

Albuquerque Environmental Health Department
Air Pollution Control Division
Operating Permit Program
List of Insignificant Activities
Proposed December 15, 1993
Revised August 18, 1995
Revised January 3, 1996

I. Mission and Goal Statement: Enhancing public health by improving Albuquerque/Bernalillo County air quality through the development of policies that encourage the regulated community to comply with all applicable air quality requirements in a sensible and cost effective way.

II. Discussion: Pursuant to Albuquerque/Bernalillo County Air Quality Control Regulations Title 20, Chapter 11, Part 42 (Part 42), Operating Permits, the Director of the Environmental Health Department (Department) may list certain activities located at major source as insignificant based on the activities' actual limitations, emission rates, or production rates and approved by the Administrator of the US Environmental Protection Agency (EPA).

The Department may not consider any activity for which applicable requirements apply as insignificant, regardless of whether the activity meets the criteria listed below.

The EPA stresses in its "White Paper for Streamlined Development of Part 70 Permit Applications,": dated July 10, 1995, (White Paper) that there is "inherent flexibility" for states to determine trivial activities without EPA approval. In addition, the White Paper also reminds the states that the process of determining and listing insignificant activities should be streamlined to minimize paperwork.

- A. Operating permit applications submitted under Title 20 Chapter 11 Part 42 (Operating Permits) of the Albuquerque/Bernalillo County air quality control Board Air Pollution control Regulations which include any of the following emissions units, operation or activities must either list them as insignificant activities or provide the information required for emissions units under 20 NMAC 11.42.II.1.1.D:
1. Any emission unit, operation, or activity that has the potential to emit no more than one (1) ton per year of any regulated criteria pollutant. Multiple emission units, operations and activities that perform identical or similar functions shall be combined in determining the applicability of this exemption, unless a De Minimis emission level for specific sources is assigned by the Department.
 2. If the total annual purchase of any substance or precursor substance listed as a hazardous air pollutant under Section 112(b) of the federal Clean Air Act, does not exceed 10 tons per year of any single substance or 25 tons per year aggregate substances, the use of the listed substance(s) shall be considered an insignificant activity for the purposes of 20 NMAC 11.42 (Part 42) permits. However, the

hazardous air pollutants emissions must be generally quantified and listed in the application as an insignificant activity.

3. Surface coating of architectural structures and fixed facility equipment, this includes spray painting, roll coating, and painting with aerosol spray cans, for sources with facility-wide total actual emissions of cleanup solvent and coating materials of less than two thousand (2,000) pounds per year.
 4. Fuel burning equipment which uses gaseous fuel, has a design rate less than or equal to five (5) million Btu per hour, and is used solely for heating buildings, for personal comfort or for producing hot water for personal use.
 5. Fuel burning equipment which uses distillate oil, has a design rate less than or equal to one (1) million Btu per hour, and is used solely for heating buildings for personal comfort or for producing hot water for personal use.
 6. Internal combustion engines on equipment utilized as the primary power source, secondary power source or as stand-by emergency units that have an annual potential to emit less than two thousand (2,000) pounds of any criteria pollutant, based on five hundred (500) hours of operating time per calendar year.
 7. Any sources which are requested by the facility prior to submittal of an operating permit application and are approved by the Director. The sources must not have any applicable requirements, not contribute to the major source status of the given facility, or be the primary function of the facility. The sources must be clearly identified and justification for consideration as insignificant activities must be provided.
- B. The following activities need not be included in a Part 42 operating permit application. These activities have been designated as Trivial Activities by the Department. Any activity for which an applicable requirement applies is not trivial.
1. Activities which occur strictly for maintenance of grounds or buildings, to include: lawn care, pest control, grinding, cutting, welding, painting, general repairs and janitorial activities.
 2. Pollution control equipment maintenance, such as welding, painting, or parts removal and replacement. Pollution control equipment maintenance does not include utilizing the control equipment as relief valves, blow down equipment, or any other continuous utilization that causes exceedances of any regulatory opacity limits.
 3. Exhaust emissions from forklifts, courier vehicles, front end loaders, graders carts and maintenance trucks.

4. User of fire control equipment including routine maintenance of emergency booster pumps.
5. General office activities to include, but not limited to, photocopying, computer printing operations, and refuse collection.
6. Characterization of waste disposal sites.
7. Non-anthropogenic wind blown dust.
8. Automotive repair activities, performed by the owner of the vehicle at a non-professional hobby shop or place of residence within military installations or a facility's contiguous property boundary line.
9. Residential activities which involve the use of items such as fireplaces, woodstoves, or barbecues to include those residential activities located within a contiguous property boundary line or sets of contiguous property boundary lines of a classified facility. Such activities will however comply with all applicable requirements under Part 22 (Woodburning).
10. Food service and cafeteria activities.
11. Any activity which is requested by the facility prior to submitting an operating permit application is approved by the Director. These activities may not have any applicable requirements, not contribute to the major status of the given facility, or be the primary function of the facility. These activities must be clearly identified and justification for consideration as a Trivial Activity must be provided.