

# LA-UR-23-21735

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**Title:** Semi-Annual Emissions Report for Los Alamos National Laboratory, AI No. 856, Title V Operating Permit P100-R2M4 for July 1 - December 31, 2022

**Author(s):** Whetham, Walter Wiley

**Intended for:** Environmental Regulatory Document  
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**Symbol:** EPC-DO: 23-075

**LA-UR:** 23-21735

**Locates Action No.:** N/A

**Date:** **MAR 27 2023**

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

**Subject: Semi-Annual Emissions Report for Los Alamos National Laboratory, AI No. 856, Title V Operating Permit P100-R2M4 for July 1 – December 31, 2022**

Dear Mr. Schleman:

Please find Los Alamos National Laboratory's (LANL) Semi-Annual Emissions report for Operating Permit P100-R2M4 for the period July 1, 2022, through December 31, 2022 (*Attachment 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, actual emissions are listed along with emission limits for ease in comparing and verifying compliance. No emission limits were exceeded during this reporting period.

If you have any questions or comments regarding this submittal or would like to discuss the submittal in greater detail, please contact Karen Armijo at (505) 665-7314 or Walt Whetham at (505) 695-8056.

Sincerely,

**JENNIFER PAYNE (Affiliate)**

Digitally signed by JENNIFER PAYNE (Affiliate)  
Date: 2023.03.03 12:39:20 -07'00'

Jennifer E. Payne  
Division Leader  
Environmental Protection and Compliance  
Triad National Security, LLC  
Los Alamos National Laboratory

Sincerely,

**THEODORE WYKA**

Digitally signed by THEODORE WYKA  
Date: 2023.03.27 12:42:41 -08'00'

Theodore A. Wyka  
Manager, Los Alamos Field Office  
National Nuclear Security Administration  
U.S. Department of Energy  
Los Alamos Field Office

Attachment(s): Attachment 1 Semi-Annual Emissions Report for Los Alamos National Laboratory, AI  
No. 856, Title V Operating Permit P100-R2M4 for July 1 – December 31, 2022

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Version 07.20.18

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## REPORTING SUBMITTAL FORM

<b>NMED USE ONLY</b>	
Staff	
Admin	

PLEASE NOTE: ® - Indicates required field

<b>SECTION I - GENERAL COMPANY AND FACILITY INFORMATION</b>					
<b>A. ® Company Name:</b> Department of Energy, National Nuclear Security Administration			<b>D. ® Facility Name:</b> Los Alamos National Laboratory		
<b>B.1 ® Company Address:</b> 3747 West Jemez Road			<b>E.1 ® Facility Address:</b> P.O. Box 1663 MS J978		
<b>B.2 ® City:</b> Los Alamos	<b>B.3 ® State:</b> NM	<b>B.4 ® Zip:</b> 8 7 5 4 4	<b>E.2 ® City:</b> Los Alamos	<b>E.3 ® State:</b> NM	<b>E.4 ® Zip:</b> 87545
<b>C.1 ® Company Environmental Contact:</b> Karen E. Armijo		<b>C.2 ® Title:</b> Program Manager		<b>F.1 ® Facility Contact:</b> Marjorie B. Stockton	
<b>C.3 ® Phone Number:</b> (505) 865-7314		<b>C.4 ® Fax Number:</b> NA		<b>F.2 ® Title:</b> Meteorology & Air Quality Team Leader	
<b>C.5 ® Email Address:</b> karen.armijo@nnsa.doe.gov			<b>F.3 ® Phone Number:</b> (505) 695-4508		
<b>G. Responsible Official: (Title V only):</b> Theodore A. Wyka			<b>H. Title:</b> Manager		<b>F.4 ® Fax Number:</b> NA
<b>K. ® AI Number:</b> 856		<b>L. Title V Permit Number:</b> P100-R2M4		<b>M. Title V Permit Issue Date:</b> July 18, 2019	<b>N. NSR Permit Number:</b> 2195
<b>O. NSR Permit Issue Date:</b> Various					
<b>P. Reporting Period:</b> From: July 1, 2022 To: December 31, 2022					

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

<b>SECTION II – TYPE OF SUBMITTAL (check one that applies)</b>				
<input type="checkbox"/>	<b>Title V Annual Compliance Certification</b>	<b>Permit Condition(s):</b>	<b>Description:</b>	
<input type="checkbox"/>	<b>Title V Semi-Annual Monitoring Report</b>	<b>Permit Condition(s):</b>	<b>Description:</b>	
<input type="checkbox"/>	<b>NSPS Requirement (40CFR60)</b>	<b>Regulation:</b>	<b>Section(s):</b>	<b>Description:</b>
<input type="checkbox"/>	<b>MACT Requirement (40CFR63)</b>	<b>Regulation:</b>	<b>Section(s):</b>	<b>Description:</b>
<input type="checkbox"/>	<b>NMAC Requirement (20.2.xx) or NESHAP Requirement (40CFR61)</b>	<b>Regulation:</b>	<b>Section(s):</b>	<b>Description:</b>
<input checked="" type="checkbox"/>	<b>Permit or Notice of Intent (NOI) Requirement</b>	<b>Permit No. <input checked="" type="checkbox"/> or NOI No. <input type="checkbox"/></b> P100R2M4	<b>Condition(s):</b> A109 B	<b>Description:</b> Title V Semi-Annual Emissions Report 7/1/2022-12/31/2022
<input type="checkbox"/>	<b>Requirement of an Enforcement Action</b>	<b>NOV No. <input type="checkbox"/> or SFO No. <input type="checkbox"/></b> <b>or CD No. <input type="checkbox"/> or Other <input type="checkbox"/></b>	<b>Section(s):</b>	<b>Description:</b>

<b>SECTION III - CERTIFICATION</b>			
After reasonable inquiry, I <u>Theodore A. Wyka</u> certify that the information in this submittal is true, accurate and complete. <small>(Name of Certifier)</small>			
<b>® Signature of Certifier:</b> <b>THEODORE WYKA</b>	<small>Digitally signed by THEODORE WYKA Date: 2023.03.27 12:43:33 -06'00'</small>	<b>® Title:</b> <b>Manager</b>	<b>® Date</b>
			<b>® Responsible Official for Title V?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Reviewed By: \_\_\_\_\_

Date Reviewed: \_\_\_\_\_

# Title V Report Certification Form

## I. Report Type

- Annual Compliance Certification  
 Semi-Annual Monitoring Report  
 Other Specify: Semi-Annual Emissions Report

## II. Identifying Information

Facility Name: Los Alamos National Laboratory

Facility Address: P.O. Box 1663, MS J978      State: NM      Zip: 87545

Responsible Official (RO): Theodore A. Wyka      Phone: (505) 667-5105      Fax: NA

RO Title: Manager      RO e-mail: [theodore.wyka@nnsa.doe.gov](mailto:theodore.wyka@nnsa.doe.gov)

Permit No.: P100-R2M4      Date Permit Issued: 7/18/2019

Report Due Date (as required by the permit): 3/30/2023      Permit AI number: 856

Time period covered by this Report:      From: 7/1/2022      To: 12/31/2022

## III. Certification of Truth, Accuracy, and Completeness

I am the Responsible Official indicated above. I, Theodore A. Wyka certify that I meet the requirements of 20.2.70.7.AE NMAC. I certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in the attached Title V report are true, accurate, and complete.

Signature **THEODORE WYKA** Digitally signed by THEODORE WYKA  
Date: 2023.03.27 12:43:59 -06'00'      Date: \_\_\_\_\_

# **ATTACHMENT 1**

**Semi-Annual Emissions Report  
Los Alamos National Laboratory, AI No. 856  
Title V Operating Permit P100-R2M4  
July 1 – December 31, 2022**

**EPC-DO: 23-075**

**LA-UR: 23-21735**

**Date:           MAR 27 2023**

**Semi-Annual Emissions Report for Los Alamos National Laboratory  
AI 856, Title V Operating Permit P100-R2M4  
July 1, 2022 - December 31, 2022**

**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 1<sup>st</sup> and July 1<sup>st</sup> 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 NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, TSP, PM<sub>10</sub>, and PM<sub>2.5</sub> 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	SO2 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 below.

Yes

Date report submitted:

Tracking Number:

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

**Comments:**

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	0	0	50.0
SO <sub>2</sub>	0	0	0	50.0
PM	0	0	0	50.0
CO	0	0	0	30.0
VOC	0	0	0	50.0
HAPs	0	0	0	No Source Permit Limit

Note: The TA-60-BDM Asphalt Plant did not operate during 2022.

## 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 <sup>-04</sup> gm/yr	8.73X10 <sup>-04</sup> 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 NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, TSP, PM<sub>10</sub>, and PM<sub>2.5</sub> 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: To meet condition of 5.f in NSR permit #634-M2, LANL submitted the following quarterly beryllium emissions reports for the Beryllium Technology Facility: first quarter report, April 26, 2022 (000856-04262022-01), second quarter report, July 27, 2022 (000856-07272022-01), third quarter report, November 22, 2022 (000856-11222022-01), and fourth quarter, February 15, 2023, (000856-02152023-01).

## 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 <sup>(1)</sup>	Beryllium (grams)	0.006	0.006	0.012	10 gm/24 hr
Beryllium Technology Facility TA-3-141 <sup>(2)</sup>	Beryllium (grams)	0.0032	0.0132	0.016	3.5 gm/yr
Target Fabrication Facility TA-35-213 <sup>(3)</sup>	Beryllium (grams)	< 0.00944	< 0.009	< 0.018	0.36 gm/yr
Plutonium Facility TA-55-PF4 Machining Operation <sup>(4)</sup>	Beryllium (grams)	< 1.495	< 1.41	< 2.91	2.99 gm/yr
	Aluminum (grams)	< 1.495	< 1.41	< 2.91	2.99 gm/yr
Plutonium Facility TA-55-PF4 Foundry Operation <sup>(5)</sup>	Beryllium (grams)	0	0	0.00	$8.73 \times 10^{-4}$ gm/yr
	Aluminum (grams)	0	0	0.00	$8.73 \times 10^{-4}$ gm/yr
<b>Beryllium Total<sup>(5)</sup> (tons) =</b>		<b>&lt; 1.67E-06</b>	<b>&lt; 1.59E-06</b>	<b>&lt; 3.26E-06</b>	
<b>Aluminum Total (tons) =</b>		<b>&lt; 1.65E-06</b>	<b>&lt; 1.55E-06</b>	<b>&lt; 3.20E-06</b>	

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 2022.

## A800 External Combustion

### A802 Emission Limits - External Combustion

Unit No.	NO <sub>x</sub> tpy	CO tpy	VOC tpy	SO <sub>2</sub> tpy	TSP tpy	PM <sub>10</sub> tpy
All Boilers	80.0	80.0	50.0	50.0	50.0	50.0

Unit No.	NO <sub>x</sub> tpy	CO tpy	SO <sub>2</sub> tpy	TSP tpy	PM <sub>10</sub> tpy	PM <sub>2.5</sub> 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 NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, TSP, PM<sub>10</sub>, and PM<sub>2.5</sub> 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:

Boilers	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A802 A) (tons per year)
NO <sub>x</sub>	10.648	8.264	18.91	80
SO <sub>2</sub>	0.065	0.050	0.11	50
TSP	0.853	0.667	1.52	50
PM-10	0.853	0.667	1.52	50
CO	8.564	6.551	15.12	80
VOCs	0.614	0.475	1.09	50
HAPs	0.204	0.157	0.36	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.

Continued on the next page

**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	0.0086	0.0069	0.015	2.9
SO <sub>2</sub>	0.0002	0.0001	0.0003	0.3
TSP	0.0014	0.0011	0.003	0.4
PM-10	0.0014	0.0011	0.003	0.4
PM-2.5	0.0014	0.0011	0.003	0.4
CO	0.0109	0.0088	0.020	4.8
VOCs	0.0074	0.0060	0.013	No Source Limit
HAPs	5.42E-04	4.37E-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	0.0086	0.0069	0.015	2.9
SO <sub>2</sub>	0.0002	0.0001	0.0003	0.3
TSP	0.0014	0.0011	0.003	0.4
PM-10	0.0014	0.0011	0.003	0.4
PM-2.5	0.0014	0.0011	0.003	0.4
CO	0.0109	0.0088	0.020	4.8
VOCs	0.0074	0.0060	0.013	No Source Limit
HAPs	5.42E-04	4.37E-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	0.0086	0.0069	0.015	2.9
SO <sub>2</sub>	0.0002	0.0001	0.0003	0.3
TSP	0.0014	0.0011	0.003	0.4
PM-10	0.0014	0.0011	0.003	0.4
PM-2.5	0.0014	0.0011	0.003	0.4
CO	0.0109	0.0088	0.020	4.8
VOCs	0.0074	0.0060	0.013	No Source Limit
HAPs	5.42E-04	4.37E-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	0	0	2.9
SO <sub>2</sub>	0	0	0	0.3
TSP	0	0	0	0.4
PM-10	0	0	0	0.4
PM-2.5	0	0	0	0.4
CO	0	0	0	4.8
VOCs	0	0	0	No Source Limit
HAPs	0	0	0	No Source Limit

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

Continued on the next page.

**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	0	0	2.9
SO <sub>2</sub>	0	0	0	10.4
TSP	0	0	0	0.5
PM-10	0	0	0	0.3
PM-2.5	0	0	0	0.3
CO	0	0	0	0.9
VOCs	0	0	0	No Source Limit
HAPs	0	0	0	No Source Limit

Note: The RLUOB boilers did not operate on fuel oil during 2022.

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	0.0257	0.0208	0.046	14.5
SO <sub>2</sub>	0.0005	0.0004	0.001	11.6
TSP	0.0043	0.0034	0.008	2.1
PM-10	0.0043	0.0034	0.008	1.9
PM-2.5	0.0043	0.0034	0.008	1.9
CO	0.0328	0.0265	0.059	20.1
VOCs	0.0222	0.0179	0.040	No Source Limit
HAPs	0.0016	0.0013	0.003	No Source Limit

## A900 Chemical Usage

### A902 Emission Limits - Chemical Usage

Unit No.	VOC/HAPs tpy
LANL-FW-CHEM	-- <sup>1</sup>
CMRR-CHEM	3.75 <sup>1</sup>

<sup>1</sup> 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 NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, TSP, PM<sub>10</sub>, and PM<sub>2.5</sub> 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:

Chemical Usage LANL-FW-CHEM		January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)
VOCs		7.39	4.07	11.46	Source limits refer to facility-wide limits.
HAPs		3.55	2.02	5.57	
Individual HAPs greater than 0.5 tons	Hydrochloric Acid	0.66	0.54	1.20	
	Methylene Chloride	0.43	0.31	0.74	
	Methanol	0.36	0.26	0.62	

Chemical Usage CMRR-CHEM		January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A902 B)
HAPs		0.011	0.002	0.013	3.75
VOCs		0	0.0002	0.0002	3.75
TAPs		0.021	0.017	0.038	No Source Limit

**A1000 Degreasers**

A1002 Emission Limits - Degreasers

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

<sup>1</sup> 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**

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 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:

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	0.019	0.017	0.036	Source limits refer to facility-wide limits.
HAPs	0.019	0.017	0.036	



## A1100 Internal Combustion

### A1102 Emission Limits - Internal Combustion

Unit No.	NOx tpy	CO tpy	VOC tpy	SO <sub>2</sub> tpy	TSP tpy	PM <sub>10</sub> 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	-- <sup>1</sup>	--	--	--
TA-33-G-3	0.21	0.1	-- <sup>1</sup>	--	--	--
TA-33-G-4	2.33	1.4	0.2	0.16	--	--

<sup>1</sup> 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, SO<sub>2</sub>, VOC, TSP, PM<sub>10</sub>, and PM<sub>2.5</sub> 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:

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	0.0034	0.0816	0.085	18.1
SO <sub>2</sub>	0.0001	0.0022	0.002	2.5
TSP	0.0001	0.0025	0.003	0.6
PM <sub>10</sub>	0.0001	0.0025	0.003	0.6
CO	0.0003	0.0082	0.008	15.2
VOC	0.0002	0.0060	0.006	0.3
HAPs	9.70E-07	2.36E-05	2.46E-05	No Source Limit

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	5.21E-05	5.21E-05	0.21
SO <sub>2</sub>	0	3.58E-06	3.58E-06	Not Required
TSP	0	3.58E-06	3.58E-06	Not Required
PM <sub>10</sub>	0	3.58E-06	3.58E-06	Not Required
CO	0	1.52E-05	1.52E-05	0.1
VOC	0	4.13E-06	4.13E-06	Not Required
HAPs	0	1.69E-08	1.69E-08	No Source Limit

Note: The TA-33-G-2 generator did not operate during the first 6 months of 2022.

Continued on the next page.

**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	1.04E-04	1.04E-04	0.21
SO <sub>2</sub>	0	7.16E-06	7.16E-06	Not Required
TSP	0	7.16E-06	7.16E-06	Not Required
PM <sub>10</sub>	0	7.16E-06	7.16E-06	Not Required
CO	0	3.03E-05	3.03E-05	0.1
VOC	0	8.27E-06	8.27E-06	Not Required
HAPs	0	3.38E-08	3.38E-08	No Source Limit

Note: The TA-33-G-3 generator did not operate during the first 6 months of 2022.

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	0.0059	0.0059	0.012	2.33
SO <sub>2</sub>	0.0004	0.0004	0.001	0.16
TSP	0.0004	0.0004	0.001	Not Required
PM <sub>10</sub>	0.0004	0.0004	0.001	Not Required
CO	0.0035	0.0035	0.007	1.4
VOC	0.0005	0.0005	0.001	0.2
HAPs	1.90E-06	1.90E-06	0.000	No Source Limit

Generator RLUOB-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0	0	0	No Source Specific Emission Limits for the RLUOB Generators
SO <sub>2</sub>	0	0	0	
TSP	0	0	0	
PM <sub>10</sub>	0	0	0	
CO	0	0	0	
VOC	0	0	0	
HAPs	0	0	0	

Note: The TA-RLUOB-GEN-1 generator did not operate during 2022.

Generator RLUOB-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.203	0.102	0.31	No Source Specific Emission Limits for the RLUOB Generators
SO <sub>2</sub>	0.005	0.003	0.01	
TSP	0.012	0.006	0.02	
PM <sub>10</sub>	0.010	0.005	0.01	
CO	0.252	0.127	0.38	
VOC	0.029	0.014	0.04	
HAPs	5.83E-05	2.94E-05	8.77E-05	

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**A1100 Internal Combustion- continued**

Generator RLUOB-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.22	0.027	0.250	No Source Specific Emission Limits for the RLUOB Generators
SO <sub>2</sub>	0.01	0.001	0.007	
TSP	0.01	0.002	0.015	
PM <sub>10</sub>	0.01	0.001	0.012	
CO	0.28	0.033	0.310	
VOC	0.03	0.004	0.035	
HAPs	6.41E-05	7.71E-06	7.18E-05	

Generator TA-48-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0	0	0	No Source Specific Emission Limits for the TA-48 Generator
SO <sub>2</sub>	0	0	0	
TSP	0	0	0	
PM <sub>10</sub>	0	0	0	
CO	0	0	0	
VOC	0	0	0	
HAPs	0	0	0	

Note: The TA-48-GEN-1 generator did not operate during 2022.

Generator TA-55-GEN-1	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	1.35E-03	1.01E-03	2.36E-03	No Source Specific Emission Limits for the TA-55 Generators
SO <sub>2</sub>	9.65E-05	7.24E-05	1.69E-04	
TSP	9.65E-05	7.24E-05	1.69E-04	
PM <sub>10</sub>	9.65E-05	7.24E-05	1.69E-04	
CO	2.89E-04	2.17E-04	5.07E-04	
VOC	9.65E-05	7.24E-05	1.69E-04	
HAPs	4.35E-07	3.26E-07	7.61E-07	

Generator TA-55-GEN-2	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	1.35E-03	1.01E-03	2.36E-03	No Source Specific Emission Limits for the TA-55 Generators
SO <sub>2</sub>	9.65E-05	7.24E-05	1.69E-04	
TSP	9.65E-05	7.24E-05	1.69E-04	
PM <sub>10</sub>	9.65E-05	7.24E-05	1.69E-04	
CO	2.89E-04	2.17E-04	5.07E-04	
VOC	9.65E-05	7.24E-05	1.69E-04	
HAPs	4.35E-07	3.26E-07	7.61E-07	

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**A1100 Internal Combustion- continued**

Generator TA-55-GEN-3	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits
NOx	0.115	0.276	0.39	No Source Specific Emission Limits for the TA-55 Generators
SO <sub>2</sub>	0.002	0.005	0.01	
TSP	0.004	0.009	0.01	
PM <sub>10</sub>	0.004	0.009	0.01	
CO	0.025	0.060	0.09	
VOC	0.004	0.009	0.01	
HAPs	2.10E-05	5.01E-05	7.11E-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 NO<sub>x</sub>, CO, SO<sub>2</sub>, 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	0.163	0.134	0.30	9.9
PM10	0.147	0.120	0.27	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 <sub>10</sub> 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 <sub>10</sub> 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 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:

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	5.484	4.024	9.51	31.5
SOx	0.059	0.042	0.10	4.9
TSP	0.719	0.527	1.25	4.7
PM <sub>10</sub>	0.719	0.527	1.25	4.4
PM <sub>2.5</sub>	0.719	0.527	1.25	4.2
CO	3.782	2.775	6.56	21.5
VOC	0.520	0.382	0.90	2.8
HAPs	0.178	0.131	0.31	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	3.604	13.269	16.87	59.4
SOx	0.250	0.920	1.17	4.2
TSP	0.485	1.787	2.27	4.8
PM <sub>10</sub>	0.485	1.787	2.27	4.8
PM <sub>2.5</sub>	0.485	1.787	2.27	4.8
CO	0.749	2.759	3.51	72.3
VOC	0.157	0.578	0.74	1.5
HAPs	0.093	0.343	0.44	No Source Limit

## A1400 Open Burning

### A1402 Emission Limits - Open Burning

Unit No.	Individual HAP <sup>1</sup> (tpy)	Total HAPs <sup>1</sup> (tpy)
Facility-Wide Open Burning	8.0	24.0

<sup>1</sup> 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 NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, TSP, PM<sub>10</sub>, and PM<sub>2.5</sub> 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:

No open burning activities took place during 2022.

## A1500 Evaporative Sprayers

### A1502 Emission Limits - Evaporative Sprayers

Unit No.	HAPs tpy
TA-60-EVAP-1	-- <sup>1</sup>
TA-60-EVAP-2	-- <sup>1</sup>
TA-60-EVAP-3	-- <sup>1</sup>
TA-60-EVAP-4	-- <sup>1</sup>
TA-60-EVAP-5	-- <sup>1</sup>

<sup>1</sup> 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 NO<sub>x</sub>, CO, SO<sub>2</sub>, VOC, TSP, PM<sub>10</sub>, and PM<sub>2.5</sub> 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:

No

Provide comments and identify any supporting documentation 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)
Polychlorinated biphenyls	0	0	0	Source limits refer to facility-wide limits.
Chloroform	0	0	0	
Chloromethane	0	0	0	
Bromoform	0	0	0	
Cyanide	0	0	0	
Manganese	0	0	0	
Mercury	0	0	0	
Nickel	0	0	0	
TOTAL HAPs	0	0	0	

Note: The TA-60-EVAP-1 evaporative sprayer did not operate during 2022.

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)
Polychlorinated biphenyls	2.11E-10	0	2.11E-10	Source limits refer to facility-wide limits.
Chloroform	3.73E-07	0	3.73E-07	
Chloromethane	2.38E-06	0	2.38E-06	
Bromoform	2.74E-07	0	2.74E-07	
Cyanide	2.88E-06	0	2.88E-06	
Manganese	1.34E-06	0	1.34E-06	
Mercury	7.36E-08	0	7.36E-08	
Nickel	1.10E-05	0	1.10E-05	
TOTAL HAPs	1.83E-05	0	1.83E-05	

Continued on the next page.



**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)
Polychlorinated biphenyls	0	0	0	Source limits refer to facility-wide limits.
Chloroform	0	0	0	
Chloromethane	0	0	0	
Bromoform	0	0	0	
Cyanide	0	0	0	
Manganese	0	0	0	
Mercury	0	0	0	
Nickel	0	0	0	
<b>TOTAL HAPs</b>	0	0	0	

Note: The TA-60-EVAP-3 evaporative sprayer did not operate during 2022.

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)
Polychlorinated biphenyls	0	0	0	Source limits refer to facility-wide limits.
Chloroform	0	0	0	
Chloromethane	0	0	0	
Bromoform	0	0	0	
Cyanide	0	0	0	
Manganese	0	0	0	
Mercury	0	0	0	
Nickel	0	0	0	
<b>TOTAL HAPs</b>	0	0	0	

Note: The TA-60-EVAP-4 evaporative sprayer did not operate during 2022.

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)
Polychlorinated biphenyls	0	0	0	Source limits refer to facility-wide limits.
Chloroform	0	0	0	
Chloromethane	0	0	0	
Bromoform	0	0	0	
Cyanide	0	0	0	
Manganese	0	0	0	
Mercury	0	0	0	
Nickel	0	0	0	
<b>TOTAL HAPs</b>	0	0	0	

Note: The TA-60-EVAP-5 evaporative sprayer did not operate during 2022.

Evaporative Sprayer TA-60-EVAP-6	January - June Emissions (tons)	July - December Emissions (tons)	Annual Emissions (tons)	Permit Limits (Condition A1502 A) (tons per year)
Polychlorinated biphenyls	0	0	0	Source limits refer to facility-wide limits.
Chloroform	0	0	0	
Chloromethane	0	0	0	
Bromoform	0	0	0	
Cyanide	0	0	0	
Manganese	0	0	0	
Mercury	0	0	0	
Nickel	0	0	0	
<b>TOTAL HAPs</b>	0	0	0	

Note: The TA-60-EVAP-6 evaporative sprayer did not operate during 2022.

## 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 <sub>2</sub> )	150.0
Total Particulate Matter (TSP)	120.0
Particulate Mater less than 10 microns (PM <sub>10</sub> )	120.0
Particulate Mater less than 2.5 microns (PM <sub>2.5</sub> )	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, SO<sub>2</sub>, VOC, TSP, PM<sub>10</sub>, and PM<sub>2.5</sub> 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:

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

#### Comments:

Pollutant	January - June Emissions (tons)	July - December Emissions (tons)	2022 Annual Emissions (tons)	Permit Limits (Condition A102) (tons per year)
Nitrogen Oxides	20.29	26.05	46.3	245
Carbon Monoxide	13.65	12.32	26.0	225
Volatile Organic Carbons	8.76	5.55	14.3	200
Sulfur Dioxide	0.39	1.02	1.4	150
Total Particulate Matter	2.25	3.13	5.4	120
Particulate Matter less than 10 microns	2.23	3.12	5.3	120
Particulate Matter less than 2.5 microns	1.21	2.32	3.5	120
Hazardous Air Pollutants	4.04	2.67	6.7	24