



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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AIR & RADIATION  
DIVISION

August 20, 2020

Lt. Col. Rebecca S. Corbin  
Commander, 611th Civil Engineer Squadron  
10471 20th Street, Suite 302  
JBER Alaska 99506-2201

Dear Lt. Col. Corbin:

This letter is in response to the application dated April 16, 2020, submitted by the United States Air Force to the U.S. Environmental Protection Agency. This application concerns the USAF's solid waste incinerator unit located in Oliktok, Alaska, that is subject to the 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, 40 C.F.R. Part 60, Subpart EEEE (Subpart EEEE). The USAF's application requests the EPA approval to exclude their OSWI unit from Subpart EEEE as a rural institutional waste incinerator as provided for at 40 C.F.R. § 60.2887(h). As described below, this OSWI unit does not qualify for the rural IWI exclusion and therefore, the EPA disapproves of the USAF's application.

Previously, ARTEC Alaska, on behalf of the USAF, submitted an application dated April 30, 2019, making this same request for the OSWI unit in Oliktok, Alaska. In a letter dated July 12, 2019, the EPA disapproved of the 2019 application because it had not been submitted to and approved by EPA prior to the initial startup of the OSWI unit in 2007 as required by 40 C.F.R. § 60.2887(h)(1).

According to §60.2887(h)(1), an application for the rural IWI exclusion must be submitted to and approved by the EPA prior to initial startup of a new incineration unit. A new incineration unit is defined as an OSWI unit that commenced construction after December 9, 2004; or commenced reconstruction or modification on or after June 16, 2006. The USAF commenced construction of an OSWI unit at the Oliktok facility in 2007 and, therefore, became subject to Subpart EEEE.

The USAF has submitted this new application based on its plan to modify their OSWI unit and that this modification would then allow them a new opportunity to reapply for the rural IWI exclusion prior to the initial startup of the modified OSWI unit. However, under Subpart EEEE, commencement of a modification or reconstruction on or after June 16, 2006, applies only to an existing OSWI unit that is not currently subject to this standard. Under 40 C.F.R. Part 60 Subpart A, modification or reconstruction as defined at §§60.14 and 60.15, respectively, applies only to an existing facility not currently subject to a standard but then becomes subject to the standard following the completion of the modification or reconstruction. Since the USAF's OSWI unit is already subject to Subpart EEEE, any modification or reconstruction of this OSWI unit will not provide a new opportunity to reapply for the rural IWI exclusion. Therefore, the EPA's letter dated July 12, 2019, disapproving the USAF's first application for the rural IWI exclusion is still applicable.

If you have more information, you wish us to consider concerning this matter, you may resubmit your request to the EPA, Region 10, at any time. If you have any questions regarding the information in this letter, please contact Bryan Holtrop at (206) 553-4473 or [holtrop.bryan@epa.gov](mailto:holtrop.bryan@epa.gov).

Sincerely,

KRISHNASWAMY  
VISWANATHAN

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Krishna Viswanathan  
Director

cc: Mr. Jim Plosay  
Alaska Department of Environment Conservation