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Title:	2007 Annual Compliance Certification Report Air Quality Title V Operating Permit P100M2
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Intended for:	Ms. Debra McElroy Section Chief, Enforcement/Compliance New Mexico Environment Department - Air Quality Bureau 1301 Siler Road, Building B Santa Fe, New Mexico 87507



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Form 836 (7/06)

Operating Permit
Annual Compliance Certification Report Form

January 1 – December 31, 2007

(PART 1)

Identifying Information

Source Name: Los Alamos National Laboratory County: Los Alamos

Source Address: P.O. Box 1663, MS J978

City: Los Alamos State: NM Zip Code: 87545

Responsible Official: Richard S. Watkins Ph No. (505) 667-4218 Fax No. (505) 665-3811
Technical Contact: Steven L. Story Ph No. (505) 665-2169 Fax No. (505) 665-8858

Principal Company Product or Business: National Security and Nuclear Weapons Research Primary SIC Code: 9711

Permit No. P100 Permit Issued Date: April 30, 2004 (P100), June 15, 2006 (M1), July 16, 2007 (M2)

Certification of Truth, Accuracy, and Completeness

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

Signature Richard S Watkins Date: 1/23/08

Title: Associate Director, Environment, Safety, Health & Quality

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Annual Compliance Certification Data for State Permit No. P100M2			
Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency Continuous (C) or Intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.1 Asphalt Production			
2.1.1 Applicable Req's 2.1.1.1 of the permit	LANL Asphalt Plant operations meet requirements of 20.2.11 NMAC; 40 CFR Part 60, Subpart I; and NSR Permit No. GCP-3-2195G.	I	Yes
2.1.2 Emission Limits	Emissions are calculated and reported to NMED on a 6-month basis in accordance with permit condition 4.1. Emissions are compared to allowable emission limits in each semi-annual report and have not been exceeded. Particulate matter (PM) rate (lb/hr) was determined during compliance testing and a report with this value was submitted to NMED on September 22, 2005.	I	Yes
2.1.2.1 of the permit	LANL has certified visible emission (opacity) readers on-site who perform readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limitation. Opacity reports are provided to NMED in the semi-annual monitoring reports. No visible emissions exhibited an opacity of 20% or greater during this reporting period.	I	Yes
2.1.3 Operational Req's 2.1.3.1 of the permit	Data on asphalt production is collected on a monthly basis. The 12-month rolling total is calculated and compared against the production limit set in this permit condition. LANL did not exceed the 13,000 tons per year, 12-month rolling total limit.	I	Yes

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2.1.3.2 of the permit	The plant is equipped with a fugitive dust control system, which limits particulate emissions to the exhaust stack.	I	Yes
2.1.3.3 of the permit	Dust collection and control systems are in place on screens, conveyor belts, and transfer points to sufficiently prevent opacity from exceeding 20%. Opacity is monitored monthly and reports are included in LANL's semi-annual monitoring reports.	I	Yes
2.1.3.4 of the permit	The baghouse is equipped with a differential pressure gauge, which continuously monitors differential pressure across the baghouse.	I	Yes
2.1.3.5 of the permit	Natural gas is not used by the plant at this time.	N/A	N/A
2.1.3.6 of the permit	Total sulfur content is $\leq$0.5 percent by weight for propane used. Purchase records from the propane supplier are maintained on site as required by condition 2.1.5.1 of the permit.	I	Yes
2.1.3.7 of the permit	The Asphalt Plant operates within the specified hours-of-operation. To aid operators, a sunrise/sunset chart is maintained at the plant. A log of start up and shut down times is kept as required by condition 2.1.5.1.	I	Yes
2.1.3.8 of the permit	The Asphalt Plant did not exceed 4,380 hours of operation in 2007. A log of operating hours is maintained as required by condition 2.1.5.1.	I	Yes
2.1.3.9 of the permit	In 2006, the haul road was paved. A log of road sweeping is maintained as required by condition 2.1.5.1. Watering of the haul road is no longer performed.	N/A	N/A

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2.1.3.10 of the permit	A location evaluation of this source has been performed and placement, including setback and co-location, meets conditions of the NSR permit GCP-3-2195G. Particulate abatement systems are in place with pressure drop monitored to reduce emissions from the plant. A closed loop system is used to recycle baghouse fines. Haul roads are paved and do not require watering.. The haul road is periodically swept to prevent visible emissions. Sweeping of the haul road is recorded. No internal combustion engines will be used at the plant.	I	Yes
2.1.4 Emissions Monitoring Req's 2.1.4.1 of the permit	LANL has certified opacity readers on-site who perform monthly six minute opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limit. Potential emission points are determined by EPA Method 22. Opacity reports are provided to NMED in the semi-annual monitoring reports.	I	Yes
2.1.4.2 of the permit	The differential pressure across the bag house is monitored and collected in accordance with condition IV.C.2 of NSR permit GCP-3-2195G.	I	Yes
2.1.4.3 of the permit	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 limit.	I	Yes

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2.1.5 Recordkeeping 2.1.5.1 of the permit	Recordkeeping conditions are met using the following methods: The production log contains hours of operation, production rates, and number of haul truck trips. The permit binder, located at the facility, contains fuel sulfur content provided by supplier, tickets of fuel purchased, frequency of haul road sweeping, and copies of proposed and performed maintenance. Haul road watering is no longer performed and has been replaced by sweeping. (All records are kept at the asphalt plant).	I	Yes
2.1.5.2 of the permit	An initial start-up compliance test for PM and opacity was performed on August 25 & 26, 2005. A copy of the final report was submitted to NMED on September 22, 2005. The report is also maintained on-site.	I	Yes
2.1.5.3 of the permit	Monthly six (6) minute opacity readings are performed. Results are submitted to NMED with the semi-annual monitoring report. Records are also maintained on-site.	I	Yes
2.1.5.4 of the permit	Records of the monitoring of differential pressure across the baghouse are maintained on-site.	I	Yes
2.1.6 Reporting 2.1.6.1 of the permit	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 5, 2007 and August 3, 2007. Emissions reports were submitted to NMED on March 9, 2007 and September 17, 2007.	I	Yes

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2.2 Beryllium Activities			
2.2.1 Applicable Req's 2.2.1.1. of the permit	LANL beryllium operations meet requirements of 40 CFR Part 61, Subpart C, and NSR Permit Numbers 632, 634 and 1081.	I	Yes
2.2.2 Emission Limits	Emissions are calculated and reported to NMED on a 6-month basis in accordance with permit condition 4.1. Emissions are compared to allowable emission limits in each semi-annual report. Allowable emission limits have not been exceeded.	I	Yes
2.2.3 Operational Req's	TA-3-29: Beryllium operations are no longer conducted at TA-3-29. NMED was notified of the request to cancel the registration of this source in a memorandum dated June 15, 2007. No operations were conducted in 2007. TA-3-66: Emissions from machining and arc melt/casting operations are exhausted through a HEPA filtration system prior to entering the atmosphere. Polishing and electroplating/ chemical milling operations are conducted in aqueous solution or lubricant baths. TA-3-141: 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. No process limits were exceeded, and the continuous emission monitor is maintained in accordance with the Laboratory's quality program. TA-16-207: Sanding of beryllium surfaces is	I	Dev

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2.2.3 Operational Req's (Continued)	performed wet using a fine grit abrasive. TA-35-87: All cutting and punching of beryllium foil occurs within an enclosed bench top glovebox. TA-35-213: All processes are exhausted through a HEPA filtration system prior to entering the atmosphere. NMED was notified of a failed HEPA filter test that occurred on March 28, 2007. NMED requested that this be noted as a deviation in the annual compliance report. A subsequent HEPA filter test conducted on May 10, 2007 passed. No beryllium operations were conducted while the HEPA filter system was down. TA-55-PF4: All operations are exhausted through the facility's HEPA filtration system (3 filters with a control efficiency of 99.95% each). The non-accessible filter (4^{th} filter with a control efficiency of 99.95%) is replaced when the pressure drop across the filter indicates breakthrough or excessive loading. No process limits were exceeded.		
2.2.4 Monitoring Req's	TA-3-29 – Beryllium operations are no longer conducted at TA-3-29. NMED was notified of the request to cancel the registration of this source in a memorandum dated June 15, 2007. No operations were conducted in 2007. TA-3-66 – Log books are maintained during operations showing the number of metallographic specimens used in the polishing operation and the weight of samples processed in the electroplating/chemical milling, machining, and arc melting/casting operations. TA-3-141 – The exhaust stack has a continuous emission monitor; cartridge and HEPA filters are equipped with differential pressure gauges that measure differential pressure when fans are	I	Yes

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2.2.4 Monitoring Req's (Continued)	in operation. TA-16-207– Project files of components prepared for testing are maintained. TA-35-87 – A log of the number of filters cut is maintained. TA-35-213 – A copy of the stack emission test results is available for inspection as well as a log of hours of operation that are used to calculate total emissions. TA-55-PF4 – The HEPA filtration system contains a differential pressure gauge that measures differential pressure across the HEPA filters. The differential pressure is verified daily while the exhaust fans are in operation. Annual HEPA filter challenge tests are performed and results are submitted to NMED in LANL's semi-annual monitoring reports.		
2.2.5 Recordkeeping	TA-3-29 – Beryllium operations are no longer conducted at TA-3-29. NMED was notified of the request to cancel the registration of this source in a memorandum dated June 15, 2007. No operations were conducted in 2007. TA-3-66 – Recordkeeping for this source is specified in condition 2.2.4. TA-3-141– Inventory records are maintained to demonstrate compliance with beryllium process limits and daily differential pressure readings. Process limits have not been exceeded. Control equipment maintenance and repair activities are also recorded. TA-16-207 – Recordkeeping for this source is specified in condition 2.2.4. TA-35-87 – Recordkeeping for this source is specified in condition 2.2.4. TA-35-213 – Recordkeeping for this source is specified in condition 2.2.4. TA-55-PF4 – Stack emission test results and	I	Yes

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2.2.5 Recordkeeping (Continued)	operating parameters, including daily differential pressure readings when exhaust fans are running, are recorded and available at the facility. A copy of annual HEPA filter test reports and daily differential pressure readings are kept. Filter change out records are also kept. Process records are available of the quantity and weight of classified parts processed during a 24-hour period and annually.		
2.2.6 Reporting	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 5, 2007 and August 3, 2007. Emissions reports were submitted to NMED on March 9, 2007 and September 17, 2007. TA-3-141 quarterly reports were submitted to NMED within 60 days after each calendar quarter. Reports submitted in 2007 were on the following dates: 1/29/2007, 5/8/2007, 8/9/2007, and 10/30/2007. The reports document the compliance status with the permitted emission rate from the continuous monitoring system.	I	Yes

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2.3 Boilers and Heaters			
2.3.1 Applicable Req's 2.3.1.1 of the permit	LANL boiler and heater operations meet the requirements of 40 CFR Part 60, Subpart Dc, as required, and 20.2.61 NMAC.	I	Yes
2.3.2 Emission Limits	Emissions are calculated and reported to NMED on a 6-month basis in accordance with permit condition 4.1. Emissions are compared to the allowable emission limits in each semi-annual report. In addition, fuel use records are collected monthly and emissions calculated to verify compliance with the emission limits. Allowable emission limits have not been exceeded.	I	Yes
2.3.2.1 of the permit	LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limitation. Opacity reports are provided to NMED in the semi-annual monitoring reports. Visible emissions did not equal or exceed 20% opacity.	I	Yes
2.3.3 Operational Req's 2.3.3.1 of the permit	For units listed under this permit condition, a 12-month rolling total of natural gas used is calculated and recorded each month. The rolling total is compared to the fuel use limit each month and provided in the semi-annual monitoring report. Natural gas usage limits were not exceeded.	I	Yes

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2.3.3.2 of the permit	For units located at TA-21-357, a 12-month rolling total of natural gas and fuel oil use is calculated and recorded each month. Rolling totals are compared to fuel use limits in this permit and provided to NMED in the semi-annual monitoring report. Natural gas and fuel oil usage limits were not exceeded. The TA-21 Steam Plant (TA-21-357), where these boilers are located, ceased operation in June 2007. These units have been removed from service and will no longer be used.	I	Yes
2.3.4 Monitoring Req's 2.3.4.1 of the permit	For units located at TA-21-357, a volumetric flow meter is in place and used to monitor and record monthly natural gas use. The TA-21 Steam Plant (TA-21-357), where these boilers are located, ceased operation in June 2007. These units have been removed from service and will no longer be used.	I	Yes
2.3.4.2 of the permit	For units located at TA-55-6, a volumetric flow meter is in place and used to monitor monthly natural gas use. Readings from this flow meter are recorded monthly.	I	Yes
2.3.4.3 of the permit	LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limit.	I	Yes
2.3.5 Recordkeeping 2.3.5.1 of the permit	Facility wide natural gas use is collected and recorded on a monthly basis. From the total usage, metered sources are subtracted and the difference is apportioned between non-metered boilers and heaters based on fuel or heat input ratings. Facility wide fuel oil usage for applicable units is collected and recorded on a monthly basis.	I	Yes

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2.3.6 Reporting 2.3.6.1 of the permit	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 5, 2007 and August 3, 2007. Emissions reports were submitted to NMED on March 9, 2007 and September 17, 2007.	I	Yes
2.4 Carpenter Shops			
2.4.1 Applicable Req's 2.4.1.1 of the permit	None	N/A	N/A
2.4.2 Emission Limits	Emissions of PM_{10} are calculated and reported on a 6-month basis in accordance with permit condition 4.1. Emissions are compared to allowable emission limits in each semi-annual report. Allowable emission limits have not been exceeded.	I	Yes
2.4.3 Operational Req's 2.4.3.1 of the permit	Hourly use of saws, drills, shaping and sanding equipment are tracked. Hours of operation are collected monthly and provided in the semi-annual monitoring report. LANL carpenter shops did not exceed 4368 hours of operation during this compliance certification period.	I	Yes
2.4.3.2 of the permit	Process cyclones are operated during shop operations that are vented to the cyclones.	I	Yes
2.4.4 Monitoring Req's 2.4.4.1 of the permit	A log is maintained of monthly hours of operation for each shop.	I	Yes
2.4.5 Recordkeeping 2.4.5.1 of the permit	The monthly hours of operation for each shop is recorded and provided to NMED in the semi-annual monitoring report.	I	Yes

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2.4.6 Reporting 2.4.6.1 of the permit	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 5, 2007 and August 3, 2007. Emissions reports were submitted to NMED on March 9, 2007 and September 17, 2007.	I	Yes
2.5 Chemical Usage			
2.5.1 Applicable Req's 2.5.1.1 of the permit	None	N/A	N/A
2.5.2 Operational Req's	None	N/A	N/A
2.5.3 Emission Limits 2.5.3.1 of the permit	Facility wide emissions from chemical use are calculated and reported on a 6-month basis in accordance with permit condition 4.1. A comparison against the allowable emission limits is performed at each of these reporting periods. Facility wide emission limits have not been exceeded.	I	Yes
2.5.4 Monitoring Req's 2.5.4.1 of the permit	Facility wide chemical purchase records are collected in LANL's ChemLog database and used to calculate emissions. Chemical emission information is submitted to NMED every 6-months in accordance with permit condition 4.1.	I	Yes
2.5.5 Reporting 2.5.5.1 of the permit	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 5, 2007 and August 3, 2007. Emissions reports were submitted to NMED on March 9, 2007 and September 17, 2007.	I	Yes

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2.6 Degreasers	TA-55-DG-2 & TA-55-DG-3 did not operate during this compliance certification period.		
2.6.1 Applicable Req's 2.6.1.1 of the permit	LANL degreaser operations met all requirements of 40 CFR Part 63, Subpart T.	I	Yes
2.6.2 Emission Limits 2.6.2.1 of the permit	Emissions are calculated and reported on a 6-month basis in accordance with permit condition 4.1. Comparison against the allowable emission limits is performed at each of these reporting periods. Allowable emissions have not been exceeded.	I	Yes
2.6.3 Operational Req's 2.6.3.1 of the permit	• 2.6.3.1.1 – The degreaser is kept closed with a tight fitting cover when it is not being used • 2.6.3.1.2 – A freeboard ratio of 0.75 or greater is maintained. • 2.6.3.1.3 – All waste solvent and solvent contaminated wipe rags are collected and stored in closed containers. • 2.6.3.1.4 – Flushing operations are performed within the freeboard area. • 2.6.3.1.5 – Cleaned parts are allowed to drip for 15 seconds or until dripping stops. • 2.6.3.1.6 – A fill line has been established to prevent the unit from being overfilled. • 2.6.3.1.7 – Spills are wiped up immediately. • 2.6.3.1.8 – Administrative controls are in place to prevent observable splashing with an agitation device. • 2.6.3.1.9 – The degreaser is located in a glove box with a set ventilation flow rate. Exhaust flows are set to not exceed 40 m/min. • 2.6.3.1.10 – Sponges, fabric, wood, or paper are not cleaned in the degreaser.	I	Yes

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2.6.4 Monitoring Req's 2.6.4.1 of the permit	A computerized software system 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 6-month basis in accordance with permit condition 4.1.	I	Yes
2.6.4.2 of the permit	Checklists for work practice standards are completed.	I	Yes
2.6.5 Recordkeeping 2.6.5.1 of the permit	A Material Safety Data Sheet (MSDS) is kept and available that describes the content and concentration of the solvent. Records of work practice checklists are also maintained.	I	Yes
2.6.6 Reporting 2.6.6.1 of the permit	Only one of the three permitted degreasers is being used. If other units are brought on-line, NMED will be notified.	I	Yes
2.6.6.2 of the permit	If an inoperative degreaser should become active, a compliance report will be submitted to the NMED within 150 days after startup.	I	Yes
2.6.6.3 of the permit	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 5, 2007 and August 3, 2007. Emissions reports were submitted to NMED on March 9, 2007 and September 17, 2007.	I	Yes

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2.7 Internal Combustion			
2.7.1 Applicable Req's 2.7.1.1 of the permit	TA-33-G-1 meets the requirements of 20.2.61 NMAC and NSR Permit No. 2195F.	I	Yes
2.7.2 Emission Limits	TA-33-G-1 did not operate during this compliance certification period.	I	Yes
2.7.2.1 of the permit	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. Visible emissions did not equal or exceed 20% opacity.	I	Yes
2.7.3 Operational Req's 2.7.3.1 of the permit	Hours of each stationary standby generator are tracked and evaluated twice a year to verify that the average hours per year limit is not exceeded. The hours of operation are provided to NMED in LANL's Semi-Annual Monitoring report. The limit of 168 hr/year average was not exceeded.	I	Yes
2.7.3.2 of the permit	TA-33-G-1 did not operate during this compliance certification period.	I	Yes
2.7.3.3 of the permit	TA-33-G-1 did not operate during this compliance certification period.	I	Yes
2.7.4 Monitoring Req's	Hours of each stationary standby generator are tracked and evaluated twice a year to verify that the average hour per year limit is not exceeded. The hours of operation are provided to NMED in LANL's Semi-Annual Monitoring report. TA-33-G-1 did not operate during this compliance certification period.	I	Yes

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2.7.4.1 of the permit	LANL has certified opacity readers on-site who perform opacity readings using 40 CFR 60, Appendix A, Method 9 to determine compliance with the opacity limitation.	I	Yes
2.7.5 Recordkeeping 2.7.5.1 of the permit	Recordkeeping requirements are specified at condition 2.7.4.	I	Yes
2.7.6 Reporting 2.7.6.1 of the permit	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 5, 2007 and August 3, 2007. Emissions reports were submitted to NMED on March 9, 2007 and September 17, 2007.	I	Yes
2.8 Data Disintegrator			
2.8.1 Applicable Req's 2.8.1.1 of the permit	LANL Data Disintegrator operations meet requirements of NSR Permit No. 2195H.	I	Yes
2.8.2 Emission Limits	Emissions are calculated and reported on a 6-month basis in accordance with permit condition 4.1. A comparison against the allowable emission limits is performed at each of these reporting periods. Allowable emission limits were not exceeded.	I	Yes
2.8.3 Operational Req's	None	N/A	N/A
2.8.4 Monitoring Req's 2.8.4.1 of the permit	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 in the semi-annual monitoring reports.	I	Yes

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Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency Continuous (C) or Intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.8.4.2 of the permit	LANL has a service contract in place to perform regular maintenance and repair on the cyclone and cloth tube filter per manufacturer's recommendation.	I	Yes
2.8.5 Recordkeeping 2.8.5.1 of the permit	A log is kept of the number of boxes of media that are destroyed monthly.	I	Yes
2.8.5.2 of the permit	Records are maintained to demonstrate compliance with manufacturer's recommended repair and maintenance schedules for the cyclone and cloth tube filter.	I	Yes
2.8.6 Reporting 2.8.6.1 of the permit	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 5, 2007 and August 3, 2007. Emissions reports were submitted to NMED on March 9, 2007 and September 17, 2007.	I	Yes
2.8.7 Compliance 2.8.7.1 of the permit	No compliance test was required or performed during this compliance certification period.	N/A	Yes

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Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency Continuous (C) or Intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.9 Power Plant (TA-3-22)			
2.9.1 Applicable Req's 2.9.1.1 of the permit	Power Plant boilers are in compliance with the requirements of 20.2.33 NMAC (Gas Burning Equipment – Nitrogen Dioxide) and 20.2.34 NMAC (Oil Burning Equipment - Nitrogen Dioxide). The combustion turbine is in compliance with 40 CFR Part 60 Subpart A and 40 CFR Part 60 Subpart GG. Both the boilers and turbine are in compliance with 20.2.61 NMAC (Smoke and Visible Emissions) and NSR Permit Number 2195-BM1.	I	Yes
2.9.2 Emission Limits	Compliance with the boilers pound per hour emission limits were determined during source compliance tests performed in September 2002. Compliance with the Combustion Turbine pound per hour emission limit was determined during source compliance tests performed in October 2007. For both tests, the results were provided to NMED. Emissions are also calculated and reported to the NMED on a 6-month basis in accordance with permit condition 4.1. Comparison against the 12-month rolling total emission limits is performed each month and at each of the above mentioned emission reporting periods.	I	Yes
2.9.2.1 of the permit	Results from source compliance tests performed on the boilers in September 2002, demonstrate that NO_2 emissions do not exceed 0.3 lbs per MMBtu of heat input.	I	Yes

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Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency Continuous (C) or Intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.9.2.2 of the permit	An initial emission compliance test was performed on October 5, 2007. The Nitrogen Oxide emission concentration was shown to be less than 25 ppmv at 15% Oxygen.	I	Yes
2.9.3 Operational Req's 2.9.3.1 of the permit	The natural gas transportation contract states that gas provided to LANL will be pipeline quality. Pipeline quality gas contains no more than 2 grains of total sulfur per 100 scf. Fuel oil is checked/analyzed prior to or upon delivery to verify it contains less than or equal to 0.05% sulfur by weight.	I	Yes
2.9.3.2 of the permit	A 365 day rolling total for both natural gas and fuel oil use is maintained and reviewed to verify usage does not exceed 2,000 MMscf and 500,000 gallons respectively. The rolling totals are provided in LANL's semi-annual monitoring report.	I	Yes
2.9.3.3 of the permit	A flow meter is used to measure natural gas flowing to all 3 boilers as a combined total. The flow rate is continually recorded.	I	Yes
2.9.3.4 of the permit	The natural gas transportation contract states that gas provided to LANL will be pipeline quality. Pipeline quality gas contains no more than 2 grains of total sulfur per 100 scf. A 365 day rolling total for natural gas is maintained and reviewed to verify usage does not exceed 646 MMscf. The rolling total is provided in LANL's semi-annual monitoring report.	I	Yes

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Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency Continuous (C) or Intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.9.3.5 of the permit	A volumetric flow meter is used to measure natural gas flowing to the combustion turbine. The flow rate is continually recorded. The flow meter meets both the initial certification requirements and quality assurance requirements specified in this condition.	I	Yes
2.9.3.6 of the permit	The Dry Low Emissions (DLE) control technology is an integral part of the combustion turbine design. The DLE control was evaluated during start-up and determined to be working as designed.	I	Yes
2.9.3.7 of the permit	The combustion turbine is operated at no less than 100% load, except for start-up and shut-down periods. It has been determined that 100% load may vary from 20 to 23 MW.	I	Yes
2.9.3.8 of the permit	An operator log book is used to identify when a boiler was brought on line or taken off line (or standby). It also records the type of fuel the boiler is using. The plant computer monitoring system also has information on boiler start and stop times and duration of use. The combustion turbine hours of operation, including start and stop times, are monitored and recorded each day of turbine operation.	I	Yes
2.9.4 Monitoring Req's 2.9.4.1 of the permit	Data on fuel oil use is electronically collected and calculated as a 365 day rolling total.	I	Yes
2.9.4.2 of the permit	Volumetric flow meters with correctors are in place at the facility to monitor natural gas flow to the boilers. The gas consumption monitored at this meter is electronically collected and is used to calculate a 365 day rolling total.	I	Yes

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Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency Continuous (C) or Intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.9.4.3 of the permit	A volumetric flow meter with corrector is in place at the facility to monitor natural gas flowing to the turbine. The gas consumption data from this meter is collected daily and is used to calculate a 365 day rolling total.	I	Yes
2.9.4.4 & 2.9.4.5 of the permit	No fuel oil deliveries to the plant were made during this compliance certification period. A supplier certification showing sulfur content is required prior to or upon delivery. If the certification is not available, the fuel oil is analyzed to verify it contains less than or equal to 0.05% sulfur by weight.	I	Yes
2.9.4.6 of the permit	The operating load of the combustion turbine is monitored and recorded hourly during normal operations. Start up and shut down times are recorded separately.	I	Yes
2.9.4.7 of the permit	A spreadsheet was developed and is used to perform these calculations when daily gas consumption data and hours of operation are entered. The results are compared to the NOx pound per hour and ton per year limits.	I	Yes
2.9.4.8 of the permit	A spreadsheet was developed and is used to perform these calculations when daily gas consumption data and hours of operation are entered. The results are compared to the CO pound per hour and ton per year limits.	I	Yes
2.9.4.9 of the permit	The calculations in conditions 2.9.4.7 and 2.9.4.8 were performed at least once each calendar quarter since the start of the combustion turbine on September 23, 2007.	I	Yes

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Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency Continuous (C) or Intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.9.4.10 of the permit	On May 1, 2007, from 9:58am to 10:08am, the LANL Power Plant experienced an excess emission with an observed average opacity of 25%. The excess emission occurred during a boiler start-up exercise using fuel oil. During the start-up exercise, operational problems were encountered and the unit was brought down quickly to minimize visible emissions. Written notification was provided to NMED on May 9, 2007. Pipeline quality natural gas fuel is used at the plant, as indicated in the gas transportation contract. Each time a boiler is started on No. 2 fuel oil, or a malfunction occurs while using No. 2 fuel oil, opacity readings are taken. 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. Opacity readings are provided to NMED in the semi-annual monitoring reports.	I	Dev
2.9.4.11of the permit	An initial compliance test for NOx and CO was performed on the combustion turbine within 60 days following the unit achieving maximum normal production. The unit achieved its maximum normal production rate on September 27, 2007, and the compliance test was performed on October 5, 2007. The test report was provided to NMED on October 22, 2007. The test consisted of the EPA test methods identified in this permit condition.	I	Yes

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Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency Continuous (C) or Intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.9.4.12 of the permit	The natural gas used by the combustion turbine meets the definition of natural gas in 60.331(u). The sulfur monitoring requirement is met under 40 CFR 60.334(h)(3)(i), which allows the use of a current and valid transportation contract that specifies the maximum total sulfur content is 20 grains per 100 scf or less. The transportation contract specifies a sulfur content not to exceed 2 grains of total sulfur per 100 scf. A copy of the transportation contract is available at the facility.	I	Yes
2.9.5 Recordkeeping 2.9.5.1 of the permit	Fuel oil use is tracked electronically to provide a monthly record of daily and 365 day rolling totals.	I	Yes
2.9.5.2 of the permit	Daily natural gas consumption is recorded monthly and is used to calculate a 365 day rolling total.	I	Yes
2.9.5.3 of the permit	Daily natural gas consumption is recorded monthly and is used to calculate a 365 day rolling total.	I	Yes
2.9.5.4 of the permit	No fuel oil deliveries were made to the Power Plant during this compliance certification period.	I	Yes
2.9.5.5 of the permit	No fuel oil deliveries were made to the Power Plant during this compliance certification period.	I	Yes
2.9.5.6 of the permit	An hour tracking log is used at the combustion turbine to record start time, stop time, operating hours, and normal hourly operating load.	I	Yes

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Permit Term or Condition Identification No. {1}	Method(s) or other information or other facts used to determine the compliance status {2}	Data Collection Frequency Continuous (C) or Intermittent (I) {3}	In Compliance? If so type a Yes. If not type a Dev and complete table entitled Deviation Reporting (Part 3) {4}
2.9.5.7 of the permit	Records of the measurement and monitoring data required by condition 2.9.4.7 are maintained and available at the facility.	I	Yes
2.9.5.8 of the permit	Records of the measurement and monitoring data required by condition 2.9.4.8 are maintained and available at the facility.	I	Yes
2.9.5.9 of the permit	Quarterly records required by condition 2.9.4.9 are maintain and available at the facility.	I	Yes
2.9.5.10 of the permit	The natural gas transportation contract states that gas provided to LANL will be pipeline quality. Pipeline quality gas contains no more than 2 grains of total sulfur per 100 scf. Fuel oil is checked/analyzed prior to or upon delivery to verify it contains less than or equal to 0.05% sulfur by weight. Daily logs are kept which record the dates and duration of fuel oil use. Opacity readings are taken and recorded on a visible emission observation form when a boiler is initially started on fuel oil, or when a malfunction occurs.	I	Yes
2.9.5.11 of the permit	The initial compliance test report for the combustion turbine is maintained and available at the facility.	I	Yes
2.9.5.12 of the permit	The combustion turbine is in compliance with the record keeping requirements of 40 CFR 60.7 and a copy of the transportation contract is maintained that specifies the maximum total sulfur content is 20 grains per 100 scf or less as required by 40 CFR 60.334(h).	I	Yes

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2.9.6 Reporting 2.9.6.1 of the permit	Emissions and monitoring reports are submitted on a 6-month basis in accordance with permit conditions 4.1 and 4.2. LANL submitted monitoring reports to NMED on February 5, 2007 and August 3, 2007. Emissions reports were submitted to NMED on March 9, 2007 and September 17, 2007.	I	Yes
2.10 Facility Wide Emission Limits			
2.10.1 of the permit	Facility-wide actual emissions are calculated and compared with the facility-wide emission limits twice a year. Emission reports are submitted on a 6-month basis in accordance with permit condition 4.1. LANL submitted emission reports to NMED on March 9, 2007 and September 17, 2007. No emission limits were exceeded during this reporting period.	I	Yes
2.10.2 of the permit	The LANL air quality group has a review process for construction and modification projects. This process identifies projects applicable to 20.2.72 NMAC.	I	Yes
8.0 Stratospheric Ozone			
8.1 Subpart F	A stratospheric ozone protection program is in place at LANL. LANL, through our maintenance subcontractors KSL as well as other outside contractors, use appropriately certified technicians and certified recycling and recovery equipment. KSL as well as other outside contractors are trained and follow LANL procedures to demonstrate that required service practices found in 40 CFR 82.156 (Subpart F) are followed.	I	Yes

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8.2 Subpart B	Motor vehicle air conditioners (MVAC) are serviced at LANL by KSL pursuant to 40 CFR part 82, Subpart B. KSL technicians comply with EPA standards for servicing motor vehicle air conditioners.	I	Yes
8.3 Subpart H	KSL maintains LANL halon systems. KSL technicians comply with the standards for servicing and maintaining equipment containing halons pursuant to 40 CFR Part 82, Subpart H.	I	Yes
9.0 Radionuclide NESHAPs			
9.1 Subpart H – *Emissions of radionuclides other than radon from DOE facilities.*	LANL has a radionuclide NESHAP team that is devoted to compliance with 40 CFR Part 61, Subpart H (Emissions of radionuclides other than radon from DOE facilities). The EPA limit for radionuclide emissions, corresponding to a maximum off-site dose, is 10 millirem per year. The projected emissions from 2007 result in less than 0.5 millirem off-site. This is approximately the same emissions level as measured in 2006. The annual report summarizing 2007 emissions will be issued before June 30, 2008. The 2006 report, designated LA-14339, is available on the ENV-EAQ web site at the following URL. http://int.lanl.gov/environment/air/docs/reports/LA-14339_NoMaps.pdf In 2007, emissions from 26 stacks were continuously monitored. Also, LANL evaluated emissions from over 50 non-monitored sources and operated 18 ambient air monitoring stations to meet Subpart H requirements.	I	Yes

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9.2 Subpart Q – *Emissions of radon from DOE facilities.*	LANL has a radionuclide NESHAP team that is devoted to compliance with 40 CFR Part 61, which includes compliance with Subpart Q (emissions of radon from DOE facilities). LANL operations do not meet the criteria described in Subpart Q which require compliance with this standard. EPA Region 6 has confirmed this with LANL and the NMED at the Title V Open House February 25, 2003.	I	Yes
10.0 Asbestos NESHAP			
10.1 Subpart M	LANL has a program in place to meet the requirements found in the Asbestos NESHAP standard 40 CFR Part 61, Subpart M. LANL provided asbestos notifications as required. NMED routinely performs inspections of asbestos work at LANL.	I	Yes

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Annual Compliance Certification Data Element:

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

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

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

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

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

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

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Deviation Reporting

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

Deviation Summary Report

(PART 4)

Deviation Report — Permit No. P100M2

No	Emission Unit ID	Poll	Applicable Requirement (Include Rule Citation)	Monitoring Method (Include Rule Citation)	Monitoring Frequency	Total # of Deviations
1	TA-3 Power Plant	Opacity	Permit Condition 2.9.4.10.	40 CFR Part 60, Appendix A, Method 9	Upon Start-up or malfunction when using fuel oil.	1
2	Beryllium Activities; TA-35-213	Be	Permit Condition 2.2.3	N/A	N/A	1

	Deviation Started		Deviation Ended				
No	Date	Time	Date	Time	# of Days	Cause of Deviation	Corrective Action Taken
1	5/1/2007	9:58 am	5/1/2007	10:08am	< 1	On May 1, 2007, the Power Plant exceeded the 20% opacity limit as listed in Permit Condition 2.9.4.10. Verbal notification was made to NMED on May 2, 2007, and a written notification was provided to the NMED Air Quality Bureau in a letter dated May 9, 2007. The ten (10) minute average opacity observed during the observation was 25%. This is a deviation from Operating Permit Condition 2.9.4.10, which states that visible emissions shall not equal or exceed 20% opacity. The excess emission occurred during a boiler start-up exercise using fuel oil. During the start-up exercise, operational problems were encountered and the unit	LANL improved the boiler operating procedure to guide boiler operators in performing manual fuel oil burner valve operation and enhance operator training on procedure updates. Additional requirements were put in place to provide close oversight of trainees during the fuel oil light-off evolution.

Deviation Summary Report

(PART 4)

						was brought down quickly to minimize visible emissions. The start-up exercise is performed weekly to verify readiness of the system should the commercial natural gas supply be interrupted. These periodic fuel oil start-up exercises usually result in only minor opacity readings. LANL provided NMED with copies of the opacity reports in the August 3, 2007 Semi-annual Monitoring Report.	
2	3/28/2007	8:53 am	5/10/2007	1:24 pm	* (see note under cause)	On March 28, 2007 an annual HEPA filter test conducted at TA-35-213 failed. After the filter was replaced, a subsequent filter test was conducted on May 3, 2007, resulting in a failed test. On both occasions, NMED was notified within 24 hours. The filter was replaced again and tested on May 10, 2007 and passed. No beryllium operations occurred while the HEPA system was down. * All Beryllium operations were ceased immediately upon HEPA test failure. The final HEPA filter test passed 44 days following the initial failed test.	LANL engineers believe that a pin-hole leak on the HEPA filter media resulted in the failed tests.

Los Alamos
NATIONAL LABORATORY
EST.1943

Environment, Safety, Health and Quality
P. O. Box 1663, MS K491
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JAN 23 2008
AIR QUALITY BUREAU

Date: January 23, 2008
Refer To: ESH&Q-08-006

Ms. Debra McElroy
Section Chief – Enforcement/Compliance
New Mexico Environment Department
Air Quality Bureau
1301 Siler Road
Building B
Santa Fe, New Mexico 87507

SUBJECT: IDEA ID NO. 856 – LOS ALAMOS NATIONAL LABORATORY (LANL) AIR QUALITY TITLE V OPERATING PERMIT P100M2 ANNUAL COMPLIANCE CERTIFICATION REPORT FOR JANUARY– DECEMBER, 2007

Dear Ms. McElroy:

Attached is Los Alamos National Laboratory's Title V Operating Permit Annual Compliance Certification report for the period **January 1 – December 31, 2007**. This submission is required by permit condition 5.1 of NMED Operating Permit P100M2, and is transmitted by January 30th following the reporting period. 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 US EPA Region 6. Two permit deviations are listed in Part 4 of the certification report.

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

Sincerely,

Richard S Watkins

Richard S. Watkins
Associate Director
Environment, Safety, Health & Quality
Los Alamos National Security, LLC

Attachment: a/s