



State of Utah

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GUIDELINES

TO: Operating Permit Section Staff

FROM: Regg Olsen, Permitting Branch Manager

RDO
5/27/14

DATE: May 27, 2014

SUBJECT: Insignificant Activities and Major Source Determinations

As outlined in R307-415-5e, "an application may not omit information needed to determine the applicability of, or to impose, any applicable requirement, or to evaluate the fee amount required under R307-415-9". As further outlined in R3-7-415-5e, the insignificant activities "...apply only to operating permit applications and do not affect the applicability of R307-415 to a source, do not affect the requirement that a source receive an approval order under R307-401, and do not relieve a source of the responsibility to comply with any applicable requirement."

Based on the above, a source must include emissions from all emissions units, including those that may be classified as insignificant for the application, in making a major source determination. Once a source determination has been made, the source may then choose not to include those activities and emission levels in accordance with R307-415-5e. The insignificant activities and emission levels listed under R307-415-5e(1) are not required to be included in the permit application. The insignificant activities listed under R307-415-5e(2) are exempted because of size and production rate but are required to be included in the permit application.

As a practical matter, major sources will likely be able to determine their major status without resorting to counting emissions from the "insignificant activities". Those few sources that are close to the threshold should make a good faith effort to determine all of their emissions and, if necessary or desired, request a determination from the Director that the source is under the appropriate threshold.

This Guideline shall be audited every three years by the Title V Operating Permit Section Manager to determine the current status and relevance of the information.

CC: NSR Section Staff