

Air Quality Operating Permit Application Form 1.0: General Information

INSTRUCTIONS:

Section 1.3: Insignificant Activities

SOURCE NAME: _____

DATE: _____

DWEE FACILITY ID: _____

IMPORTANT: PLEASE READ THE INSTRUCTIONS BELOW PRIOR TO COMPLETING THIS FORM. Please type or print with black ink. Do NOT use pencil. If you have questions, please contact the Nebraska Department of Water, Energy, and Environment (DWEE) Air Quality Operating Permit Team by email at DWEE.AirQuality@nebraska.gov or by phone at (402) 471-2186.

GENERAL INSTRUCTIONS

The following includes the insignificant emission activities list, classes, and descriptions for use with Air Quality Operating Permit (OP) applications, OP classification or applicability determinations, and emissions inventory reporting. Please read the discussion in each Part to determine how to treat the activity in question. Please contact the DWEE if you have questions.

“Insignificant activities” is defined in Nebraska Administrative Code Title 129 - Nebraska Air Quality Regulations, Chapter 1, as those activities and emissions that may be excluded from reporting for operating permit applications and/or emissions inventories. Title 129, Chapter 6, Section 002.05D further provides that the list of insignificant activities shall also describe those classes of activities that only need to be listed in an operating permit (OP) application with a limited amount of support data.

The applicant is always responsible for providing all information necessary to determine if an activity, piece of equipment or group of items is subject to an applicable requirement. Inclusion of an activity, emission unit or specific use or storage of a regulated pollutant on the list of insignificant activities does not absolve an applicant from any applicable requirements that the activity or emission unit is otherwise subject.

The authority to develop and update the list of insignificant activities comes from Title 129, Chapter 6, Section 002.05C. In addition, Section 002.05D of Chapter 6 allows DWEE to describe classes of insignificant or trivial activities that may be excluded from an OP application and emissions inventories.

OPERATING PERMIT CLASSIFICATION

Emissions from all insignificant activities listed in Parts 1 and 2 of this form must be included in the determination of whether a source must obtain a Class I or Class II operating permit. These listed activities cannot be considered insignificant or trivial:

- Any activity listed in Parts 1 through 3 below that emits a pollutant(s) subject to a synthetic minor limitation cannot be considered insignificant unless the source accepts further limitations on the potential emissions of the pollutant in question. As an example:

A source's potential to emit (PTE) for a single hazardous air pollutant (HAP) is 12.5 tons per year (tpy). This includes 1.5 tpy from emissions units listed as, or in a class of, insignificant activities identified in Parts 1 through 3 of the Instructions for Section 1.3, Form 1.0 for Insignificant Activities. The source has the following two options to be classified synthetic minor for HAPs:

Option 1: Accept an enforceable permit limit of less than 10 tpy for all emissions units and keep records of the HAP emissions for all units (including those qualifying as insignificant activities); or

Option 2: Accept an enforceable permit limit of less than 8.5 tpy and keep records on emissions units except that records do not need to be kept on emission units which emit 1.5 tpy or less of HAP and which are listed as insignificant activities or which are identified in a class of insignificant activities.

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- Any emission unit subject to applicable requirements, including, but not limited to, New Source Performance Standards (NSPS), National Emissions Standards for Hazardous Air Pollutants (NESHAP), or construction permit requirements.

An OP must contain all applicable requirements as provided for in Title 129, Chapter 6. For those units subject to an applicable requirement, the permit applicant must assign an emission unit identification number, complete the appropriate emission unit application forms, and calculate and submit emissions as part of the OP application and Annual Emission Inventory reporting to DWEE.

- Stationary engines except for stationary engines being tested at a stationary test cell/stand.

Stationary engines are subject to NSPS (40 CFR 60) Subparts IIII or JJJJ and/or NESHAP (40 CFR 63) Subpart ZZZZ. These applicable requirements must be addressed in an Operating Permit. For OP application filing, Form 6.0, Section 6.2.1 must be completed for each stationary engine at the source. If an engine at the source is a nonroad engine, then OP Application Form 6.0, Section 6.2.2 must be completed and submitted with the application ("nonroad" engine is defined in that form).

PART 1 - INSIGNIFICANT ACTIVITIES INCLUDED IN AN OP APPLICATION:

In accordance with Title 129, Chapter 6, Sections 002.05C and 00205D, the DWEE has determined that the following listed insignificant activities must be included in an OP application. Use Form 1.0, Section 1.3, Table 1. However, the emissions associated with the following activities do not need to be included in Annual Emissions Inventory reporting unless the emissions data is requested by DWEE.

Inclusion of any activity in the following list does not absolve an applicant from compliance with any applicable requirements to which such activity or emission is otherwise subject. In addition, Title 129 provides that the DWEE may request, and the applicant or permittee is obligated to provide, any additional information including information about any insignificant activity listed.

- 1a) Comfort cooling towers
- 1b) Process cooling towers with a circulating water flow rate less than 2,000 gallons per minute. In the Insignificant Activity Description column of the Table 1 found in Section 1.3, Form 1.0, include the circulating water flow rate, total dissolved solids concentration, estimated drift loss, and average hours or days in service.
- 1c) Space heaters. In the Insignificant Activity Description column of Table 1 found in Section 1.3, Form 1.0, include the heat input rating, fuel type, including a summary of annual fuel use for space heating, and number of heaters with the same rating and fuel type.
- 1d) Fuel storage and distribution equipment, including storage vessels (tanks), with aggregate annual throughput of less than 1 million gallons for the entire source. Records verifying aggregate annual fuel oil throughput must be maintained for five (5) years and made available to DWEE or USEPA within forty-eight (48) hours of a request for documentation of annual throughput. **Please note that gasoline storage tanks at area sources of HAPs ("area sources" is defined in Title 129, Chapter 1) cannot be considered insignificant activities because these tanks are subject to NESHAP Subpart CCCCCC (40 CFR 63.11111); therefore, the applicable requirements for affected units under this subpart must be incorporated into an OP.**

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- 1e) Stationary internal combustion turbines at area sources of HAP, that are not subject to applicable requirements such as a NSPS or NESHAP, use only natural gas as a fuel source, and are rated below 1,630 horsepower. In the Insignificant Activity Description column of Table 1 in Section 1.3, Form 1.0, please include the size of the unit, fuel used and average hours or days of service per year.
- 1f) Stationary external combustion units not subject to a NSPS or NESHAP using the listed fuel type and rated below the corresponding heat input rating in the table below. In the Insignificant Activity Description column of Table 1 in Section 1.3, Form 1.0, include heat input rating of the unit, the fuel(s) used, and average hours or days of service per year.

Fuel Type	Heat Input Rating
Natural Gas	10.0 Million British Thermal Units per Hour (MMBtu/hr)
Diesel Oil	8.0 MMBtu/hr
No. 2 Fuel Oil	8.0 MMBtu/hr
No. 6 Fuel Oil	2.0 MMBtu/hr
Coal	1.5 MMBtu/hr
Wood	5.5 MMBtu/hr
Propane	8.0 MMBtu/hr
Kerosene	8.0 MMBtu/hr

- 1g) Welding equipment. In the Insignificant Activity Description column of Table 1 in Section 1.3, Form 1.0, include the number of hand-held welders and the type and amount (pounds) of welding wire used per year.

PART 2 - HAP and VOC (Volatile Organic Compound) EMITTING INSIGNIFICANT ACTIVITIES:

Emission units emitting small amounts of HAPs must be included in the insignificant activities list of an OP application. When completing Table 1 in Section 1.3, Form 1.0, please complete all four columns for each insignificant activity listed.

HAP emissions must also be reported in the source's Annual Emissions Inventory report if the sum of the individual HAPs exceeds 2.5 tons per year. However, HAP emissions may be excluded from the source's Annual Emissions Inventory report if annual HAP emissions are below the reporting levels (pounds/year) in Title 129, Appendix I. To view the Title 129 Appendix go to <https://dwee.nebraska.gov/>, select "Rules & Regulations" from the drop down menu on "Resources & Services", then select "Title 129 Nebraska Air Quality Regulations".

Sources with synthetic minor HAP limitations must list all HAP emissions units on the appropriate application forms, unless the source accepts further enforceable permit limitations on PTE that allow an activity to be considered insignificant. An example of permit limitations is provided in the OPERATING PERMIT CLASSIFICATION section above.

Emission units emitting 0.5 tons or less per year of VOCs must be included in the insignificant activities list of an OP application. These VOCs must be reported in the Annual Emissions Inventory reporting if the sum

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of the VOC emissions exceeds 1.0 ton per year. When completing Table 1 in Section 1.3, Form 1.0, please complete all four columns for each insignificant activity listed.

Sources with synthetic minor VOC limitations must list all VOC emissions units on the appropriate application forms, unless the source accepts further enforceable permit limitations on PTE to allow an activity to be insignificant.

PART 3 – INSIGNIFICANT ACTIVITIES NOT INCLUDED IN AN OP APPLICATION AND ANNUAL EMISSIONS INVENTORY REPORTING:

As provided for by Title 129, Chapter 6, Sections 002.05C and 00205D, the DWEE has determined that the following listed activities are insignificant (consistent with US-EPA's list of activities that may be treated as "trivial" in its "White Paper for Streamlined Development of Part 70 Permit Applications" issued July 10, 1995) and can be omitted from inclusion in OP applications and Annual Emissions Inventory reporting provided the activity **does not emit** a pollutant(s) subject to a synthetic minor emissions limitation. However, if the activity emits a pollutant subject to a synthetic minor emissions limitation, then the activity **must be** included in an OP application on the appropriate emission unit form, in an Annual Emissions Inventory report, and must be considered in the determination of OP classification.

Inclusion of any activity here does not absolve an applicant from compliance with any applicable requirements to which such activity or emission is otherwise subject. The DWEE may request additional information about any activity listed and the applicant or permittee is obligated to provide the information requested.

- 3a) Forges and drop hammers or hydraulic presses used for forging or metal working
- 3b) Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal, or plastic
- 3c) Brazing and soldering equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAPs that exceed the reporting level(s) in Title 129, Appendix I
- 3d) Pneumatically operated equipment, including hand tools
- 3e) Carbon Dioxide (CO₂) lasers, used only on metals and other materials which do not result in emissions of HAPs that exceed the reporting level(s) in Title 129, Appendix I
- 3f) Laser trimmers using dust collection and that do not result in emissions of HAPs that exceed the reporting level(s) in Title 129, Appendix I

PART 4 – INSIGNIFICANT ACTIVITIES NOT INCLUDED IN AN OP APPLICATION, ANNUAL EMISSIONS INVENTORY, OR OP CLASSIFICATION AND APPLICABILITY DETERMINATION:

As provided for by Title 129, Chapter 6, Sections 002.05C and 00205D, (and US-EPA's "White Paper" referenced above) the DWEE has determined that the following classes of insignificant activities may be treated as "trivial" and do not need to be included in an OP application, Annual Emissions Inventory reporting, or in the determination of OP classification and applicability. However, the DWEE may request

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additional information about any of these activities, and the applicant or permittee is obligated to provide the information requested.

- 4a) Office Activities, including operation of standard office equipment when such activities are conducted solely in support of the principal business activity, not including printers or businesses primarily involved in photographic reproduction
- 4b) Janitorial activities, services, and consumer use of janitorial products
- 4c) Maintenance of processing equipment, machinery and/or control devices, buildings, grounds or facilities to maintain appearance or condition provided these activities are not conducted as part of a manufacturing process and do not trigger a permit modification
- 4d) Portable, sealed storage containers that are not connected to a process unit or line by piping, transfer hoses, lines or valves, etc.
- 4e) Comfort air conditioning, cooling, dehumidification or ventilation systems not used to remove air contaminants generated by or released from specified units of equipment.
- 4f) Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing, industrial, or commercial process
- 4g) Non-commercial food preparation
- 4h) Laundry activities, except for dry-cleaning and steam boilers
- 4i) Tobacco smoking rooms and areas
- 4j) Batteries and battery charging stations, except at battery manufacturing plants
- 4k) Equipment used to mix and package items such as soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized
- 4l) Equipment used exclusively to slaughter animals
- 4m) Vents from continuous emissions monitors and other analyzers
- 4n) Hot melt adhesives with no volatile organic compounds (VOC) or hazardous air pollutants (HAP) in the formulation
- 4o) Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam
- 4p) Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants
- 4q) Laboratory equipment used for physical or chemical analysis but not lab fume hoods or vents
- 4r) Routine calibration and maintenance of laboratory equipment or other analytical instruments
- 4s) Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis
- 4t) Hydraulic and hydrostatic testing equipment
- 4u) Environmental chambers not using HAP gases
- 4v) Shock Chambers, Humidity Chambers, and Solar Simulators
- 4w) Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes. Additionally, there cannot be a requirement for a fugitive dust control plan

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or its equivalent. Any such requirements must be addressed as applicable requirements in an Operating Permit.

- 4x) Process water filtration, deionization, and demineralization systems, demineralizer water tanks, and demineralizer vents
- 4y) Boiler water treatment operations, not including cooling towers
- 4z) Oxygen scavenging (de-aeration) of water
- 4aa) Ozone generators
- 4bb) Fire suppression systems, excluding RICE (Reciprocating Internal Combustion Engine) emergency pumps at a fixed site
- 4cc) Emergency road flares
- 4dd) Steam vents and safety relief valves
- 4ee) Steam leaks
- 4ff) Steam cleaning and sterilizer operations
- 4gg) Employee support activities such as cafeteria and recreational facilities
- 4hh) Laboratory and Research and Development Activities conducted exclusively in the non-processing areas of the source
- 4ii) Storage and handling of lubricating and heavy oils with a vapor pressure less than 0.5 pounds per square inch (psi) under standard conditions, when held for source use only

Produced by: Nebraska Department of Water, Energy, and Environment, 245 Fallbrook Avenue, Suite 100, Lincoln, NE 68521; phone (402)471-2186. To view this, and other information related to our agency, visit our web site at <https://dwee.nebraska.gov/>.