

September 23, 1996

4APT-ARB

Mr. John R. McDowell, P.E.
4416 Topside Road
Knoxville, TN 37920

SUBJECT: TITLE V APPLICABILITY ISSUES RELATED TO THE
CINCINNATI/NORTHERN KENTUCKY INTERNATIONAL AIRPORT

Dear Mr. McDowell:

Your letter of August 27, 1996, requested clarification from the Environmental Protection Agency (EPA) concerning the subject matter. These issues were discussed in part, with Mr. Alan Drake of my staff, and Mr. Hank Wiseman of the Kentucky Division of Air Quality (KDAQ). Specifically, you requested clarification regarding the exclusion of emissions from aircraft, ground service equipment, and privately-owned vehicles (POVs) on airport roadways. In addition, you requested confirmation on Regional policy for tenant facilities. Lastly, you requested clarification of Regional policy concerning emissions of ethylene glycol during deicing operations. Below is our response to each topic identified in your letter.

Aircraft

Aircraft emissions do not have to be included in a title V applicability determination. You may wish to note that jet engine test cells (i.e., aircraft engine is removed from the aircraft prior to testing) are considered stationary sources and must aggregate such emissions when determining title V applicability.

Ground Service Equipment

According to the definition of nonroad engine in 40 CFR Part 89.2, internal combustion engines are not considered to be nonroad engines if they remain or will remain at a location for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. 40 CFR Part 89.2 specifically defines a location as any single site at a building, structure, facility, or installation. As such, a specific piece

of aerospace ground equipment would be considered a stationary source unless it is determined that it is moved (for reasons other than to solely qualify it as mobile) to another location within the requisite time period. Determinations concerning whether particular pieces of aerospace ground equipment are considered nonroad engines should be made by the permitting authority on a case-by-case basis.

POVs on Airport Roadways

Emissions from POVs on airport roadways do not have to be included in a title V applicability determination.

Tenant Facilities

With respect to airports, tenant facilities are generally considered as separate sources for title V applicability. This is because, under a landlord-tenant relationship, the landlord (property owner) does not have common control (i.e., partial ownership, voting interest, funding, etc.) over tenant (separately owned airlines) operations. Landlord-tenant relationships are considered by the permit authority on a case-by-case basis. Based upon conversations with KDAQ, it appears that individual airlines operating out of the Cincinnati/Northern Kentucky International Airport will be treated as separate sources under title V permitting. It is important to note that emissions from support facilities under common control (e.g., ownership) of a particular airline must be aggregated with the airline's emissions.

Deicing with Ethylene Glycol

To date, the Region has not issued guidance concerning this issue. KDAQ has indicated that they intend to require each individual airline to include in their emissions inventory, potential emissions of ethylene glycol that would occur during that airline's deicing operations. As an aside, if deicing operations were shared among the airlines (i.e., at a deicing station), potential emissions would be counted by the owner of the deicing operation. If an airline had common control of the deicing operation, the source would be considered a support facility as indicated above.

Thank you for the opportunity to assist you in this matter.
If you should have any questions regarding this letter, please
contact Mr. Alan Drake of my staff at 404/562-9123.

Sincerely yours,

/s/

R. Douglas Neeley
Chief
Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division

cc: Hank Wiseman, KDAQ