

## APPENDIX J. TRIVIAL ACTIVITIES—(DE MINIMIS) LIST

This Appendix is to be used in Part 70 permitting only. The following activities and emissions units may be presumptively omitted from part 70 permit applications. Certain of these listed activities include qualifying statements intended to exclude many similar activities. Any activity to which a source-specific State or federal applicable requirement applies is not trivial even if it is included on this list. For purposes of this appendix, a source-specific requirement is one that requires emissions-unit specific information to apply, as opposed to a facility-wide requirement.

### (A) AGRICULTURAL

- (1) Lawn care (noncommercial) Internal combustion engines used for landscaping purposes
- (2) Weed and pest control (noncommercial) (this does not include manufacturing and formulation of herbicides or pesticides for commercial sale)  
~~Pest control (noncommercial)~~  
~~Herbicide and pesticide activities except for manufacturing and formulation for commercial sale~~
- (3) Open burning for the purpose of land management

### (B) ANALYSIS/TESTING

- (1) Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents
- (2) Compressed gas cylinders and gases utilized for equipment calibrating and testing
- (3) Emissions from instrument systems utilizing air or natural gas
- (4) Environmental field sampling operations
- (5) Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis
- (6) Hydraulic ~~or~~ and hydrostatic testing
- (7) Routine calibration and maintenance of laboratory equipment or other analytical instruments

~~Analysis/laboratory activities emissions from the following: air contaminant detectors, air contaminant recorders, combustion controllers, combustion shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers (e.g., water quality), and emissions associated with sampling activities. Also, emissions from bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including assorted~~

~~vacuum producing devices and vents but **NOT** lab fume hoods or vents~~

(8) Sampling connections used exclusively to withdraw materials for testing and analysis including air contaminant detectors and vent lines

(9) Site assessment work, including but not limited to, the evaluation of waste disposal or remediation sites  
~~Emissions from instrument systems utilizing air or natural gas~~

(10) Vents from continuous emissions monitors and other analyzers

~~Environmental field sampling operations~~

~~Sampling connections used exclusively to withdraw materials for testing and analysis, including air contaminant detectors and vent lines~~

~~Compressed gas cylinders and gases utilized for equipment calibration and testing~~

**(C) ANIMALS**

(1) Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized

(2) Equipment used exclusively to slaughter animals, but **not** including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating

**(D) BATTERY CHARGING**

(1) Industrial battery recharging and maintenance operations for batteries utilized within the facility only  
Batteries and battery charging stations, except at battery manufacturing plants

**(E) BLOWDOWNS**

(1) Emissions from the depressurization during startup, shut down, maintenance or emergencies of compressors or other vessels containing natural gas or liquid hydrocarbons for the purpose of maintenance due to emergency circumstances

**(F) CLEANING**

(1) Abrasive blasting

(2) Acid washing (maintenance cleaning)

(3) Carbon dioxide blasting equipment in degreasing or depainting

(4) Caustic washing (maintenance cleaning)

~~Abrasive blasting~~

~~Steam cleaning~~

~~Carbon dioxide blasting equipment in degreasing or depainting~~  
(5) High pressure water depainting operations and aqueous industrial spray washers

(6) Laundry activities, except for dry-cleaning and steam boilers

~~Vacuum cleaning systems used exclusively for industrial, commercial, or residential housekeeping purposes, except those systems used to collect particulate matter subject to 252:100 and hazardous and/or toxic air contaminants~~

~~Ultrasonic cleaning operations which do not utilize volatile organic compounds~~

~~Molten salt bath descaling operations~~

(7) Natural gas water heating systems for fixed vehicle wash racks

(8) Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants

(9) Steam cleaning operations

(10) Steam sterilizers

(11) Ultrasonic cleaning operations which do not utilize volatile organic compounds

(12) Vacuum cleaning systems used exclusively for industrial, commercial or residential housekeeping purposes, except those systems used to collect particulate matter subject to 252:100 and hazardous and/or toxic air contaminants

**(G) COOLING TOWERS/BOILER WATER**

~~Emissions from non-contact cooling towers (cooling water that has not been in contact with other materials or fluids containing regulated air pollutants)~~

(1) Boiler water treatment operations, not including cooling towers

(2) Demineralized water tanks and demineralizer vents

(3) Emissions from non-contact cooling towers (cooling water that has not been in contact with other materials or fluids containing regulated air pollutants)

(4) Oxygen scavenging Deaerator units associated with boilers or hot (de-aeration) of water heating systems

(5) Process water filtration systems and demineralizers

~~Demineralized water tanks and demineralizer vents~~

**(H) ELECTRIC POWER**

~~Equipment associated with electrical power transmission which do not involve fuel-burning activities using transformers and substations~~

- (1) 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
- (2) Equipment associated with electrical power transmission which do not involve fuel-burning activities using transformers and substations

**(I) FIREFIGHTING**

- (1) Emissions from fire or emergency response equipment and training to include use of fire control equipment including equipment for testing and training, engines used exclusively for firefighting, and open burning of materials or fuels associated with firefighting training. Buildings burned for firefighting training must still adhere to NESHAP for Asbestos, as well as Subchapter 13 and 27A OS 2-5-106.1.
- (2) Fire extinguishers and fire extinguishing systems Fire suppression systems

**(J) FUGITIVE EMISSIONS**

- (1) Emergency road flares
- (2) Emissions from natural gas odorizing activities
- (3) Emissions from pneumatic starters on reciprocating engines, turbines, compressors, or other equipment
- (4) Fugitive emissions of jet fuels associated with aircraft fuel cell and fuel bladder repair
- (5) Fugitive emissions related to movement of passenger vehicles provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted
- (6) Gas flares or flares used solely to indicate danger to the public (e.g. road hazard)
- (7) Gravel, sand and dirt storage for use in on-site construction projects
- (8) Non-routine clean out of tanks, lift stations, and equipment for the purposes of worker entry or in preparation for maintenance or decommissions
- ~~Seal replacement (i.e., manhole gaskets)~~
- (9) Paving of roads, parking lots, and other areas
- (10) Road sanding and salting operations
- (11) Roof coating, service, and repair
- ~~Paving of roads, parking lots, and other areas~~
- (12) Seal replacement (i.e., manhole gaskets)
- (13) Steam leaks
- (14) Steam vents and safety relief valves
- (15) Unpaved roadways and parking areas

(16) Vent emissions from gas streams used as buffer or seal gas in rotating pump and compressor seals

(17) VOC fugitive emissions from component additions (e.g. valves, flanges, connectors, pump seals, compressor seals, etc.) regulated by a fugitive monitoring program where the total increase is less than one ton per year of any criteria pollutant or the de minimis set forth in 252:100-41-43. The component additions must be identified in the next scheduled monitoring report required by the applicable requirements. VOC fugitive emissions from component additions (e.g. valves, flanges, connectors, pump seals, compressor seals, etc.) not regulated by a fugitive monitoring program provided that no applicable requirement is triggered when components are added.

~~Emissions from natural gas odorizing activities~~

~~Emissions from pneumatic starters on reciprocating engines, turbines, compressors, or other equipment~~

~~Gas flares or flares used solely to indicate danger to the public (e.g. road hazard)~~

(18) Warehouse activities including the storage of packaged raw materials and finished goods

~~Non routine clean out of tanks, lift stations, and equipment for the purposes of worker entry or in preparation for maintenance or decommissions~~

~~Unpaved roadways and parking areas~~

~~Gravel, sand and dirt storage for use in on site construction projects~~

~~VOC fugitive emissions from component additions (e.g. valves, flanges, connectors, pump seals, compressor seals, etc.) regulated by a fugitive monitoring program where the total increase is less than one ton per year of any criteria pollutant or the de minimis set forth in 252:100-41-43. The component additions must be identified in the next scheduled monitoring report required by the applicable requirements. VOC fugitive emissions from component additions (e.g. valves, flanges, connectors, pump seals, compressor seals, etc.) not regulated by a fugitive monitoring program provided that no applicable requirement is triggered when components are added.~~

~~Fugitive emissions of jet fuels associated with aircraft fuel cell and fuel bladder repair~~

~~Fugitive emissions related to movement of passenger vehicles provided the emissions are not counted for applicability purposes or any required fugitive dust control plan or its equivalent is submitted~~

~~Road sanding and salting operations~~

**(K) INSULATION**

~~Insulation installing or removal (non-asbestos)~~

- ~~(1) Application of refractory & insulation (calcium silicate, etc.)~~
- ~~(2) Insulation installing or removal (non-asbestos)~~

**(L) LUBRICATING**

~~(1) Emissions from engine crankcase vents and equipment lubricating sumps~~

~~(2) Lubricating pumps, sumps, and systems~~

~~Emissions from engine crankcase vents and equipment lubricating sumps~~

**(M) MAINTENANCE**

~~(1) Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emissions of HAP metals~~

~~(2) Emissions from pipeline maintenance pigging activities~~

~~(3) Grinding, cutting, sanding for maintenance purposes~~

~~(4) Maintenance, upkeep, and replacement types of activities, including those not altering the capacity of process, combustion or control equipment, and which do not increase regulated pollutant emissions unless subject to NESHAP or NSPS~~

~~Welding, brazing, soldering for maintenance purposes~~

~~(5) Plant maintenance and upkeep activities (e.g., grounds keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification~~

~~(6) Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification~~

~~(7) Use of adhesives for maintenance purposes~~

~~(8) Welding, brazing, soldering for maintenance purposes~~

~~Grinding, cutting, sanding for maintenance purposes~~

~~Emissions from pipeline maintenance pigging activities~~

~~Maintenance, upkeep, and replacement types of activities, including those not altering the capacity of process, combustion or control equipment, and which do not~~

~~increase regulated pollutant emissions unless subject to NESHAP or NSPS~~

**(N) METALS**

- (1) Blacksmith forges
- (2) Carbon monoxide lasers, used only on metals and other materials which do not emit HAP in the process
- ~~Equipment used for inspection of metal products~~
- (3) Die casting machines
- (4) Drop hammers or hydraulic presses for forging or metalworking
- ~~Foundry sand mold forming equipment to which no heat is applied, and from which no organics are emitted~~
- (5) Equipment used exclusively for rolling, forging, pressing, spinning, drawing, or extruding either hot or cold metals unless their emissions exceed any applicable regulated amount
- (6) Equipment used exclusively to mill or grind coatings and holding compounds where all materials charged are in paste form (unless HAP emission)
- ~~Equipment used exclusively for rolling, forging, pressing, spinning, drawing, or extruding either hot or cold metals unless their emissions exceed any applicable regulated amount~~
- (7) Equipment used for inspection of metal products
- (8) Foundry sand mold forming equipment to which no heat is applied, and from which no organics are emitted
- (9) Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic
- ~~Carbon monoxide lasers, used only on metals and other materials which do not emit HAP in the process~~

**(O) MISCELLANEOUS**

- ~~Operations previously determined to be de minimis pursuant to 252:100-7-2(b)(3) or 252:100-41-43(a)(5)~~
- (1) Acetylene, butane, and propane torches
  - (2) Air vents from air compressors and pneumatically operated equipment, including hand tools, emitting ambient air
  - (3) Bathroom/toilet vents
  - (4) Environmental chambers not using hazardous air pollutant (HAP) gasses
  - (5) Humidity chambers
  - (6) Laser trimmers using dust collection to prevent fugitive emissions

- (7) Paint mixing operations located at retail paint, hardware, or department stores where the paint is sold in five gallon or smaller containers
- (8) Rifle and pistol ranges
- (9) Shock chambers
- ~~Humidity chambers~~
- (10) Smoking rooms and areas
- (11) Solar simulators
- (12) Vacuum producing devices where only ambient air and the oil emission from the vacuum producing mechanism itself are exhausted
- (13) Venting of compressed natural gas, butane, or propane gas cylinders

**(P) MOBILE SOURCES**

- (1) Aircraft ground support (AGE) equipment, including but not limited to portable power generators, lights, and HVAC support
- (2) Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources

~~Mobile source emissions from cars, trucks, forklifts, courier vehicles, front loaders, graders, cranes, carts, hydrostatic and hydraulic testing equipment, maintenance trucks, helicopters, locomotives, marine vessels, portable generators moveable by hand, portable pumps, portable air compressors, portable welding machines, and portable fuel tanks~~

- (3) Other on and off road mobile sources (i.e. coal stacker & reclaimer)
- (4) Portable electrical generators that can be moved by hand from one location to another. "Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle conveyance, or device.
- (5) Road sanding and salting operations
- (6) The use of products such as antifreeze and fuel additives for the purpose of maintaining water vehicles
- (7) Vehicle exhaust from maintenance or repair shops
- ~~Well servicing/workover rigs and associated equipment~~
- (8) Well drilling rigs and associated equipment
- (9) Well servicing/workover rigs and associated equipment
- ~~Aircraft ground support (AGE) equipment, including but not limited to portable power generators, lights, and HVAC support~~
- ~~Vehicle exhaust from maintenance or repair shops~~
- ~~Road sanding and salting operations~~

**(Q) OFFICE AND JANITORIAL**

- (1) Consumer use of office equipment and products, not including printers of businesses primarily involved in photographic reproduction
- (2) Consumer use of paper trimmers/binders
- (3) Janitorial services and consumer use of janitorial products
- ~~Sweeping (Floor Sweep)~~
- (4) Office emissions (photocopying, blueprint copying, photograph processes)
- (5) Sweeping (Floor Sweep)

**(R) OIL AND GAS**

- (1) Natural Gas pressure regulator vents, excluding venting at oil and gas production facilities

**(S) OUTDOOR RECREATION**

- ~~Outdoor recreational emissions (campfires, barbecue pits)~~
- ~~Open burning for the purpose of land management (must get permission from Air Quality Enforcement even though exempt from permitting)~~
- (1) Outdoor kerosene heaters
- (2) Outdoor recreational emissions (campfires, barbecue pits)

**(T) PLASTICS/FIBERGLASS**

- (1) Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining plastic
- (2) Plastic or fiberglass welding or repair
- (3) Processes used for the curing of fiberglass or paint products
- (4) Sealing or cutting plastic film or foam with heat or wires
- ~~Processes used for the curing of fiberglass or paint products~~

**(U) REFRIGERANTS**

- (1) Cold storage refrigerator equipment
- (2) De minimis refrigerant releases

**(V) RESIDENTIAL**

- (1) Air conditioning units used for ~~or~~ human comfort that do not have applicable requirements under title VI of the Act ventilation systems not regulated under Title VI of the Clean Air Act
- (2) Emergency (backup) electrical generators at residential locations

- (3) Emissions from residential housing units, dormitories, and multifamily dwellings to include fuel burning for the purposes of heating except prohibited open burning
- (4) Non-commercial food preparation
- (5) Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing industrial or commercial process

**(W) SOLID WASTE**

- (1) RCRA Solid Waste Management Units subject to 40 CFR Part 265, Subparts AA, BB, and CC
- (2) Solid waste landfill operations
- ~~RCRA Solid Waste Management Units subject to 40 CFR Part 265, Subparts AA, BB, and CC~~

**(X) SOLVENT**

- (1) Covered cold solvent degreasers not subject to federal emission standards (e.g. NESHAP or NSPS)
- (2) Emissions from laundry care equipment processing bedding, clothing or other fabric items. These include dryers, extractors, & tumblers. **NOT CLEANING OPERATIONS USING PERCHLOROETHYLENE OR PETROLEUM SOLVENTS (i.e., dry cleaning).**

~~Covered cold solvent degreasers not subject to federal emission standards (e.g. NESHAP or NSPS)~~

**(Y) STORAGE TANKS/DISTRIBUTION**

- (1) Commercial gasoline dispensing stations, including those located within the physical boundaries of a Title V source
- (2) Emissions from lube oil, seal oil, or hydraulic fluid storage tanks and equipment as long as not emitting VOCs or HAPs
- (3) Emissions from tanks containing separated water produced from oil and gas operations
- (4) Lubricants and waxes used for machinery and other equipment lubrication and emission from lubricating oil or hydraulic fluid storage tanks and equipment
- (5) Runway and aircraft de-icing activities, including de-icer storage tanks unless otherwise regulated

~~Emissions from lube oil, seal oil, or hydraulic fluid storage tanks and equipment as long as not emitting VOCs or HAPs~~

- (6) Storage and use of chemicals unless otherwise regulated by an applicable state or federal regulation. These chemicals include, but not limited to: alum, ammonia, biocides, corrosion inhibitors, dechlorination chemicals, inorganic salts, acids or bases to include

caustic and sulfuric acid, coagulants, flocculants, precipitants, surfactants, anti-foam chemicals, sealing inhibitors, oxygen scavengers, phosphates, polyelectrolytes, limestone slurry, lime and lime slurry, flue gas desulfurization system slurry, and sulfur slurry; propane and acetylene under pressure.

(7) Storage and use of products or equipment for maintaining motor vehicles operated at the site (including but not limited to antifreeze and fuel additives) not regulated under Title VI, CFC rules)

(8) Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized

(9) Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP

~~Emissions from tanks containing separated water produced from oil and gas operations~~

~~Commercial gasoline dispensing stations, including those located within the physical boundaries of a Title V source~~

~~Lubricants and waxes used for machinery and other equipment lubrication and emission from lubricating oil or hydraulic fluid storage tanks and equipment~~

~~Runway and aircraft de icing activities, including de icer storage tanks unless otherwise regulated~~

~~Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized~~

**(Z) SURFACE COATING**

(1) Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP

(2) Surface coating for maintenance purposes such as roll/brush/pad coating, painting with aerosol cans, spray airless, and conventional spray painting

(3) Touch-up painting operations where paints/coatings are applied at less than one quart per hour

**(AA) WASTEWATER**

(1) Emissions from dredging pits, ponds, sumps, or other wastewater conveyance facilities

- (2) Emissions from skimmer pits, oil/water separators, and maintenance of filter separators
- (3) Emissions from the removal of sludge or sediment from pits, ponds, sumps, or wastewater conveyance facilities
- (4) Industrial and/or municipal wastewater treatment processes (excluding combustion or incineration equipment), storage silos for dry material(sludges), composting, or grease trap waste handling or treatment
- (5) Ozone generators
- ~~Removal of basic sediment & water from collection/storage systems (i.e., clarifiers)~~
- ~~Water and wastewater treatment and transportation system~~
- (6) Pit, ponds, sumps, or wastewater conveyance facilities
- ~~Emissions from skimmer pits, oil/water separators, and maintenance of filter separators~~
- ~~Emissions from the removal of sludge or sediment from pits, ponds, sumps, or wastewater conveyance facilities~~
- ~~Industrial and/or municipal wastewater treatment processes (excluding combustion or incineration equipment), storage silos for dry material(sludges), composting, or grease trap waste handling or treatment~~
- ~~Ozonization process or process equipment including ozone generation for water treatment processes~~
- (7) Removal of basic sediment & water from collection/storage systems (i.e., clarifiers)
- (8) Sanitary sewerage and storm water runoff collection systems
- (9) Water and wastewater treatment and transportation system
- ~~Emissions from dredging pits, ponds, sumps, or other wastewater conveyance facilities~~

**(BB) WOODWORKING**

- (1) Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood
- (2) Wood—working (saw-cutting, staining & varnishing) (noncommercial)
- (3) Woodworking utilized for hobby purposes or maintenance of grounds or buildings