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TRC/MARIAH ASSOCIATES, INC.  
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 FILE # 01990

## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

March 9, 1995

Mr. Rex G. McDonnell III, P.E.  
 Senior Project Manager  
 TRC ENVIRONMENTAL CORPORATION  
 3939 Bee Caves Road, Building C  
 Austin, Texas 78746

Re: Permit Requirements  
 Jet Engine Test Cells

Dear Mr. McDonnell:

This is in response to your letter dated February 14, 1995 requesting a clarification of the permitting requirements for jet engine test cells. As you stated, these specialized buildings are used to test jet engines that are either installed in the aircraft or on a rolling dolly. Test runs accomplished with the jet engine installed in the aircraft have always been considered a mobile source and not subject to permitting requirements. When the sophisticated buildings known as hush houses were constructed to attenuate the noise and allow this maintenance run to be accomplished at night, it was determined that if the engine was not installed in the aircraft, it was not a mobile source and a permit would be required.

Upon further consideration, the Texas Natural Resource Conservation Commission (TNRCC) New Source Review Program has determined that since the jet engine is being tested as a part of the maintenance activity (whether it is strapped to a dolly or installed in the aircraft), this testing may be considered a part of the maintenance activity and may qualify for exemption under Standard Exemption No. 70.

70. Repairs or maintenance not involving structural changes where no new or permanent facilities are installed.