

Air Pollution Control District of Jefferson County
Title V Listing of “Trivial Activities”

The following types of activities and emissions units are presumptively considered “trivial activities” pursuant to Regulation 2.16 *Title V Operating Permits* section 1.43. Note that certain of these listed activities include qualifying statements intended to exclude many similar activities. The District may periodically update this list.

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. Non-commercial food preparation.
5. Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction.
6. Janitorial services and consumer use of janitorial products.
7. Internal combustion engines used for landscaping purposes.
8. Laundry activities, except for dry-cleaning and steam boilers.
9. Bathroom/toilet vent emissions.
10. Emergency (backup) electrical generators at residential locations.
11. Tobacco smoking rooms and areas.
12. Blacksmith forges.
13. 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.¹
14. 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.
15. Portable electrical generators that can be moved by hand from one location to another.²
16. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
17. Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals.³

¹ Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise required.

² "Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized 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 and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

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18. Air compressors and pneumatically operated equipment, including hand tools.
19. Batteries and battery charging stations, except at battery manufacturing plants.
20. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP.⁴
21. 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.
22. Equipment used to mix and package, soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
23. Drop hammers or hydraulic presses for forging or metalworking.
24. 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 equipment.
25. Vents from continuous emissions monitors and other analyzers.
26. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
27. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
28. Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP.
29. CO2 lasers, used only on metals and other materials which do not emit HAP in the process.
30. Consumer use of paper trimmers/binders.
31. 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.
32. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants.
33. Laser trimmers using dust collection to prevent fugitive emissions.
34. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents.⁵
35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
37. Hydraulic and hydrostatic testing equipment.
38. Environmental chambers not using hazardous air pollutant (HAP) gasses.

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 and are not appropriate for this list.

⁵ Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.

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39. Shock chambers.
40. Humidity chambers.
41. Solar simulators.
42. Fugitive emission 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.
43. Process water filtration systems and demineralizers.
44. Demineralized water tanks and demineralizer vents.
45. Boiler water treatment operations, not including cooling towers.
46. Oxygen scavenging (de-aeration) of water.
47. Ozone generators.
48. Fire suppression systems.
49. Emergency road flares.
50. Steam vents and safety relief valves.
51. Steam leaks.
52. Steam cleaning operations.
53. Steam sterilizers.