

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



SEP 2 1 2015

Date: Symbol:

ADESH-15-138

LA-UR:

15-26874

Locates Action No.:

N/A

Received

SEP 22 2015

Air Quality Bureau

Compliance Reporting Manager Compliance & Enforcement Section New Mexico Environment Department Air Quality Bureau 1301 Siler Road, Building B Santa Fe, New Mexico 87507-3113

Dear Compliance Reporting Manager:

Subject: Title V Semi-Annual Emissions Report for Permit P100-R1-M3, January 1, 2015 -

February 26, 2015 and Permit P100-R2, February 27, 2015 - June 30, 2015

AI No. 856 - Los Alamos National Laboratory (LANL)

Enclosed is Los Alamos National Laboratory's (LANL) Semi-Annual Emissions report for Permit P100-R1-M3 for the period January 1, 2015 through February 26, 2015 and for Permit P100-R2 for the period February 27, 2015 through June 30, 2015. This report is required by permit condition A109 B and is submitted within 90 days from the end of the reporting period as required by that condition.

The semi-annual emissions report includes actual emissions from permitted sources included in LANL's Operating Permit. In this report, the actual emissions are listed along with the emission limits for ease in comparing and verifying compliance. No annual emission limits were exceeded during this reporting period.

Additionally, this report includes emissions from LANL's stationary standby generators in order to verify compliance with the previous operating permit which was in effect until February 26, 2015.

Please contact Steven L. Story at (505) 665-2169 or <u>story@lanl.gov</u> of the Environmental Compliance Programs (ENV-CP) if you have questions.

Sincerely,

Michael T. Brandt, DrPH, CIH

Associate Director

Environment, Safety & Health



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Sincerely,

Michael T. Brandt, DrPH, CIH

Associate Director

Environment, Safety & Health

MTB:SLS:WW/lm

Enclosure: 1. Title V Semi-Annual Emissions Report for Permit P100-R1-M3, Jan. 1, 2015 – Feb. 26,

2015 and Permit P100-R2, Feb 27, 2015 - Jun 30, 2015

Cy: Hai Shen, EM-SG, (E-File)

Kirsten Laskey, LASO-SUP, (E-File)

Paul David Henry, DIR, (E-File)

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ENV-CP Title V Emissions Report File, J978

Env-correspondence@lanl.gov

Title V Semi-Annual Emission Report for Permit P100-R1-M3

January 1, 2015 – February 26, 2015

and Permit P100-R2

February 27, 2015 – June 30, 2015

Identifying Information		
Source Name: Los Alamos National Laboratory	County: Los Alamo	os .
Source Address: City: Los Alamos	_ State: NM	_ Zip Code: <u>87545</u>
Responsible Official: Michael T. Brandt Technical Contact: Steven L. Story Ph No. (5 Principal Company Product or Business: National Security and Nu		65-8858
Permit No. P100-R1-M3, Jan 1, 2015 - Feb. 26, 2015 [IDEA/Temp	oo ID No. 856} Permit Issued I	Date: April 26, 2013
Permit No. P100-R2, Feb. 27, 2015 – June 30, 2015 {IDEA/Tempo	o ID No. 856} Permit Issued D	ate: Feb, 27, 2015
Certification of Truth, Accuracy, and Comple	eteness	
I, Michael T. Brandt certify that, based on information and belie information in the attached semi-annual emission report are true, ac Signature Title: Associate Director Environmental, Safety, and Health	curate, and complete.	y, the statements and

ENCLOSURE 1

Title V Semi-Annual Emissions Report for Permits
P100-R1-M3
January 1, 2015 – February 26, 2015
and
P100-R2
February 27, 2015 – June 30, 2015

ADESH-15-138

LA-UR-15-26874

Date: SEP 2 1 2015

Title V Semi-Annual Emissions Report Permit P100-R1-M3, January 1, 2015 - February 26, 2015 Permit P100-R2, February 27, 2015 - June 30, 2015

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 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 shall be estimated. The reports shall include a comparison of actual emissions that occured 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 submitted:	Tracking Number:		
x	No	Provide comments and identify any supporting docume	ntation as an attachment.		

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	0.001			50.0
SO ₂	0.000			50.0
PM	0.001			50.0
СО	0.042			30.0
voc	0.001			50.0
HAPs	0.001			No Source Permit Limit

A700 Beryllium Activities

A702 Emission Limits - Beryllium Activities

Source	Beryllium Particulate Matter	Aluminum Particulate Matter
Sigma Facility TA-3-66	10 gm/24 hr	N/A
Beryllium Technology Facility TA-3-141	3.5 gm/yr	N/A
Target Fabrication Facility TA-35-213	0.36 gm/ут	N/A
Plutonium Facility TA-55-PF-4 Machining Operation	2.99 gm/yr	2.99 gm/ут
Plutonium Facility TA-55-PF-4 Foundry Operation	8.73X10 ⁻⁰⁴ gm/ут	8.73X10 ^{-₀4} gm/yr

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 shall be estimated. The reports shall include a comparison of actual emissions that occured 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:	
	Provide comments and identify any supporting	documentation as an attachment.	
Comments: Continued	on the next page		

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)	9.80E-07		Ŀ	10 gm/24 hr
Beryllium Test Facility TA-3-141 ⁽²⁾	Beryllium (grams)	< 0.0033	*		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		< 1.66E-06			
Aluminum Total (ton	is) =	< 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 Test 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 six months of 2015.

A800 External Combustion

A802 Emission Limits - External Combustion

Unit No.	NOx tpy	CO tpy	VOC tpy	SO, 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 shall be estimated. The reports shall include a comparison of actual emissions that occured 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:

 \square

Bollers	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 A) (tons per year)
NOx	12.18			80
SO ₂	0.07			50
TSP	0.98			50
PM-10	0.98			50
со	9.80			80
VOCs	0.70			50
HAPs	0.23			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	0.008			2.9
SO ₂	0.000			0.3
TSP	0.001			0.4
PM-10	0.001			0.4
PM-2.5	0.001			0.4
СО	0.011			4.8
VOCs	0.007			No Source Limit
HAPs	0.001			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	0.008			2.9
SO ₂	0,000			0.3
TSP	0.001			0.4
PM-10	0,001			0.4
PM-2.5	0.001			0.4
со	0.011			4.8
VOCs	0.007			No Source Limit
HAPs	0.001			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	0.008			2.9
SO₂	0.000			0.3
TSP	0.001			0.4
PM-10	0.001			0.4
PM-2.5	0.001			0.4
СО	0.011			4.8
VOCs	0.007			No Source Limit
HAPs	0.001			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	0.000			2.9
SO ₂	0.000			0.3
TSP	0.000			0.4
PM-10	0.000			0.4
PM-2.5	0.000			0.4
со	0.000			4.8
VOCs	0.000			No Source Limit
HAPs	0.000			No Source Limit

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

A800 External Combustion - continued

RLUOB Boilers Totals (Oil)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.000			2.9
SO ₂	0.000			10.4
TSP	0.000			0.5
PM-10	0.000			0.3
PM-2.5	0.000			0.3
СО	0.000			0.9
VOCs	0.000			No Source Limit
HAPs	0.000			No Source Limit

Note: The RLUOB boilers did not operate on fuel oil during the first 6 months of 2015.

RLUOB Boilers Totals (Gas and Oil)	January - June Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.025	14.5
SO ₂	0.000	11.6
TSP	0.004	2.1
PM-10	0.004	1.9
PM-2.5	0.004	1.9
со	0.032	20.1
VOCs	0.021	No Source Limit
HAPs	0.002	No Source Limit

A900 Chemical Usage

A902 Emission Limits - Chemical Usage

Unit No.	VOC/HAPs tpy		
LANL-FW-CHEM	- E		
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 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	Provide comments and identify any supporting documents	nentation as an attachment.	

Chemical Usage LANL-FW-CHEM		January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)
VOCs		5.72			THE R. P. LEWIS CO., LANSING, MICH.
HAPs		2.35			The second second
Individual HAPs greater than 0.5	Glycol Ethers	0.72			Source limits refer to facility-wide limits.
tons	Hydrochloric Acid	0.67			

Chemical Usage CMRR-CHEM	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)
HAPs	0			3.75
VOCs	0			3.75
TAPs	0			No Source Limit

A1000 Degreasers

A1002 Emission Limits - Degreasers

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

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 shall be estimated. The reports shall include a comparison of actual emissions that occured 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.

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	0.003			Source limits refer
HAPs	0,003			to facility-wide limits.

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	PM₁₀ 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	uu l		HH.	**
TA-33-G-3	0.21	0.1	t		 -	1.50
TA-33-G-4	2.33	1.4	0.2	0.16	**	

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 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 Provi	de comments and identify any supporting docume	ntation 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	0.015			18.1
SO ₂	0.000			2.5
TSP	0.000			0.6
PM ₁₀	0.000			0.6
со	0.002			15.2
VOC	0.001			0.3
HAPs	4.36E-06			No Source Limit

Note: The TA-33-G-1P generator only operated for 1.5 hours during the first six months of 2015.

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	0.010			0.21
SO ₂	0.001			Not Required
TSP	0.001			Not Required
PM ₁₀	0.001			Not Required
СО	0.003			0.1
voc	0.001			Not Required
HAPs	3.34E-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	0.000			0.21
SO ₂	0.000			Not Required
TSP	0.000			Not Required
PM ₁₀	0.000			Not Required
со	0.000			0.1
VOC	0.000			Not Required
HAPs	1.35E-08			No Source Limit

Note: The TA-33-G-3 generator only operated for a 0.1 hours during the first six months of 2015,

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	0.647			2.33
SO ₂	0.044			0.16
TSP	0.044			Not Required
PM ₁₀	0.044			Not Required
СО	0.390			1.4
voc	0.051			0.2
HAPs	2.10E-04			No Source Limit

Generator RLUOB-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.217			
SO ₂	0.006			on a Na
TSP	0.013			No Source Specific
PM ₁₀	0.011			Emission Limits for the CMRR
СО	0.268			Generators
voc	0.031			Something
HAPs	5.63E-05			

Generator RLUOB-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.074			
SO₂	0.002			
TSP	0.004			No Source Specific
PM ₁₀	0.004			Emission Limits for the CMRR
co	0.092			Generators
voc	0.010			
HAPs	1.92E-05			

A1100 Internal Combustion- continued

Generator RLUOB-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.202			No Source Specific
SO₂	0.005			
TSP	0.012			
PM ₁₀	0.010			Emission Limits for the CMRR
со	0.250			Generators
voc	0.028			
HAPs	5.24E-05			

Generator TA-48-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.000			
SO ₂	0.000			
TSP	0.000			No Source Specific
PM ₁₀	0.000			Emission Limits for the CMRR
СО	0.000			Generators
VOC	0.000			
HAPs	0.00E+00			L B E L K

Note: The TA-48-GEN-1 generator did not operate during the first six months of 2015.

Generator TA-55-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.000			No Source Specific Emission Limits for the CMRR Generators
SO ₂	0.000			
TSP	0.000			
PM ₁₀	0.000			
со	0.000			
voc	0.000			
HAPs	0.00E+00			

Note: The TA-55-GEN-1 generator did not operate during the first six months of 2015.

Generator TA-55-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.000			
SO ₂	0.000			No Source Specific
TSP	0.000			
PM ₁₀	0.000			Emission Limits for the CMRR
СО	0.000			Generators
VOC	0.000			
HAPs	0.00E+00			

Note: The TA-55-GEN-2 generator did not operate during the first six months of 2015.

A1100 Internal Combustion- continued

Generator TA-55-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits		
NOx	0.148					
SO ₂	0.003			No Source Specific Emission Limits fo		
TSP	0.005					
- PM ₁₀	0.005					
CO	0.032			Generators		
VOC	0.007			Generators		
HAPs	2.70E-05			500000000000000000000000000000000000000		

Stationary Standby Generators	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	2.03			
SO ₂	0.10			No Source Specific Emission Limits for Standby Generators
TSP	0.11			
PM ₁₀	0.11			
со	0.46			
voc	0.11			
HAPs	7.46E-04			De la

Note: The P100-R2 permit does not include this source. However, the standby stationary generators are included in this emissions report because it was a source in the previous permit (P100-R1-M3) which was in effect until February 27, 2015. The emissions from this source will not be added to the facility wide totals.

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 shall be estimated. The reports shall include a comparison of actual emissions that occured 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.

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	0.03			9.9
PM10	0.03			9.9

A1300 TA-3 Power Plant

A1302 Emission Limits - TA-3 Power Plant

All TA-3 Power	r Plant Boilers Con	nbined (TA-33-1, T	A-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

ΓA-3 Power Pla	int Turbine (TA-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 shall be estimated. The reports shall include a comparison of actual emissions that occured during the reporting period with the facility-wide allowable emission limits at Table 106.B.

Yes Date report submitted: Tracking Number:	

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

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	6.11			31.5
SO ₂	0,06			4.9
TSP	0.80			4.7
PM ₁₀	0.80			4.4
PM _{2.5}	0.80			4.2
со	4.21			21.5
VOC	0.58			2.8
HAPs	0.20			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	0.39			59.4
SOx	0.03			4.2
TSP	0.05			4.8
PM ₁₀	0.05			4.8
PM _{2.5}	0.05			4.8
СО	0.08			72.3
voc	0.02			1.5
HAPs	1.07E-02			No Source Limit

A1400 Open Burning

A1402 Emission Limits - Open Burning

Unit No.	Individual HAP ¹ (tpy)	Total HAPs'(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 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 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.

	that occared during	the reporting period with the racin	y-wide unowable emission in	mus at rable 100.D.	
Has this report	ing requirement been n	net during this reporting period with	h a separate reporting submitt	tal? Answer Yes or No below	
	Yes	Date report submitted:		Tracking Number:	
x	No Provide com	ments and identify any supporti	ng documentation as an att	achment.	
Comments: No open burning	g activities took place du	ring the first six months of 2015.			
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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 occured 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 Prov	ide comments and identify any supporting docume	entation as an attachment.	

Pollutant	January - June Emissions (tons)	July - December Emissions (tons)	2015 Annual Emissions (tons)	Facility Wide Permit Limits (Condition A102) (tons per year)
Nitrogen Oxides	20.0			245
Carbon Monoxide	15.2			225
Volatile Organic Carbons	7.1			200
Sulfur Dioxide	0.2			150
Total Particulate Matter	1.9			120
Particulate Matter less than 10 microns	1.9			120
Particulate Matter less than 2.5 microns	0,9			120
Hazardous Air Pollutants	2.8			24