**NSC Technical Subcommittee Call Minutes – October 17, 2017**

**Participation [by regions]:**

1: Sara Johnson – NH

3: Carrie Wintersteen, Jeremy Hancher & Lee Ann Briggs – PA

4: Tony Pendola – NC; Jessica Dalton – FL; Melissa Collier & Trayce Moore Thomas - MS

5: Brent Goetz & Todd Nein – OH; Renee Bashel & Lisa Ashenbrenner Hunt – WI; Jim Dodson, Ed Clements, Tammy Haug, Quentin Gilbert, Chris Cissell & Mark Stoddard

6: Dianne Wilkins & Lloyd Kirk - OK

7: Barb Goode & Lynelle Ladd – KS

9: Jenna Latt – CA; Kale Walch - AZ

?: Jennifer Schmidt

**September minutes:** approved as is

**Stationary Engines: 40 CFR 63, Subpart 4Z/40 CFR 60, Subparts 4I/4J RICE/NESHAP/NSPS – Lessons learned and moving forward \***

Melanie King, EPA OAQPS & Sara Ayres, EPA OECA; Introductions by Barb Goode, Kansas State University

A comparison of requirements for stationary non-emergency engines located at an area source taking into account various parameters was presented such as installation date (prior to June 12, 2006), reconstruction (cost exceeds 50% or 75% of the cost of a comparable engine), type of fuel, capacity ( greater than 25, 175, 300 or 500 HP).

As an example, a compression ignition engine installed prior to June 12, 2006 and reconstructed afterwards such that the cost of reconstruction amount to half up to three-quarters of the cost of a comparable engine, that engine would need to meet the Tier 1 emission standards for NMHC+NOx, CO and PM. If the cost were to exceed three-quarters, that engine may need to adhere to Tier 4 emission standards depending on the year of reconstruction.

Obligations can be as simple as the operation & maintenance in accordance with manufacturer’s instructions along with records of such or as complex as the installation of emission controls along with periodic performance testing.

Engines that are portable or transportable, meaning capable of being carried or moved from one location to another, are mobile unless they remain at the same location for more than 12 months. A location is defined as “any single site at a building, structure, facility or installation.” A portable engine that remains stationary greater than 12 months or a seasonal operating time frame is regulated as a stationary engine.

A question was raised as to the status of an engine stored in a warehouse or maintenance shop for greater than 12 months which may be moved infrequently and used as an engine. The EPA has previously determined that a portable engine that was stored in one location and not used for greater than 12 months could still be considered non-stationary.

The EPA Applicability Determination Index (ADI) was referenced frequently - <https://cfpub.epa.gov/adi/> - some of which are specific to this topic can be found through <https://www.epa.gov/stationary-engines>.

Stationary engines that operate less than 100 hours per year are considered “Limited use” which is only relevant to engines subject to the RICE regulation – 40 CFR 63, Subpart 4Z. A limited use engine with a capacity greater than 500 HP located at a major source does not have to meet any requirements under the RICE NESHAP except for the initial notification for new engines. There are limited benefits for engines less than 500 HP.

**Regulatory Gap**

An example of this issue is a stationary spark ignition engine <500 HP at an area source of HAP that was constructed (as that term is defined in the RICE NESHAP) after June 12, 2006, but manufactured prior to July 1, 2008. The RICE NESHAP requires the engine to comply with the Spark Ignition Engine NSPS, but the engine was manufactured prior to the applicability date specified in the NSPS. In this scenario, the engine is subject to the RICE NESHAP, but does not have to meet any requirements.

**Certified Emissions Life**

It is the hours of operation or calendar years which the engine is designed to properly function in terms of reliability and fuel consumption without being remanufactured. Assuming the engine is operated and maintained in accordance with the manufacturer’s instructions, the engine should maintain its certification over its life.

Additionally, ***“The useful life period is designed to represent the time during which the engine manufacturer is responsible for the engine meeting the emission standards as long as the owner operates the engine according to the manufacturer’s specifications. . . .”***

**Resources**

**RICE Regulation Navigation Tool** - <https://www3.epa.gov/ttn/atw/rice/output/quiz.html>

**NSPS Regulation Navigation Tool** - <https://www3.epa.gov/ttn/atw/ice/quiz.html>

**RICE Requirements at Area Sources** - <https://www.epa.gov/sites/production/files/2014-03/documents/9_24_2013_summaryrequirements_area_sources.pdf>

**RICE & NSPS Q&A, April 2, 2013** - <https://www.epa.gov/sites/production/files/2014-03/documents/4_2_2013_qa_stationary_rice_neshap_nsps_stationaryci_si_ice.pdf>

**Waivers for stack testing, examples** - <https://www.epa.gov/sites/production/files/2016-11/documents/rice_neshap_nsps_applicability_determinations_1.pdf>

**Emission Standards for Farm Equipment Engines** - <https://www.epa.gov/afos-air/emission-standards-farm-equipment-engines>

**EPA’s Transportation & Air Quality Document Index System**

<https://iaspub.epa.gov/otaqpub/>. Certification documents for a heavy-duty and/or non-road engine must be obtained by contacting ComplianceInfo@epa.gov.

**\*** During the Technical Subcommittee call held on June 20, 2017, it was suggested that we revisit the RICE rule possibly inviting Melanie King, EPA to speak.

**Future topics:**

* National Compliance Assistance Centers – Agriculture to Transportation – **January 16, 2018**?
* Coating manufacturers: information sharing
* Electronic hazardous waste manifests user fees
* Startup/shutdown final rule: Tony Pendola - NC & Melissa Collier – MS
* Region 5 Plating & Polishing NESHAP (6W) outreach effort – current progress

**Next Call: November 21, 2017**

1 pm CST (2 pm EST) (3rd Tuesday of month)

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