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EPA RELEASES PROPOSED DEICING POLLUTION RULE

August 31, 2009

What's at Issue

On August 28, 2009, the U.S. Environmental Protection Agency (EPA) released a Notice of Proposed Rule Making (NPRM) titled "Effluent Limitation Guidelines and New Source Performance Standards for the Deicing Category."

Why It's Important

This NPRM will impose regulatory requirements for the collection and treatment of deicing runoff at certain airports.

Major Provisions

Applicability

This NPRM will apply to all primary commercial service airports with greater than 1,000 annual jet departures. Non-primary and general aviation airports are outside the scope of this NPRM.

Requirements

Primary Commercial Service Airports with more than 1000 Annual Jet Departures

≥ 10,000 Annual Departures (all aircraft)		< 10,000 Departures (all aircraft)
≥ 460,000 gal. annual ADF usage*	< 460,000 gal. annual ADF usage*	
 Capture 60% of available ADF. Treat collected ADF to meet Chemical Oxygen Demand (COD) limit of 271 mg/L daily maximum and 154 mg/L weekly average. Certify use of nonurea-based pavement deicers or meet effluent limit for ammonia of 14.7 mg/L. 	 Capture 20% of available ADF. Treat collected ADF to meet Chemical Oxygen Demand (COD) limit of 271 mg/L daily maximum and 154 mg/L weekly average. Certify use of non-ureabased pavement deicers or meet effluent limit for ammonia of 14.7 mg/L. 	1. Certify use of non- urea-based pavement deicers or meet effluent limit for ammonia of 14.7 mg/L.

^{*}Note: Aircraft Deicing Fluid (ADF) usage refers to undiluted ADF quantity

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NATA Position

NATA will review the full text of the NPRM to determine the implementation cost and possible safety implications on the industry. NATA will also coordinate with other industry trade associations and its membership to respond to the EPA's request for comments on this NPRM.

Status

This NPRM is open to public comment until December 28, 2009. The NPRM may be downloaded <u>here</u>.

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