

## 1.0 INTRODUCTION

The Laboratory is a nonprofit scientific institution dedicated to the research and development (R&D) of nuclear weapons science and technology; earth, energy, and environmental systems; nuclear and advanced materials; bioscience; and nuclear plasmas and beams. The Laboratory is owned by DOE/NNSA and is operated by the University of California. The Laboratory is unlike most other sources affected by Part 70 because its purpose is not to manufacture a "product" for distribution in commerce. The Laboratory's products are specific solutions to R&D problems, and many of these solutions are transferred elsewhere for commercialization or production. The Laboratory's R&D operations are unique in that they have no defined process or schedule. Rather, the intent of research is to constantly develop and improve processes. Therefore, operational flexibility is of the utmost importance to this institution.

The Laboratory has worked closely with the NMED, AQB to structure a permit application format that fulfills all of the requirements of Part 70 for identifying fees and applicable requirements and also provides for the operational flexibility needed for a research facility. The approach recognizes the following:

- The primary purpose of the operating permit application is to identify all applicable state and federal air quality requirements, verify these requirements by the permitting authority, and certify compliance status with these applicable requirements by the responsible official from LANL. Title V is not intended to apply additional requirements to facilities but rather to bring all existing applicable requirements under a single permit.
- Almost none of the thousands of research operations at the Laboratory has applicable regulatory requirements. Therefore, the main purpose of the operating permit is to document compliance for the industrial-type sources that are on site to support the research operations, and to assess fees on the Laboratory's facility-wide emissions.