



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, WA 98101

Reply To  
Attn Of: OAQ-107

Colonel D. H. Showers  
3 CES/CE  
6326 Arctic Warrior Drive  
Elmendorf Air Force Base, Alaska 99506-3240

Re: Applicability Determination - MACT Subpart GG

Dear Colonel Showers:

This letter responds to the February 23, 1999, letter from Colonel Kevin P. Hansen (copy enclosed) requesting a United States Environmental Protection Agency (EPA) determination regarding the applicability of 40 CFR Part 63, Subpart GG - National Emission Standards for Aerospace Manufacture and Rework Facilities (Aerospace NESHAP), to operations at the Elmendorf Air Force Base (AFB). We have coordinated our review of this request with EPA's Office of Air Quality Planning and Standards (OAQPS) and Office of Regulatory Enforcement (ORE). Based upon the enclosed November 4, 1999, memorandum from OAQPS and ORE, EPA has determined that the Aerospace NESHAP will not apply to operations at Elmendorf AFB, provided Elmendorf AFB meets the requirements specified in the aforementioned memorandum.

While the Aerospace NESHAP will not apply to the Elmendorf AFB, we understand that significant reductions in hazardous air pollutant (HAP) emissions will be accomplished as part of the Elmendorf ENVVEST/XL Project. We encourage the Air Force to obtain HAP emission reductions equivalent to, or even greater than, that which would have occurred had the Aerospace NESHAP applied to the Elmendorf AFB. In addition, EPA recommends that the Air Force evaluate whether the activities covered by the NESHAP would be the most cost-effective source of such reductions. As a stakeholder in the ENVVEST/XL Project, EPA is ready to assist in identifying and evaluating cost-effective HAP emission reductions at the Elmendorf AFB.

If you have any questions regarding our response, please contact Dan Meyer or David Bray of my staff at (206) 553-4150 and (206) 553-4253, respectively.

Sincerely,

Barbara McAllister, Director  
Office of Air Quality

DB:cb

Enclosures (2)

cc: David A. Bennett, Elmendorf AFB  
Bill MacClarence, ADEC (Anchorage)  
John A. Pavitt, EPA Region 10 - Alaska Operations Office  
John Stone, ADEC (Juneau)