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GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**

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DEPUTY SECRETARY

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To Cornelius ✓  
File # 44  
LANL

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January 5, 1994

CERTIFIED MAIL NO. P 108 733 324  
RETURN RECEIPT REQUESTED

Tony Grieggs  
Staff Member  
Los Alamos National Laboratory  
Mailstop K-490  
P.O. Box 1663  
Los Alamos, NM 87545

Ref: FACT SHEET on Los Alamos National Laboratory PBR/SDP Unit experiment  
Sub: Possible Air Quality Permit Requirement for PBR/SDP Unit

Dear Mr. Grieggs:

This letter is in regarding the U.S. Department of Energy (DOE)/Los Alamos National Laboratory (LANL) for Research, Development and Demonstration experiment at the Packed-Bed Reactor/Silent Discharge Plasma (PBR/SDP) Unit.

The unit description given in the NMED Hazardous and Radioactive Materials Bureau fact sheet states that, there will be some air pollutants emitted from this experimental source.

Please note an air quality permit may be required for this experimental source if any of the following are applicable:

- 1) the emission rate of any one regulated air pollutant (nitrogen oxides, carbon monoxide, non-methane hydrocarbons, total suspended particulate, sulfur dioxide) is greater than 10 pounds per hour or 25 tons per year, or
- 2) the emission rate of Lead is greater than 5 tons per year, or
- 3) any toxic air pollutant listed in the AQCR 702, Part Three Appendix A which exceeds the corresponding emission rate shown in pounds per hour.

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Tony Grieggs  
LANL PBR/SDP Unit  
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It is very important to estimate the type and amount of all possible air pollutants from this source to determine whether an air quality permit is required.

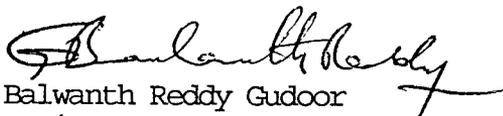
A general air quality permit application is enclosed with this letter. Please estimate all possible air pollutants from this experiment and indicate the maximum emission rates of each pollutant in the enclosed application and submit to our Department for review.

For your information a copy of AQCR 702 and AQCR 700 are enclosed with this letter which explains the permit requirement determination procedure, and required permit fee.

AQCR 702, Part Two A.4 states that "for all sources subject to this regulation, applications for permits shall be filed prior to the commencement of the construction, modification, or installation. Regardless of the anticipated commencement date, no construction, modification or installation shall begin prior to issuance of the permit".

If you have any questions, please call me in Santa Fe at (505) 827-2412.

Sincerely,



Balwanth Reddy Gudoor  
Environmental Engineer  
Technical Analysis and Permits Section  
Air Pollution Control Bureau

Enclosures: 1) General air quality permit application  
2) A copy of AQCR 702 (explains permit applicability)  
3) A copy of AQCR 700 (explains permit fee requirements)

xc: Barbara Hoditschek, Hazardous and Radioactive Materials Bureau, NMED