

## Do I Need to Include Fugitive Emissions?



Air contaminants that cannot reasonably be exhausted through a stack or a building structure are called fugitive emissions. Examples of fugitive emissions include dust blowing from rock and coal piles and dust kicked up by vehicles traveling on roadways. Volatile Organic Compound (VOC) emissions from outdoor leaking valves or flanges are also fugitive emissions.

You will include quantifiable fugitive emissions in your PTE calculation if:

1. The fugitive emissions are Hazardous Air Pollutants (HAPs).

OR

2. Your facility is one of those source categories listed in Table 2-1, in which case you will need to include the quantifiable fugitive emissions of all other regulated air pollutants (e.g., particulate matter, VOCs).

OR

3. Your facility is subject to a New Source Performance Standard (NSPS) or National Emission Standard for Hazardous Air Pollutants (NESHAP) promulgated before August 7, 1980.

Some large facilities may have a source category included in Table 2-1 along with other source categories that are not listed. The fugitive emissions of regulated air pollutants other than HAPs from the non-listed source would not have to be considered in the facility's PTE calculation.

If you need to include fugitive emissions, identify them as a separate emission source or part of an already established emission source.

**Table 2-1: Types of Facilities that Must Include Fugitive Emissions in PTE**

<ul style="list-style-type: none"> <li>• Coal cleaning plants - with thermal dryers</li> <li>• Portland cement plants</li> <li>• Iron and steel mills</li> <li>• Primary copper smelters</li> <li>• Hydrofluoric, sulfuric, or nitric acid plants</li> <li>• Lime plants</li> <li>• Coke oven batteries</li> <li>• Carbon black plants</li> <li>• Fuel conversion plants</li> <li>• Secondary metal production plants</li> <li>• Fossil-fuel boilers (or combination thereof) totaling more than 250 mmbtu/hr</li> <li>• Taconite ore processing plants</li> <li>• Charcoal production plants</li> <li>• Asphalt concrete plants</li> <li>• Secondary lead smelters and refineries</li> <li>• Sewage treatment plants</li> <li>• Ferro-alloy production plants</li> <li>• Stationary gas turbines</li> </ul>	<ul style="list-style-type: none"> <li>• Primary zinc smelters</li> <li>• Primary aluminum ore reduction plants</li> <li>• Municipal incinerators capable of charging more than 250 tons of refuse per day</li> <li>• Petroleum refineries</li> <li>• Phosphate rock processing plants</li> <li>• Sulfur recovery plants</li> <li>• Primary lead smelters</li> <li>• Sintering plants*</li> <li>• Chemical process plants- not including ethanol production by natural fermentation</li> <li>• Petroleum storage and transfer units, total storage capacity over 300,000 barrels- or 40,000 gallons</li> <li>• Glass fiber processing plants</li> <li>• Fossil fuel-fired steam electric plants of more than 250 mmbtu/hr</li> <li>• Phosphate fertilizer plants</li> <li>• Grain elevators</li> <li>• Stationary sources subject to NESHAP for asbestos, beryllium, mercury, vinyl chloride</li> </ul>
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\*Processing of fine grain materials into coarser lumps (performed primarily on ores).