

US EPA ARCHIVE DOCUMENT

## 1.0 Introduction

### 1.1 Regulatory Background

On March 16, 1995, the President announced, as part of his National Performance Review Regulatory Reinvention Initiative, that the United States Environmental Protection Agency (USEPA) would develop a set of pilot projects that provide the flexibility to test alternative strategies to achieve environmental goals. The initiative gives a limited number of regulated entities an opportunity to demonstrate excellence and leadership (hence Project XL). Sponsors will be given the flexibility to develop alternative strategies that replace or modify specific regulatory requirements on the condition that they produce "superior" environmental results. In exchange for greater flexibility, regulated entities will be held to a higher standard of accountability for demonstrating project results.

Project XL has been broken down into three specific regulatory reinvention programs that coincide with the President's alternative performance-based strategies: the XL program for commercial facilities; the industry-wide or sector-based XL program; and XL programs dealing with government agencies regulated by the USEPA.

### 1.2 ENVVEST Overview

ENVVEST (Environmental Investment) is the Department of Defense (DoD) specific program for XL projects for government agencies. Jointly sponsored by the Department of Defense (DoD) and the USEPA, the program was formally indoctrinated on November 1995, when the DoD and USEPA signed a Memorandum of Agreement (MOA) on Regulatory Reinvention Pilot Projects. This MOA established a framework for developing ENVVEST pilot programs at 3-5 selected DoD facilities.

ENVVEST seeks to accomplish many of the same goals and objectives as Project XL. It defines performance goals and creates optimal approaches to achieve those goals. However, it will test budgeting processes while combining compliance with the unique pollution prevention and technology resources available to DoD.

ENVVEST differs from Project XL in the following primary areas: funds originally programmed for "relieved" compliance actions remain at the installation for reinvestment over the duration of the ENVVEST project's investment period; and both installations and regulators agree on alternative use of funds - typically pollution prevention projects with high environmental return on investment.

### 1.3 Elmendorf Participation in ENVVEST

Elmendorf Air Force Base (Elmendorf) and Vandenburg Air Force Base are currently leading the Air Force as pilot ENVVEST initiatives.

In December 1997, the USEPA approved Elmendorf's ENVVEST proposal for implementation. A Public Outreach Plan was approved. The USEPA Region X, the State of Alaska Department of Environmental Conservation (ADEC), and Elmendorf, commonly referred to as the Parties, developed and signed an Interim Project Agreement (IPA) in August 1998. The process continued by soliciting public comment and involvement while negotiating the framework of the project. Comments received during a series of ENVVEST public meetings were incorporated into a draft Final Project Agreement (FPA), which was published in the Federal Register in November 1999 for additional public comment. Minor revisions to the draft FPA were made based on comments received during this final comment period. All parties signed the revised FPA on December 15, 1999.

With the ENVVEST program, Elmendorf proposed and has received regulatory flexibility under the Title V permitting process. Elmendorf requested that the ADEC and the USEPA apply relevant Clean Air Act policy guidance to Elmendorf. Specifically, the USEPA's policy document *Major Source Determinations for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs for the Clean Air Act*, dated August 2, 1996. The flexibility granted by the application of the EPA guidance results in Elmendorf having only one major emission source, the central heating and power plant. The ENVVEST agreement allows simplification of the application, implementation, management, and renewal processes of Title V permitting and management.

### 1.4 Elmendorf ENVVEST Pollution Prevention (P2) Projects

As a result of the above stated flexibility, Elmendorf has estimated that total monitoring, recordkeeping, reporting, and overall management costs will decrease by about 80 percent, yielding about \$1.5 million in savings. These realized cost savings are being directed toward pollution prevention (P2) opportunities.

As part of the FPA, Elmendorf has agreed to implement an alternative-fuel vehicle program, a hazardous air pollutant (HAP) reduction program, and other possible P2 opportunities. These efforts are discussed in detail in the following sections.

## 2.0 Alternate-Fuel Vehicle P2 Project

## 2.1 Introduction

Elmendorf's primary P2 project is the introduction of a compressed natural gas (CNG) fleet and fueling program. These alternate fuel vehicles, and the supporting infrastructure should reduce levels of carbon monoxide (CO) on the base, and support the State of Alaska's efforts to reduce CO levels in the Anchorage urban area. Reduction of CO levels in Anchorage is a key goal of the ADEC because the area has been designated as a "non-attainment area" for CO.

Furthermore, the use of alternate-fuel vehicles by Elmendorf will assist the Municipality of Anchorage and the State of Alaska in their efforts to demonstrate and promote the feasibility of CNG technology.

The Elmendorf CNG program is being phased in over a six-year period. The development of the program consists of two primary activities:

- design and construction of the CNG fueling station, and
- conversion of gasoline and/or diesel-fired vehicles to CNG-burning vehicles.

These activities are briefly discussed below, in the context of the progress-to-date and planned activities in each development area.

## 2.2 Progress to Date

### CNG Fueling Station

Elmendorf obtained the services of USKH, a local engineering firm for the design of the on base CNG fueling station. The design effort was completed in September 1998, at a total cost of approximately \$31,000. The CNG station consists of a 250 cubic feet per minute (CFM) compressor, a series of cascading storage tanks and two 3600 pound per square inch (PSI) fill stands. The station also contains a computerized fuel tracking and management system.

The contract for the construction of the CNG fueling station was awarded to Palmerco Construction Incorporated of Anchorage in March 1999 for approximately \$494,000, with work starting later the same year. The station was opened in August 2000 with a grand opening ceremony attended by ENVVEST stakeholders.

### Vehicle Conversions

The vehicle conversion contract was awarded to Bachman NGV of Louisville, KY. The total number of vehicles to be converted to CNG is not defined as it depends upon the per vehicle cost, which varies dependent upon make and model but is approximately \$9,000.00. In Fiscal Year (FY) 2000, \$136,000.00 was programmed for vehicle conversions. FY01 added another \$100,600.00 to the conversion program. To date, the following vehicles have been completed:

- 4X4 Suburban (1)
- 4X4 Extended Cab Pickups (2)
- Telephone Maintenance Trucks (4)

Additional vehicles of similar make and model have been selected for conversion under this contract. These vehicles were chosen based on their engine type (EPA-approved CNG conversion kits are not available for all engine families), useable cargo space (ability to carry CNG tankage), frequency of use (high use vehicles are given priority) and availability at Elmendorf. As many vehicles as possible from this list will undergo conversions with the remaining FY00 and FY01 funds.

Also, during this first year of the program, eight Elmendorf mechanics were trained and certified in CNG conversion. Conversions from FY02 onward can now be performed in house.

### **2.3 Planned Activities**

The ENVEST budget for CNG station operation and maintenance, and vehicle conversions is \$100,000.00 per year for FY02-FY04. Additional monies may be made available per approval by ENVEST parties.

#### CNG Fueling Station

The station is located on base at the southwest corner of the 9<sup>th</sup> Street and Jerstad Avenue intersection. Canopies for the dispenser island and compressor/storage units will be constructed in FY02 to provide protection from the elements. Additional slow fill hook-ups may also be added to locations across the base if warranted.

Use of the CNG station by city and state alternative fuel vehicles has been proposed. This would require formal agreements with all parties addressing a number of issues including base access and security, and recouping of fuel costs. A sample agreement is being reviewed to help evaluate feasibility of this proposal.

#### Vehicle Conversions

In addition to vehicles similar to those described above, Elmendorf plans to convert a 28-passenger diesel bus to a dedicated CNG system. Estimated cost of this conversion is approximately \$30,000.00.

As noted above, Elmendorf mechanics are trained and certified in the CNG conversion process, and will handle vehicle conversions in subsequent years. Elmendorf expects that performing the conversions in-house will lower the per vehicle cost of CNG conversion by \$3000.00. Additionally, Elmendorf is requesting dual and dedicated CNG fueled vehicles through its standard procurement and lease procedures.

### **3.0 Hazardous Air Contaminant P2 Project**

#### **3.1 Introduction**

In addition to the alternate-fuel vehicle P2 project, Elmendorf is continuing a base-wide HAP emissions reduction program. This program has been ongoing for several years and Elmendorf has made significant strides towards reducing air emissions while maintaining operational capability and flexibility.

In the summer of 1999, Elmendorf contracted the Air Quality Branch of the Institute for Environment, Safety and Occupational Health Risk Analysis (IERA/RSEQ) to conduct a comprehensive HAP emissions reduction survey for the base. The results of the survey, delivered in July 1999, provided Elmendorf with a list of project initiatives to further reduce actual and potential HAP air emissions. Several of these initiatives are now in the process of being carried out under the ENVVEST program.

#### **3.2 Progress to Date**

Under the IERA/RSEQ survey, the base's existing Air Emission Inventory (AEI) and Title V Permit Application were reviewed to determine those processes responsible for the greatest actual and potential HAP emissions, and those processes that would benefit the most from a project designed to reduce emissions.

The survey identified initiatives for the following source-groups: surface coating operations, internal combustion engines, incinerators, gasoline distribution, and aircraft engine testing. Of these source-groups, surface coating operations are a large contributor to the base's HAP emissions, and have received the greatest attention to date.

#### Surface Coating HAP Reduction Strategy

The majority of Elmendorf's surface coating operations involve the application of paints and primers at the Corrosion Control, Transportation, Aerospace Ground Support Equipment, and Civil Engineering Vertical Repair Shops. Elmendorf's surface coating HAP reduction strategy is based on implementing the following changes in these areas (areas in parentheses have been completed):

- installation of automatic paint gun washers (Corrosion Control)
- switch to high solids/low VOC paints (basewide)
- switch to high volume/low pressure paint application (Transportation & Corrosion Control)
- personnel training to increase paint transfer efficiencies (Transportation & Corrosion Control)
- installation of a paint partition and mixing system (Transportation)
- install carbon adsorption units in paint booths (Corrosion Control, FY02)

High solids/low VOC paints contain significantly lower levels of HAP solvents such as toluene, xylene and methyl ethyl ketone (MEK). Through its Hazardous Materials Management Process (HMMP) Team, Elmendorf has implemented an across-the-board move to high solids/low VOC paints where technically feasible. The base hazardous materials/hazardous waste management plan (O Plan 19-3) provides links to websites that list environmentally friendly substitutes for paints and other hazardous materials. Shop level personnel are required to consult these lists before requesting approval to purchase any paint or other hazardous material.

High volume/low pressure (HVLP) spray guns, personnel training in paint application techniques to improve the transfer efficiency, paint partition and mixing systems, and automatic spray gun washers all reduce HAPs emitted during the painting process. Carbon adsorption units will remove approximately 85% of solvents from paint booth vent emissions.

Along with purchase and installation of the HVLP spray guns, Elmendorf technicians received training in HVLP painting techniques. The training program also provided an audit of the overall surface coating operations in place at Elmendorf. The contractor inspected the equipment used, the infrastructure in place, and provided a list of recommendations for improvements designed to increase the transfer efficiency of surface coating operations and reduce emissions. These recommendations are being incorporated into current operations and facility designs.

#### Medical Waste Disposal Unit Replacement

Although not funded with ENVVEST funds, the medical waste incinerator has been replaced with a steam sterilization and maceration unit (SSM). The SSM unit simultaneously sterilizes medical waste with steam and super heated water while chopping it with a proprietary cutting



system. The SSM process results in sterilized, unrecognizable waste that is significantly reduced in volume and can be disposed in any sanitary landfill.

Takeoff and Landing Emissions Inventory

Public comments submitted by The Trustees for Alaska expressed concern about emissions from aircraft operations at Elmendorf and requested ENVVEST funds be used to quantify the air emissions from our airfield operations. These inventories are routinely performed at Air Force installations when required by more stringent air quality regulation provisions. A takeoff and landing emissions inventory was completed in July 2001. The study was based on actual 1999 flying data and included aircraft stationed at Elmendorf as well as transient aircraft. Total emissions for CY99 are shown below.

	<b>NOx (tons/yr)</b>	<b>CO (tons/yr)</b>	<b>THC (tons/yr)</b>	<b>PM-10 (tons/yr)</b>	<b>SO<sub>2</sub> (tons/yr)</b>
<b>Winter Mixing Height (952 ft)</b>	<b>332.16</b>	<b>519.42</b>	<b>172.56</b>	<b>100.94</b>	<b>46.1</b>
<b>Summer Mixing Height (1908 ft)</b>	<b>372.10</b>	<b>527.49</b>	<b>172.68</b>	<b>104.77</b>	<b>48.08</b>

**3.3 Planned Activities**

Elmendorf will continue purchasing additional automatic washers and HVLP spray guns for use in all shops that perform surface coating operations.

Elmendorf has also proposed to replace several of the existing shop paint booths with new booths equipped with carbon adsorption units. These efforts, which require funding for both design and construction, will be phased in over the next several years. Project design and construction funds are tentatively allocated according to the following schedule:

<u>Area</u>	<u>Design</u>	<u>Construction</u>
Corrosion Control	FY2001	FY2002
Transportation	FY2001	FY2003
Aerospace Ground Support Equipment	FY2003	FY2004
Civil Engineering Vertical Repair	FY2003	FY2004

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## 4.0 Future P2 Projects

### 4.1 Introduction

In addition to the alternate fuel and surface coating P2 projects identified in Sections 2.0 and 3.0, Elmendorf is also considering other P2 projects under the ENVVEST program. The projects being considered are based on the IERA/RSEQ survey findings discussed above, proactive U.S. Air Force initiatives, and comments/recommendations received on the ENVVEST FPA from public participants.

### 4.2 Additional P2 Projects under Consideration

The following additional P2 projects are currently under consideration:

- Clean Cam Technology Systems
- Block or headbolt heaters/plug-ins
- Road Paint Truck Replacement

#### Clean Cam Technology Systems

The Clean Cam Technology Systems (CCTS) technology is a proven, non-intrusive method for emissions reduction in older, in-service diesel-powered engines. This emission reduction technology uses replacement parts requiring very little change in the structural appearance of the engine, and the modification does not have a significant impact on operations or maintenance.

The U.S. Air Force has recently initiated the Comprehensive Aerospace Ground Support Equipment Emission Reduction Program (CAGSEERP). As part of this effort, CCTS is being validated as a reduction technology for A/M32A-86 (-86) generators, which are used widely for Aerospace Ground Support at Air Force installations nation-wide. Based on limited testing at Brooks Air Force Base, Texas, the CCTS modification reduces hydrocarbon emissions by 44%, Carbon Monoxide emissions by 43%, Nitrogen Oxide emissions by 77%, and particulate emissions by 52%.

To assist in the evaluation of the effectiveness of CCTS in cold weather duty, Elmendorf has recently been selected to participate in a demonstration during the winter of FY02. Funding for the demonstration project is being provided through a Wright-Patterson AFB pollution prevention initiative. The results of the field study will be presented to the ENVVEST stakeholders for evaluation as a future ENVVEST project.

### Block or Headbolt Heaters/Plug-ins

A study presented at the 1997 Society of Automotive Engineers' International Fall Fuels & Lubricants Meeting & Exposition shows a sizeable reduction in both CO and VOC emissions with the use of a headbolt or block heater during cold weather starts. At minus 15 degrees Celsius, the researchers report a reduction in CO and VOC emissions of 60% and 65%, respectively with the use of a block heater.

In addition, The Municipality of Anchorage has also conducted emissions testing to determine the CO reductions with the use of block heaters. The Municipality's tests, conducted in 1998 and 1999, show a reduction in cold-start CO emissions ranging from 45% to 87% with the use of block heaters.

In the future, Elmendorf may propose the use of ENVVEST funds to pursue the installation of headbolt or block heater infrastructure. There are a few areas on base equipped with outdoor electrical outlets or plug in stands (some housing areas and dorms) but greater expansion of the program is required to realize the true emission reduction benefits. In the meantime, Elmendorf has adopted the Municipality of Anchorage policy to plug in at 20° F or lower for all areas that are currently equipped.

### Road Paint Truck Replacement

Road and airfield painting operations are a significant source of HAPs for Elmendorf AFB. The HAPs Emission Inventory prepared in December 2000 documented that actual emissions during the 1998 season was nearly 6 tons. New paint and application technologies are available that would allow us to drop these emissions to nearly zero. Waterborne paints with low to no VOC content are available but will require a new application truck due to their different components and consistency. The cost of a new truck is estimated at approximately \$225,000.00. Although it seems a high cost, the emission reductions that can be achieved make this proposal especially appealing.

Elmendorf is currently pursuing funds for a new truck through federal level Air Force pollution prevention programs. However, if we are not successful in obtaining these funds, ENVVEST stakeholders approved purchase of a new truck with ENVVEST funds (during the last public meeting held August 2001).