



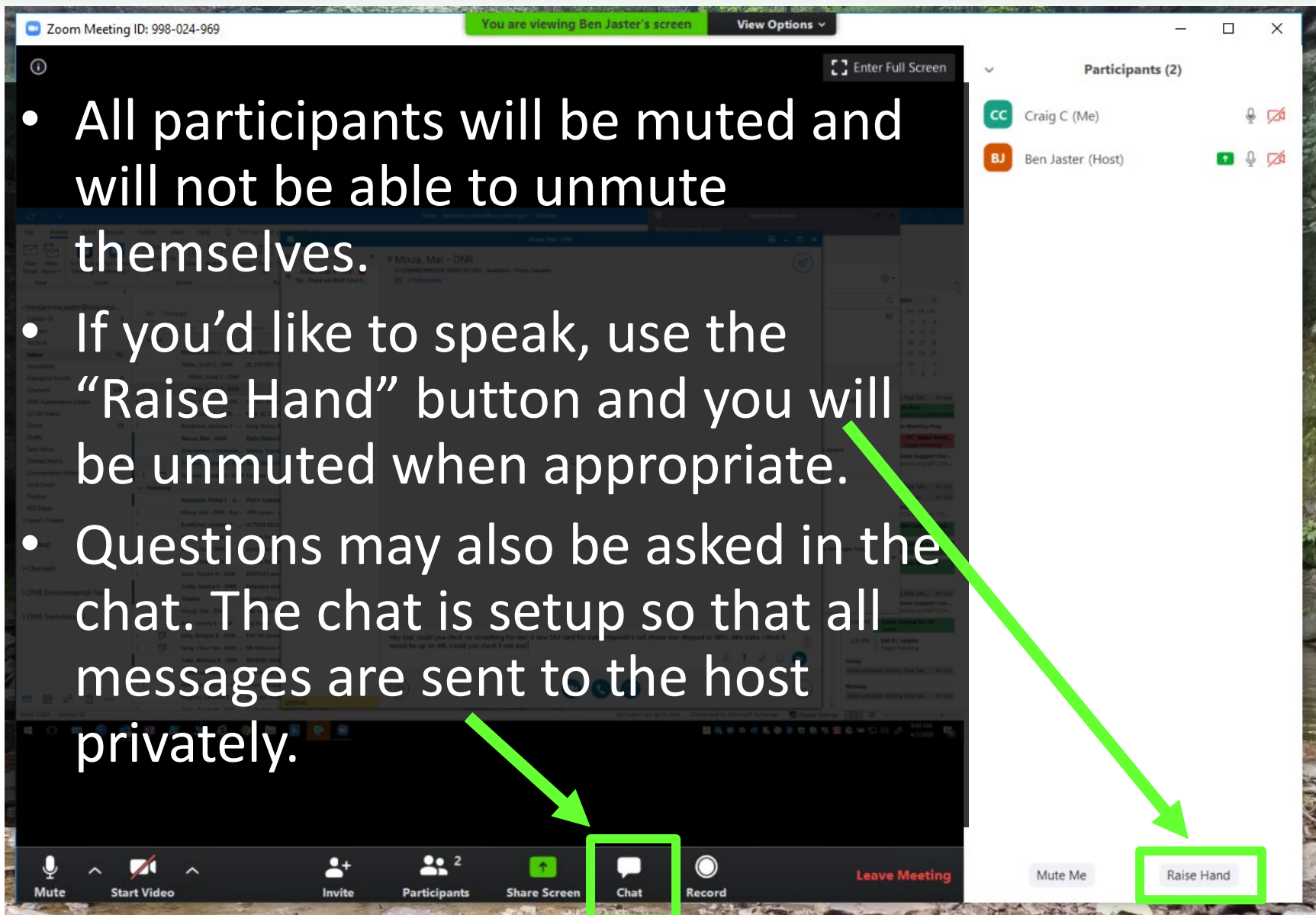
Zoom Guidelines

Hello Everyone,

We've developed some guidelines for this meeting, in the hopes of making this a smooth and enjoyable experience for all. Thank you in advance for your understanding.

Zoom Guidelines

- All participants will be muted and will not be able to unmute themselves.
- If you'd like to speak, use the "Raise Hand" button and you will be unmuted when appropriate.
- Questions may also be asked in the chat. The chat is setup so that all messages are sent to the host privately.





Zoom Guidelines

- The host will attempt to respond to all messages received, but some messages may be missed.
- Participants will join the meeting with their video disabled. We ask that you keep your video disabled for the duration of the meeting.



Zoom Guidelines

- We ask for patience while the Air Program conducts this meeting with this setup.
- Zoom technical support: **support.zoom.us**

Agenda

- Introductions
- Background
 - Definition of Non-Road Engines
 - Historical Regulation of Engines Testing Operations
 - Engine testing and Air Permitting
- Input from Stakeholders
- Wrap up/Next Steps



Non-Road Engines Defined

40 CFR Part 1068 defines “non-road engine” as an internal combustion engine that meets any of the following criteria:

- Will be used in or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as garden tractors, off-highway mobile cranes and bulldozers)
- Will be used in or on a piece of equipment that is intended to be propelled while performing its function (such as lawnmowers and string trimmers)
- By itself or in or on a piece of equipment, it is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.



Non-Road Engines Defined

The regulation goes on to specify that an internal combustion engine is not a nonroad engine if it meets any of the following criteria:

- The engine is used to propel a motor vehicle, an aircraft, or equipment used solely for competition.
- The engine is regulated under 40 CFR part 60, (or otherwise regulated by a federal New Source Performance Standard under section 111 of the Clean Air Act).
- The engine is portable/transportable but remains 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.
 - A location is any single site at a building, structure, facility, or installation.
 - Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period.



Engine Testing in Air Permitting

- Wisconsin is a leader in non-road engine manufacturing and in the manufacture of equipment using non-road engines
- Historically, all emissions from manufacturing were included in permits including all types of engine testing
- In 2008, manufacturers began asking EPA to weigh in on whether certain non-road engine testing processes should be considered stationary source emissions and included in air permits



Engine Testing in Air Permitting

- Construction and operation (Title I and V) air permitting generally only cover stationary sources
- **Stationary source** is defined in Section 302(z) as any source of an air pollutant except emissions resulting directly from an internal combustion engine for transportation purposes or from a nonroad engine or nonroad vehicle

The Question

Is testing of non-road engines, during the manufacturing process a stationary source?



Engine Testing in Air Permitting

Engine testing means many things:

- Performance testing
- End of line product testing
- Roll-off testing
- Reliability/endurance testing
- Research and development testing





EPA Determinations

EPA has provided many opinions since 2016 on engine testing in stationary source permitting

<https://www.epa.gov/nsr/stationary-source-air-pollution>

- Confirm whether the engines in question are motive or non-road engines
- Provide EPA opinion
- Affirm that final opinion is the purview of the state permit authority

DNR plans to draft guidance

- Provide its opinion on engine testing in stationary source air permitting
- Ensure consistent implementation of final opinion

Determinations to Date

FID	Permit No. (if applicable)	Emission Unit ID(s)	Process Description(s)	Determination	Determination Date	Author of Determination
420040720	420040720-P30	P02, P03, P03F, P11, P14, P15, P38, P47	Marine engine testing including production wet test cells (P03, P03f: end of the line quality tests), and non-production wet test cells (P02, P11, P38, P47: non-assembly wet test cells, endurance engine testing, and sound lab) and non-productoin dynamometer test cells (P14 and P15)		Requested 03/05/2020	
114052510	20-RSG-024	P17, P22, P81 (29 of 30 test areas)	Assembly run-in stations, roll-brake testing, whole vehicle evaluation, sound testing, vehicle component testing (e.g., mower belt drive), chassis test, hot room, cold room, wind tunnel, thrown objects and stake testing, stress analysis testing of assembled nonroad equipment (riding lawn equipment)	EPA: Nonroad Engines; DNR: Under evaluation	EPA: 10/2/2019, DNR: Under evaluation	EPA Region 5
114056250	114056250-S08	P20	Testing of utility vehicles including mobile equipment startup stations, quality audit stations, roll-brake testing.	Nonroad Engines	10/02/2019	EPA Region 5
241011870	241011870-P30	P200 and Legacy XL tractor testing	End of the line quality testing of power equipment including lawn tractors, lawn equipment, snow removal equipment, and power washers. Testing is done to evaluate the final product's mechanical systems, not engine testing.	EPA: Nonroad Engines; DNR: Under evaluation	03/29/2018	EPA Region 5
642028970	642028970-F30	P84, P106, P107	Testing of nonroad equipment (e.g., lawn maintenance tractors) to ensure equipment functions correctly as part of the assembly process.	Nonroad Engines	05/15/2017	WDNR
265070960	N/A	P20	Sound, load, electrical system and startup testing of large power generation systems used for standby power, demand response or microgrid or cogeneration facility	Stationary Source (generator end use is stationary, not portable)	05/11/2017	EPA Region 5
460147930	16-JJW-097-EXM	N/A	Nonroad engines including mobile sources such as lawn mowers, skid steers, excavators, ATVs, and go-carts operated in a demonstration area to provide a location where distributors and other potential customers can observe or experience Kohler engine-powered equipment in operation.	Nonroad Engines	06/07/2016	WDNR
State	Permit No. (if applicable)	Emission Unit ID(s)	Process Description(s)	Determination	Determination Date	Author of Determination
IA	--	--	Performance tests on construction and forestry equipment - engines already installed to power the quipment	Nonroad Engines	11/10/2016	EPA Region 7
MI	--	--	Automobile roll-off testing	Engines used for transportation purposes (not subject to permitting)	11/27/2012	EPA Region 5
MI	--	--	Chassis dynamometer test cells for fully assembled vehicles	Stationary source (motor vehicle not yet introduced into commerce)	08/16/2010	EPA Region 5

Discussion

Questions

- What are the costs or challenges associated with having engine testing in air pollution control permits?



Questions

- Are there specific concerns with compliance demonstration methods, monitoring or recordkeeping requirements associated with engine testing in your air permits?



Questions

- Are there specific concerns with limitations taken to meet ambient air quality standards, increment, or emission limitations taken to avoid major source permitting?



Questions

- Do the products you produce have to meet any other emission standards, i.e., marine engine standards, non-road engine standards?



Questions

- What questions do you have about the legal basis for including or not including non-road engine testing operations as stationary sources in permits?



Questions

- Are there any other concerns you have about including or not including non-road engine testing in air permits?





Next Steps