

INSTRUCTIONS:

Section 1.3: Insignificant Activities

IMPORTANT: Please type or print with black ink. Do NOT use pencil. If you have questions, please contact the Nebraska Department of Environment and Energy (NDEE), Air Quality Operating Permit Section, at (402) 471-2186 or NDEE.AirQuality@nebraska.gov.

GENERAL INSTRUCTIONS

After reading these instructions, complete Section 1.3, Insignificant Activities List.

As defined in [Title 129, Chapter 1](#), insignificant activities are those activities and emissions that may be excluded from reporting for operating permit applications and/or emissions inventories. If an insignificant activity must be included in an operating permit application, the activity can be listed in the application with a limited amount of support information. The authority to develop a list of insignificant activities comes from [Title 129, Chapter 6](#), Section [002.05C](#). The NDEE also has the ability to update the list of insignificant activities, as necessary.

These instructions include the insignificant activities list. Parts 1 and 2 of these instructions include insignificant activities that are exempt, or conditionally exempt, from inclusion in both the operating permit application and the emissions inventory report forms. Parts 3 and 4 include insignificant activities that must be included in the operating permit application forms but could potentially be exempt from reporting under the emissions inventory program.

Please note that, while potentially exempt from inclusion in an Operating Permit Application or the Annual Emissions Inventory Report, **all insignificant activities listed in Parts 1 through 4 of this form must still be included in the determination of whether a source must obtain a Class I or Class II operating permit.**

Also note that, once the source classification has been determined by the permittee, **any activity listed in Parts 2 through 4 of this form that emits a pollutant(s) subject to a synthetic minor limitation is not an insignificant activity unless the source accepts further limitations on the potential emissions of the pollutant in question.**

EXAMPLE: A source's potential to emit (PTE) for a single hazardous air pollutant (HAP) is 12.5 tons per year (tpy), including 1.5 tpy from emissions units qualifying as insignificant activities identified in Parts 1 through 4 of this form. The source wants to be synthetic minor for HAPs. The source has two options, which are:

- 1. Accept a limit of less than 10 tpy for all emissions units and keep records of the HAP emissions for all units; or,*
- 2. Accept a limit of less than 8.5 tpy, which allows the units to be considered insignificant activities.*

In addition to insignificant activities listed in Parts 1 through 4 that emit a regulated air pollutant subject to a synthetic minor emissions limitation as described above, **all emission units that are subject to applicable requirements, including, but not limited to, NSPS, NESHAP, and/or construction permit requirements, cannot be considered insignificant activities**, as Operating Permits are required to contain all applicable requirements (Title 129, Chapter 6). For those units subject to an applicable requirement, you must assign an emission unit identification number, complete the appropriate emission unit application forms, and calculate and submit emissions as part of your application and Annual Emission Inventory Reports to NDEE.

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Engines can no longer be insignificant activities. With the exception of stationary engines being tested at a stationary test cell/stand, all stationary engines are subject to NSPS, 40 CFR 60 Subpart IIII and/or NESHAP, 40 CFR 63 Subpart ZZZZ. Therefore, these applicable requirements must be addressed in the Operating Permit.

If you have engines that are moved around your source, review the following definition of a nonroad engine from 40 CFR 89.2 and 40 CFR 1068.3:

- (1) Except as discussed in paragraph (2) of this definition, a nonroad engine is any internal combustion engine:
 - (i) In or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as garden tractors, off-highway mobile cranes and bulldozers); or
 - (ii) In or on a piece of equipment that is intended to be propelled while performing its function (such as lawnmowers and string trimmers); or
 - (iii) That, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Characteristics of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.
- (2) An internal combustion engine is not a nonroad engine if:
 - (i) The engine is used to propel a motor vehicle or a vehicle used solely for competition, or is subject to standards promulgated under section 202 of the Act; or
 - (ii) The engine is regulated by a federal New Source Performance Standard promulgated under section 111 of the Act; or
 - (iii) The engine otherwise included in paragraph (1)(iii) of this definition remains or will remain at a location for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that remains in a single location on a permanent basis (i.e., at least two years) and that operates at that single location approximately three months (or more) each year. This paragraph does not apply to an engine after the engine is removed from the location.

For purposes of the above paragraph, the 12-month timeframe does not apply to an engine that is kept at a staging area/storage. For example, if an emergency generator is kept in a building for deployment when needed, the time it spends idle in storage is not counted. Only the timeframe when the emergency engine is at its point of use should be counted. If you have one or more engines that meet the definition of a nonroad engine, complete Form 6.0, Section 6.2.2. These engines will not be included in your operating permit but will be discussed briefly in the fact sheet. You do not have to report nonroad engine emissions in your Annual Emissions Inventory Reports.

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PART 1:

In accordance with Title 129, Chapter 6, Section 002.05C, the NDEE has determined that the following insignificant activities are exempt from inclusion in the Operating Permit Application and Annual Emissions Inventory Reports. Please note that these activities are in no way absolved from fulfilling any other applicable requirements. The NDEE may request additional information about any activity exempted by this list, and the permittee is obligated to provide the information requested.

- 1) 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
- 2) Janitorial activities, services, and consumer use of janitorial products
- 3) 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
- 4) Portable, sealed storage containers that are not connected to a process unit or line by piping, transfer hoses, lines or valves, etc.
- 5) Air conditioning units used for human comfort
- 6) Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing, industrial, or commercial process.
- 7) Non-commercial food preparation
- 8) Laundry activities, except for dry-cleaning and steam boilers
- 9) Tobacco smoking rooms and areas
- 10) Batteries and battery charging stations, except at battery manufacturing plants
- 11) 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.
- 12) Equipment used exclusively to slaughter animals
- 13) Vents from continuous emissions monitors and other analyzers
- 14) Hot melt adhesives with no volatile organic compounds (VOC) or hazardous air pollutants (HAP) in the formulation
- 15) 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
- 16) Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants
- 17) Laboratory equipment used for physical or chemical analysis but not lab fume hoods or vents
- 18) Routine calibration and maintenance of laboratory equipment or other analytical instruments
- 19) Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis
- 20) Hydraulic and hydrostatic testing equipment
- 21) Environmental chambers not using HAP gases
- 22) Shock Chambers, Humidity Chambers, and Solar Simulators
- 23) 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 or its equivalent. Any such requirements must be addressed as applicable requirements in an Operating Permit.
- 24) Process water filtration, deionization, and demineralization systems, demineralizer water tanks, and demineralizer vents
- 25) Boiler water treatment operations, not including cooling towers
- 26) Oxygen scavenging (de-aeration) of water

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- 27) Ozone generators
- 28) Fire suppression systems, excluding RICE emergency pumps at a fixed site
- 29) Emergency road flares
- 30) Steam vents and safety relief valves
- 31) Steam leaks
- 32) Steam cleaning and sterilizer operations
- 33) Employee support activities such as cafeteria and recreational facilities
- 34) Laboratory and Research and Development Activities conducted exclusively in the non-processing areas of the source
- 35) 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. The NDEE asks that the applicant list the tanks/storage devices, including the tank contents, located at the source in the second table in Section 1.3 so that the NDEE is aware of the existence of these tanks/storage devices at your source.

PART 2:

In accordance with Title 129, Chapter 6, Section 002.05C, the NDEE has determined that the following activities are **conditionally exempt** from inclusion in the Operating Permit Application and Annual Emissions Inventory Reports. The following activities are exempt from inclusion in the Operating Permit Application and the Annual Emissions Inventory **unless the activity emits a pollutant(s) subject to a synthetic minor emissions limitation**. If the activity emits a pollutant subject to a synthetic minor emissions limitation, the activity must be included in the Operating Permit Application on the appropriate emission unit form and in the Annual Emissions Inventory Report.

Please note that these activities are in no way absolved from fulfilling any other applicable requirements. The NDEE may request additional information about any activity exempted by this list, and the permittee is obligated to provide the information requested.

- 1) Forges and drop hammers or hydraulic presses used for forging or metal working
- 2) Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal, or plastic
- 3) Brazing, soldering, and welding 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
- 4) Pneumatically operated equipment, including hand tools
- 5) 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 II or Appendix III
- 6) 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 3:

In accordance with Title 129, Chapter 6, Section 002.05C, the NDEE has determined that the following insignificant activities must be included in the Section 1.3: Insignificant Activities List. The emissions associated with the following activities do **not** need to be included in the Annual Emissions Inventory Reports **unless** the emissions data is requested by NDEE.

Please note that these activities are in no way absolved from fulfilling any other applicable requirements. The NDEE may request additional information about any insignificant activity listed, and the permittee is obligated to provide the information requested.

- 1) Comfort cooling towers

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- 2) Process cooling towers with a circulating water flow rate less than 2,000 gallons per minute. In the Description column of Section 1.3, include the circulating water flow rate, total dissolved solids concentration, estimated drift loss, and average hours or days in service.
- 3) Space heaters. In the Description column of Section 1.3; 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.
- 4) 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 NDEE 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 cannot be considered insignificant activities, as these tanks are subject to NESHAP Subpart CCCCCC (§63.11111).** The applicable requirements for affected units under this subpart must be incorporated into the Operating Permit.
- 5) Stationary internal combustion turbines at area sources of HAP that are not subject to a NSPS or NESHAP, use only natural gas as a fuel source, and are rated below 1,630 horsepower. In the Description column of Section 1.3, please include the size of the unit, the fuel used, and average hours or days of service.
- 6) 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 Description column of Section 1.3, include heat input rating of the unit, fuel(s) fired, 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

PART 4:

Emission units emitting small amounts of HAPs must be included in the insignificant activities list, but are excluded from the Annual Emissions Inventory Reports if annual HAP emissions are below the reporting levels (pounds/year) in [Title 129, Appendix I](#) (Hazardous Air Pollutants). NDEE may request that these HAP emissions be reported. When completing Section 1.3, please place the annual HAP emissions in the Description column.

Sources with synthetic minor HAP limitations must list all HAP emissions units on the appropriate application forms, unless the source accepts further limitations on their potential emissions that allow an activity to be insignificant (see example on Page 1 of this form).

