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# Clean Air Act Engine Rules/Continuing Confusions (RICE NESHAP): Jeremy Jewell (Trinity Consultants) Arkansas Environmental Federation Air Workshop Presentation

## Arkansas Environmental, Energy, and Water Law Blog

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Jeremy Jewell of Trinity Consultants undertook a presentation at the April 12<sup>th</sup> Arkansas Environmental Federation Air Workshop titled *Engine Rules: Continuing Confusions ("Presentation")*.

The *Presentation* addresses a number of issues associated with the Clean Air Act Reciprocating Internal Combustion Engines (RICE) National Emission Standard for Hazardous Air Pollutants rule.

The *Presentation* addresses issues such as:

- Status of nonroad engines (including potential nonroad engine examples)
- Performance tests v. compliance demonstration
- Test method concerns
- CPMS deviation reporting
- Engine control types
- Question regarding "emergency or not"?
- Operation logs
- What if you operate an emergency engine more than the allowable non-emergency hours?
- Operational limits
- On-line CEDRI reporting for emergency reciprocal internal combustion engines (RICE)
- Regulatory gap
- Overlooked exemptions
- PTE based on Tier standards
- Determining applicability of rental engines

Click here to download a copy of the [Presentation](#).