

APPENDIX 112E

**ENGINE TEST FACILITIES NESHAP
ROCKET MOTOR TEST FIRING NESHAP
(Prerule Stage)**

CAA SECTION 112 NESHAP

REGULATION STATUS

EPA is working on two fronts to develop rules for various types of engine testing facilities (ETFs). They are developing the Rocket ETF NESHAP and the ETF NESHAP. The ETF NESHAP potentially covers all ETFs other than rockets.

Due to a budget shortfall, EPA has cancelled contractor support on all ETF rules. EPA decided to cancel support on these NESHAPs because they have little hope of achieving significant emission reductions from these sources. EPA plans to work with stakeholders to complete the MACT determinations and hopefully develop the final rules in-house.

Since these NESHAPs are scheduled for promulgation on 15 Nov 00, the §112(j) Permit Hammer will become effective on 15 May 02. If the final ETF rules are not issued by that date, major source installations with ETF facilities will be required to apply for a case-by-case MACT determination. Appendix F contains more information on the Permit Hammer Rule.

The Services have been working closely with EPA as these rules develop. To monitor EPA's progress on these rules, refer to the HAP Subcommittee Status Reports (published every other month) and the HAP Status Binder Web page for this appendix on DENIX.

DISCUSSION

Applicability

EPA has not yet indicated whether the rule will be limited to major HAP sources or to both major and area HAP sources.

Recent NESHAPs for combustion sources such as secondary aluminum production, secondary lead smelting, portland cement manufacturing, and hazardous waste incineration affect both major and area sources. EPA needed to regulate these area sources because CAA §112(c)(6) requires them to ensure that sources accounting for 90% of nationwide emissions of dioxins and furans (D/F) are subject to a MACT standard.

Specifically, the requirements for area sources in the proposed Secondary Aluminum Production NESHAP are limited to D/F control. The nationwide D/F emissions from this source category are only 0.4 lbs/year, but this amount represents 3.5 percent of the total annual manmade D/F emissions. Since EPA is targeting such small amounts of D/F emissions, they will likely consider D/F regulations for all combustion sources including ETFs.

Potential Standards

The initial NESHAP requirements for **existing** sources should not be very burdensome. For most ETF subcategories, the MACT floor for existing sources will be no control except for possibly work practice standards. The MACT floor is the

minimum control level that EPA must impose, regardless of cost. EPA must consider cost if they decide to go beyond the MACT floor.

The initial NESHAP requirements for **new** sources could be substantial since the MACT floor must equal the level achieved by the best controlled similar source.

MILITARY SOURCES

Rocket ETFs

EPA collected information from the following military installations.

- ❖ Air Force
 - Hill AFB
 - Arnold Engineering Development Center
 - Edwards AFB
- ❖ Navy
 - NAWC China Lake
 - NAWS Indian Head
- ❖ Army
 - Redstone Arsenal

Aircraft ETFs

In February, 1999, the Services Steering Committee (SSC) submitted information to EPA on 138 military Aircraft engine test cells located on 46 military installations. The SSC also submitted air toxic emission factors for JP-5 and JP-8 fuel combustion in gas turbine engines. This information was compiled by the Navy Aircraft Environmental Support Office.

Other ETFs

The Services Steering Committee also submitted information to EPA on 161 military engine test cells (other than rocket and aircraft engines) located on 40 military installations. This information was compiled by the HAP Subcommittee. Engines tested at military facilities include those used in marine vessels, tactical vehicles, research and development laboratories, aircraft auxiliary power units, aircraft ground support equipment, aerial targets/drones, torpedoes, school laboratory engines, and electric power generators.

The ETF facility data submitted to EPA can be found on the HAP Status Binder Web Site for this Appendix. The SSC consolidated and submitted data for aircraft and other ETFs instead of EPA sending formal information collection requested letters to each installation.

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