



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
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AIR & RADIATION
DIVISION

September 30, 2021

Lieutenant Colonel Stanton P. Brown
Commander, 611th Civil Engineer Squadron
10471 20th Street, Suite 302
JBER Alaska 99506-2201

Dear Lieutenant Colonel Brown:

This letter is in response to your June 3, 2021, application submittal concerning the incinerator located at the United States Air Force Long Range Radar Site in Oliktok, Alaska. The USAF's submittal requests approval from the U.S. Environmental Protection Agency to exclude this incinerator as a rural institutional waste incinerator at 40 CFR 60.2887(h) under 40 CFR part 60 subpart EEEE, Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006. The EPA has determined that this incinerator does not qualify for the rural institutional waste incinerator exclusion.

As described in 40 CFR 60.2887(h), the EPA may exclude a rural institutional waste incinerator from the applicable requirements of subpart EEEE. To obtain this exclusion, the owner or operator must submit an application demonstrating that the unit is located more than 50 miles from the boundary of the nearest Metropolitan Statistical Area and that alternative disposal options are not available or are economically infeasible. See 40 CFR 60.2887(h)(1)(i) and (ii). The application must be submitted to and approved by the EPA prior to the initial startup of the incineration unit according to 40 CFR 60.2887(h)(1).

The USAF has previously submitted applications to the EPA requesting the rural IWI exclusion for this incinerator in 2019 and 2020. In its 2019 application, the USAF indicated that its incinerator located in Oliktok, Alaska was installed and began operation in 2007. Because the USAF's 2021 application was submitted after the initial startup of this incinerator in 2007, the USAF does not meet the requirement of 40 CFR 60.2887(h)(1). Accordingly, the EPA is disapproving the Air Force's application submitted on June 3, 2021, for the rural IWI exclusion under subpart EEEE for its incinerator located in Oliktok, Alaska. This disapproval is consistent with the EPA's previous disapproval letters issued on July 12, 2019, and August 20, 2020, to the USAF concerning the applicability of this exclusion for the same incinerator.

Even if the USAF had submitted its application prior to the incinerator's initial startup, USAF has not provided sufficient information to demonstrate that it could satisfy the other requirements for an exclusion from the requirements of Subpart EEEE. While USAF provided information about the costs associated with transport of waste from its location, it did not provide information concerning USAF's available funding that could enable the EPA to evaluate whether the costs of alternative disposal are economically infeasible. Given that USAF has been disposing of wastes without incineration since at least 2017, it is unlikely that USAF could make the necessary demonstration of economic infeasibility.

Finally, the USAF indicates in its application that operation of the incinerator was suspended in 2017 because of actions taken by the EPA. The EPA wants to clarify that its action disapproving the rural IWI exclusion took place after USAF decided to shut down the incinerator in 2017. If the USAF would like to restart this incinerator, the EPA is available to provide the necessary guidance to assure that re-start occurs in full compliance with any applicable requirement of subpart EEEE.

If you have any questions regarding the information in this letter, please contact Bryan Holtrop at (206) 553-4473 or holtrop.bryan@epa.gov.

Sincerely,

McFadden,
Kelly

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Kelly McFadden, Chief
Air Permits and Toxics Branch

cc: Mr. Jim Plosay
Alaska Department of Environment Conservation