



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

April 27, 2022

Mr. Daniel S. Musel
Chief, Environmental Management Division
Directorate of Public Works
Department of the Army
U.S. Army Installation Management Command
Headquarters, U.S. Army Garrison Command, Fort Knox
125 6th Avenue, Suite 320
Fort Knox, Kentucky 40121-5719
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Via Electronic Mail

Dear Mr. Musel:

This letter is in response to your February 14, 2022, request to the U.S. Environmental Protection Agency (EPA) for a regulatory interpretation regarding the oil analysis program specified in the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE NESHAP).

In your letter, you asked EPA to clarify whether certain oil change procedures satisfy the oil analysis program requirements in the RICE NESHAP, provided in paragraph 40 CFR 63.6625(i) for compression ignition (CI) engines and 40 CFR 63.6625(j) for spark ignition (SI) engines. Those regulatory provisions specify that the oil analysis program must be performed at the same frequency for changing oil specified in Tables 2c and 2d in the rule. The question posed, essentially, is whether regulated entities that adopt the oil analysis program must change the oil filter on a more frequent basis than the oil even when the oil analysis program indicates condemning limits have not yet been reached. You provide extensive documentation in the form of excerpts from past EPA rules, Response to Comment documents, and a webinar regarding this issue.

The provisions in 40 CFR 63.6625(i) and (j) refer to Tables 2c and 2d for the requirements. As you note in your letter, these tables state that the requirement is to “change oil and filter.” You state that “based on the [provided] documentation, we believe it was never EPA’s intent to continue to require an oil filter change annually when an owner/operator opted to follow the oil analysis option for existing generators.” We concur with this statement and clarify that regulated entities that adopt the oil analysis program for existing generators must change the oil filter for these generators when changing the oil in these generators and are not required to change the filter prior to changing the oil. The intention of EPA’s regulations is that the oil filter should always be changed whenever the engine oil is changed.


Please note that nothing in EPA's regulations preventing the owner/operator from changing the oil and/or oil filter sooner than condemning limits have been reached, if appropriate for other reasons (*e.g.*, discovery of a clogged or defective filter). Also please note that the engine owner/operator is responsible for incorporating the oil analysis program into the engine's maintenance plan, changing the oil within two business days of receiving analysis results indicating the condemning limits have been reached, and keeping records.

If you have any questions about this response, please contact Chris Werner at (919) 541-5133 or werner.christopher@epa.gov.

Sincerely,

**PENNY
LASSITER**

Penny Lassiter
Director
Sector Policies and Programs Division

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