



Department of
**Environment &
Conservation**

Insignificant Activities and Emission Units

Title V Sources

Today's Discussion

- Sources requiring an air permit
- What sources cannot be insignificant?
- Applicable requirements
- Definitions
- What qualifies as insignificant?
- What to do once you make a determination
- Documentation

Sources requiring an air permit

1200-03-09-.01(1)(a) states:

Except as specifically exempted in Rule 1200-03-09-.04, no person shall begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit or, if applicable, submitted a notice of intent and obtained a notice of coverage or authorization, for the construction or modification of such air contaminant source.

What sources cannot be insignificant?

Part 1200-03-09-.04(5)(c)1 states:

Notwithstanding any other provisions of paragraph (11) of Rule 1200-03-09-.02, no emissions unit or activity subject to a federally enforceable applicable requirement not included in this Division 1200-03 or Division 0400-30 (other than generally applicable requirements of the state implementation plan) shall qualify as an insignificant emissions unit or activity.

Applicable requirements

- The permit application shall list and the permit shall contain all generally applicable requirements that apply to insignificant emission units or activities at the major source. For compliance purposes, the Technical Secretary may require monitoring, recordkeeping, and reporting for insignificant emission units or activities.
[1200-03-09-.04(5)(c)]

Note: There is no provision for insignificant activities or insignificant emission units in the New Source Review or Prevention of Significant Air Quality Deterioration (PSD) regulations.

Definitions

Insignificant activity or **insignificant emissions unit** means any activity or emissions unit which qualifies as insignificant based on any one of the following:

- Any air emissions from an air emissions unit or activity at a stationary source for which the emissions unit or activity has a potential to emit less than 5 tons per year of each regulated air pollutant that is not a hazardous air pollutant, and less than 1,000 pounds per year of each hazardous air pollutant. Such emission units and activities or types of emission units and activities must be listed in the permit application.

Definitions – Insignificant activity (continued)

- The emission unit or activity, with the exception of parts 19. and 84., is listed in subparagraph (5)(f) as not having to be included in a Title V application. For an activity listed in subparagraph (5)(f), with the exception of parts 1., 2., 19., and 84., the emissions unit or activity must have a potential to emit less than 5 tons per year of each regulated air pollutant that is not a hazardous air pollutant, and less than 1,000 pounds per year of each hazardous air pollutant.
- The emission unit or activity is listed in subparagraph (5)(g) as not having to be included in a Title V application.

Definitions – Insignificant activity (continued)

- Any emission unit with the potential to emit radionuclides which will result in a dose to the most exposed member of the public of less than 0.1 millirem per year. Such emission unit must be listed in the permit application. [Emissions of pollutants other than radionuclides must also be addressed.]
- Any emission units or activities considered by the Division to be insignificant and approved by EPA. The Division shall maintain a list of emission units or activities which are considered to be insignificant by the Division and EPA. Such emission units or activities must be listed in the permit application.
[1200-03-09-.04(5)(a)4.]

Definitions (continued)

Potential to emit means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the Administrator.

[1200-03-09-.04(5)(a)5]

- Inherent limitations
- Federally-enforceable limitations

What qualifies as insignificant?

Any insignificant activity or insignificant emissions unit

- Meets the criteria specified in 1200-03-09-.04(5)(a)4(i)
 - Potential to emit less than 5 tons per year of each air contaminant and each regulated air pollutant that is not a hazardous air pollutant
 - Potential to emit less than 1,000 pounds per year of each hazardous air pollutant
- Such emissions units and activities or types of emission units and activities must be listed in the permit application.

What qualifies as insignificant? (continued)

The categorical emission units listed in 1200-03-09-.04(5)(f)

- Also known as the “(f)” list
- List of 93 types of process units or activities (excluding items 19 and 84).
- These emission units or activities, with the exception of items 19 and 84, are not required to be listed in the construction or operating permit applications for the facility. Activities of the type listed in 19 and 84 must be included in the permit application.
- With the exception of items 1, 2, 19, and 84, the emissions unit or activity must have a potential to emit less than 5 tons per year of each air contaminant and each regulated air pollutant that is not a hazardous air pollutant, and less than 1,000 pounds per year of each hazardous air pollutant.

What qualifies as insignificant? (continued)

The emission units or activities listed in 1200-03-09-.04(5)(g).

- Also known as the “(g)” list
- List of 53 types of process units or activities
- The emissions unit or activity must have a potential to emit less than 5 tons per year of each air contaminant and each regulated air pollutant that is not a hazardous air pollutant, and less than 1,000 pounds per year of each hazardous air pollutant.
- These emission units or activities are not required to be listed in the construction or operating permit applications for the facility.

What qualifies as insignificant? (continued)

Sources of radionuclides - Any emission unit with the potential to emit radionuclides which will result in a dose to the most exposed member of the public of less than 0.1 millirem per year.

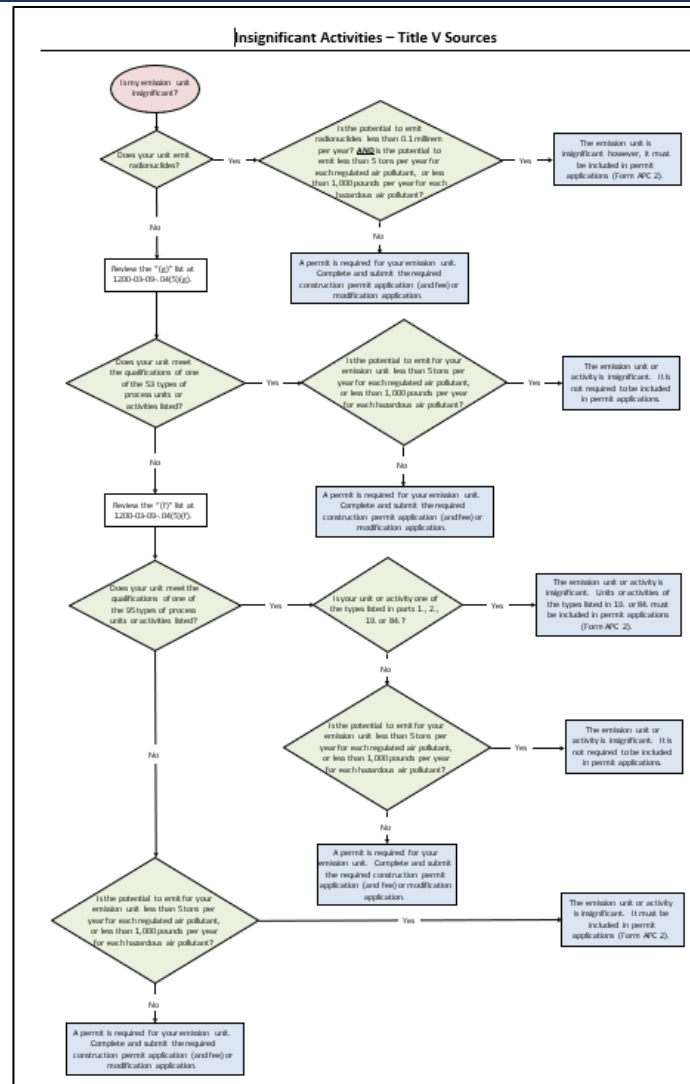
- These emission units or activities must be listed in the construction or operating permit applications for the facility.
- Be sure to address emissions of pollutants other than radionuclides from the source.

What qualifies as insignificant? (continued)

Designated emission units or activities - Any emission units or activities considered by the Division to be insignificant and approved by EPA.

- The Division shall maintain a list of emission units or activities which are considered to be insignificant and approved by EPA.
- These emission units or activities must be listed in the construction or operating permit applications for the facility.
- Currently, the Division does not have a list of emission units or activities that meet this criteria.

Is my emission unit Insignificant?



My emission unit is insignificant - now what?

- Prepare documentation to support your determination
 - Brief description of emission unit or activity
 - Copies of vendor information, such as specification sheets, brochures, or stack test data
 - Detailed emission calculations (when required)
 - Identification of the specific rule citation that applies
- Submit updated APC Index, APC 1, and APC 2 forms

Documentation

Upon request from the Technical Secretary the applicant must provide sufficient documentation to enable the Technical Secretary to determine that the emission unit or activity has been appropriately listed on the permit application as insignificant.

[1200-03-09-.04(5)(e)1]

- Brief description of each emission unit or activity
- Copies of vendor information, such as specification sheets, brochures, or stack test data
- Detailed emission calculations (when required)
- Identification of the specific rule citation that applies

Documentation (continued)

- Retain copies of the documentation onsite and make them available for inspection, if requested.
- Update your list of insignificant emission units or activities and retain it onsite.

Upon request from the Technical Secretary, at any time during the term of the permit, an applicant who lists an activity or emissions unit as insignificant under subpart 1200-03-09-.04(5)(a)4(i) of this paragraph shall demonstrate to the Technical Secretary that the actual emissions of the unit or activity are below the emission thresholds listed in that subpart.

[1200-03-09-.04(5)(e)2]

My emission unit needs a permit - now what?

- Prepare construction permit application or permit modification application package, including:
 - Necessary application forms
 - Process flow diagram
 - Detailed emission calculations
 - Vendor information, if available
 - Construction permit application fee
- Submit signed application package electronically to Air.Pollution.Control@tn.gov

Questions?

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<https://www.tn.gov/environment/air.html>