

From: [Smith, Kristina A.CIV.USARMY.IMCOM.PACIFIC.\(USA\)](#)
To: [Dec Air Comment](#)
Cc: [Heil, Cynthia L \(DEC\)](#); [Edwards, Alice L S \(DEC\)](#); [Dick, Eric M.CIV.USARMY.USAG.\(USA\)](#)
Subject: ADEC Serious SIP Comments from Fort Wainwright (UNCLASSIFIED)
Date: Friday, July 26, 2019 10:04:42 AM
Attachments: [ADEC Serious SIP Comment_Fort Wainwright.pdf](#)

CLASSIFICATION: UNCLASSIFIED

Good Morning,

Please find an electronic copy of the comments Fort Wainwright has on the Serious SIP. The signed hard copy will also be sent in the mail.

Regards,
Kris

Kristina Smith
Air Program Manager
DPW - Environmental
U.S. Army Garrison Alaska
3023 Engineer Place
Fort Wainwright, AK 99703

Desk: 907-361-9687
Email: kristina.a.smith14.civ@mail.mil

We are the Army's Home

Learn more at https://urldefense.proofpoint.com/v2/url?u=http-3A-www.wainwright.army.mil&d=DwIFAg&c=eXCf5DW4bHgLDm-H5_GmQ&r=bGI5SkMXMO5pO5ArrFWu_38cCPnYgdePZXX1mLY-vA&m=ZG3gsw6CqnDtXtnqZ29BbklcfZKPcaOdJ88IGeiWHYw&s=6yiOjzgUrWmikNpaZMZVO9SoH9MLxUlfo75Uxo9xoSM&e=

CLASSIFICATION: UNCLASSIFIED



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, U.S. ARMY GARRISON ALASKA
1046 MARKS ROAD #6000
FORT WAINWRIGHT, ALASKA 99703-6000

RECEIVED

JUL 26 2019

Directorate of Public Works

Alaska Department of Environmental Conservation
Division of Air Quality
ATTN: Cindy Heil
555 Cordova St.
Anchorage, AK 99501

To Whom This Concerns:

On 13 May 2019, the Alaska Department of Environmental Conservation (ADEC) issued the draft Serious State Implementation Plan (SIP) and requested comments no later than 27 July 2019. United States Army Garrison Alaska (USAG Alaska) has reviewed the Serious SIP and has made comments to ensure correct information is used in the evaluation of control strategies that Fort Wainwright would be subject too upon the Environmental Protection Agency (EPA) approval of the plan. Fort Wainwright appreciates the opportunity to comment on this serious SIP.

All comments contained within this letter address the ADEC Serious SIP draft document section titled Volume II; III.D.7.7 Control Strategies.

Comment 1: Section 7.7.8.3 Fort Wainwright

Please reword the sentence: "The EUs located within the military installation at Fort Wainwright Central Heating and Power Plant (CHPP) are operated by a private utility company, Doyon Utilities, LLC. (DU) and owned by the U.S. Army Garrison Fort Wainwright (FWA)" to "EUs located within the military installation include units such as boilers and generators that are owned and operated by the U.S. Army Garrison Alaska (FWA). The FWA Central Heating and Power Plant (CHPP), also located within the installation footprint, is owned and operated by a private utility company, Doyon Utilities, LLC (DU)."

The current wording suggests that DU operates all of the emission units (EUs) located within the installation footprint, which is misleading and inaccurate. DU also owns the CHPP, not Fort Wainwright. U.S. Army Garrison Fort Wainwright is now United States Army Garrison Alaska.

Comment 2: Section 7.7.8.3 Fort Wainwright, applies throughout the section

Several emission units were transferred between DU and Fort Wainwright at the beginning of 2019. The following corrections should be made to accurately reflect EU ownership and which entity has requirements to comply with: DU EU 10 is now FWA EU 50; DU EU 11 is now FWA EU 51; DU EU 12 is now FWA EU 52; DU EU 13 is now FWA EU 53; DU EU 15 is now FWA EU 54; DU EU 16 is now FWA EU 55; DU EU 17 is now FWA EU 56; DU EU 18 is now FWA EU 57; DU EU 19 is now FWA EU 58; DU EU 20 is now FWA EU 59; DU EU 21 is now FWA EU 60; DU EU 24 is now FWA EU 61; DU EU 25 is now FWA EU 62; DU EU 26 is now FWA EU 63; DU EU 27 is now FWA EU 64; and DU EU 28 is now FWA EU 65.

Comment 3: Section 7.7.8.3.1 NO_x Controls for Fort Wainwright, Last Paragraph

"Limit EU 8 to 500 hours of operation per year." Please clarify which EU 8 is being referred to here: FWA EU 8 or DU EU 8?

Comment 4: Section 7.7.8.3.1 NO_x Controls for Fort Wainwright

"Limit non-emergency operation of the 27 diesel fired boilers, with the exception of the waste-fuel boilers, to no more than 500 hours per year, for maintenance checks and readiness testing."

In reviewing this requirement, there is a misstated assumption in the Fort Wainwright Best Available Control Technologies (BACT) Analysis that states that the boilers are emergency boilers. The only emergency boilers in use on Fort Wainwright are EUs 8, 9, and 10. All other boilers in the emissions inventory are considered insignificant emission sources and are not used for emergency purposes, as they are the primary heating source at their designated building identifier. Limiting boilers to 500 hours would affect Army readiness and create problems with maintaining mission important infrastructure during seasonally cold temperatures.

Comment 5: Section 7.7.8.3.2 PM_{2.5} Controls for Fort Wainwright

"Limit non-emergency operation of the 27 diesel fired boilers, with the exception of the waste-fuel boilers, to no more than 500 hours per year, for maintenance checks and readiness testing."

In reviewing this requirement, there is a misstated assumption in the Fort Wainwright BACT Analysis that states that the boilers are emergency boilers. The only emergency boilers in use on Fort Wainwright are EUs 8, 9, and 10. All other boilers in the emissions inventory are considered insignificant emission sources and are not used for emergency purposes, as they are the primary heating source at their designated building identifier. Limiting boilers to 500 hours would affect Army readiness and create problems with maintaining mission important infrastructure during seasonally cold temperatures.

Comment 6: Section 7.7.8.3.3 SO₂ Controls for Fort Wainwright

“Limit non-emergency operation of the 27 diesel fired boilers, with the exception of the waste-fuel boilers, to no more than 500 hours per year, for maintenance checks and readiness testing.”

In reviewing this requirement, there is a misstated assumption in the Fort Wainwright BACT Analysis that states that the boilers are emergency boilers. The only emergency boilers in use on Fort Wainwright are EUs 8, 9, and 10. All other boilers in the emissions inventory are considered insignificant emission sources and are not used for emergency purposes, as they are the primary heating source at their designated building identifier. Limiting boilers to 500 hours would affect Army readiness and create problems with maintaining mission important infrastructure during seasonally cold temperatures.

Comment 7: Section DEC BACT DETERMINATION for Fort Wainwright Central Heating and Power Plant

Based on a review of the control package and the BACT analyses for the other two coal fired facilities located in the nonattainment area, the economic feasibility argument finding should equitably apply to all coal fired facilities in the nonattainment area. There is no articulated argument stating why the Fort Wainwright CHHP is required to have additional controls or why it is dissimilar to the other coal power plants that are subject to the same requirements. The Fort Wainwright CHHP is a coal fired plant with the same or similar processes as the Chena Power Plant and the UAF Power Plant, and would be subject to the same proposed coal sulfur limitations. Studies completed by EPA in 2016, as highlighted in Vol. II: III.D.7.8 Modeling document, states that wood smoke contributes between 60-80% of the fine particulate matter found on filters during the winter months, while major sources contribute less than 10%. Installation of costly controls on an aging facility may that have little to no influence on the air quality in the nonattainment area, where wood smoke is identified as the major primary contributor.

Additionally, Fort Wainwright is assessing future energy usage based on aging infrastructure and is developing plans for improvement or replacement of current utilities, which has a projected timetable of less than 15 years. As such, Fort Wainwright requests that an Economic Infeasibility determination be applied to the Fort Wainwright CHHP.

If you desire further information, please contact Kristina Smith, USAG Alaska, Air Quality Program Manager at (907) 361-9687 or at kristina.a.smith14.civ@mail.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Ruga".

Christopher J. Ruga
Colonel, US Army
Commanding