



CITY OF PHILADELPHIA
DEPARTMENT OF PUBLIC HEALTH
PUBLIC HEALTH SERVICES
AIR MANAGEMENT SERVICES

Air Management Services
321 University Avenue
Philadelphia PA 19104-4543
Phone: (215) 685-7572
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***Instructions
for
Natural Minor
Operating Permit Application***

October 2004

Part A: General Information

A. Overview

This application is to be used in cases where a facility has potential emissions less than the Title V threshold. Similar to the Title V Operating Permit program, the City's Operating Permit program will encompass all sources within a facility (site). Eventually, all new and existing permitted sources (Non-Title V) within Philadelphia must obtain an Operating Permit from the city by completing this application. This application is to be used for Natural Minor facilities. Natural Minor facilities are facilities that are truly minor without the imposition of federally enforceable emission limitations.

A.1 Number of copies required

Submit the completed application package in **triplicate** to Air Management Services. The contact names and mailing address are provided at the end of this guide (Appendix A).

A.2 Application Fees

A payment of the permit application processing fee of \$300 (from 2000-2004, \$375 thereafter) by means of one check made payable to the "City of Philadelphia" must be included with this application. Once a facility has been issued a City of Philadelphia Operating Permit, it will no longer be required to pay its Air Management Services licensing fees.

A.3 Compliance Review Form

A completed City of Philadelphia Compliance Review Form must be submitted with each operating permit application, as required by Title 25 of the Pennsylvania Code, Section 127.412..

A.4 Certification

This application must be signed by a *responsible official* in Section 1.4 of the application, "Certification of Truth, Accuracy, and Completeness".

"*Responsible Official*" is defined as follows:

- A. For a corporation: a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - 1. the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
 - 2. the delegation of authority to such representative is approved in advance by Air Management Services (AMS);

For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

- B. For a municipality, State, Federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this paragraph, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of EPA); or
- C. For affected sources:
 - 1. The designated representative in so far as actions, standards, requirements, or prohibitions under Title IV of the Clean Air Act or the regulations promulgated thereunder are concerned; and
 - 2. The designated representative for any other purposes under 40 CFR Part 70.

A.5 General Permit for Boilers

If your facility has only boilers as air pollution sources, you may have the option of accepting the conditions of a general permit for boilers instead of submitting an operating permit application. A facility may use the general permit for boilers if the boilers at the facility have a combined capacity of between 10 million BTU per hour and 50 million BTU per hour and they burn either #2 fuel oil or natural gas. If your facility meets these criteria, you may request a general permit for boilers by notifying AMS in writing. A general permit application will be sent to you. The general permit fees will be the same as for the regular operating permit.

A.6 Request for Exemption

If you wish to make your facility eligible for exemption from City of Philadelphia operating permit requirements, you may be able to do so by accepting the following emission limitations on your facility:

- 8 tons of volatile organic compounds (VOC) per year
- 10 tons of nitrogen oxides (NO_x) per year
- 20 tons of carbon monoxide (CO) per year
- 8 tons of sulfur oxides (SO_x) per year
- 3 tons of particulate matter less than 10 microns (PM₁₀) per year.

If you wish to accept the above limitations on your facility, complete a “Request for Exemption from City of Philadelphia Operating Permit Requirements” form and return it to AMS. If approved, your facility will keep its existing AMS licenses and licensing fees.

The following facilities are **not** eligible for an exemption:

- Facilities that are applicable to a Standard of Performance for New Stationary Sources (NSPS) regulation listed in 40 CFR Part 60.
- Facilities that are applicable to a Maximum Achievable Control Technology (MACT) regulation listed in 40 CFR Part 63.

In addition, Air Management Services may decide not to grant an exemption to a facility if it believes an operating permit is necessary to properly monitor compliance for the facility.

Part B: Specific Instructions

B. Overview

The City of Philadelphia Operating Permit Application consists of the following sections:

- Section 1: General Information
- Section 2: Site Inventory

B.1 Section 1: General Information

This section gives general information about the site as a whole and is only filled out once per application. There are four basic parts in this section:

1.1 Application Type:

Indicate the type of permit for which this application is made for. Check all that would apply:

- ***Initial*** is for the initial application submittal.
- ***Renewal*** is for the renewal of an existing City of Philadelphia Operating Permit.
- ***Modification*** is for a proposed modification to the original operating permit or plan approval.
- ***Other*** is for all other types of application submittals. Briefly explain the type of submittal in the space provided.

1.2 Plant Information:

This sub-section provides general information about the plant. The following information is requested and must be completed:

- a) **Tax ID:** This is the Federal Tax ID. This number is unique for a company and in conjunction with the plant code, is used to track information for a site.
- b) **Firm Name:** The name of the company.
- c) **Plant ID:** **Do not** fill out this code. This code is assigned by AMS and is used to separate multiple sites that belong to a facility. This number along with the Tax ID would directly point to a specific site location.
- d) **Plant Name:** Applicants designation of the plant for which the application is made.
- e) **Plant Address:** Address where the plant is located.
- f) **Permit Contact at the Plant:** Provide the name of a contact person for questions relating to information provided in this application.
- g) **Telephone Number:** Provide the telephone number of the contact person given above.
- h) **SIC Code:** This is the Standard Industrial Classification Code for the main activity at this site.
- i) **Description of SIC Code:** Provide a brief description for the SIC Code given.

1.3 Mailing Information:

Provide the name and address of the person to which the operating permit should be mailed.

1.4 Certification of Truth, Accuracy, and Completeness:

This certification must be signed by a responsible official. Refer to Part A, Item A.4, "Certification" on page 3 of this guide for a definition of "**responsible official**".

Caution: Please note that applications without a signed certification will be returned as incomplete.

B.2 Section 2: Site Inventory List

Provide a summary of all air pollution sources, control equipment, and emission points from air pollution sources (stacks or vents). For purposes of identifying what sources to list, the general guideline is to list all sources that have the potential to emit any Regulated Air Pollutants (as defined in Pa Code, Title 25, Chapter 121) in any amount. Sources that belong in the *Insignificant Activities Listing* need not be included in this inventory. See Appendix B for the *Insignificant Activities Listing*.

If you have a source or group of sources which you believe should be classified as Insignificant Activities and should be included in the Insignificant Activities Listing, the following steps must be taken to assure that you have identified all sources in the facility:

1) Contact AMS to see if a special exemption can be granted for this request.

or;

2) Using a separate sheet of paper, list all sources that you believe should be considered as insignificant activities. Include a justification for each source in this listing and attach this listing immediately following the Site Inventory Section.

2.1 Site Inventory:

In the Inventory table provided, the following information is requested:

- **Permit #** is the number of the AMS installation permit for this equipment. This number can be found in the upper right hand corner of the installation permit. If the equipment has an installation permit but you do not know the number, place an "X" in the box. If the equipment does not have an installation permit, leave the box blank.
- **Company Designation** is name of the equipment as typically referred to in the plant.
- **Unit Description** is a brief description of the equipment. For combustion units, include the types of fuel burned in the description. For processes, include the types of materials processed.
- **Maximum Process Rate** only pertains to air pollution sources, not control devices, stacks or vents. For combustion units, list the rated capacity in millions of BTU per hour. For processes, list the maximum amount of material that can be processed in an hour.
- **Installation Date** is the date the equipment was installed or last modified. For equipment installed or last modified before 1970, exact dates are not needed.

For each air pollution source, attach a process flow diagram including all stacks, vents, and control devices linked to the source. **This does not have to be a detailed engineering diagram.** The diagrams may be very crude, hand-written, and do not need to be drawn to scale. A series of boxes and arrows will be sufficient.

2.2 *Process Information:*

This section must be completed for each air pollution source that does not have an installation permit.

- a) ***Company Designation:*** Give the name of the source as designated by the facility.
- b & c) ***Manufacturer & Model:*** Provide this information if available.
- d) ***Standard Operation:*** Give the typical operating hours for the source.
- e & f) ***Is there a control device?:*** If the source vents to a control device, provide the requested information.

Stack/Vent Info:

If the source exhausts through a stack or vent, complete the section. If there is no stack or vent, write “None” next to the section heading.

- a) ***Is Discharge Vertical?:*** Check appropriate box.
- b) ***Stack/Vent Geometry:*** Is the shape of the stack/vent exhaust opening circular or rectangular.
- c) ***Dimensions:*** Give the diameter of the opening for circular stacks and vents, the length and width of the opening for rectangular stacks and vents.
- d) ***Exhaust Temperature:*** If room temperature, put “ambient”.
- e) ***Exhaust Volume:*** Give in actual cubic feet per minute.
- f) ***Height above Street Level:*** Distance from the stack/vent exhaust to street level.
- g) ***Est. Distance to Nearest Property Line (Ft):*** Estimated distance from exhaust to the nearest property line of the facility.
- h) ***Weather Cap?:*** Check appropriate box.

Appendix A: Air Management Services Contact Information

Chief of Source Registration

Air Management Services
Department of Public Health
321 University Avenue
Philadelphia, PA 19104-4543
Source Registration General Telephone: (215) 685-7572

Appendix B: Insignificant Activities Listing

SOURCE CATEGORY & INSIGNIFICANT ACTIVITIES EXEMPTION

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At present, there are only two permanently exempted source categories. These categories include residential wood stoves and asbestos demolition/renovation sites. (Ref. Section 127.504(d))

Insignificant activities are those located within a facility which do not create air pollution in significant amounts. These insignificant activities need not be described in the application. Insignificant activities include, but are not limited to, operation of the following types of equipment and the conducting of the following activities:

(Note: This listing may be revised as additional insignificant activities are identified)

TABLE A - INSIGNIFICANT ACTIVITIES

1. Air conditioning and ventilation systems not designed to remove pollutants generated by or released from other sources.
2. Portable space heaters, electrically heated furnaces, ovens and heaters, and other electrically operated equipment from which no emissions of air contaminants occur.
3. The emissions from the internal combustion engines powering mobile air contamination sources. The term "mobile" means it is capable of moving by its own power. The term does not include a source mounted on a vehicle, whether the mounting is permanent or temporary, which source is not used to supply power to the vehicle.
4. Routine office equipment, such as copier, printer, communication equipment, etc.
5. Any equipment, machine or device from which emission of air contaminant does not occur.
6. Paper trimmers or binders.
7. Detergent washing of metal parts, except those using VOCs or air toxic.
8. Cafeteria equipment used for employee meal preparation.
9. Stationary storage tanks or containers, which are not used for storage of volatile organic liquids or hazardous air pollutants.

10. Laundry operations that are used for cleaning employee uniforms or other clothing, except for those using VOCs or HAPs.
11. Construction or demolition of building or structures.
12. Clearing of land.
13. Maintenance activities and the equipment and supplies used therein.
14. Machine shop and maintenance shop equipment used for routine maintenance, such as lathe, drilling and boring machine, cutter, grinder, welder, reaming machine, milling machine, planer and shaper, etc. This list does not include casting operations.
15. Fire protection equipment and activities involved in fire protection training, first aid or emergency medical training.
16. Garbage compactors and waste barrels.
17. Stationary material handling systems from which no emissions of air contaminant occur.
18. Electrically operated equipment from which no emissions of air contaminant occur.
19. Portable water treatment equipment, but not including air stripper.
20. Service and maintenance shop for mobile sources, such as car, truck, etc., except where they include degreasing operations that are large enough to be regulated under 25 Pa. Code 129.63.
21. Sources emitting inert gases only, such as argon, helium, krypton, neon, and xenon; pure constituents of air such as nitrogen, oxygen, or carbon dioxide; or the organic aliphatic hydrocarbon gases methane and ethane.
22. Propane or natural gas tanks or containers.