



Risk Reduction & Environmental Stewardship Division

Meteorology & Air Quality Group

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Date: October 23, 2003

Refer to: RRES-MAQ:03-270

Mr. Ned Jerabek
Air Quality Bureau
New Mexico Environment Department
2048 Galisteo
Santa Fe, NM 87505

Dear Mr. Jerabek:

Los Alamos National Laboratory (LANL) requests that all of the storage tanks be removed from the proposed operating permit P-100. Due to the recent revision by EPA to 40 CFR 60 New Source Performance Standards (NSPS) Subpart Kb, all of LANL's storage tanks qualify as insignificant emission units with potential to emit less than one ton of regulated air pollutants per year.

On November 27, 2002, Los Alamos National Laboratory (LANL) submitted an updated Operating Permit application. On April 14 and June 17, LANL amended the application with additional storage tanks. In total, 26 tanks were identified as having applicable recordkeeping requirements under 40 CFR 60 Subpart Kb.

In the correspondence dated April 14 and June 17, LANL advised that EPA had proposed revisions to 40 CFR 60 Subpart Kb that would exempt the LANL storage tanks from the only applicable requirements for recordkeeping.

On October 15, in the Federal Register (68 FR 59328), the proposed revisions to 40 CFR 60 Subpart Kb became final. The effective date of the rule is October 15, 2003. With this change, none of LANL's tanks are subject to the recordkeeping requirements under 60.116b (a) and (b), or any other part of Kb. With no applicable requirements, these tanks now qualify as insignificant. Therefore, LANL requests that they be removed from the proposed permit.

The NSPS in 40 CFR 60 Subpart Kb now completely exempt the following classes of tanks:

- Less than 75 m³ (19,815 gallons) in capacity,
- Greater than 151 m³ (39,894 gallons) in capacity with a content vapor pressure less than 3.5 kPa (0.51 psi, 26.4 mm Hg),
- Between 75 m³ and 151 m³ in capacity with a content vapor pressure less than 15 kPa (2.18 psi, 112.7 mm Hg), and
- Process tanks.

This information is also being submitted to EPA Region 6. In addition, a copy of this notice will be posted on our website (<http://www.airquality.lanl.gov/OpPermitGenInf.htm>). If you have any questions concerning this request, please contact me (505-665-0239) or Jackie Hurtle (505-665-4380) at LANL's Meteorology and Air Quality Group (RRES-MAQ), permitting section.

Sincerely,

Jean Dewart
Group Leader
Meteorology and Air Quality Group

Enc: a/s

Cy:

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RRES-MAQ Operating Permit Project File8
RRES-MAQ File