

Engineering Guide #62

Question:

What activities, which emit extremely small amounts of air pollutants, do not have to be inventoried for a Title V applicability determination or listed as insignificant activities on a Title V permit application?

Answer:

The Ohio EPA recognizes that there are extremely small air contaminant emitting activities that are trivial in size and have never been considered a part of the current regulatory program. Therefore, Ohio EPA will continue to not expect these trivial activities to be inventoried or listed as insignificant activities at a Title V facility. If it is unclear whether a particular activity is trivial, it should be inventoried and listed as an insignificant activity on the Title V application.

Described below are activities that the Ohio EPA considers to be trivial:

Note: This guide applies only to the Title V permittee or to those determining if their facilities are subject to Title V permitting requirements. Any activity that appears on this list would clearly be considered de minimis under OAC rule 3745-15-05, and there would be no requirements for such activities at non-Title V facilities.

Trivial Air Contaminant Emission Activities

1. Administrative office supplies - ink pens, markers, "white-out", and pencil sharpeners
2. Office equipment - copying machines, computer/word processor printers, typewriters, blueprint copying machines, paper shredders, and photographic processing equipment (by which an image is reproduced upon material sensitized to radiant energy)
3. Facility maintenance equipment - drills, grinders, welders, chain saws, lawn mowers, propane torches, roof repair tar pots, and battery chargers
4. General facility maintenance activities - building painting with waterbased latex paints, building painting with solventbased paints where the maximum uncontrolled VOC emissions are less than five pounds per day, activities associated with repaving or resurfacing facility properties, lawn care activities (fertilizer, insecticide, pesticide, and/or herbicide applications), and fire suppression systems (does not include generators)
5. Janitorial supplies - floor cleaning materials, furniture cleaning materials, floor polishes, and paint aerosol cans
6. Employee/visitor activities - smoking rooms for the consumption of tobacco products, cooking equipment for food, comfort air conditioning systems, hot water tanks, and clothes dryer vents
7. Vehicle emissions - vehicle emissions from forklifts, automobiles, trucks, cranes, bulldozers, etc.
8. Storage equipment - storage tanks for liquids with a capacity of less than seven hundred gallons, pressurized storage tanks (that store inorganic liquids or propane, butane, isobutane and liquid petroleum gases), storage drums/barrels, and vegetable oil processing operations [storage tanks, pumps, and valves]
9. Small heaters and boilers - certain fossil-fuel fired heaters and boilers, that only burn natural gas, propane, kerosene, or #2 oil and have a heat input capacity of less than four million Btu/hour
10. Small oilers - on-line or manual oilers, including hydraulic fluids, with a reservoir capacity of less than one-half gallon

11. Electric powered equipment - electric powered equipment whose only air contaminant emissions result from the effect of the electrical field on the room air (e.g., ozone generation)
12. Packaging equipment - equipment used exclusively for the packaging of lubricants, greases, waterborne adhesives, coatings, or binders
13. Air separation plants
14. Small recycling or reclaiming units - noncontinuous solvent recycling or reclaiming units with a capacity of less than twenty gallons
15. Certain cooling towers - cooling towers utilizing only non-contact cooling water and not regulated under NESHAP
16. Other small air contaminant emitting activities - any activity that (a) has a maximum uncontrolled emission rate of less than one pound per day for each of the following pollutants: VOC, particulates, CO, NO_x, SO₂, Pb, and any other inorganic compound and (b) has a maximum total uncontrolled emission rate of less than one pound per day for all hazardous air pollutants
17. Any trivial activities that have been identified by U.S. EPA in Appendix A of the "White Paper" issued on July 10, 1995

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