19/2020	09/02/2020
< 1.22E-04	< 9.51E-06
< 1.22E-04	< 8.74E-06
Period 8 Sum: < 2.44E-04	

Period #:	9
09/02/2020	09/16/2020
09/16/2020	09/24/2020
09/24/2020	10/01/2020
< 1.22E-04	< 8.76E-06
< 1.22E-04	< 1.52E-05
< 1.22E-04	< 1.75E-05
Period 9 Sum: < 3.66E-04	

3rd Quarter Total: 8.54E-04 ^aHDER 1.75E-05

^a HDER = Highest Daily Emission Rate