

## LA-UR-16-21091

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Author(s): Ramanathan, Brinda

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**Environmental Protection & Compliance Division (EPC-DO)**

**Environmental Compliance Programs (EPC-CP)**

PO Box 1663, K490

Los Alamos, New Mexico 87545

(505) 667-0666

*Date:* February 29, 2016

*Symbol:* EPC-DO-16-052

*LA-UR:* 16-21091

*Locates Action No.:* N/A

Mr. Ted Schooley  
Permit Program Manager  
New Mexico Environment Department  
525 Camino de los Marquez, Suite 1  
Santa Fe, NM 87505-1816

Dear Mr. Schooley:

**Subject: Facility ID 856 – Permit 2195, Exemption Notice for Seven (7) Fuel-Burning Units**

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 seven (7) exempt sources as defined in Section 202.B.1.a. The exempt units are listed below.

List No.	Source Description	Location	Manufacturer	Model No.	Serial No.	Capacity (MMBtu/hr)
1	Gas Furnace	TA-03-0474	Rheem	R801PA125524MSA	W52142947	0.13
2	Gas Water Heater	TA-48-0034	Rheem	PROG40-36NRH62	M251508542	0.04
3	Gas Furnace	TA-03-2004	Rheem	R801PA125524MSA	W361408899	0.13
4	Gas Fired HVAC	TA-48-0028	Trane	YSD150F4RHA	153610481D	0.35
5	Gas Furnace	TA-52-0044	Rheem	R801PA1003172SB	W371513806	0.10
6	Gas Boiler	TA-50-0037	Lochinvar	FBN-1501	1537101994275	1.50
7	Gas Boiler	TA-50-0037	Lochinvar	FBN-1501	1537101994274	1.50

The listed units use pipeline quality natural gas as fuel and have a design rate of less than five (5) million BTU per hour.

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. If you have any questions, please feel free to contact Bill Blankenship at 665-0823.

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,



Anthony R. Grieggs  
Group Leader  
Environmental Compliance Programs  
Los Alamos National Security, LLC

ARG:SLC:BR/lm

Enclosure: 1. NMED Air Quality Notice of Exemption

Cy: Hai Shen, EM-SG, (E-File)  
Richard Kacich, DIR, (E-File)  
Kirsten Laskey, EM-LA (E-File)  
Adrienne Nash, LASO-NS-PI, (E-File)  
Craig S. Leasure, PADOPS, (E-File)  
William Mairson, PADOPS, (E-File)  
Michael T. Brandt, ADESH, (E-File)  
Raeanna Sharp-Geiger, ADESH, (E-File)  
John P. McCann, EPC-DO, (E-File)  
Steven L. Story, EPC-CP, (E-File)  
Kathleen Gorman, EPC-ES, (E-File)  
Brinda Ramanathan, EPC-CP, (E-File)  
Margie Stockton, EPC-CP, (E-File)  
Walter Whetham, EPC-CP, (E-File)  
Timothy A. Dolan, LC-ESH, (E-File)  
Saundra Martinez, OIO-DO, (E-File)  
[lasomailbox@nnsa.doe.gov](mailto:lasomailbox@nnsa.doe.gov), (E-File)

Mr. Ted Schooley  
EPC-DO-16-052

- 3 -

Cy (Continued):

[emla.docs@em.doe.gov](mailto:emla.docs@em.doe.gov), (E-File)

[lasomailbox@nnsa.doe.gov](mailto:lasomailbox@nnsa.doe.gov), (E-File)

[locateteam@lanl.gov](mailto:locateteam@lanl.gov), (E-File)

[env-correspondence@lanl.gov](mailto:env-correspondence@lanl.gov)

ENV-CP Permit Application No. 2195 File #106 (w/enc.)

ENV-CP Exemption Notice Binder (Notice #106) (w/enc.)

# **Enclosure 1**

**Air Quality Notice of Exemption**

**EPC-DO-16-052**

**LA-UR 16-21091**

**Date:** FEB 29 2016

<p><b>Mail Application To:</b></p> <p>New Mexico Environment Department  Air Quality Bureau  Permits Section  525 Camino de los Marquez, Suite 1  Santa Fe, New Mexico, 87505</p> <p>Phone: (505) 476-4300  Fax: (505) 476-4375  www.env.nm.gov/aqb</p>		<p><b>For Department use only:</b></p> <p>AIRS No.:</p>
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## Air Quality Exemption Application Form

(a.k.a. Air Quality Notice of Exemption Form)

Under Section 202.B of 20.2.72 NMAC (New Mexico Administrative Code) – [Air Quality] Construction Permits, the presence of new or modified sources and activities exempted at a facility must be reported in the permit application forms supplied by the Department. Emissions from sources and activities exempted under Section 202.B are not included in the calculation of the facility-wide potential emission rate under Paragraphs 1 or 2 of Subsection A of 20.2.72.200 NMAC.

This application form provides a means to notify the Department of such exempted sources and activities. In addition to submitting this form, new or modified sources submitting a 20.2.72 NMAC Universal Application (UA) must list all exempted sources and activities in the UA form.

- 1) For construction of exempted sources or commencement of exempted activities after issuance of a 20.2.72 NMAC permit, this form may be submitted as an administrative permit revision application under 20.2.72.219.A NMAC.
- 2) For facilities that consist only of exempted activities and sources, this form may serve as notification of such exemption under 20.2.72 NMAC.
- 3) For an existing Notice of Intent (NOI), exemptions in 20.2.72.202.B NMAC cannot be processed using this form and require a new NOI application.

This form applies only to the exemptions to equipment under 20.2.72.202 NMAC. Although equipment may be exempt from the requirements of 20.2.72 NMAC, there may be other state or federal Clean Air Act (CAA) regulations that apply to exempt equipment. The owner/operator is responsible for meeting all applicable state and/or federal CAA regulations regardless of the 20.2.72.202 NMAC exempt status. No fee is required for submittal of this form. For further information on permit exemptions, please see 20.2.72.202 NMAC.

Complete the appropriate section(s) that is applicable to your facility. Each applicable section must be filled out completely and the form must be notarized and submitted to the Air Quality Bureau at the address listed above. If at any time the facility cannot operate under its exemption status, you must inform the Air Quality Bureau and update your permit applicability status. For purposes of these exemptions, a sufficient period of time to retain a supporting record is two (2) years after the creation of such record. Along with this form is an attached document entitled Guidance for Exemption Calculations. The guidance document provides examples of calculating potential emission rates if you choose this option. If so, include the appropriate calculation page(s) from the guidance document with this application form.

### Section 1: General Information

Company and Facility Location Information	
1	Company name: Los Alamos National Security, LLC
2	Facility name: Los Alamos National Laboratory      SIC code (4 digits): 9711
3	Company mailing address: PO Box 1663, MS J978, Los Alamos, NM 87545

4	Contact person: Anthony R. Grieggs	Title: Group Leader
5	Phone No: 505-665-0451	Fax No: 505-665-8858 e-mail: grieggs@lanl.gov
6	County in which facility is/will be located: Los Alamos	
7	Nearest New Mexico town or tribal community: Los Alamos	Zip code: 87544
8	Town or community distance and direction from source: About 1 mile north	
9	Status of land at facility (check one): <input type="checkbox"/> Private <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Government <input type="checkbox"/> Bernalillo County	
<b>Current Air Quality Permit Status of the Facility</b>		
10	Has this facility been issued an Air Quality Construction Permit (20 NMAC 2.72, Section 200.A or 200.B)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, the Permit No.: 2195
11	Has this facility been issued a No Permit Required (NPR) letter? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, the date of the letter:
12	Has this facility been issued a Notice of Intent (NOI) to Construct? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, the NOI No.:
13	Has this facility been issued a General Construction Permit (GCP)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, the Registration No.:

## **Section 2: Fuel Burning Equipment**

20.2.72.202.B.1 NMAC exempts:

- (1) 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; or
  - (b) Uses distillate oil (not including waste oil) and has a design rate less than or equal to one (1) million BTU per hour;

**ACKNOWLEDGEMENT:** By checking this box I understand that I am to follow the requirements of this exemption as listed above under 20.2.72.202.B.1 NMAC.

***See Attachment 1 for details of fuel burning equipment included in this application.***

## **Section 3: VOC Handling and/or Storage**

20.2.72.202.B.2 NMAC exempts:

- (2) VOC emissions resulting from the handling or storing of any VOC if:
- (a) Such VOC has a vapor pressure of less than two tenths (0.2) PSI at temperatures at which the compound is stored and handled; and
  - (b) The owner or operator maintains sufficient record keeping to verify that the requirements of Sub-paragraph (a) of this paragraph are met;

**ACKNOWLEDGEMENT:** By checking this box I understand that I am to follow the requirements of this exemption as listed above under 20.2.72.202.B.2 NMAC.

## **Section 4: Standby Generator**

20.2.72.202.B.3 NMAC exempts:

(3) 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 applicant notifies the Department of the presence of the following standby generator(s) at the facility:

Manufacturer	Serial Number	Date of Manufacture	Date of Installation <sup>1</sup>	Capacity (horsepower)

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

Name of commercial power provider <sup>2</sup> :	
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<sup>2</sup>Commercial power is purchased from a commercial utility company, which specifically does not include power generated on site for the sole purpose of the user.

I understand that I may also be subject to other Federal Regulations (i.e., 40 CFR Part 60, Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engines; Subpart IIII Standards of Performance for Stationary Compression Ignition Internal Combustion Engines; 40 CFR Part 63, Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines).

- By checking this box I acknowledge that, without this exemption, the emissions from these sources require a permit under 20.2.72 NMAC, Construction Permits. **OR**
- I have included the PER<sup>3</sup> (uncontrolled) emission calculations for these emission sources as an attachment.

<sup>3</sup>Potential Emission Rate (PER) of the facility 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 hrs/day, 365 days/yr). List each PER separately. See Guidance for Exemption Calculations located at the end of this application for an example.

***ACKNOWLEDGEMENT:*** By checking this box I understand that I am to follow the requirements of this exemption as listed above under 20.2.72.202.B.3 NMAC.

**Section 5: Repositioning or Relocating Sources of Air Emissions or Emissions Points within the Plant Site**

20.2.72.202.B.4 NMAC exempts:

(4) The act of 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 of such emissions;

**ACKNOWLEDGEMENT:** By checking this box I notify the Department that there has not been an increase in air emissions or to ambient impacts of such emissions in accordance with 20.2.72.202.B.4 NMAC.

**Section 6: Emissions Exempted Based on Quantity**

20.2.72.202.B.5 NMAC exempts:

(5) Any emissions unit, operation, or activity that has a potential emission rate of no more than one-half (1/2) ton per year of any pollutant for which a National or New Mexico Ambient Air Quality Standard has been set or one-half (1/2) ton per year of any VOC. Multiple emissions units, operations, and activities that perform identical or similar functions shall be combined in determining the applicability of this exemption.

List all new or modified emission unit(s), operation(s), and activity(ies). Designate those that perform identical or similar functions that shall be combined for applicability determination purposes (add rows as necessary):

Emission Unit(s) Description	Serial Number	Capacity (size)	Regulated Pollutant(s) Emitted <sup>1</sup>	Potential Emission Rate <sup>2</sup> of Pollutant

<sup>1</sup> Regulated pollutants: Particulate Matter (PM10, PM2.5, TSP); Sulfur Dioxide (SO2); Carbon Monoxide (CO); Nitrogen Dioxide (NO2); Hydrogen Sulfide (H2S); Lead (Pb); Total Reduced Sulfur; Volatile Organic Compounds (VOCs)

<sup>2</sup> Potential Emission Rate (PER) of the facility 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 hrs/day, 365 days/yr). List each PER separately.

If you require help with this section, please contact the Small Business Environmental Assistance Program at any of the following numbers: (505) 222-9507, 222-9528, or 222-9583.

**ACKNOWLEDGEMENT:** By checking this box I notify the Department of the presence of emissions that fall within the requirements of 20.2.72.202.B.5 NMAC.

## **Section 7: Surface Coating**

20.2.72.202.B.6 NMAC exempts:

- (6) Surface coating of equipment, including spray painting, roll coating, and painting with aerosol spray cans, if:
- (a) The potential emission rate of VOCs do not exceed ten (10) pounds per hour;
  - (b) The facility-wide total VOC content of all coating and clean-up solvent use is less than two (2) tons per year; and
  - (c) The owner or operator maintains sufficient record keeping to verify that the requirements in Sub-paragraphs (a) and (b) of this paragraph are met;

Additional Information:

- 1) Most Paint Stripping and Miscellaneous Surface Coating Operations also are regulated by National Emission Standards for Hazardous Air Pollutants (NESHAPs). For more information on this regulation (40 CFR Part 63 Subpart HHHHHH) go to this web site link [http://www.env.nm.gov/aqb/sbap/sbap\\_industry\\_sectors\\_3.html](http://www.env.nm.gov/aqb/sbap/sbap_industry_sectors_3.html).
- 2) In addition, your facility may be regulated by NESHAPs for Nine Metal Fabrication and Finishing Source Categories. For more information on this regulation (40 CFR Part 63 Subpart XXXXXX) go to the web site link listed in #1 above.

**ACKNOWLEDGEMENT:** By checking this box I understand that I am to follow the requirements of this exemption as listed above under 20.2.72.202.B.6 NMAC.

## **Section 8: Abrasive Blasting**

20.2.72.202.B.6 NMAC exempts:

- (7) Particulate emissions resulting from abrasive blasting operations, if:
- (a) Blasting operations are entirely enclosed in a building; and
  - (b) No visible particulate emissions are released from the building.

By checking this box I acknowledge that, without this exemption, the emissions from these sources require a permit under 20.2.72 NMAC, Construction Permits. **OR**

I have included the PER<sup>1</sup> (uncontrolled) emission calculations for these emission sources as an attachment.

<sup>1</sup>Potential Emission Rate (PER) of the facility 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 hrs/day, 365 days/yr). List each PER separately. See [Guidance for Exemption Calculations](#) at the end of this document for an example.

**ACKNOWLEDGEMENT:** By checking this box I understand that I am to follow the requirements of this exemption as listed above under 20.2.72.202.B.6 NMAC.

Your facility may also be subject to National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories (40 CFR Part 63 Subpart XXXXXX). For more information, go to: [http://www.env.nm.gov/aqb/sbap/sbap\\_industry\\_sectors\\_3.html](http://www.env.nm.gov/aqb/sbap/sbap_industry_sectors_3.html).

**Certification of Information for  
Air Quality Exemption Application Form**

I, Anthony R. Grieggs, hereby certify that the information and data submitted in this application are true, accurate and complete. I agree to operate in accordance with the exemption requirements as stated under the relevant sections of this form.

Signed this 25<sup>th</sup> day of February, 2016 upon my oath or affirmation, before a notary of the State of New Mexico.

Anthony R. Grieggs  
Signature

2/25/2016  
Date

Anthony R. Grieggs  
Printed Name

Environmental Compliance Group Leader  
Title

Scribed and sworn before me on this 25<sup>th</sup> day of February, 2016.

My authorization as a notary of the State of New Mexico expires on the 5<sup>th</sup> day of May, 2019

Louella B. Medina  
Notary's Signature

2/25/2016  
Date

Louella B. Medina  
Notary's Printed Name



**ENCLOSURE 1- Exemption Notice**

List of new equipment that are exempt from 20.2.72 NMAC permitting requirements

The exemption requirement is 20 NMAC 2.72.202.B.1.a. and based on manufacturer's maximum rated capacity.

List No.	Source Description	Location	Manufacturer	Model No.	Serial No.	Capacity (MMBtu/hr)
1	Gas Furnace	TA-03-0474	Rheem	R801PA125524MSA	W52142947	0.13
2	Gas Water Heater	TA-48-0034	Rheem	PROG40-36NRH62	M251508542	0.04
3	Gas Furnace	TA-03-2004	Rheem	R801PA125524MSA	W361408899	0.13
4	Gas Fired HVAC	TA-48-0028	Trane	YSD150F4RHA	153610481D	0.35
5	Gas Furnace	TA-52-0044	Rheem	R801PA1003172SB	W371513806	0.10
6	Gas Boiler	TA-50-0037	Lochinvar	FBN-1501	1537101994275	1.50
7	Gas Boiler	TA-50-0037	Lochinvar	FBN-1501	1537101994274	1.50