

January 18, 2006

(AR-18J)

Michael E. Hopkins, P.E.  
Assistant Chief, Permitting  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
122 South Front Street  
P. O. Box 1049  
Columbus, Ohio 43266-1049

Re: Use of Halon 1211 for short term research purposes at  
Wright Patterson Air Force Base in Dayton, Ohio

Dear Mr. Hopkins:

This letter is in response to your October 26, 2005 e-mail of a letter regarding the use of Halon 1211 for short term research purposes at Wright Patterson Air Force Base, in Dayton, Ohio. Specifically, you asked whether the United States Environmental Protection Agency (USEPA) would concur with the Ohio Environmental Protection Agency (OEPA) analysis that the temporary use of Halon 1211 at Wright Patterson Air Force Base for a 12-month testing period (to identify a reliable fire extinguishing agent for ballistic threats to the C-130J aircraft engine) would not trigger New Source Review (NSR).

Our understanding from your letter is that no acceptable alternative compound exists for this application; the capture of the released Halon 1211 during the research trial is not considered practical; the research trial will occur for a 12 month period; and the Halon 1211 emissions are estimated at 1,620 pounds for the year. Although current Federal regulations specify "any emissions rate" as the significance level for ozone depleting substances (ODS) such as Halon 1211, on July 23, 1996, USEPA proposed a new significance level of 100 tons per year for ODS. USEPA received no adverse comments on the proposed significance level. USEPA anticipates acting on this portion of the 1996 proposal as part of upcoming rulemaking on NSR reform.

Given the pending promulgation of final rules establishing an ODS significance level, and in light of the factors set

forth above; other factors including the limited nature of the trial; and the military safety purposes of the trial; USEPA does not object to OEPA's proposal not to conduct a NSR analysis in this particular situation.

This decision is fact-specific and site-specific, is based on the particular circumstances of this case, and can not be viewed as establishing precedent for any future requests, even in similar situations.

If you have any additional questions feel free to contact Genevieve Damico, of my staff, at (312) 353-4761.

Sincerely,

/s/

Pamela Blakley, Chief  
Air Permits Section