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July 8, 1998

Leland Maez
Permit Engineer
ESH-17, Air Quality Group
Los Alamos National Laboratory
P.O. Box 1663, MS J978
Los Alamos, NM 87545

Re: Exemption Request for 150 Ton per Hour Crusher

Dear Mr. Maez,

This letter is in response to your letter of June 3, 1998 for an exemption for Los Alamos National Laboratory to construct and operate a portable 150 ton per hour (TPH) crusher for radioactively contaminated material from Decommissioning and Demolition (D&D) activities. The letter was received by the New Mexico Environment Department Bureau of Air Quality (Department) on June 5, 1998.

Title 20 of the New Mexico Administrative Code, Chapter 2, Part 72 (20 NMAC 2.72) Construction Permits, Section 202.B.5 exempts any emissions unit with a potential emission rate of no more than ½ ton per year of any pollutant for which a National or New Mexico Ambient Air Quality Standard has been set from inclusion in the calculation of the facility wide potential emission rate. Please note that the calculation of the potential emission rate should include any other activities, as appropriate, that are integral to the operation of the facility (for example, the dust raised by vehicle traffic over unpaved haul roads). 20 NMAC 2.72 Section 202.B stipulates that the facility containing such equipment is to notify the Department by using forms provided by the Department.

20 NMAC 2.72 Section 107.V defines potential emission rate as the emission rate of a source at its maximum capacity in the absence of air pollution control equipment which is not vital to the production of normal product of the source or its normal operation. The determination of maximum capacity includes any federally enforceable physical or operational capacity of the source. The definition of potential emission rate does not include limitations on the hours of operation, use of air pollution controls, nor limitations on the amount of material to be processed by the facility as these are not federally enforceable physical or operational limits. Therefore, the potential emission rate of this facility is to be calculated using the maximum capacity of the facility for the maximum number of hours per year.

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For example, a 150 TPH crusher operating 24 hours a day 365 days a year has a potential throughput of 1,314,000 tons per year of material throughput (150 tons/hour times 24 hours/day times 365 days/year). Table 11.19.2-2 of the Compilation of Air Pollution Emission Factors, Fifth Edition, Volume 1 (AP-42) lists the emission rate for Total Suspended Particulates (TSP) from primary crushing operations as 0.00070 lb of TSP per ton of material throughput. The potential throughput of 1,314,000 tons/year can then be multiplied by the AP-42 factor for primary crushing to obtain 919.8 lb/year of TSP emissions from crushing operations. This process can be repeated for the other operations described in your letter (loading, screening, conveying, etc.) and then summed together to obtain potential emission rate of TSP. Please note that this process must be repeated for the other criteria pollutants that this facility will emit. The Department requires all crushing operations to follow this process when calculating the potential emission rate for their facility.

Based on these reasons, the Department is unable to grant your request for an exemption. If you have any questions, please contact me at (505)827-1494 extension 1474.

Sincerely,

James J. Cesario

James J. Cesario
Permit Engineer
New Source Review Unit
Permitting Section

cc: Jim Shively, Program Manager, Permitting
Vince Vigil, Program Manager, Enforcement
Royce Wyrick, Environmental Supervisor, Enforcement