

## Division for Air Quality Trivial Activities

The Kentucky Division for Air Quality, Permit Review Branch, maintains a list of "insignificant" and "trivial" activities for use by air pollution sources when submitting permit applications.

Emissions from trivial activities are not required to be included on permits or permit applications, and are not considered when determining source status or other applicability determinations. Following is a list of trivial activities that has been approved by the division and the U.S. Environmental Protection Agency:

### List of Trivial Activities

1. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
2. Air conditioning units used for human comfort that do not have applicable requirements under Title VI of the Act.
3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing, industrial or commercial process.
4. Noncommercial food preparation.
5. Consumer use of office equipment and products, not including printers or other businesses primarily involved in photographic reproduction.
6. Janitorial services and consumer use of janitorial products.
7. Laundry activities, except for dry cleaning and steam boilers.
8. Bathroom/toilet vent emissions.
9. Emergency (backup) electrical generators used at residential locations.
10. Tobacco smoking rooms and areas.
11. Blacksmith forges.
12. Plant maintenance and upkeep activities (e.g., grounds keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation and paving parking lots), providing these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity and do not otherwise trigger a permit modification.
13. Repair or maintenance shop activities not related to the source's primary business activity, providing they do not include emissions from surface coating or de-greasing (solvent metal cleaning) activities or emissions that would otherwise trigger a permit modification.
14. Portable electrical generators that can be moved by hand from one location to another.
15. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
16. Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emissions of HAP metals.
17. Air compressors and pneumatically operated equipment, including hand tools.
18. Batteries, and battery charging stations, except at battery manufacturing plants.
19. Storage tanks, vessels and containers holding or storing liquids that do not emit VOCs or HAPs.
20. Storage tanks, reservoirs and other equipment used to contain, pump, mix, handle or package soaps, vegetable oils, grease, animal fat and nonvolatile aqueous salt solutions, providing they are appropriately covered.
21. Drop hammers or hydraulic presses for forging or metalworking.

22. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators or electrical power generating equipment.
23. Vents from continuous emissions monitors and other analyzers.
24. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
25. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive formulation.
26. Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOCs or HAPs.
27. CO<sub>2</sub> lasers used only on metals or other materials that do not emit HAPs in the process.
28. Consumer use of paper trimmers and binders.
29. 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 from the boilers delivering the steam.
30. Salt baths using nonvolatile salts that do not emit any regulated air pollutants.
31. Laser trimmers using dust collection to prevent fugitive emissions.
32. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents.
33. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
34. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
35. Hydraulic and hydrostatic testing equipment.
36. Environmental chambers that do not use HAP gases.
37. Shock chambers.
38. Humidity chambers.
39. Solar simulators.
40. 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.
41. Process water filtration systems and demineralizers.
42. Demineralized water tanks and demineralizer vents.
43. Boiler water treatment operations, not including cooling towers.
44. Oxygen scavenging (de-aeration) of water.
45. Ozone generators.
46. Fire suppression systems.
47. Emergency road flares.
48. Steam vents and safety relief valves.
49. Steam leaks.
50. Steam cleaning operations.
51. Steam sterilizers.

Notes:

1. Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners or operators must still get a permit if otherwise required.
2. "Moved by hand" means that it can be moved without the assistance of a motorized or nonmotorized vehicle, conveyance or device.
3. Brazing, soldering and welding equipment and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production level thresholds. Brazing, soldering, welding and cutting torches directly related to plant maintenance, upkeep and repair or to maintenance shop activities that emit HAP metals are addressed in item 12.

4. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored. They are not appropriate for this list.
5. Many lab fume hoods or vents might qualify for treatment as insignificant activities, depending on the applicable SIP or be grouped together for purposes of description.