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Title: IDEA ID No. 856 – Los Alamos National Laboratory, Permit #2195,
Exemption Notice for Thirty Small Fuel-Burning Units

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**Environment, Safety, Health, Quality, Safeguards,
 and Security (ESHQSS)**

Symbol: ESHQSS: 21-022
LAUR: 21-24382
Date: **MAY 13 2021**

Mr. Ted Schooley
 Permitting Section Chief
 New Mexico Environment Department, Air Quality Bureau
 525 Camino de los Marquez, Suite 1
 Santa Fe, NM 87505-1816

**Subject: IDEA ID No. 856 – Los Alamos National Laboratory, Permit #2195, Exemption
 Notice for Thirty Small Fuel-Burning Units**

Dear Mr. Schooley:

In accordance with the requirements of 20.2.72 NMAC Section 219 A.1.e for administrative permit revisions, Los Alamos National Laboratory (LANL) is providing notification to incorporate thirty (30) exempt sources as defined in Section 202.B.1.a.

The applicable exemption is Section 202.B.1(a) which states:

Fuel burning equipment which is used solely for heating buildings for personal comfort or for producing hot water for personal use and which:

- (a) *Uses gaseous fuel and has a design rate less than or equal to five (5) million BTU per hour.*

We request these exempt units be placed on the Air Quality Permit #2195 as an administrative revision (2195 R-84). If you have any questions, please feel free to contact Marjorie Stockton (Triad) at (505) 665-3289.

These small boilers and heaters will be included in our small boiler pool, and emissions from these units will be included in our emissions reporting for small boilers, and subject to emission limits in Table 802.A of our Title V Operating Permit P100-R2M4.

The exempt units are listed in the following table. The listed units all use pipeline quality natural gas as fuel and have a design rate of less than five (5) million BTU per hour.

New Exempt Fuel Burning Units at Los Alamos National Laboratory

Description	Make	Model No.	Capacity (MMbtu/hr)	Serial No.	Location	Replacement
Gas-Fired Heater	Re-Verber Ray	DR 30 NFS-2 120V	0.03	1910mech19 9179 0002	TA-60-0001	No



Description	Make	Model No.	Capacity (MMbtu/hr)	Serial No.	Location	Replacement
Gas-Fired Heater	Re-Verber Ray	DR 30 NFS-2 120V	0.03	1911MECH2 01281 0001	TA-60-0001	No
Gas-Fired Heater	Re-Verber Ray	DR 160 NFS-2 120V	0.16	1911MECH2 01281 0003	TA-60-0001	No
Gas-Fired HVAC	Trane	YHC060F4R	0.12	202315296L	TA-35-0455	No
Gas-Fired HVAC	Trane	YHH240G4R	0.25	202410961D	TA-35-0455	No
Gas-Fired HVAC	Trane	YCD480B4T	0.8	C20G04739	TA-03-0102	No
Gas-Fired HVAC	Trane	YCD480B4T	0.8	C20G04740	TA-03-0102	No
Gas-Fired HVAC	Trane	CSAA035UBL 00	0.546	K20H28801	TA-16-0202	No
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070 108	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070 085	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070 102	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070 106	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070 111	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070 104	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070 089	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDBP-225	0.225	BT13062074 692	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDBP-225	0.225	BT13062074 691	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-150	0.15	BTH3062068 169	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-200	0.2	BTH3062054 943	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-300	0.3	BT13062073 134	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-300	0.3	BT13062073 123	TA-53-0002	Yes

Description	Make	Model No.	Capacity (MMbtu/hr)	Serial No.	Location	Replacement
Gas-Fired Furnace	HEIL	G80CTL1352 422	0.132	A202829429	TA-53-0014	Yes
Gas-Fired Furnace	HEIL	G80CTL1352 422	0.132	A202929685	TA-53-0014	Yes
Gas-Fired Furnace	HEIL	G80CTL1352 422	0.132	A202929679	TA-53-0014	Yes
Gas-Fired Furnace	HEIL	G80CTL1352 422	0.132	A202829424	TA-53-0014	Yes
Gas-Fired HVAC	Trane	SFHLLF254P	0.35	C20H05576	TA-16-0202	Yes
Gas-Fired HVAC	Trane	SFHLLF204P	0.35	C20H05577	TA-16-0202	Yes
Gas-Fired Boiler	Aerco Benchmark	BMK 3000 GWBF3	3.0	G-20-0415	TA-35-0002	Yes
Gas-Fired Heater	Reznor	NX250	0.25	BTK3062317 661	TA-53-0019	Yes
Gas-Fired Heater	Reznor	UDAP-30	0.03	BTL3062331 075	TA-53-0315	Yes

In accordance with Section 203.A.12, I hereby certify on behalf of LANL that the information submitted in this notification is as complete, true, and accurate as possible, to the best of my personal knowledge.

Sincerely,



Taunia Van Valkenburg
Group Leader

Attachment(s): Attachment 1 Air Quality Administrative Revision for Thirty Small Fuel-Burning Units

Copy: Adrienne L. Nash, NA-LA, adrienne.nash@nnsa.doe.gov
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Triad, EPC-CP Permit Application File

Permitting Administrative Multi-Form

Use for NSR administrative permit revisions (including GCPs), TV administrative amendments, TV responsible official notifications, and other submittals required by a permit condition. Refer to Section 4 for instructions, acronyms, and mailing addresses.

For Department use only:		For Department use only:
Reviewed by:		Received Date
Permit revision number:		
Date:		
<input type="checkbox"/> Approved <input type="checkbox"/> Completed <input type="checkbox"/> Denied		

Section 1: General Information – Required for All Submittals

1	Facility Name: Los Alamos National Laboratory		
2	Preparer/Consultant Name: Vincent A. Carretti	Title: Environmental Professional – Air Quality	
3	Email: vcarretti@lanl.gov	Phone: (505) 665-1658	
4	Address: P.O. Box 1663, MS J978, Los Alamos, NM 87545		
5	Air Permit Contact: Marjorie B. Stockton	Title: Acting Meteorology & Air Quality Team Leader	
6	Email: mstockton@lanl.gov	Phone: (505) 665-3289	
7	Address: P.O. Box 1663, MS J978, Los Alamos, NM 87545		
8	Check all boxes below for which this submittal applies:	AI #: 856	Permit #: 2195
	<input checked="" type="checkbox"/> NSR Construction Permit (20.2.72 NMAC) <input type="checkbox"/> TV Operating Permit (20.2.70 NMAC)	<input type="checkbox"/> NOI (20.2.73 NMAC) (Sections 2-B, 2-D) <input checked="" type="checkbox"/> Notice of Exemption (20.2.72.202.B NMAC) (Section 2-F)	<input type="checkbox"/> PSD Permit (20.2.74 NMAC) <input type="checkbox"/> Nonattainment Permit (20.2.79 NMAC)

Section 2: Details of Submittal

Only print and submit the pages necessary for your submittal. Print double sided head-to-toe, flip on short end (tablet). The Permit Section responds to all TV Administrative amendments and responds only to denials of NSR administrative revisions. Courier proof of delivery is required if you want confirmation that the Department received this submittal. Check the box(es) applicable to this submittal:

- | | |
|---|--|
| <input type="checkbox"/> 2-A(i) & 2-A(ii): Identical Engine or Turbine Replacements
<input type="checkbox"/> 2-B: Owner, Operator, and Name Changes to NOIs or Construction Permits
<input type="checkbox"/> 2-C: Ownership or Operational Control Changes for Title V Permits
<input type="checkbox"/> 2-D: Closing a Facility or Removing Units from a Permit or Canceling an NOI
<input type="checkbox"/> 2-E: Correct Typographical Error | <input checked="" type="checkbox"/> 2-F: Reporting Exempt Equipment for Minor Construction Permits or for No Permit Required (NPR) Facilities
<input type="checkbox"/> 2-G: Add Minor NSR Exempt Equipment to Construction Permits for PSD or Nonattainment Sources
<input type="checkbox"/> 2-H: Title V Responsible Official Designations
<input type="checkbox"/> 2-I: Submittals to the Permit Programs Manager |
|---|--|

[Section 3: Certification – Required for All Changes](#)

[Section 4: Form Instructions](#)

Section 2-F: Reporting Exempt Equipment for Minor Construction Permits or for No Permit Required (NPR) Facilities

Certain equipment can be added to minor construction permits as exempt equipment under 20.2.72.202.B NMAC as an administrative permit revision. (This exemption does not apply to facilities subject to 20.2.70 NMAC (TV), 20.2.74 NMAC (PSD), or 20.2.79 NMAC Nonattainment Sources. In those cases, use Section 2-G of this form.)

Construction permit Part 72 exemptions are not the same as operating permit TV insignificant activities (20.2.70.7.Q NMAC). If you have a TV permit and want to claim [Title V insignificant activities](#), they may be required to have authorization through a construction permit. Only the insignificant activities that meet the requirements of 20.2.72.202.B NMAC may be added using this form for an administrative permit revision.

The Potential to Emit (PTE) of regulated air contaminants from minor permit exempt equipment count toward the facility's total emissions under the PSD, nonattainment, and TV regulations therefore, the addition of equipment using this form could possibly result in the facility becoming PSD, Nonattainment, or TV major.

Check the box(es) to indicate if your facility has a permit or is a no permit required (NPR) facility, check the box(es) for the equipment being added, and complete the table(s), if applicable. Include attachments as required.

Administrative Revision: This facility has a minor construction permit as designated in Section 1 of this application. This form is being submitted to add a piece(s) of equipment that qualifies as exempt under 20.2.72.202.B NMAC.

or

Notice of Exemption: This facility does not require a 20.2.72 NMAC permit, so it is designated as a no permit required (NPR) facility. This exemption form is being submitted to record that this equipment qualifies as exempt under 20.2.72.202.B NMAC. (This exemption does not apply to (cannot be added to) NOI (20.2.73 NMAC), TV (20.2.70 NMAC), PSD (20.2.74 NMAC), or nonattainment (20.2.79 NMAC) facilities.)

AQB used to require either the Notice of Exemption Form or Exemption Application Form for these facilities. This form replaces both of those forms.

Only fill out the information in this table if your facility is an NPR facility, we already have the information for permitted sites.

Facility Name:	Plant primary SIC Code (4 digits):
	Plant NAICS code (6 digits):
Facility Street Address (If no facility street address, provide directions from a prominent landmark):	
Company Name:	Phone:
Company Mailing Address:	
Air Contact:	Title:
Email:	Phone:

The facility is: <input type="text"/> (distance) miles <input type="text"/> (direction) of <input type="text"/> (nearest New Mexico town or tribal community).	Zip Code:	County:
Status of land (check one): <input type="checkbox"/> Private <input type="checkbox"/> Indian/Pueblo <input type="checkbox"/> Federal BLM <input type="checkbox"/> Federal Forest Service <input type="checkbox"/> State Land <input type="checkbox"/> Bernalillo County		

Section 2-F: Reporting Exempt Equipment for Minor Construction Permits or for No Permit Required (NPR) Facilities, continued

Minor Construction Permit (Part 72) or NPR Exempt Equipment

The equipment checked in this section meets the requirements of the exemption in 20.2.72.202 NMAC, will comply with all applicable federal requirements in 40 CFR Part 60 (NSPS) or 40 CFR Part 63 (MACT), and appropriate records will be created and retained for two (2) years (or five (5) years if a TV source):

Standby Generators

Standby generators which are operated only during the unavoidable loss of commercial utility power and less than 500 hours per year. (20.2.72.202.B(3) NMAC). Potentially applicable federal regulations: 40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subparts JJJJ or IIII. Emission rates from emergency standby generators should be calculated assuming operation throughout the year (i.e., 8760 hours per year) to verify that it does not make your facility PSD, Nonattainment, or TV major.

Standby Generator Manufacturer	Serial Number	Date of Manufacture	Date of Installation ¹	Capacity (hp)
Name of commercial power provider ² :				

¹ Date of installation is the date the engine is placed and secured at the location where it is intended to be operated.

² Commercial power is purchased from a utility company, which specifically does not include power generated on-site for the sole purpose of the user.

Abrasive Blasting

Enclosed abrasive blasting operations; if no visible emissions from the building. (20.2.72.202.B(7) NMAC). Potentially applicable federal regulations: 40 CFR 63 Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. More information: www.env.nm.gov/air-quality/ind-sector-info/.

Surface Coating

Surface coating of equipment, including spray painting, roll coating, and painting with aerosol spray cans and all coating and clean-up solvent; if VOCs from paints and solvents do not exceed ten (10) pounds per hour and two (2) tons per year. (20.2.72.202.B(6) NMAC). Potentially applicable federal regulations (more information: www.env.nm.gov/air-quality/ind-sector-info/):

40 CFR 63 Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources or

40 CFR 63 Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

Volatile Organic Compound (VOC) Handling and or Storage

VOC emissions resulting from the handling or storing of any VOC emission source; if vapor pressure is less than two tenths (0.2) PSI at the storage and handling temperatures. (20.2.72.202.B(2) NMAC).

Fuel Burning Equipment

☒ Fuel burning equipment used solely for heating buildings for personal comfort or producing hot water for personal use; if gaseous or liquid fuel and rated 5 MMBtu or less, or if distillate oil and 1 MMBtu or less. (20.2.72.202.B(1) NMAC).

See table below:

Description	Make	Model No.	Capacity (MMbtu/hr)	Serial No.	Location	Replacement
Gas-Fired Heater	Re-Verber Ray	DR 30 NFS-2 120V	0.03	1910mech199179 0002	TA-60-0001	No
Gas-Fired Heater	Re-Verber Ray	DR 30 NFS-2 120V	0.03	1911MECH201281 0001	TA-60-0001	No
Gas-Fired Heater	Re-Verber Ray	DR 160 NFS-2 120V	0.16	1911MECH201281 0003	TA-60-0001	No
Gas-Fired HVAC	Trane	YHC060F4R	0.12	202315296L	TA-35-0455	No
Gas-Fired HVAC	Trane	YHH240G4R	0.25	202410961D	TA-35-0455	No
Gas-Fired HVAC	Trane	YCD480B4T	0.8	C20G04739	TA-03-0102	No
Gas-Fired HVAC	Trane	YCD480B4T	0.8	C20G04740	TA-03-0102	No
Gas-Fired HVAC	Trane	CSAA035UBL00	0.546	K20H28801	TA-16-0202	No
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070108	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070085	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070102	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070106	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070111	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070104	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-75	0.075	BT13062070089	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDBP-225	0.225	BT13062074692	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDBP-225	0.225	BT13062074691	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-150	0.15	BTH3062068169	TA-53-0002	Yes

Description	Make	Model No.	Capacity (MMbtu/hr)	Serial No.	Location	Replacement
Gas-Fired Heater	Reznor	UDAP-200	0.2	BTH3062054943	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-300	0.3	BT13062073134	TA-53-0002	Yes
Gas-Fired Heater	Reznor	UDAP-300	0.3	BT13062073123	TA-53-0002	Yes
Gas-Fired Furnace	HEIL	G80CTL1352422	0.132	A202829429	TA-53-0014	Yes
Gas-Fired Furnace	HEIL	G80CTL1352422	0.132	A202929685	TA-53-0014	Yes
Gas-Fired Furnace	HEIL	G80CTL1352422	0.132	A202929679	TA-53-0014	Yes
Gas-Fired Furnace	HEIL	G80CTL1352422	0.132	A202829424	TA-53-0014	Yes
Gas-Fired HVAC	Trane	SFHLF254P	0.35	C20H05576	TA-16-0202	Yes
Gas-Fired HVAC	Trane	SFHLF204P	0.35	C20H05577	TA-16-0202	Yes
Gas-Fired Boiler	Aerco Benchmark	BMK 3000 GWBF3	3.0	G-20-0415	TA-35-0002	Yes
Gas-Fired Heater	Reznor	NX250	0.25	BTK3062317661	TA-53-0019	Yes
Gas-Fired Heater	Reznor	UDAP-30	0.03	BTL3062331075	TA-53-0315	Yes

Repositioning Sources at Plant

Repositioning or relocating sources of air emissions or emissions points within the plant site, but only when such change in physical configuration does not increase air emissions or the ambient impacts. (20.2.72.B(4) NMAC). Attach an updated plot plan. Permittees must ensure that relocation of any emissions source within the plant site does **not** increase the ambient impact and will not result in an exceedance of any National Ambient Air Quality Standard (NAAQS), New Mexico Ambient Air Quality Standard (NMAAQs), or PSD Increment. If not sure, please contact the Modeling Section Manager (505-476-4300).

Emissions Exempted Based on Quantity

Any emissions unit, operation, or activity that has the potential to emit no more than one-half (1/2) ton per year of any regulated new source review pollutant. Units, operations, or activities of similar function shall be combined when calculating the emission rate. (20.2.72.202.B(5) NMAC).

Unit Description	Serial Number	Capacity (size)	Regulated Pollutants Emitted ³	PER ⁴ tpy

³ Particulate Matter (PM, PM₁₀, PM_{2.5}); Sulfur Dioxide (SO₂); Carbon Monoxide (CO); Nitrogen Dioxide (NO₂); Hydrogen Sulfide (H₂S); Lead (Pb); Total Reduced Sulfur; and Volatile Organic Compounds (VOC).

⁴ Potential emission rate, as defined in 20.2.72 NMAC. The PER is the worst-case emission rate of the facility without controls or other limitations (unless the controls or limitations are federally enforceable) and as if the facility were operating continuously 8760 hours per year (24 hour/day, 365 days/year).

Section 3: Certification – Required for All Submittals

Company Name: Triad National Security, LLC

I, Taunia S. Van Valkenburg, hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 13 day of May, 2021, upon my oath or affirmation, before a notary of the State of New Mexico.


Signature¹

May 13, 2021
Date

Taunia S. Van Valkenburg
Printed Name

Group Leader
Title

Scribed and sworn before me on this 13 day of May, 2021.

My authorization as a notary of the State of New Mexico expires on the 12 day of June, 2023.


Notary's Signature

May 13, 2021
Date

Barbara J. Bushong
Notary's Printed Name

¹ For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AE NMAC:

