

## 2.0 FACILITY-WIDE EMISSIONS

This chapter of the application summarizes annual emissions of criteria pollutants and hazardous air pollutants (HAPs) from the Laboratory. Annual emission estimates are used under U.S. Environmental Protection Agency (EPA) and NMED air quality regulations for several purposes, including classification of a facility as a major or minor source with respect to:

- Permitting under the Title V operating permit program,
- Permitting requirements under the PSD program, and
- National Emission Standards for Hazardous Air Pollutants (NESHAP) standards under Title III of the federal Clean Air Act Amendments of 1990 (CAAA).

LANL is a major source under the Title V operating permit program based on emissions of NO<sub>x</sub>, VOC, and CO. Facility-wide emissions of criteria pollutants and HAPs based on information provided in Chapter 3 are presented in Table 3.15-1 and show the Laboratory's major source status with respect to Part 70.

Annual facility-wide emission estimates are also provided to demonstrate that LANL is a minor source with respect to applicability of NESHAP standards and the PSD permit program. Proposed facility-wide allowable emission limits are requested as part of this application to ensure emissions remain below major source thresholds for these two programs. Emission estimates provided also demonstrate the basis for LANL's annual operating permit emission fee pursuant to 20.2.71 NMAC.

Throughout Chapter 3 of this application the Laboratory has proposed operational limits for relevant emission units in order to demonstrate compliance with the proposed facility-wide limits. Additionally, LANL has numerous small emission units that qualify as "trivial" or "insignificant activities" as described in NMED guidance<sup>1,2</sup>. Emissions from trivial sources are not discussed in this application because they are so small and

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1 NMED Air Pollution Control Bureau, Operating Permit Program, List of Trivial Activities, 1/10/1996.

2 NMED Air Pollution Control Bureau, Operating Permit Program, List of Insignificant Activities, 9/29/1995.

diffuse, and are not regulated for air quality purposes. However, emissions from insignificant emissions units (IEUs) must be

included in the facility-wide totals when determining if the facility is major or minor under PSD, Title V, and Title III regulations. The insignificant emission units at LANL are described in Section 2.4.