

LA-UR-23-31248

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Title: IDEA ID No. 856 - Los Alamos National Laboratory, Permit #2195, Exemption Notice for Three New Emergency Stand-by Generators at TA-60-0001

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Intended for: Environmental Regulatory Document
Issued: 2023-10-04 (rev.1)



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**Environmental Protection & Compliance Division
Compliance Programs Group**

Symbol: EPC-DO: 23-305
LA-UR: 23-31248

Locates Action No.: N/A

Date: **OCT 03 2023**

James Nellessen, PhD
Permitting Section
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 Three New Emergency Stand-by Generators at TA-60-0001**

Dear Mr. Nellessen:

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 three exempt sources as defined in Section 202.B.

The applicable exemption is Section 202.B.3 which states:

Standby generators which are:

- (a) Operated only during the unavoidable loss of commercial utility power;*
- (b) Operated less than 500 hours per year; and*
- (c) Either are:*
 - i. The only source of air emissions at the site; or*
 - ii. accompanied by sufficient record keeping to verify that the standby generator is operated less than 500 hours per year.*

The three exempt sources are portable stand-by Diesel Generator Sets:

Generator Unit
 Manufacturer: Generac
 Size: 80 kW
 Model: MDG100DF4
 Serial No.: 3013550141
 Date of Manf: 2023

Engine
 Manufacturer: John Deere
 Size: 122 HP
 Model: 4045HFG04
 Serial No.: R574804
 Date of Manf: 2023

Generator Unit
 Manufacturer: WhisperWatt
 Size: 100 kW
 Model: DCA125SSIU4F
 Serial No.: 7514006
 Date of Manf: 2022

Engine
 Manufacturer: Isuzu
 Size: 170.8 HP
 Model: BR-4HK1X
 Serial No.: 22FH04
 Date of Manf: 2022



Generator Unit

Manufacturer: WhisperWatt
 Size: 56 kW
 Model: DCA70SSIU4F
 Serial No.: 7358647
 Date of Manf: 2022

Engine

Manufacturer: Isuzu
 Size: 95.2 HP
 Model: BR-4JJ1X
 Serial No.: 22NJ31
 Date of Manf: 2022

The three units will be located at Technical Area 60-0001, with the ability to be relocated to any location within the LANL campus. The three units will be run as standby generators only during the unavoidable loss of commercial utility power. Each generator is equipped with a non-resettable hour meter and hours of operation will be tracked to ensure each unit runs less than 500 hours per year.

Regarding Title V applicability, because these three portable generators each have an engine rated capacity less than 200 horsepower/hour, each generator qualifies as an insignificant source under 20 NMAC 2.70, Title V Operating Permits. The specific language from the NMED List of Insignificant Activities for the NM Operating Permit Program (list dated March 24, 2005) is:

- 6. Portable engines and portable turbines that have a design capacity (based on sea level specifications) or a physically derated capacity less than or equal to:
 - 200 HP engine if fueled by diesel or natural gas.*

All three generators are portable, non-road engines that do not meet the definition of stationary source under NSPS IIII for Stationary Internal Combustion engines and therefore are not subject to this NSPS. All three engines are certified to EPA Tier 4 emission standards.

We request these three exempt units be placed on the Air Quality Permit #2195 as an administrative revision (2195 R-98). If you have any questions, please feel free to contact Marjorie Stockton (Triad) at (505) 695-4508.

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,

SARAH HOLCOMB
 (Affiliate)

Digitally signed by SARAH
 HOLCOMB (Affiliate)
 Date: 2023.10.03 13:01:51
 -06'00'

Sarah S. Holcomb
 Acting Group Leader

Attachment(s): Attachment 1 Air Quality Administrative Revision for Three New Emergency Stand-by Generators

Copy: Karen E. Armijo, NA-LA, karen.armijo@nnsa.doe.gov
 Robert A. Gallegos, NA-LA, robert.gallegos@nnsa.doe.gov
 Silas DeRoma, NA-LA, silas.deroma@nnsa.doe.gov
 Stephen N. Jochem, NA-LA, stephen.jochem@nnsa.doe.gov

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ATTACHMENT 1
Air Quality Administrative Revision for
Three New Emergency Stand-by
Generators

EPC-DO: 23-305

LA-UR-23-31248

Date: OCT 03 2023

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.

Mail Application To: New Mexico Environment Department Air Quality Bureau 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505 Phone (505) 476-4300 Fax (505) 476-4375 www.env.nm.gov/aqb		For Department use only – Received Date: <input type="checkbox"/> Approved <input type="checkbox"/> Completed <input type="checkbox"/> Denied Permit revision number: Reviewed by & date:
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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: Meteorology & Air Quality Team Leader	
6	Email: mstockton@lanl.gov	Phone: (505) 695-4508	
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 |
|--|--|

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)
Generator: Generac Engine: John Deere	Generator: 3013550141 Engine: R574804	Generator: 2023 Engine: 2023	October 2023	Generator: 80 kW Engine: 122 HP
Generator: WhisperWatt Engine: Isuzu	Generator: 7514006 Engine: 22FH04	Generator: 2022 Engine: 2022	October 2023	Generator: 100 kW Engine: 170.8 HP
Generator: WhisperWatt Engine: Isuzu	Generator: 7358647 Engine: 22NJ31	Generator: 2022 Engine: 2022	October 2023	Generator: 56 kW Engine: 95.2 HP
Name of commercial power provider ² :		Los Alamos Power Pool		

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).

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 emission rate 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 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, Sarah S. Holcomb, 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 3 day of October, 2023, upon my oath or affirmation, before a

notary of the State of New Mexico.


Signature¹

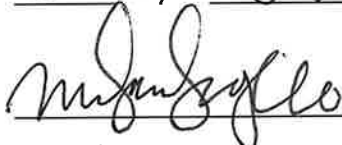
10/3/2023
Date

Sarah S. Holcomb
Printed Name

Acting Group Leader
Title

Scribed and sworn before me on this 3rd day of October, 2023.

My authorization as a notary of the State of New Mexico expires on the 12th day of June, 2027.


Notary's Signature

10/3/2023
Date

Maria Francesca Trujillo
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:

STATE OF NEW MEXICO
NOTARY PUBLIC
MARIA FRANCESCA TRUJILLO
Commission Number 1057385
My Commission Expires June 12, 2027