

2.3 Proposed Limits for Title III Applicability

Similar to the PSD discussion above, LANL is requesting facility-wide emission limits on HAPs to keep the facility a minor source of HAP emissions, and therefore not subject to the 1990 CAAA Title III requirements. The 1990 CAAA provided a list of 189 hazardous air pollutants. Since the original list was published, caprolactum has been delisted. Therefore, the current list includes 188 compounds included as regulated HAPs. The Title III major source threshold is 10 tons per year of any one HAP or 25 tons per year of all HAPs combined.

Emissions from fugitive and area sources must be included in the facility-wide totals when evaluating whether the facility is a major source under Title III. Therefore HAP emission estimates from open burning/open detonation (OB/OD) and remediation activities are included in this section.

As shown in Table 2.1-2, the Laboratory's actual HAP emissions are well below the Title III major source threshold. See Table 3.6-2 for speciated HAP data for chemical use. The largest source of HAP emissions at LANL is from chemical use in support of various research and development activities. The second largest source of HAP emissions is from fuel combustion in boilers and heaters. LANL is proposing emission limits of 8 tons per year for any one HAP and 24 tons per year of total HAPs. Chapter 3 of this application provides details about individual emission units and source categories and specific operational limits LANL proposes to ensure HAP emissions stay below the requested facility-wide limits. Table 2.3-1 shows the proposed HAP allowable emission limits. Each emission limit proposed is on a 12-month rolling average basis.

Compliance with the proposed facility-wide emissions limit will be demonstrated by calculating actual emissions from all sources that are not insignificant on a semiannual basis.

Table 2.3-1. Proposed Emission Limits for Facility-Wide HAPs

Pollutant	Proposed Allowable Limit (ton/year)
-----------	--

Total Facility-wide HAPs	24
Individual Facility-wide HAPs	8