

LA-UR-18-22248

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Title: Title V Semi-Annual Emissions Report for Permit P100-R2M1 July 1, 2017

-December 31, 2017

Author(s): Whetham, Walter Wiley

Intended for: Environmental Regulatory Document

Issued: 2018-03-28 (rev.1)





Environmental Safety & Health Los Alamos National Laboratory PO Box 1663, K491 Los Alamos, New Mexico 87545 (505) 667-4218



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ADESH-18: 020 Symbol:

Date: LA-UR:

MAR 22,6,2018

Locates Action No.:

Mr. Ralph Grubel Compliance & Enforcement Section Chief New Mexico Environment Department Air Quality Bureau 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico 87505-1816

Title V Semi-Annual Emissions Report for Permit P100-R2M1, July 1, 2017 – December

31, 2017 AI No. 856 - Los Alamos National Laboratory (LANL)

Dear Mr. Grubel:

Please find Los Alamos National Laboratory's (LANL) Semi-Annual Emissions report for Permit P100-R2M1 for the period July 1, 2017 through December 31, 2017 (Enclosure 1). 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.

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

Sincerely,

William R. Mairson Associate Director



MAR 2 6 2018

WRM/SLS/WW:am

Enclosure(s) Enclosure 1 Title V Semi-Annual Emissions Report for Permit P100-R2M1, Jul 1, 2017 – Dec 31, 2017

Copy: Adrienne L. Nash, LASO-NS-LP, (E-File)

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EPC-CP Title V Emissions Report File, J978



Version 07.03.08

New Mexico Environment Department Air Quality Bureau **Compliance and Enforcement Section** 1301 Siler Road Building B Santa Fe, NM 87507 Phone (505) 476-4300 Fax (505) 476-4375



NMED USE ONLY						NME	D USE ONLY
DTS	REPORTING	G SUB	MITT	AL FO)RM	Staff	
ТЕМРО						Admin	
PLEASE NOTE: ® - Indicates required field							
SECTION I - GENERAL COM	PANY AND FACILIT	Y INFOR					
A. ® Company Name: U.S. Department of Energy			D. ® Facil Los Alamo	i ty Name: s National La	boratory		
B.1 ® Company Address: P.O. Box 1663				lity Address			
MS J978			Same as Company				
B.2 ® City: Los Alamos	B.3 ® State: B.4 ® Zip: 8 7	5 4 5				E.3 ® State	E.4 ® Zip:
C.1 ® Company Environmental Contact: Taunia S. Van Valkenburg				lity Contact:		F.2 ® Title Air Complia	e: ance Team Leader
C.3 ® Phone Number: C.4 ® Fax Number: 505-665-9827 505-665-8858			F.3 ® Pho 505-665-2	ne Number:		F.4 ® Fax 505-665-8	
C.5 ® Email Address:	000 000 0000		F.5 ® Em	ail Address:		1 000 000 0	
tauniav@lanl.gov G. Responsible Official: (Title V only):	H. Title:		story@lan			I Eav Nu	mhor
G. Responsible Official: (Title V onlv): William R. Mairson H. Title: Associate Director ES&H I. Phone Number: 505-667-4218 J. Fax Number: 505-665-3811							
856 P100-R2M		mit Number: M. Title V Permit Issue Date: N. NSR Permit Numb 2/3/2017 2195				O. N: Vario	SR Permit Issue Date: us
P. Reporting Period: From: 7/1/2017 To:	12/ 31/2017	OR Q. F	Proposed T	est Date:	OR	R. Actual Te	st Date:
SECTION II – TYPE OF SUBMITTAL (check one that applies)							
A. Title V Annual Compliance Certification		Descriptio					
B. Title V Semi-annual Monitoring Report	Permit Condition(s):	Descriptio	n;		*		
C. NSPS Requirement (40CFR60)	Regulation:	Section(s)	:	Description:			
D. MACT Requirement (40CFR63)	Regulation:	Section(s)	:	Descrip	Description:		
E. NMAC Requirement (20.2.xx) or NESHAP Requirement (40CFR61)	Regulation:	Section(s)		Descrip	tion:		
Permit or Notice of Intent	Permit No.⊠: or NOI No.□:	Condition	(s):	Description:			
F. (NOI) Requirement	P100-R2M1	A109 B		Title V S	emi-Annual Er	nissions Rep	ort 7/1/2017-12/31/2017
G. Requirement of an Enforcement Action	NOV No. : or SFO No. : or CD No. : or Other :	Section(s)	:	Descrip	tion:		
SECTION III - PERIODIC EMIS	SIONS TEST NOTI	ICATION	S. TEST	PROTOCO	OLS AND T	EST REPO	ORTS (if applicable)
A. Test Report CMT:		Notification	CMT:				s to be Tested)
T. Initial Compliance D. Test (EPA							
After reasonable inquiry, I	William R. Mairson (name of reporting official)	cert	ify that the	information	in this submit	tal is true, a	ccurate and complete.
® Signature of Reporting Official:	(name of reporting official) ® Title:			® Date	® Responsible O	fficial for Title V	?
Lod Varin	Associate	Director E	5&H 3	-26-18	⊠ Yes		☐ No
Reviewed By					Daviawad		

Title V Semi-Annual Emission Report for Permit P100-R2M1

July 1, 2017 – December 31, 2017

Identifying Information	
Source Name: Los Alamos National Laboratory	County: Los Alamos .
Source Address:	
City: Los Alamos	State: <u>NM</u> Zip Code: <u>87545</u>
Responsible Official: William R. Mairson Technical Contact: Steven L. Story Ph No Principal Company Product or Business: National Security and Permit No. P100-R2M1, July 1, 2017 – Dec. 31, 2017 {IDEA.	. <u>(505) 665-2169</u> Fax No. <u>(505) 665-8858</u> d Nuclear Weapons Research Primary SIC Code: <u>8733</u>
Certification of Truth, Accuracy, and Con	npleteness
I, <u>William R. Mairson</u> certify that, based on information and information in the attached semi-annual emission report are tru	
Signature Command	Date: 3-26-18
Title: Associate Director Environmental Safety and Health	

ENCLOSURE 1

Title V Semi-Annual Emissions Report For Permit P100-R2M1 July 1, 2017 – December 31, 2017

ADESH-18: 020

LA-UR-18-22248

MAR 2 6 2018

Title V Semi-Annual Emissions Report Permit P100-R2M1, July 1, 2017 - December 31, 2017

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 beli	Has this re-	porting requirement	been met during	this reporting period	with a separate reporting	submittal? Answ	ver Yes or No belo
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Yes	Date report submitted:	Tracking Number:

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

Comments:

X

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	0.0019	0.0025	0.004	50.0
SO ₂	0.0007	0.0009	0.002	50.0
PM	0.0011	0.0015	0.003	50.0
СО	0.0662	0.0883	0.155	30.0
voc	0.0013	0.0017	0.003	50.0
HAPs	0,0012	0.0016	0.003	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/yr	N/A
Plutonium Facility TA-55-PF-4 Machining Operation	2.99 gm/yr	2.99 gm/yr
Plutonium Facility TA-55-PF-4 Foundry Operation	8.73X10 ⁻⁰⁴ gm/yr	8.73X10 ^{₀₄} gm/yτ

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 reporting re	quirement been met during this reporting perio	d with a separate reporting submittal? Answer Yes or No below.
☐ Ye	s Date report submitted:	Tracking Number:
X No		porting documentation as an attachment.
Comments: Contin	ued 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)	0.012	0.007	0.019	10 gm/24 hr
Beryllium Technology Facility TA-3-141 ⁽²⁾ Beryllium (grams)		< 0.00407	< 0.00293	< 0.007	3.5 gm/yr
Target Fabrication Facility TA-35-213 ⁽³⁾	Beryllium (grams)	< 0.00944	< 0.009	< 0.018	0.36 gm/yr
Plutonium Facility TA-55-PF4	Beryllium (grams)	< 1.495	< 1.41	< 2.91	2.99 gm/yr
Machining Operation ⁽⁴⁾	Aluminum (grams)	< 1.495	< 1.41	< 2.91	2.99 gm/yr
Plutonium Facility TA-55-PF4	Beryllium (grams)	0	0	0.00	8.73 x 10 ⁻⁴ gm/yr
Foundry Operation ⁽⁵⁾	Aluminum (grams)	0	0	0.00	8.73 x 10 ⁻⁴ gm/yr
Beryllium Total ⁽⁵⁾ (to	ns) =	< 1.66E-06	< 1.57E-06	< 3.23E-06	
Aluminum Total (tor	ns) =	< 1.65E-06	< 1.55E-06	< 3.30E-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 last 6 months of 2017.

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, tpy	TSP tpy	PM₁₀ tpy	PM _{2.5} tpy
RLUOB-BHW-I (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	t been met during th	us reporting period wi	th a separate reporting s	submittal? Answer	Yes or No below.

	Vos	D. 4	Town I. San Normal Services
<u> </u>	y es	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	11.18	8.08	19.3	80
SO ₂	0.07	0.05	0.1	50
TSP	0.90	0.65	1.5	50
PM-10	0.90	0.65	1.5	50
со	8.97	6.41	15.4	80
VOCs	0.64	0.46	1.1	50
HAPs	0.21	0.15	0.4	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	0.0062	0.0053	0.011	2.9
SO₂	0.0001	0.0001	0.0002	0.3
TSP	0.0010	0.0009	0.002	0.4
PM-10	0.0010	0.0009	0.002	0.4
PM-2.5	0.0010	0.0009	0.002	0.4
СО	0.0079	0.0067	0.015	4.8
VOCs	0.0053	0.0045	0.010	No Source Limit
HAPs	3,92E-04	3.32E-04	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	0.0062	0.0053	0.011	2.9
SO₂	0.0001	0.0001	0.0002	0.3
TSP	0.0010	0.0009	0.002	0.4
PM-10	0.0010	0.0009	0.002	0.4
PM-2.5	0.0010	0.0009	0.002	0.4
СО	0,0079	0.0067	0.015	4.8
VOCs	0.0053	0.0045	0.010	No Source Limit
HAPs	3,92E-04	3.32E-04	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	0.0062	0.0053	0.011	2.9
SO ₂	0.0001	0.0001	0.0002	0.3
TSP	0.0010	0.0009	0.002	0.4
PM-10	0.0010	0.0009	0,002	0.4
PM-2.5	0.0010	0.0009	0.002	0.4
СО	0.0079	0.0067	0.015	4.8
VOCs	0.0053	0.0045	0.010	No Source Limit
HAPs	3.92E-04	3.32E-04	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	0.000	0.000	2.9
SO ₂	0.000	0.000	0.000	0.3
TSP	0.000	0.000	0.000	0.4
PM-10	0.000	0.000	0.000	0.4
PM-2.5	0.000	0.000	0.000	0.4
со	0.000	0.000	0.000	4.8
VOCs	0.000	0.000	0.000	No Source Limit
HAPs	0.000	0.000	0.000	No Source Limit

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

A800 External Combustion - continued

RLUOB Bollers Totals (Oil)	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 B) (tons per year)
NOx	0.000	0,000	0.000	2.9
SO ₂	0.000	0,000	0.000	10.4
TSP	0.000	0.000	0.000	0.5
PM-10	0.000	0.000	0.000	0.3
PM-2.5	0.000	0.000	0.000	0.3
со	0.000	0.000	0.000	0.9
VOCs	0.000	0.000	0.000	No Source Limit
HAPs	0.000	0.000	0.000	No Source Limit

Note: The RLUOB boilers did not operate on fuel oil during 2017.

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	0.0186	0.0158	0.034	14.5
SO ₂	0,0004	0.0003	0,001	11.6
TSP	0.0031	0.0026	0.006	2,1
PM-10	0.0031	0.0026	0,006	1.9
PM-2.5	0.0031	0.0026	0.006	1.9
СО	0.0237	0.0201	0.044	20.1
VOCs	0.0160	0.0136	0.030	No Source Limit
HAPs	1.18E-03	9.96E-04	0.002	No Source Limit

A900 Chemical Usage

A902 Emission Limits - Chemical Usage

Unit No.	VOC/HAPs tpy
LANL-FW-CHEM	- 1 · · · · · · · · · · · · · · · · · ·
CMRR-CHEM	3.75

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:	
	X	No Provi	de comments and identify any supporting docume	ntation as an attachment.	

Comments:

Chemical Usage LANL-FW-CHEM		January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)
VOCs		3.94	6,38	10.32	
HAPs		2.53	2,63	5.16	
	Methanol	0.504	0.774	1.28	Source limits refer to facility-wide limits.
Individual HAPs greater than 0.5 tons	Hydrochloric Acid	0.764	0.377	1.14	to radiity-wide iiints.
	Cyanide Compounds	0.510	0.092	0.60	

Chemical Usage CMRR-CHEM	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)
HAPs	0.0029	0.0035	0.0064	3.75
VOCs	0.0000	0.0000	0.0000	3.75
TAPs	0.0128	0.0067	0.0195	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 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 bee	en met during this reporting pe	riod with a separate reporting submittal	? Answer Yes or No below.
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Yes	Date report submitted:	Tracking Number:

No Provide comments and identify any supporting documentation 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	0.0016	0.000	0.0016	Source limits refer	
HAPs	0.0016	0,000	0.0016	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, 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		.e.	65.	\ -
TA-33-G-3	0.21	0.1	/-	:44	9=:	100
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 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	las 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:			
х	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	0.0040	0.000	0.0040	18.1
SO ₂	0.0001	0.000	0.0001	2.5
TSP	0.0001	0.000	0.0001	0.6
PM ₁₀	0.0001	0,000	0.0001	0.6
со	0.0004	0.000	0.0004	15.2
voc	0.0003	0.000	0.0003	0.3
HAPs	1,16E-06	0,000	1.16E-06	No Source Limit

Note: The TA-33-G-1P generator did not operate during the second six months of 2017.

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	0.0009	0.0001	0.0010	0.21
SO ₂	0.0001	0.0000	0.0001	Not Required
TSP	0.0001	0.0000	0.0001	Not Required
PM ₁₀	0.0001	0.0000	0.0001	Not Required
со	0.0003	0.0000	0.0003	0.1
voc	0.0001	0.0000	0.0001	Not Required
HAPs	2.84E-07	2.70E-08	3.11E-07	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	0.0004	0.0001	0.0005	0.21
SO ₂	0.0000	0.0000	0.0000	Not Required
TSP	0.0000	0.0000	0.0000	Not Required
PM ₁₀	0.0000	0.0000	0.0000	Not Required
СО	0.0001	0.0000	0.0001	0.1
voc	0.0000	0.0000	0.0000	Not Required
HAPs	1.35E-07	2.70E-08	1.62E-07	No Source Limit

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	0.000	0.000	0.000	2.33
SO ₂	0.000	0.000	0.000	0.16
TSP	0,000	0.000	0.000	Not Required
PM ₁₀	0.000	0.000	0.000	Not Required
СО	0,000	0.000	0.000	1.4
voc	0.000	0.000	0.000	0.2
HAPs	0.000	0.000	0.000	No Source Limit

Note: The TA-33-G-4 generator did not operate during 2017.

Generator RLUOB-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0,035	0.064	0.099	
SO₂	0.001	0.002	0.003	
TSP	0.002	0.004	0.006	No Source Specific
PM ₁₀	0.002	0.003	0.005	Emission Limits for the CMRR
со	0.044	0.079	0.123	Generators
voc	0.005	0.009	0.014	
HAPs	9.17E-06	1,66E-05	2,58E-05	

Generator RLUOB-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.045	0.084	0.129	
SO ₂	0.001	0.002	0.003	
TSP	0.003	0.005	0.008	No Source Specific
PM ₁₀	0.002	0.004	0.006	Emission Limits for the CMRR
со	0.056	0.104	0.160	Generators
voc	0.006	0.012	0.018	1
HAPs	1.18E-05	2.18E-05	0.000	

A1100 Internal Combustion- continued

Generator RLUOB-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0,034	0.035	0.069	
SO ₂	0.001	0.001	0.002	
TSP	0.002	0.002	0.004	No Source Specific
PM ₁₀	0.002	0.002	0.004	Emission Limits for the CMRR
СО	0.042	0.044	0.086	Generators
voc	0.005	0.005	0.010	
HAPs	8.73E-06	9.17E-06	1.79E-05	

Generator TA-48-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.000	0.000	0.000	
SO ₂	0.000	0.000	0.000	
TSP	0.000	0.000	0.000	No Source Specific
PM ₁₀	0.000	0.000	0.000	Emission Limits for the TA-48
со	0.000	0.000	0.000	Generator
voc	0.000	0.000	0.000	
HAPs	0.000	0.000	0.000	

Note: The TA-48-GEN-1 generator did not operate during 2017.

Generator TA-55-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.000	0.0010	0.0010	
SO ₂	0.000	0.0001	0.0001	
TSP	0.000	0.0001	0.0001	No Source Specific
PM ₁₀	0.000	0.0001	0.0001	Emission Limits for the TA-55
со	0.000	0.0002	0.0002	Generators
voc	0.000	0.0001	0.0001	
HAPs	0.000	2.43E-07	2,43E-07	

Note: The TA-55-GEN-1 generator did not operate during the first six months of 2017.

Generator TA-55-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0,000	0.000	0.000	
SO ₂	0.000	0.000	0.000	
TSP	0.000	0.000	0.000	No Source Specific
PM ₁₀	0.000	0.000	0.000	Emission Limits for the TA-55
со	0.000	0.000	0.000	Generators
voc	0.000	0.000	0.000	1
HAPs	0.000	0.000	0.000	

Note: The TA-55-GEN-2 generator did not operate during 2017.

A1100 Internal Combustion- continued

Generator TA-55-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.102	0.072	0,17	
SO ₂	0,002	0.001	0.003	
TSP	0.003	0.002	0.01	No Source Specific Emission Limits for
PM ₁₀	0.003	0.002	0.01	the TA-55
СО	0.022	0.016	0.04	Generators
voc	0.005	0.002	0.01	
HAPs	1.86E-05	1.31E-05	3.17E-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:

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	0.22	0.21	0.43	9.9	
PM10	0.20	0.18	0.38	9.9	

A1300 TA-3 Power Plant

A1302 Emission Limits - TA-3 Power Plant

All TA-3 Power Plant Boilers Combined (TA-33-1, TA-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 Plant 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 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 t	his reportin	ig requirement	been met d	uring t	his report	ling period	with a separ	rate reporting	submittal?	Answer	Yes or No b	elow.
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	OF THE PARTY OF TH
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	5.62	4.21	9.8	31.5
SO ₂	0.06	0.05	0.1	4.9
TSP	0.74	0.55	1.3	4.7
PM ₁₀	0.74	0.55	1.3	4.4
PM _{2.5}	0.74	0.55	1.3	4.2
со	3.88	2.90	6.8	21.5
VOC	0.53	0.40	0.9	2.8
HAPs	0.18	0.14	0.3	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	0.864	0.429	1.29	59.4
SOx	0,060	0,030	0,09	4.2
TSP	0.116	0.058	0.17	4.8
PM ₁₀	0.116	0.058	0,17	4.8
PM _{2.5}	0,116	0.058	0.17	4.8
СО	0.180	0.089	0.27	72.3
voc	0.038	0.019	0.06	1.5
HAPs	0.024	0.012	0.04	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 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.

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 requ	uirement been met during this reporting period	with a separate reporting submitta	l? Answer Yes or No below,			
Yes	Date report submitted:		Tracking Number:			
X No	Provide comments and identify any supp	orting documentation as an atta	chment.			
Comments: No open burning activit	ies took place during 2017.					

A1500 Evaporative Sprayers

A1502 Emission Limits - Evaporative Sprayers

Unit No.	HAPs tpy
TA-60-EVAP-1	
TA-60-EVAP-2	
TA-60-EVAP-3	!
TA-60-EVAP-4	
TA-60-EVAP-5	**1

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 B111,

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 docu	mentation 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	7.14E-10	1.11E-09	1.83E-09	
Chloroform	3.28E-06	5.12E-06	8.40E-06	
Chloromethane	2.25E-06	3,51E-06	5.75E-06	
Bromoform	2.90E-06	4.52E-06	7.42E-06	Source limits refer to facility-wide limits.
Cyanide Compounds	6.67E-06	1.04E-05	1,71E-05	to racinty-wide limits.
Manganese Compounds	2.41E-05	3.76E-05	6,17E-05	
Antimony Compounds	1.14E-05	1,78E-05	2.92E-05	
TOTAL HAPs	5.06E-05	7.90E-05	1.30E-04	

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	3.26E-10	9.38E-10	1.26E-09	
Chloroform	1.50E-06	4,31E-06	5,80E-06	
Chloromethane	1.03E-06	2.95E-06	3.98E-06	
Bromoform	1,32E-06	3,81E-06	5,13E-06	Source limits refer
Cyanide Compounds	3.04E-06	8.76E-06	1.18E-05	to facility-wide limits
Manganese Compounds	1.10E-05	3.17E-05	4.27E-05	
Antimony Compounds	5.20E-06	1.50E-05	2.02E-05	
TOTAL HAPs	2.31E-05	6.64E-05	8.95E-05	

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	6.61E-10	5.00E-10	1.16E-09	
Chloroform	3.04E-06	2.30E-06	5.33E-06	
Chloromethane	2,08E-06	1.57E-06	3.65E-06	
Bromoform	2.69E-06	2.03E-06	4.71E-06	Source limits refer to facility-wide limits.
Cyanide Compounds	6.18E-06	4.67E-06	1.08E-05	to racility-wide iirilits.
Manganese Compounds	2.23E-05	1.69E-05	3,92E-05	
Antimony Compounds	1,06E-05	7.98E-06	1.85E-05	
TOTAL HAPs	4.69E-05	3.54E-05	8.23E-05	

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	0.000	0.000	0.000	
Chloroform	0.000	0,000	0.000	
Chloromethane	0.000	0.000	0.000	
Bromoform	0.000	0,000	0.000	Source limits refer to facility-wide limits.
Cyanide Compounds	0.000	0.000	0.000	To racility-wide limits.
Manganese Compounds	0.000	0.000	0.000	
Antimony Compounds	0.000	0.000	0.000	
TOTAL HAPs	0.000	0.000	0.000	

Note: The TA-60-EVAP-4 evaporative sprayer has not been installed.

Evaporative Sprayer TA-60-EVAP-5	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychorinated biphenyls	0.000	0.000	0.000	
Chloroform	0.000	0.000	0.000	
Chloromethane	0.000	0.000	0.000	
Bromoform	0.000	0.000	0.000	Source limits refer
Cyanide Compounds	0.000	0.000	0.000	to facility-wide limits
Manganese Compounds	0,000	0.000	0.000	
Antimony Compounds	0,000	0.000	0.000	
TOTAL HAPs	0.000	0.000	0.000	

Note: The TA-60-EVAP-5 evaporative sprayer has not been installed.

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 _{2.5})	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	s reporting period with a s	separate reporting submittal?	Answer Yes or No below.
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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)	2017 Annual Emissions (tons)	Facility Wide Permit Limits (Condition A102) (tons per year)
Nitrogen Oxides	17.89	12.97	30.9	245
Carbon Monoxide	13.26	9.73	23.0	225
Volatile Organic Carbons	5.17	7.29	12.5	200
Sulfur Dioxide	0.19	0.13	0.3	150
Total Particulate Matter	1.98	1.48	3.5	120
Particulate Matter less than 10 microns	1.96	1.46	3.4	120
Particulate Matter less than 2.5 microns	0.86	0.61	1.5	120
Hazardous Air Pollutants	2.95	2.93	5,9	24