



MICHELLE LUJAN GRISHAM  
GOVERNOR

HOWIE C. MORALES  
LT. GOVERNOR

NEW MEXICO  
ENVIRONMENT DEPARTMENT

525 Camino de los Marquez, Suite 1  
Santa Fe, NM 87505-1816  
Phone (505) 476-4300  
Fax (505) 476-4375  
www.env.nm.gov



JAMES C. KENNEY  
CABINET SECRETARY

JENNIFER J. PRUETT  
DEPUTY SECRETARY

Air Quality Bureau  
**PROPOSED TITLE V OPERATING PERMIT**  
Issued under 20.2.70 NMAC

**Note to Applicant for Draft-Proposed Permit Reviews:** The permit specialist provides this draft-proposed permit to the applicant as a courtesy to assist AQB with developing practically enforceable permit terms & conditions and correcting any technical errors. Please note that the draft-proposed permit may change following completion of the Department's internal reviews and if time allows, the applicant may be provided an opportunity for additional review before the permit is issued.

Certified Mail No: XXXX XXXX XXXX XXXX  
Return Receipt Requested

<b>Operating Permit No:</b>	P100-R2M4 shall be attached to P100-R2M1
<b>Facility Name:</b>	Los Alamos National Laboratory
<b>Facility Owner:</b>	U.S. Department of Energy, National Nuclear Security Administration
<b>Operator Name:</b>	Triad National Security, LLC Newport News Nuclear BWXT – Los Alamos, LLC
<b>Mailing Address:</b>	P.O. Box 1663, MS J978 Los Alamos, New Mexico 87545
<b>TEMPO/IDEA ID No:</b>	856-PRT20190005
<b>AIRS No:</b>	35 0280001
<b>Permitting Action:</b>	Title V Minor Modification
<b>Source Classification:</b>	Title V Major, PSD Minor
<b>Facility Location:</b>	382,958 m E by 3,970,164 m N; Zone 13; Datum NAD83
<b>County:</b>	Los Alamos
<b>Air Quality Bureau Contact:</b>	James E. Nellessen
<b>Main AQB Phone No.</b>	(505) 476-4300
<b>TV Permit Expiration Date:</b>	February 27, 2020
<b>TV Renewal Application Due:</b>	February 27, 2019

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**Liz Bisbey-Kuehn**  
**Bureau Chief**  
**Air Quality Bureau**

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**Date**

**[Delete all below at time final permit submitted for signature.]**

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TABLE OF CONTENTS

Part A FACILITY SPECIFIC REQUIREMENTS .....A4

- A100 Introduction and TV Minor Permit Modification to Permit P100-R2M1..... A4
- A1500 Regulated Sources – Evaporative Sprayers – TA-60 SERF ..... A4
- A1501 Control Equipment – Evaporative Sprayers – Not Required..... A5
- A1502 Emissions Inventory and Reporting – TA-60 SERF – Evaporative Sprayers ..... A5
- A1503 Applicable Requirements – Evaporative Sprayers ..... A6
- A1504 Operational Limitations– Evaporative Sprayers ..... A6
- A1505 Fuel Sulfur Requirements –Evaporative Sprayers– Not Required ..... A6
- A1506 20.2.61 NMAC Opacity –Evaporative Sprayers – Not Required..... A6
- A1507 Evaporative Sprayers–HAPs Calculations, Maintenance, and Repair..... A6

**SPECIFIC CONDITIONS REVISED/MODIFIED AND SOURCES ADDED TO AIR QUALITY PERMIT NO. P100-R2M1 BY THIS TV MINOR MODIFICATION PERMIT**

**PART A FACILITY SPECIFIC REQUIREMENTS**

**A100 Introduction and TV Minor Permit Modification to Permit P100-R2M1**

- A. All terms, conditions, and applicable requirements of Title V Air Quality Permit No. P100-R2M1, including Part A Facility Specific Requirements, and General Conditions Parts B and C, remain in effect unless specifically modified or revised by this TV minor permit modification.
- B. The Department has reviewed the TV Minor Permit Modification application for the proposed changes to Title V Air Quality Permit No. P100-R2M1 and has determined that the proposed changes meet the requirements of 20.2.70.404.B NMAC.
- C. This modification consists of adding one (1) evaporative sprayer to the existing five evaporative sprayers at the facility. This unit has a maximum spray capacity of 24 gallons/minute (site capacity of 20 gallons/minute) and will be located at the Sanitary Effluent Reclamation Facility (SERF) which is located in TA-60/Sigma Mesa.

**A1500 Regulated Sources – Evaporative Sprayers – TA-60 SERF**

- A. Table A1500.A lists all regulated air emission sources at the TA-60 SERF facility of the process equipment for this source category.

**Table A1500.A: Regulated Sources List – TA-60 SERF**

Unit No.	Source Description	Make Model	Serial No.	Maximum Capacity/ Permitted Capacity	Manufacture Date	Construction Date
TA-60-EVAP-1	Water spray evaporator	SMI Evaporative Solutions SMI 120	0053	9 gal per min/ 7.51 gal per min	2016	July 2016
TA-60-EVAP-2	Water spray evaporator	SMI Evaporative Solutions SMI 120	0054	9 gal per min/ 7.51 gal per min	2016	July 2016
TA-60-EVAP-3	Water spray evaporator	SMI Evaporative Solutions SMI 120	0055	9 gal per min/ 7.51 gal per min	2016	July 2016
TA-60-EVAP-4	Water spray evaporator	SMI Evaporative Solutions SMI 120	0056	9 gal per min/ 7.51 gal per min	2016	July 2018

**Table A1500.A: Regulated Sources List – TA-60 SERF**

Unit No.	Source Description	Make Model	Serial No.	Maximum Capacity/ Permitted Capacity	Manufacture Date	Construction Date
TA-60-EVAP-5	Water spray evaporator	SMI Evaporative Solutions SMI 120	0057	9 gal per min/ 7.51 gal per min	2016	July 2018
TA-60-EVAP-6	Water spray evaporator	SMI Evaporative Solutions SMI 420B	9360	24 gal per min/ 20 gal per min	2014	May 2019

**A1501 Control Equipment – Evaporative Sprayers – Not Required**

**A1502 Emissions Inventory and Reporting – TA-60 SERFLimits – Evaporative Sprayers**

A. ~~The permittee shall report actual emissions of regulated air pollutants from the SERF evaporative sprayers as follows: federally enforceable work practice standards in Conditions A1507.A and B establish the emissions allowable under the permit (20.2.70.7.H and I NMAC) since separate numerical pph and tpy emission limits for TSP, PM10, VOCs, and HAPs from the evaporators are not appropriate for this operating scenario. 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.~~

- (1) ~~Calculated actual ton per year (tpy) stack (point source) and fugitive emission rates from the SERF sprayers of individual and total hazardous air pollutants (HAPs) shall be determined and applied toward the facility-wide HAPs tpy emission limit caps in Table 106.B (P100-R2M1), shall be included in the semi-annual emissions inventory report required at A109.A (P100-R2M1), and shall be included in the annual emissions inventory reports required by 20.2.73 NMAC and Condition B110.H (P100-R2M1).~~
- (2) ~~Calculated actual pph and tpy emission rates of particulate matter (PM), PM10, and PM2.5 shall be included in the annual emissions inventory reports required by 20.2.73 NMAC and Condition B110.H (P100-R2M1) but are not applied toward the facility-wide emission limit caps for those pollutants in Table 106.B. Only emissions from stacks (point sources) of those pollutants count toward these PSD synthetic minor limits in Table 106.B (P100-R2M1).~~

**A1503 Applicable Requirements – Evaporative Sprayers**

- A. There are no additional applicable requirements other than those listed for the entire facility in Table 103.A (P100-R2M1).

**A1504 Operational Limitations– Evaporative Sprayers**

- A. This equipment is authorized for continuous operation.

**A1505 Fuel Sulfur Requirements –Evaporative Sprayers– Not Required****A1506 20.2.61 NMAC Opacity –Evaporative Sprayers – Not Required****A1507 Evaporative Sprayers–HAPs Calculations, Maintenance, and Repair–~~Work Practice~~ Standards**

- A. Operational Requirements**HAPs Calculations** (Evaporative Sprayers)

**Requirement:** Compliance with the **facility-wide** allowable emission limits in Table 106.B (P100-R2M1) shall be demonstrated by calculating the annual total HAPs emissions in tons per year. The emissions shall be calculated based on the most recent water analysis and hours of operation for the evaporative sprayers.

**Monitoring:** The permittee shall conduct an analysis of the basin water, including analytical results (water concentrations) for all HAPs and New Mexico TAPs, at the Sanitary Effluent Reclamation Facility (SERF) every two years beginning no later than calendar year 2018. The permittee shall monitor the hours of operation for each sprayer.

**Recordkeeping:** The permittee shall record a monthly rolling, 12-month total of HAPs emissions based on the sum of **calculated actual** emissions from all the evaporative sprayers. The emission factors for the HAPs shall be based on the values from the most recent water analysis.

**Reporting:** The permittee shall submit reports according to described in Section A109 and in accordance with Section B111 (P100-R2M1). An electronic copy of the required water analysis including analytical results (water concentrations) for all HAPs, TAPs, and the total dissolved solids (TDS) shall be sent to AQB with the Semi-annual Monitoring Report specified in Condition A109.A (P100-R2M1) for any year in which the water sampling is conducted.

- B. Maintenance and Repair Requirements

**Requirement:** Compliance with the **facility-wide** allowable emission limits in Table 106.B A (P100-R2M1) shall be demonstrated by properly maintaining and repairing the units.

**Monitoring:** Maintenance and repair shall meet the minimum manufacturer's or permittee's recommended maintenance schedule. Activities that involve maintenance, adjustment,

replacement, or repair of functional components with the potential to affect the operation of an emission unit shall be documented as they occur.

**Recordkeeping:** The permittee shall maintain records in accordance with Section B109 (P100-R2M1), including records of maintenance and repairs activities and a copy of the manufacturer's or permittee's recommended maintenance schedule.

**Reporting:** The permittee shall maintain records in accordance with Section B109 (P100-R2M1), including records of maintenance and repairs activities and a copy of the manufacturer's or permittee's recommended maintenance schedule.