

## TRIVIAL AND INSIGNIFICANT ACTIVITIES

23-Sep-09

### **SECTION 1: Trivial activities not required to be listed (activities subject to an NSPS, NESHAP or MACT regulation cannot be a trivial activity).**

The activities described in this section are not required to be listed in a permit application under Chapter 16.

- A. Fuel Use:
  - (1) Fuel burning equipment of less than 500,000 Btu/hour capacity,
  - (2) Production of hot water for on-site personal use not related to any industrial process; and
  - (3) Fuel use related to food preparation for on-site consumption.
- B. Plant Upkeep:
  - (1) Routine housekeeping or plant upkeep activities such as painting buildings, retarring roofs or paving parking lots; and
  - (2) Clerical activities such as use of office supplies or operating copy machines and document printers, except operation of such units on a commercial basis.
- C. Fabrication Operations:
  - (1) Equipment used for the inspection of metal products;
  - (2) Equipment used exclusively for forging, pressing, drawing, spinning, or extruding cold metals;
  - (3) Equipment used exclusively to mill or grind coatings and molding compounds where all materials charged are in paste form; and
  - (4) mixers, blenders, roll mills or calendars for rubber or plastics for which no materials in powder are added and in which no organic solvents, diluents, or thinners are used.
- D. Finishing Operations:
  - (1) Closed tumblers used for cleaning or deburring metal products without abrasive blasting; and
  - (2) Equipment for washing or drying fabricated glass or metal products, if no VOCs are used in the process, and no gas, oil or solid fuel is burned.
- E. Storage Tanks
  - (1) Pressurized storage tanks for anhydrous ammonia, liquid petroleum gas (LPG), liquid natural gas (LNG), or natural gas.
  - (2) Organic liquid tanks (including petroleum tanks) with a storage capacity of less than or equal to 1000 gallons.
- F. Wastewater Treatment: Stacks or vents to prevent escape of sewer gases through plumbing traps, not including those at wastewater treatment plants.
- G. Cleaning Operations: Alkaline/phosphate cleaners and associated cleaners and associated burners.
- H. Residential-type Activities: Typical emissions from residential structures (but not exclusively from residential structures), not including
  - (1) Fuel burning equipment with a capacity of 500,000 Btu/hour or greater;
  - (2) Emergency backup generators; and
  - (3) Incinerators
- I. Recreational Activities: Use of the following for recreation activities:
  - (1) Fireplaces;
  - (2) Barbecue pits and cookers; and
  - (3) Kerosene fuel use.
- J. Health Care Activities: Activities and equipment directly associated with the diagnosis, care, and treatment of patients in medical or veterinary facilities, not including support activities such as power plants, heating plants, and emergency generators, incinerators, or other units affected by applicable requirements as defined in ADEM Administrative Code 335-3.

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K. Miscellaneous:

- (1) Safety devices, such as fire extinguishers and fire water pump engines, if associated with a permitted emission source, but not including sources of continuous emissions;
- (2) Flares to indicate danger to the public; and
- (3) Fugitive dust emissions from operations of a passenger automobile, station wagon, pickup truck, van or any other vehicle not exclusively operated at a stationary source.
- (4) Continuous emission monitoring systems vent lines
- (5) Air compressors

L. Fire fighting training

M. Internal combustion engines in mobile vehicles

N. Non-contact water cooling towers

O. Small capacity storage (tote bins, drums)

P. Steam-only vent lines

Q. Trivial Activities of the Pulp and Paper Industry (can be used by other industries if applicable)

- (1) Air purification systems
- (2) Ash sluice tanks
- (3) Batch digester uncapping
- (4) Black liquor mix boxes (e.g., for sulfur addition)
- (5) Building fans
- (6) Building vents
- (7) Caustic tanks
- (8) Chemical spills less than reportable quantity
- (9) Chip feeders
- (10) Deinking cell
- (11) Demineralized water tanks
- (12) Demineralized vents
- (13) Dredging
- (14) Dregs washer
- (15) Dryer can steam/condensate blowdown
- (16) Electrical charging station
- (17) Grinding/blasting for nondestructive testing of metals
- (18) Hydrapulper
- (19) Hydroblasting (e.g., evaporators)
- (20) Instrument air dryers and distribution
- (21) Lime mud filter filtrate tanks
- (22) Lime mud piles
- (23) Liquid sodium hydrosulfide storage tanks
- (24) Log flumes
- (25) Neutralized spent cooking acid tanks

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- (26) Oilers on chain, etc.
  - (27) Open containers
  - (28) Paper machine "blowdown" with air for cleanup
  - (29) Parts washer
  - (30) Phosphoric acid tanks
  - (31) Pressure filters
  - (32) Pressure relief valves
  - (33) Pressurized pulp washers
  - (34) Process raw water treatment (e.g., phosphate)
  - (35) Process sewer system
  - (36) Pulp tanks and stock chests
  - (37) Pumps
  - (38) Railroad flares
  - (39) Rolling stock refueling (gasoline and/or diesel)
  - (40) Salamanders (outdoor space heaters)
  - (41) Saltcake storage tanks vented to the recovery system
  - (42) Smelt spout cooling water tanks
  - (43) Smelt spout covers (dog houses)
  - (44) Sodium carbonate tanks
  - (45) Sodium hypochlorite storage tanks
  - (46) Soil "borrow" pits
  - (47) Spill collection tanks
  - (48) Starch or dye make-down tanks
  - (49) Sulfuric acid tanks
  - (50) Tank interior coatings (epoxy resins)
  - (51) Turpentine loading
  - (52) Welding activities for maintenance and /or field fabrication
  - (53) White liquor clarifiers
  - (54) White liquor oxidizer
  - (55) Winder
  - (56) Wood shops for maintenance and/or field fabrications
  - (57) Mill water transfer lines
- R. Trivial Activities of the Electrical Generating Industry (can be used by other industries if applicable)
- (1) Fuels and Material Handling
    - a. Gasoline and fuel oil transfer and dispensing
    - b. Petroleum storage tanks, not subject to NSPS, and associated containment
  - (2) Water and wastewater treatment, handling and storage process
  - (3) Waste

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- a. Coal combustion by-product disposal (except for dry stacking and intermittent ash hauling and disposal).
  - b. Vents from ash transport systems not operating at positive pressure (e.g., ash hoppers)
  - c. Open burning under ADEM regulations
  - d. Central vacuum system
- (4) Maintenance
- a. Outage related activities
  - b. Activities related to the construction and routine maintenance and repair of facility where emissions would not be associated with a primary production process of the facility (e.g., cleaning, insulation, solvent use, steam cleaning, painting, degreasing, washing, welding, vacuuming, coating, sweeping, abrasive use, removal of insulation).
  - c. HVAC and refrigeration
  - d. Vehicle and machinery (includes sanding, grinding, cleaning, painting, buffing and polishing of equipment).
- (5) Operations
- a. Building ventilation other than boiler room, coal handling, and ash loading (e.g. turbine room, battery room)
  - b. Lubrication of equipment except vents form oil vapor extractors
  - c. Hydrogen vents
  - d. Steam vents
  - e. Air compressor and distribution systems
  - f. Emergency equipment
  - g. Fugitive dust from operation of a passenger automobile, station wagon, pickup truck, and van.
  - h. Pressure relief valves
  - i. Test gases and bottled gases
- S. Trivial Activities of the Wood Products Industry (can be used by other industries if applicable)
- (1) Conveying of green wood chips and/or saw dust, except when pneumatically conveyed
  - (2) Green wood chip screening
  - (3) Bark conveyors
- T. Trivial Activities of the Fiberglass Manufacturing Industry (can be used by other industries if applicable)
- (1) Pelletizing of dust collected in the electrostatic precipitators on the glass furnaces
  - (2) Transfer of pelletized electrostatic precipitator dust to storage silos
  - (3) Resin and binder tanks, and distribution system of binder
  - (4) Precoat mix tank
  - (5) Batch feeding into furnaces
  - (6) Furnace forehearth and natural draft vents
  - (7) Forming line fugitive emissions
  - (8) Scrubber water recycling tanks
  - (9) Heating of asphalt adhesive on insulation facing material
  - (10) Application of water-based facing adhesives

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- (11) Fiberglass packaging operations
  - (12) Recycling system of fiberglass trim
  - (13) Handling and conveying of fiberglass dust from dust collector hoppers
  - (14) Virgin blowing wool processing and packaging
- U. Trivial Activities of the Textile Industry (can be used by other industries if applicable)
- (1) Spills not exceeding reportable quantity and temporary containment of spills.
  - (2) Operation of equipment not vented to outdoors.
  - (3) Used oil storage and handling.
  - (4) Outdoor storage, handling, and/or processing of dry bulk chemicals, raw materials, textile by-products, textile waste, coal, wood, wood waste, etc.
  - (5) Wastewater piping, holding ponds, lint screens, treatment plants, drying beds, and monofills.
  - (6) Miscellaneous activities including trash compactors, space heaters, portable steam cleaners, sandblasting for maintenance purposes, drum rinsing stations, lift truck battery charging stations, LP gas fill stations, and maintenance lubrication.
  - (7) Non-routine clean out of tanks and equipment for purposes of worker entry or in preparation for maintenance or decommissioning.
  - (8) Refrigeration machine vents.
  - (9) Cloth cutting and sewing operations.
  - (10) Steam drying or spot cleaning of cloth where no volatile chemicals are used.
  - (11) Blowing down lint and dust with compressed air.
- V. Trivial Activities of Iron & Steel Foundries (can be used by other industries if applicable)
- (1) Alloy Screening
  - (2) Carbon Application (Heat retention on ladles, etc.)
  - (3) Cooling Ponds
  - (4) Crane Engines
  - (5) Dredging
  - (6) Dumpster
  - (7) Flange and Valves
  - (8) Hydroblasting (e.g. quenchers)
  - (9) Ladle Preheating
  - (10) Machining Operations
  - (11) Maintenance Steam Cleaning
  - (12) Office Building Openings
  - (13) Oiling and Greasing for Maintenance
  - (14) Permanent Mold Lubrication (dusting)
  - (15) Permanent Mold Pipe Casting Cooling
  - (16) Pipe Repair Sandblasting
  - (17) Process (non-contact) Water Cooling Towers and Lagoons
  - (18) Propane Tanks and Gas Fired Liquid Propane Converters
  - (19) Quenching Operations
  - (20) Sandblasting (maintenance)
  - (21) Shell Core Machines
  - (22) Slag Sluice Tanks and Troughs

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- (23) Thickeners
- (24) Water Spray Pipe Cooling
- W. Trivial Activities of Secondary Aluminum Industries (can be used by other industries if applicable)
  - (1) Waste or Used Oil Tanks Less Than 10,000 gal
  - (2) Waste or Used Oil Tanks Less Than 100,000 gal Installed Prior to 1972
  - (3) Mobile Equipment Repair Shops
  - (4) Process Coolant Tanks (Aluminum Rolling Mills)
  - (5) Argon Tanks
  - (6) Liquid CO<sub>2</sub> Tanks
  - (7) Sodium Hypochlorite Tanks
  - (8) Sodium Hydroxide Tanks
  - (9) Kerosene Tanks Less Than 10,000 gal
  - (10) Aboveground Coolant Tanks
  - (11) Portable Acetylene/Oxygen
  - (12) Diesel Tanks Less Than 10,000 gal
  - (13) Soluble Industrial Cleaner Tanks Less Than 1,000 gal
  - (14) Polymer Tanks for Wastewater Treatment
  - (15) Ferric Chloride Tanks
  - (16) Thickener Used for Wastewater Treatment
  - (17) Clarifying/Tanks Associated with Welding Stations Wastewater Treatment
  - (18) Anionic Flocculent Tanks
  - (19) Portable Electricity Generators (Gas or Diesel)
- X. Trivial Activities of the Petroleum Refining Industry (can be used by other industries if applicable)
  - (1) Fuels and Material Handling
    - a. Gasoline, diesel, and fuel oil dispensing to mobile sources/emergency equipment/maintenance equipment
    - b. Petroleum storage tanks, <250 barrels, not subject to NSPS, and associated containment
    - c. Additives/treatment chemicals; tote bins, drums, gas cylinders, and other tanks <250 barrels
  - (2) Stormwater System
    - a. Non-process sumps
    - b. Open or covered drainage troughs from process areas for rainwater handling
  - (3) Waste
    - a. Open burning under ADEM regulations
    - b. Roll-off boxes/temporary frac tanks
    - c. De-watering waste
  - (4) Maintenance
    - a. Activities related to the construction, maintenance, and repair of the facility where emissions would not be associated with a primary production process of the facility(e.g., cleaning, insulation, solvent use, steam cleaning, equipment draining and steam out, painting, degreasing, washing, welding, cutting, vacuuming, coating, sweeping, abrasive use, and removal of non-asbestos insulation)
    - b. HVAC and refrigeration
    - c. Open containers
    - d. Equipment blinding

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- e. Minor maintenance and associated preparation (e.g., filter media changeout, pump maintenance, LDAR maintenance, instrument maintenance, line pigging, equipment repair, catalyst handling, minor tank maintenance, and sludge removal)
  - f. Short-term frac tank use
  - g. Asphalt or concrete paving activities and maintenance
  - h. Plant vehicle and equipment maintenance
  - i. Pest and weed control
  - j. Dust associated with handling dry chemicals
- (5) Operations
- a. Equipment lubrication systems, including tanks, pumps, lines, etc.
  - b. Hydrogen vents
  - c. Steam vents
  - d. Air compressor and distribution systems
  - e. Emergency equipment
  - f. Fugitive dust from operation of vehicles and equipment
  - g. Pressure relief systems
  - h. Test gases and bottled gases
  - i. Gas chromatograph/on-line analytical equipment
  - j. Sampling, sample handling and field testing
  - k. H<sub>2</sub> Trailers
  - l. Tank water draw-offs
  - m. Caustic handling
  - n. De-pressurizing LPG tanks
  - o. Tank gauging
  - p. Antifreeze and coolant storage and handling

## TRIVIAL AND INSIGNIFICANT ACTIVITIES

23-Sep-09

### **SECTION 2: Insignificant activities required to be listed (activities subject to an NSPS, NESHAP or MACT regulation cannot be an insignificant activity).**

The activities described in this subpart must be listed in a permit application under Chapter 16, and calculation of emissions from these activities shall be provided if required.

- A. Fuel Use
  - (1) Fuel burning equipment of greater than 500,000 Btu/hour capacity but less than 5,000,000 Btu/hour when operated on natural gas or #1/#2 fuel oil.
  - (2) Emergency back-up internal combustion engines
- B. Fabrication Operations: Equipment used exclusively for forging, pressing, drawing, spinning, or extruding hot metals.
- C. Finishing Operations: Open tumblers with a batch capacity of less than 2,000 gallons.
- D. Storage Tanks: Fuel oil storage tanks with a capacity of less than 2,000 gallons.
- E. Cleaning Operations: commercial laundries, not including dry cleaners.
- F. Emissions from a laboratory, as defined in this item. "Laboratory" means a place or activity devoted to experimental study or teaching in any science, or to the testing and analysis of drugs, chemicals, chemical compounds, or other substances, or similar activities described in this sentence are conducted on a laboratory scale. Activities are conducted on a laboratory scale if the containers used for reactions, transfers, and other handling of substances are designed to be easily and safely manipulated by one person. If a facility manufactures or produces products for profit in any quantity, it may not be considered to be a laboratory under this item. Support activities necessary to the operation of the laboratory are considered to be part of the laboratory. Support activities do not include the provision of power to the laboratory from sources that provide power to multiple projects or from sources which would otherwise require permitting, such as boilers that provide power to an entire facility.
- G. Miscellaneous:
  - (1) Equipment used exclusively for packaging lubricants or greases;
  - (2) Equipment used for hydraulic or hydrostatic testing;
  - (3) Brazing, soldering or welding equipment;
  - (4) Blueprint copiers and photographic processes;
  - (5) Equipment used exclusively for melting or application of wax; and
  - (6) Non-asbestos equipment used exclusively for bonding lining to brake shoes.
- H. Insignificant Activities of the Pulp and Paper Industry (can be used by other industries if applicable)
  - (1) Black liquor dump tanks
  - (2) Chemical unloading
  - (3) Chlorine car unloading
  - (4) Chlorine dioxide generation dump tanks
  - (5) Fugitive lime dust from kilns
- I. Insignificant Activities of the Electrical Generating Industry (can be used by other industries if applicable)
  - (1) Fuels and Materials Handling
    - a. Covered coal and limestone conveyers
    - b. Coal bunker dust collector vents
    - c. Coal scale dust collector exhaust
    - d. Process materials associated with air pollution control equipment



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- e. Alternative fuel handling
- f. Bunker room exhaust
- g. Coal sampling and weighing operations
- (2) Cooling towers
- (3) Waste
  - a. Intermittent ash hauling and disposal
  - b. Hydrovactor air separator tanks
  - c. Soil borrow pits
  - d. Ash storage silo operations with emissions less than 5 tons/year.
- (4) Operations
  - a. Boiler room ventilation
  - b. Oil vapor extractor (e.g., turbine seal oil, turbine oil)
- J. Insignificant Activities of the Wood Products Industry (can be used by other industries if applicable)
  - (1) Log debarking operations
  - (2) Sizing saws, located immediately up stream or down stream from the debarker, used to cut logs to a manageable length.
  - (3) Green wood/lumber chippers
  - (4) Bark chippers
- K. Insignificant Activities of the Textile Industry (can be used by other industries if applicable)
  - (1) Jet/Package dyeing of cloth and yarn.
  - (2) Operation of dye preparation areas, drug rooms, and chemical mix rooms.
  - (3) Emergency power generation.
- L. Insignificant Activities of Iron and Steel Foundries (can be used by other industries if applicable)
  - (1) Hot Metal Transfer
  - (2) Slag Cooling
  - (3) Slag Handling
- M. Insignificant Activities of Secondary Aluminum Industries (can be used by other industries if applicable)
  - (1) Standby Pumps Powered by Diesel and/or Gas Engines
  - (2) Aluminum Scalping Area with Lube Operations & Misc. Tanks
  - (3) Additional Coolant Tanks
  - (4) Biocide Tanks for Coolant
  - (5) Coolant Mixing Tanks
  - (6) Salt Stockpile (Dross Reclamation) - Roofed
  - (7) Water Spray on Aluminum Ingots
  - (8) Water Tanks
  - (9) Propane Tanks to include Loading and Unloading
  - (10) Basins Associated with Collecting Plant Wastewaters
  - (11) Conversion Coating Tanks & Distribution
  - (12) Wastewater Treatment Activities (Tanks/Clarifiers/Pumps, etc.)
  - (13) Oily Waste Treatment Activities (Tanks, Piping, Clarifiers, Chemical Addition)
  - (14) Aluminum Slitting Operations (Coil Unloading/handling, Chip Hoppers)

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- (15) Aluminum Ingot Sawing Operations
  - (16) Lab Related to Aluminum Coil Coating Activities
  - (17) Wax Application Activities as Related to Coil Processing
  - (18) Aluminum Strip Oiling Activities (Re: Aluminum Coil Processing)
  - (19) Aluminum Coil Washing Operations (Tanks, Pumps, Coil Handling)
  - (20) Aluminum Coil Leveling Operations
  - (21) Intermittent Grading On Plant Property
- N. Insignificant Activities of the Petroleum Refining Industry (can be used by other industries if applicable)
- (1) Operations
    - a. Non-contact cooling towers
    - b. Non-regulated process sewer systems
    - c. Liquid sulfur storage/loading activities
    - d. Gas compressor vents
    - e. Venting delayed coking drums
    - f. Petroleum coke handling, transporting, and loading
    - g. Steam eductor vents
  - (2) Maintenance
    - a. De-coking heaters and lines
    - b. Catalyst, catalyst support, solid absorbent change out and handling activities
    - c. Vacuum truck use
  - (3) Waste
    - a. Spent caustic handling