

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JAN 12 2000

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Pat Ladner
Executive Director
Alaska Aerospace Development Corporation 4300 B Street, Suite 101
Anchorage, Alaska 99503

Dear Mr. Ladner:

This letter is in response to your letter of November 17, 1999, requesting a policy determination under title V of the Clean Air Act (title V). Specifically, you asked whether hazardous air pollutant (HAP) emissions from rocket launching at your Kodiak Island, Alaska, aerospace facility would be considered fugitive, mobile source emissions, or nonfugitive, stationary source emissions. In a subsequent telephone conversation, your staff clarified that you are asking us to address this question in light of an Environmental Protection Agency (EPA) Region X policy memorandum concerning your facility.¹ In that letter, Region X assumed you would be engaged in the testing of rocket engines attached to fixed test stands. Based on that premise, their letter described how such emissions would be treated for title V applicability purposes.

As you noted in your letter to us, you are currently developing emissions estimates in order to determine major source status for your facility, and the answer to this question will be critical to that determination. You also correctly state that if your facility is determined to be a major source, you would then have to obtain an operating permit under title V (part 70). In your letter, you specify that you intend to perform the activity of rocket launching and subsequently you clarified that you have no intent, nor is your facility equipped or designed, to conduct test firing of rocket engines attached to fixed test stands. In addition, you stated, and included diagrams showing, that the emissions from rocket launching at your facility will be directed through an acoustical energy diversion structure (flame trench) during the early stages of rocket liftoff.

¹See memorandum from Douglas E. Hardesty, Manager, Federal and Delegated Air Programs Unit, EPA Region X, to Beverly Williams, Alaska Department of Environmental Conservation, dated June 24, 1998; subject: Alaska Aerospace Development Corporation - Kodiak Launch Complex.

For the activity of rocket launching, where a rocket leaves the launch pad, the first and foremost question to consider for title V applicability purposes is whether the activity is a stationary or mobile source since only stationary sources are permitted under title V. We agree with you that rocket launching is a mobile source and thus the emissions from rocket launching do not need to be counted for title V applicability purposes. The fact that the emissions will be ducted through a flame trench structure during the early stages of liftoff have no bearing on this decision.

The secondary question of whether or not the emissions of HAP from rocket launching are fugitive or nonfugitive is irrelevant for two reasons. First, such distinctions are only meaningful for stationary sources and second, because all HAP emissions (fugitive and nonfugitive) from stationary sources are counted toward major source status under title V.

I appreciate the opportunity to be of service and trust that this information will be useful to you.

Sincerely,

John S. Seitz
Director
Office of . Quality Planning
and Standards

cc: Doug Hardesty, EP A Region X
Jeff Herring, EPA/OAQPS
Steve Hitte, EP A/OAQPS
Ray Nye, Region X