

Statement of Basis - Narrative
NSR Permit

COMPANY: U.S. Department of Energy National Nuclear Security Administration
FACILITY: Los Alamos National Laboratory
PERMIT NO.: 2195 P
IDEA ID No.: 856 - PRN20060014
PERMIT WRITER: Michael Schneider

Fee Tracking

Track- ing	NSR tracking entries completed: <input type="checkbox"/> Yes <input type="checkbox"/> No
	NSR tracking page attached to front cover of permit folder: <input type="checkbox"/> Yes <input type="checkbox"/> No
	Paid Invoice Attached: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Balance Due Invoice Attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Invoice Comments: Fees Paid in Full

Review	Date to Enforcement: 01/10/07	Inspector Reviewing:
	Date Review Completed:	
	Date to Applicant: 01/10/07	
	Date to HPM:	

- 1.0 **Plant Process Description:**
 LANL proposes to construct and operate three diesel fired generators used to provide power for experiments and research activities at Technical Area 33 (TA-33). LANL has not disclosed the nature of each experiment. LANL proposes to construct two 20 kilowatt (approximately 27 HP) generators and a 225 kilowatt (302 HP) unit.

- 2.0 **Description of this Modification:**
 Not Applicable as this is a new application.

- 3.0 **History:**
 Not Applicable as this is a new application at this site. See LANL Title V permit for permit history and regulated sources.

- 4.0 **Public Response/Concerns:**
 We received interest from Concerned Citizens for Nuclear Safety, Loretto Regional Justice and Peace and Embudo Valley Environmental Group. On January 3, 2007 a letter responding to their concerns and questions was emailed and mailed to the above parties. A request for public hearing determination was sent to the Division Director prior to the Holidays.

- 5.0 **Compliance Testing:**
 Initial compliance tests will be required for each generator.

6.0 **Modeling:**

Please see modeling report attached to the permit file

7.0 **New/Modified/Unique Conditions (Format: Condition#: Explanation):**

All conditions are new and necessary to ensure a federally enforceable permit is issued. Per the application, each generator will be limited to 500 hours annually.

8.0 **Applicable State Regulations (NMAC):**

Delete NMACs that are not relevant. Identify “why” or “why not” in Comments

20 NMAC	Title	Applies (Y/N)	Comments
2.3	Ambient Air Quality Standards	Y	Applies to all facilities' sources
2.7	Excess Emissions During Malfunction	Y	Applies to all facilities' sources
2.61	Smoke and Visible Emissions	Y	Applies to all owner or operators of stationary combustion equipment. Each generator shall not have visible emissions in excess of twenty (20) percent opacity. Compliance shall be determined using EPA Method 9 for at least ten (10) minutes.
2.70	Operating Permits	N	PTE of these units is not > 100 TPY. LANL as a whole is subject to TV.
2.71	Operating Permit Fees	N	PTE of these units is not > 100 TPY. LANL as a whole is subject to TV
2.72	Construction Permits	Y	200.A.1 PER > 10 pph or 25 tpy combined for NOx.
2.73	NOI & Emissions Inventory Requirements	Y	Applicable to all facilities that require a permit. PER > 10 tpy for a criteria pollutant
2.74	Permits-Prevention of Significant Deterioration	N	PTE from this facility alone is well below 100 TPY.
2.75	Construction Permit Fees	Y	Subject to 20 NMAC 2.72
2.77	New Source Performance	N	These generators are not subject to 40 CFR 60 Subpart III – <u>Standards of Performance for Stationary Compression Ignition Internal Combustion Engines</u> as they were manufactured and installed prior to the applicability date listed in this regulation. The NSPS applies to an owner and operator who orders an engine after July 11, 2005 if the engine is manufactured after April 1, 2006. The above engines have been at Los Alamos prior to April 1, 2006.
2.78	Emissions Standards for HAPs,	N	There is not a 40 CFR Part 61 NESHAP for this source category.
2.79	Permits B Nonattainment Areas	N	This facility is not located in a non attainment area

2.82	MACT Standards for Source Categories of HAPs.	N	There is not a 40 CFR Part 63 MACT for this source category.
------	---	---	--

9.0 Applicable Federal Regulations:

Air Programs Subchapter C (40 CFR 50)	Title National Primary and Secondary Ambient Air Quality Standards	Applies (Y/N)	Comments
C	Federal Ambient Air Quality Standards	Y	Applies to all facilities

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Comments
A	General Provisions	N	This applies only if any other subpart is applicable

NESHAP Subpart (40 CFR 61)	Title	Applies (Y/N)	Comments
A	General Provisions	N	This applies only if any other subpart is applicable

NESHAP Subpart (40 CFR 63)	Title	Applies (Y/N)	Comments
A	General Provisions	N	This applies only if any other subpart is applicable

Note: