

**From:** [INGOGLIA, J M GS-14 USAF AFMC PACAF/AFIMSC Det 2/CEV](#)  
**To:** [Dec Air Comment](#); [Heil, Cynthia L \(DEC\)](#)  
**Cc:** [HOLLIDAY, MICHAL D Col USAF PACAF/AFIMSC Det 2/CE](#); [STRINGHAM, KATHERINE L GS-13 USAF PACAF/PACAF/AFIMSC Det 2/CEV](#); [WEBB, SCOTT GS-13 USAF AFCEC AFCEE/CZOP](#); [MARTINSON, DAVID A GS-14 USAF PACAF 354 CES/CD](#)  
**Subject:** Formal Comment to Proposed Regulation Changes Relating to Fine Particulate Matter (PM2.5); Including New and Revised Air Quality Controls and State Implementation Plan (SIP)  
**Date:** Friday, July 26, 2019 4:28:00 PM  
**Attachments:** [USAF SIP Comments.pdf](#)

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Ms Heil,

Attached are USAF comments on the proposed regulation.

We appreciate the opportunity to comment.

Sincerely,

*J. Mark Ingoglia*, DAF GS14  
Chief, Environmental Branch  
AFIMSC Det 2, CEV  
808 449-1077



**DEPARTMENT OF THE AIR FORCE**  
DETACHMENT 2, AIR FORCE INSTALLATION AND MISSION SUPPORT CENTER  
JOINT BASE PEARL HARBOR-HICKAM, HAWAII

26 July 2019

MEMORANDUM FOR ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
ATTN: CINDY HEIL  
Division of Air Quality  
555 Cordova Street  
Anchorage AK 99501

FROM: AFIMSC Det 2/CE  
25 E. St, Suite C-310, Bldg 1102  
JBPH-H, HI 96853-5412

SUBJECT: Formal Comment to Proposed Regulation Changes Relating to Fine Particulate Matter (PM<sub>2.5</sub>); Including New and Revised Air Quality Controls and State Implementation Plan (SIP)

1. On 14 May 2019, the Alaska Department of Environmental Conservation (ADEC) released the Serious Area State Implementation Plan (SIP) for the Fairbanks North Star Borough (FNSB) Fine Particulate (PM<sub>2.5</sub>) Nonattainment Area (NAA) for public review. Public comments are due by 5:00 p.m. on 26 July 2019. The Air Force appreciates the opportunity to comment on the SIP and the collaborative effort with the ADEC to provide a means to attain the PM<sub>2.5</sub> 24-hour standard.
2. Although Eielson Air Force Base is not within the NAA, Eielson shares a coal contract with Fort Wainwright Army Garrison for coal obtained from Usibelli Coal Mine (UCM). The Air Force has the following comment on the sulfur content of coal.
  - a. In Amendments to State Air Quality Control Plan Vol. III: Appendix III.D.7.07 and in the Best Available Control Technology (BACT) Summary Highlight located at <http://dec.alaska.gov/media/16232/bact-summary-highlight-051419.pdf>, the proposed BACT for coal-sulfur content is 0.2 percent sulfur by weight. This sulfur limit will cut off access to tens of millions of tons of coal from UCM as well as pose a potential threat of fuel supply interruption for the coal-fired power plants using UCM coal.

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b. The Air Force requests ADEC adopt a BACT coal-sulfur content of 0.25 percent sulfur by weight based on a semi-annual weighted average of coal-sulfur content in shipments of coal ~~within the semi-annual period corresponding to Facility Operating Report reporting period.~~

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c. The ADEC has proposed that BACT for coal burning facilities in the nonattainment area is a coal-sulfur limit of 0.2 percent sulfur by weight. UCM is the only source of commercial coal available to the coal-fired boiler facilities within the Fairbanks North Star Borough fine particulate nonattainment area. The mine has limited ability to affect the sulfur content in the coal. There is not a coal washing or segregating facility associated with UCM which could ensure a consistent coal-sulfur concentration. Current practice for providing low-sulfur coal to their customers is identifying

sulfur content of the resource through drilling and sampling efforts. However, the ability to characterize the sulfur content of the coal mined is limited.

Within the millions of tons of coal resources available to UCM, there is a significant amount of coal with higher sulfur content than 0.2 percent by weight; in fact, any limit proposed to the coal sulfur content is effectively cutting off access to tens of millions of tons of coal resources. As such, the Air Force proposes that the coal-sulfur content limit be lowered to 0.25 percent by weight on an as received basis (wet) as opposed to 0.2 percent by weight as proposed by ADEC. The increase in coal sulfur content will help with coal accessibility and availability over the next decade.

The state was silent on how the measure was to be reported or considered within a regulatory context. The ADEC's standard permit condition for coal fired boilers (Standard Condition XIII) requires that the permittee report sulfur content of each shipment of fuel with the semi-annual Facility Operating Reports. UCM currently provides a semi-annual report to all customers which includes sulfur content of each shipment of coal along with the weighted average coal-sulfur content for the six-month period coinciding with the operating reports' reporting period. The Air Force proposes that the standard operating permit condition remain the same, and that facilities continue to provide the state with the sulfur content of each shipment of fuel; in addition, the weighted average coal-sulfur content of the shipments received by the facility during the reporting period would be referenced in the operating report.

3. If additional information is required, please contact Katherine Stringham, Regional Support Branch Air Program Manager, directly by e-mail at [katherine.stringham@us.af.mil](mailto:katherine.stringham@us.af.mil) or by telephone at (808) 449-1094.



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