



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
1200 Sixth Avenue
Seattle, WA 98101

October 5, 1999

Reply To

Attn Of: OAQ-107

MEMORANDUM

SUBJECT: EPA Determination Regarding the Consistency of the Elmendorf ENVVEST/XL Project Proposal and EPA's Guidance for Military Installations

FROM: David C. Bray, Senior Air Pollution Scientist
Office of Air Quality, Region 10

TO: Elmendorf ENVVEST/XL Project Team

The Elmendorf ENVVEST/XL Project proposes to consider the Base as eleven (11) separate stationary sources for purposes of Title V permitting. EPA has reviewed the proposal and has determined that it is consistent with EPA's guidance regarding "Major Source Determinations for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act (Act)," dated August 2, 1996.

Under the August 2, 1996 guidance, military installations may consider pollutant-emitting activities that are under the control of different military services *not* to be under common control and therefore treated as separate stationary sources. Similarly, leased activities at military installations may be considered to be under separate control from activities under the control of the military controlling entities and therefore treated as separate sources. More importantly, pollutant emitting activities under the control of a military service may be identified and distinguished in the same way that industrial and commercial sources are distinguished. That is, "industrial groupings" at a military installation may be assigned an appropriate 2-digit SIC code (as if they were non-military facilities) and classified into "primary" and "support" activities. As is done with non-military sources, support activities would be aggregated with their associated primary activity regardless of dissimilar 2-digit SIC codes. However, in accordance with EPA guidance on support activities, a support activity may be considered to be a separate source, in and of itself, if it does not provide more than 50% of its output to any single primary activity.

The attached document, prepared by the Air Force and EPA, describes the 11 primary and support activities which currently comprise the Elmendorf Air Force Base. Nine of these activities are under the control of the Air Force; one is under the control of the House Armed Services Committee, and one is a contract-for-service asphalt batch plant that works for all of the military entities and tenant organizations on the Base and is not under the control of any single entity. EPA has determined that the proposed categorization of pollutant-emitting activities within the Base is consistent with EPA's guidance for military installations and that the Elmendorf Base may be treated as eleven separate sources for Title V permitting purposes.

Attachment

Controlling Entities and Standard Industrial Classification (SIC) Code Divisions for Elmendorf AFB

The current Alaska operating permit program would treat the entire Elmendorf Air Force Base as a single air contaminant emission source for the purpose of determining if a state-issued Clean Air Act Title V permit is required. The 1996 Base emissions inventory, prepared by a contractor in support of the Base's Title V permit application, lists 106 sources of regulated air pollutant emissions that would need to be addressed in the permit.

EPA released a policy document, entitled "Major Source Determinations for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs for the Clean Air Act" ("Major Source Guidance"), dated August 2, 1996. This Major Source Guidance recognizes that military installations possess unique characteristics warranting flexibility in major source determinations. The Major Source Guidance allows military installations to divide by military controlling entities, and within a controlling entity, into functionally distinct emitting activities. The activities can be classified as either primary or support activities. To that end, the Base has utilized the Major Source Guidance to divide the 106 emission sources into eleven functionally distinct emitting activities based on the controlling entities and the Standard Industrial Classification (SIC) Code manual.

ACTIVITIES UNDER THE CONTROL OF ENTITIES OTHER THAN THE AIR FORCE

SIC Code 55, Gasoline Service Station

The Gasoline service station is operated by the Army Air Force Exchange Service (AAFES), a part of the House Armed Services Committee, and is not under the control of the Air Force or even the Department of Defense. The station is open to all active duty and retired military, reserve, national guard, and coast guard members in the Anchorage area. There are roughly 6,675 active duty military members assigned to Elmendorf AFB and approximately 9,000 retired military in the local area.

SIC Code 16, Contract Street Construction (Asphalt Batch Plant)

The asphalt batch plant is owned and operated by a private contractor. It operates on a contract-for-service basis and performs work for all of the military entities and tenant organizations on the Base. While it is allowed by the Air Force to reside within the boundaries of the Base, it is not under the control of the Air Force.

ACTIVITIES UNDER THE CONTROL OF THE AIR FORCE

The following primary and support SIC codes were used to divide the activities under the control of the Air Force:

SIC CODE	Type of Activity
45, Flight Line	Primary
48, Communications	Primary
80, Health Service	Primary
87, Admin/Engineering	Primary
97, National Security	Primary
49, Power Plant	Support
65, Real Estate	Support
75, Automotive Repair	Support
92, Safety/Fire Prevention	Support

PRIMARY ACTIVITIES

SIC Code 45, Flight Line

The flight line is considered a primary activity. The emission sources for the flight line grouping are those directly associated with flight operations and maintenance. The purpose of these sources is to allow Elmendorf AFB to accomplish its mission of conducting aircraft flight operations. Included in the SIC code division are sources such as boilers used for heating hangers and spray booths for painting of aircraft parts. Flight line operations are one of the fundamental defense functions performed of Elmendorf AFB.

SIC Code 48, Communications

Communications are considered a primary activity. The emission sources listed under this SIC Code primarily exist for communication functions such as satellite communications, Electronic Security and intelligence functions that are located on the installation. These missions and the sources associated with them could be located elsewhere; therefore, this SIC code division is considered a primary activity.

SIC Code 80, Health Service

Health Services is considered a primary activity. The mission of the hospital is to provide centralized expert health care to military members throughout the Pacific Rim. The location of the hospital on Elmendorf AFB is incidental to its ability of perform its mission. The independent nature of this activity warrant its designation as a primary activity.

SIC Code 87, Admin/Engineering

Administration and Engineering is considered a primary activity. The emission sources

listed under this SIC code support “Command and Control” for the Alaska Command “ALCOM”. The ALCOM Commander has the responsibility for directing the activities of all North American military forces in the Pacific theater to include the Canadian military. Elmendorf AFB houses these facilities for the DOD/Air Force command structure. These facilities could easily operate independently of Elmendorf AFB to meet their mission responsibilities. Their function is somewhat like that of a small Pentagon. Because the sources associated with this SIC code can be performed independent of the installation boundary, they are considered as primary.

SIC Code 97, National Security

National Security is considered a primary activity. The emission sources listed under this SIC code are primarily from activities for which no other appropriate SIC code exists, for example, recycling of CFC refrigerants and asbestos remediation and removal. In accordance with the Major Source Guidance, these activities do not correlate to any other functional activity, and are considered as one of the primary activities for Elmendorf AFB.

SUPPORT ACTIVITIES

SIC Code 65, Real Estate

Real estate is considered a support activity. The emission sources listed under this SIC code provide service to military family housing. On Elmendorf AFB, military family housing provides support to active duty military personnel and their families from the US Air Force, Army, and Navy, as well as Canadian military members assigned to the base.

With an assumed equal distribution of housing unit, at the most only 44 percent of the units on Elmendorf AFB would be occupied by personnel that support the flight line. Additionally, there are several tenant organizations as well as members from other services that reside in base housing. The dynamics of residency include the service member’s rank, family size, and date of assignment to Elmendorf AFB. These changes will cause slight variations in the percentages over time but no attempt is made to control which military members working to support any one activity have access to base housing.

With the number of military members distributed among a range of functional activities, it is unlikely that housing supports any one SIC code activity with greater than 50 percent of its service.

SIC Code 75, Automotive Repair

Automotive Repair is considered a support activity. This SIC code provides service to the entire base fleet of government vehicles. The services are also provided to tenant organizations. Roughly 31 percent of the base fleet (including leased vehicles) are assigned to support engineering and administration. Another 25 percent of the fleet directly support the flight line. No single activity has a 50 percent majority of vehicles on base which use the services provided by this SIC code source division.

SIC Code 92, Safety/Fire Prevention

Safety and fire prevention are considered a support activity. The services provided by the fire department are equally distributed in support of all SIC codes on Elmendorf. The fire department will respond to fire emergencies across the base population. Responsibilities include housing fires, structural fires for all Elmendorf AFB (3rd Wing) and tenant organizations on base, as well as flight line emergencies. Elmendorf AFB has an extremely varied population and a wide range of real estate usage. The base is, in essence, a small city with industrial areas, retail shops and services, as well as housing and recreation areas. Fire and safety services are not provided to or support any individual activity with more than 50 percent of their service.

SIC Code 49, Power Plant

Power Production is considered a support activity. Elmendorf AFB has performed an analysis to determine that the “product” provided by this activity does not support more than 50 percent of any one of the other SIC code activities.

SIC Code	Percentage of Power from CH&PP
45, Flight Line	14
48, Communications	3
80, Health Services	17
87, Admin/Engineering	26
97, National Security	2
65, Real Estate	33
75, Automotive Repair	4
92, Safety/Fire Prevention	<1
49, Power Plant	1