

Table 1 (Continued) – Categories of Stationary Sources (Note: For these categories, fugitive emissions must be considered in determining whether a source is a major stationary source.)

(ix) Hydrofluoric, sulfuric, or nitric acid plants;	(xxi) Fossil-fuel boilers (or combination thereof) totaling more than 250 million British thermal units per hour heat input;
(x) Petroleum refineries;	(xxii) Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels;
(xi) Lime plants;	(xxiii) Taconite ore processing plants;
(xii) Phosphate rock processing plants;	(xxiv) Glass fiber processing plants;
(xiii) Coke oven batteries;	(xxv) Charcoal production plants;
(xiv) Sulfur recovery plants;	(xxvi) Fossil-fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input;
(xv) Carbon black plants (furnace process);	
(xvi) Primary lead smelters;	
(xvii) Fuel conversion plants;	
(xviii) Sintering plants;	
(xix) Secondary metal production plants;	
(xx) Chemical process plants;	

In addition, facilities in certain New Source Performance Standard (NSPS) source categories must include fugitive emissions in the calculation of PTE. If the emission source is within a source category that is regulated by a NSPS that was promulgated on or before August 7, 1980, fugitive emissions of all pollutants from the emission source must be included when calculating PTE. For example, fugitive emissions of both criteria pollutants and HAPs from gas turbines must be included in determining whether a stationary source is required to obtain a Part 70 permit. In this case, fugitives are included regardless of whether that particular gas turbine is subject to an NSPS. This is because an NSPS limiting emissions from this source category (gas turbines) was promulgated before August 7, 1980 (40 CFR Part 60 Subpart GG). If a permit is required, fugitive emissions are evaluated during the permitting process.

Fugitive emissions are usually particulate matter or VOCs, including HAPs. They are produced from various activities, e.g., when operating processes, or during material storage and transfer (from evaporation or wind erosion). They do not include emissions from emission units installed within a building. Fugitive emission sources can vary significantly even between similar plants or businesses. Therefore, every attempt should be made to quantify fugitive emissions through a source-specific engineering analysis.

Not all emission sources are obvious. Besides stacks and vents for manufacturing processes, attention must be paid to auxiliary activities at the plant. Conveyors, tank truck loading and unloading, tanks, valves and vents, wastewater treatment plant emissions, and dust from roads are all potential air emission sources. Degreasing tanks, welding activities, pumps, valves, painting and cleanup activities also emit pollutants that may need to be counted. Emissions from vehicle engines do not need to be included in calculation of PTE. However, dust from vehicular truck traffic must be included, in most cases, if fugitive emissions are required to be calculated. A final step in identifying emissions units to include in calculating PTE is to then delete those activities identified as a “trivial activity” at OAC 252:100, Appendix J. Emissions from these activities need not be counted in determining your PTE.