

NSPS- Framing the Issues



- ◆ If physical and/or operational changes are made on an existing engine such that the changes meet the regulatory definition of a "significant modification" or "re-construction", the engine will become subject to the new engine rule.
- ◆ In cases where an operating company leases engines from a compression service provider, typically it is the service provider who performs necessary maintenance and changes on the engines (such as engine overhaul).
- ◆ Most all operating companies have not tracked information regarding when and what changes were made on engines, and therefore would not be able to determine whether or not the regulatory definition of "significant modification" or "reconstruction" were triggered.

NSPS- Questions for the Panel



1. NSPS Notifications - Should/can the manufacturer/vendor provide NSPS notifications to regulatory agencies?
2. Engine Maintenance Records - How can the operator assure compliance with required engine maintenance plans and documentation for vendor maintained engines?
3. Engine Status - How can continued NSPS non-applicability status be verified and documented for rental engines that have routine maintenance, are moved to different locations within a company, and subsequently leased to different companies?
4. What happens when Operator and Vendor disagree about whether or not “reconstruction” was triggered?