

Major vs. Area Source

MPUA RICE Seminar

May 4, 2010



HAP-specific

- “Major” means major for HAPS
- 10 tpy any single HAP
- 25 tpy all HAPs combined



Multiple Sources at Location

- Do all sources combined trigger “Major” source designation?
- If not, apply as if individual units



Example

- 200 hp
- 350 hp
- 660 hp

Unless total emissions >25 tpy, treat each as an individual unit

(Possible confusion: “site rating”)



CITY UTILITIES
Bringing Power Home.™



Emergency Units

MPUA RICE Seminar

May 4, 2010



Emergency Unit Can Be...

- Industrial
- Commercial
- Residential

Can not ...

- Be peak shavers
- Generate income



Can Be Used For...

- Grid support – 15 hours per year
- Internal system support
- On-site generation
- On-site mechanical duty (pumps, e.g.)
- Non-emergency service for 50 hours per year



How to Identify/Designate

- Title V operating permit
- Emission Inventory Questionnaire
- Internal documentation
 - Plant nomenclature, prints, memos, applicability analysis
- Suggestion: commit to writing
 - Include alternative requirements



Maintaining Status

- Proof is in the pudding
 - Review record keeping requirements
 - Log every instance of operation – duration and reason
 - Confirm applicability annually (Compliance certification)



CITY UTILITIES
Bringing Power Home.™

