

US EPA ARCHIVE DOCUMENT

FINAL PROJECT AGREEMENT

ELMENDORF AIR FORCE BASE

AIR QUALITY ENVVEST INITIATIVE

PREAMBLE

This Final Project Agreement (“FPA” or “Agreement”) is prepared in support of President Clinton’s Reinventing Environmental Regulation Initiative. This Agreement states the intention of the United States Environmental Protection Agency (EPA), Elmendorf Air Force Base, Alaska (“Elmendorf” or “Base”), and the Alaska Department of Environmental Conservation (ADEC) (collectively hereinafter referred to as “the Parties”) to carry out a pilot project pursuant to the 1995 Memorandum of Agreement (MOA) between the Department of Defense (DOD) and EPA on Regulatory Reinvention Pilot Projects,¹ testing innovative approaches to environmental protection. The program resulting from the MOA is called ENVVEST and represents an initiative to develop new approaches for meeting DOD and EPA responsibilities while achieving better environmental performance at lower cost. The ENVVEST program mirrors and supports EPA’s regulatory relief efforts for industry and communities under Project XL.

Under this Agreement, Elmendorf will agree to demonstrate superior environmental performance and superior environmental technology through the implementation of an alternative-fuel vehicle program and other pollution prevention projects. The Elmendorf initiative follows President Clinton’s mandate that regulatory reinvention under the Project XL/ENVVEST program put the focus on progress rather than process. The EPA and ADEC will, in return, allow Elmendorf the use of innovative means for complying with the Clean Air Act Operating Permit Program (Title V).

I. Overview-Purpose of Agreement

This Agreement is a joint statement of the Parties’ intentions with regard to the Elmendorf Air Quality ENVVEST Initiative. This Agreement is not intended to create legal rights or to be a contract or a regulatory action, such as a permit or rule. While it does not give rise to any rights enforceable in a legal action either to compel performance of the Agreement or for damages, it is intended to clearly state the plans of the Parties and to represent the firm commitment of each Party to carry out the project.

¹ See Attachment 1, “Memorandum of Agreement between the Department of Defense and the U.S. Environmental Protection Agency on Regulatory Reinvention Pilot Project,” November 2, 1995.

II. Description of the Project

A. General Project Description

According to the 1990 census, the Anchorage Metropolitan Statistical Area (MSA) encompasses 1,698 square miles and has a reported population of 226,338. Anchorage is the largest city in Alaska, and about half of all Alaskans reside within the Anchorage MSA. Anchorage is currently classified a serious nonattainment area for the federal carbon monoxide (CO) standard. The southern boundary of the Base borders the Anchorage nonattainment area. Located just north of Anchorage, Alaska, Elmendorf Air Force Base encompasses approximately 13,000 acres and is the second largest military installation in Alaska. It has more than 800 buildings, two runways, more than 150 miles of roads, and more than 6,000 personnel from all branches of the United States and Canadian armed forces. With civilian workers, retirees and their families, the number of people associated with Elmendorf rises to nearly 25,000. Just under a third of the military people live in Elmendorf's 1,644 family housing units and dormitories, while the other families reside off Base. Total economic impact of Elmendorf on the Anchorage vicinity is nearly \$500 million a year.

The mission of Elmendorf is to: (1) provide the Commander-in-Chief North American Aerospace Defense Command and the United States Commander-in-Chief Pacific trained and equipped tactical air superiority forces for the defense of North America; (2) provide composite tactical air and airlift forces for contingency operations throughout the Pacific area of responsibility; (3) provide medical care for all military forces in Alaska; and (4) host the 11th Air Force Headquarters and other associate units.

Elmendorf, like many other military installations, differs from most civilian stationary air pollutant sources, in that the Base hosts and supports a wide variety of functions and activities. These include an operational airfield, residential housing, office buildings, gas stations, utilities, military police and fire departments, public schools, chapels, a hospital, dental clinics, retail stores, and recreational facilities, amongst others. The Base is, in essence, a city.

With the introduction of regulatory reinvention and the creation of Project XL/ENVVEST, Elmendorf recognized an opportunity to propose a pollution prevention program for reduction in air pollutant emissions. The flexibility expected from application of EPA guidance regarding major stationary sources on military installations allows Elmendorf to reinvest administrative cost savings, realized from a limited applicability of the Title V permitting program. The environmental improvement comes through reduced CO emissions and other pollution prevention initiatives which will benefit the environment.

Title V has changed the approach to source-specific regulation under the Clean Air Act by requiring each state to develop and implement an operating permit program for all *Major Stationary Sources* (42 U.S.C. § 7661 *et seq.*) of air pollution and other stationary sources subject to requirements under Sections 111, 112, 129, or Title IV of the Clean Air Act. The major purpose of this program is to consolidate, in a single document,² all of the -federal, state, and local requirements applicable to the stationary source, thereby simplifying compliance and enforcement. On December 6, 1996 (61 FR 235, 64463-64475), EPA granted interim approval to the Alaska Permit to Operate program pursuant to the requirements of Title V of the Clean Air Act and the Code of Federal Regulations, Title 40, Part 70 (40 CFR 70).

The current Alaska operating permit program would treat the entire Elmendorf installation as a single air contaminant (AS 46.14.990(1)) emission source for the purpose of determining if a state-issued Clean Air Act Title V permit is required. The 1996 Base emissions inventory, prepared by ENSR in support of the Base's Title V permit application, lists 106 sources of regulated contaminants (AS 46.14.990(23)) that would need to be addressed in the permit . Using the current Alaska permitting approach, the costs of obtaining and maintaining a Title V permit would be very significant for the installation.

In order to increase the opportunities for pollution prevention efforts, the Base proposes to use the Project XL/ENVVEST process to reallocate money, currently earmarked for Title V permitting requirements, into several non-funded pollution prevention projects. The Base intends to demonstrate superior environmental performance through the introduction of a compressed natural gas (CNG) fleet and fueling program. These alternative fuel vehicles, and the supporting infrastructure should reduce the levels of CO on the Base, and support Alaska's efforts to reduce CO levels in the non-attainment area. Furthermore, the use of alternative 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 compressed natural gas technology. Any additional cost savings will be applied to another pollution prevention project that is agreed to by the Parties after conferring with stakeholders and public participants. While many types of supplemental environmental projects are being considered and discussed, the Parties have expressed a preference for projects that will result in a reduction of hazardous air contaminants (HAC) (AS 46.14.990(14)).

The Base will accomplish this pollution prevention effort through a two-fold exercise of regulatory flexibility by ADEC and the EPA. First, Elmendorf, ADEC, and the EPA will use EPA's policy document, entitled "Major Source Determinations for Military Installations under the Air Toxics, New Source

² See preamble to 57 Fed. Reg. at 32,251.

Review, and Title V Operating Permit Programs for the Clean Air Act” (“Major Source Guidance”), dated August 2, 1996. This Major Source Guidance recognizes that military installations possess unique characteristics warranting flexibility in major source determinations. The Major Source Guidance allows military installations to divide into functionally distinct emitting activities, separating such emission source groupings as housing and hospitals. This separation allows for a more fair and accurate picture of an installation’s emissions. To that end, the Base has utilized the Major Source Guidance to divide the 106 emission sources into eleven functionally distinct emitting activities by using the Standard Industrial Classification (SIC) Code manual. The SIC code breakout of the Base can be found in Attachment 2. Major stationary sources covered by National Emission Standards for Hazardous Air Pollutants (NESHAP) and New Source Performance Standards will be included in the Title V permit, if applicable.³ Based on potential to emit (PTE), a number of emission sources would be considered major stationary sources. However, only one of the emission sources, the central heating and power plant (CH&PP), is a truly major stationary source⁴ based upon its actual emissions of oxides of nitrogen (NOx) (> 100 tpy) and CO (> 100 tpy) . Except for those emission sources discussed below, all other regulated emission sources fall well below the major stationary source threshold.

The second avenue of regulatory flexibility is the use of a three-pronged mechanism to limit the PTE (AS 14.990(21)) of several other activities which are a subset of the 11 SIC Code activities discussed above. Actual emissions from these other sources are considerably below applicable major source thresholds. Consequently, the Base will seek and apply limits on the potential to emit from these sources. First, the Base will apply for Preapproved Limits for the thirty-nine emergency diesel engines on the flightline pursuant to 18 AAC 50.230 (a, b, c and e). Second, the Base will apply for Preapproved Limits for throughput of gasoline from its distribution facility (fuel tanks) pursuant to 18 AAC 50.230(a, b, d and

³ Pursuant to EPA’s policy of “Options for Limiting the Potential to Emit (PTE) of a Stationary Source Under Section 112 and Title V of the Clean Air Act (Act)” (Jan 25, 1995), extended by EPA on Aug. 27, 1996 and July 10, 1998), sources whose actual emissions remain below 50% of the major source threshold are not considered major sources for NESHAPS and Title V applicability purposes. If the Base’s NESHAP sources are determined to be below 5 tons per year (TPY) of any single HAP and 12.5 TPY total HAPs, the Base will not be subject to Aerospace NESHAPs requirements or require a Title V permit for those sources.

⁴ To be classified as a “major stationary source,” a source must emit, or have the potential to emit, 100 tons per year of any air pollutant (as defined in section 302(j) of the Clean Air Act), or 10 tons per year of any hazardous air pollutant, or 25 tons per year of any combination of hazardous air pollutants (as defined in section 112(b) of the Clean Air Act).

e).⁵ Third, the Base will apply for a state permit to cover HACs under Owner Requested Limits set forth in 18 AAC 50.225.⁶ These alternative emission standards create practicably enforceable limits and are a necessary prerequisite for obtaining the regulatory flexibility under this project. The administrative costs associated with these PTE limits are expected to be minimal because the Base already tracks much of the necessary reporting information.⁷

The use of the EPA Major Source Guidance and limitations on the PTE of some sources will allow the Base to streamline the Title V permit process.

Consequently, only the CH&PP and several other sources subject to new source performance standards will be included in the Title V permit. This will simplify monitoring, recordkeeping, and reporting associated with Title V, and result in significant cost savings that will be applied to additional pollution prevention projects.

B. Conformity to the Memorandum of Agreement

The following section addresses criteria for consideration under the DOD/EPA Memorandum of Agreement.

1. Regulatory Flexibility

Information regarding regulatory flexibility is discussed in the preceding section.

In support of this proposal, ADEC, in cooperation with EPA, will exercise regulatory flexibility by designating the CH&PP as the only major stationary source at Elmendorf, and propose approval of the scaled down version of the Base's Title V permit. ADEC will work toward inclusion of the Major Source Guidance into 18 AAC 50.

2. Cost Savings and Paperwork Reduction

Elmendorf expects to realize considerable cost savings and paperwork reduction through the application of the ENVVEST initiative. Without ENVVEST and the Major Source Guidance, Elmendorf could be treated as a single major source, from fence-line to fence-line. For this scenario, the total funding requirement programmed through fiscal year 2004 is currently

⁵ Maximum daily throughput would be less than 19,900 gallons.

⁶ Limitations on a source's ability to emit air contaminants at the request of the owner or operator.

⁷ Owner-requested limits require a \$300 retainer to cover Alaska's pre-application assistance, billable at \$78 per hour. Preapproved limits require a processing fee of \$100.

at \$2.045M.

Under the alternative scenario of permitting the Elmendorf CH&PP as the only major source, and ADEC approval of potential to emit limits, the total funding requirement programmed through fiscal year 2004 would be reduced to \$518K.

In this alternative scenario, the total reinvestment opportunity for pollution prevention projects, including an alternative-fuel vehicle program, is expected to be \$1.527M. The cost of pollution prevention projects undertaken pursuant to this Agreement will not exceed Elmendorf's cost savings of this scenario.

3. Description of Stakeholder Involvement

Starting in the spring of 1997, the Base began presenting the ENVVEST proposal to various groups in the community. Those groups included three local community councils, a municipal transportation committee, and the Base restoration advisory board. The proposal was also presented to the 1998 EPA Region X Federal Facility Conference. Additionally, notices have been placed in the Anchorage Daily News to inform the public about the FPA and make it available for review. See the attached "ENVVEST Public Outreach Plan, Elmendorf Air Force Base" for more details on future stakeholder involvement (Attachment 3).

4. Environmental Results: Innovation/Pollution Prevention

It is the intent of the Parties to reinvest the Title V savings into environmentally significant pollution prevention opportunities. One of the pollution prevention projects currently being planned is installation of a compressed natural gas (CNG) fueling station on the Base and conversion of certain Base fleet vehicles to be capable of using CNG as an alternative fuel. The exact number of vehicles to be converted to CNG usage has not yet been determined. The Base has an active CNG working group composed of members from the Civil Engineering Squadron and Logistics Group that are in the process of developing the details of fleet conversion. The most likely scenario is to convert a combination of light-duty and heavy-duty vehicles. The cleaner burning CNG vehicles will contribute to reduced carbon monoxide (CO) emissions for Elmendorf and will demonstrate to the general public that this level of technology is achievable and beneficial. Carbon monoxide is a product of the incomplete combustion of fossil fuels and is emitted directly from the tailpipe of vehicles. Carbon monoxide enters the bloodstream through the lungs and forms carboxyhemoglobin, a compound that inhibits the blood's capacity to carry

oxygen. People with heart disease are particularly sensitive to CO poisoning. Infants, the elderly, and individuals with respiratory diseases are also sensitive receptors. Carbon monoxide can also affect healthy people by impairing the capacity to exercise, visual perception, manual dexterity, learning functions and the ability to perform complex tasks.

Elmendorf also agrees to assemble a list of other feasible opportunities available at the Base, along with the costs and environmental benefits of each opportunity. The Parties have discussed the possibility of some sort of HAC reduction project. The Parties agree to meet in a public forum to discuss selection of the opportunities called for under this Agreement. Upon selection of the opportunity or opportunities by Agreement of the Parties, they will sign a supplemental Agreement setting forth the opportunities selected and any necessary measures to assure their performance. If the Parties cannot agree upon additional opportunities and a Supplemental Agreement is not signed by September 30, 2002 Elmendorf will use the savings that would have funded those additional opportunities to expand the CNG project.

5. Transferability, Feasibility, Monitoring, Reporting, and Evaluation

a. Transferability

This initiative is a pilot program, which implements a new approach to air pollutant source permitting and administrative management. The ultimate goals of this initiative are 1) to demonstrate the feasibility of alternative-fuel vehicles in the Anchorage area, and 2) to reduce air pollution by way of prevention at the source. A demonstration of the environmental benefits achieved from this approach would be clear justification for the transfer of this type of initiative to virtually all similar DOD installations. The alternative-fuel vehicle program has the potential for technology transfer to other entities that are interested in a similar program. It will also be useful as a template for DOD installations located near urban areas, which are currently considered significant markets for alternative-fuel vehicles.

b. Feasibility

It is estimated that the administrative cost savings realized, through the granting of regulatory relief, will be \$1.527M. These savings will be available for investment into pollution prevention for the alternative-fuel vehicle program and another project(s). It is estimated, at this point in time, that the cost distribution will be

approximately \$1,000,000 into the alternative-fuel vehicle program and \$500,000 in another project(s). Administratively, the proposal is feasible. Mechanisms are in place to allow for permit and procedural flexibility.

c. Monitoring, Reporting, and Evaluation

It is anticipated that evaluation of the project will be accomplished on several fronts. Elmendorf will work closely with EPA, ADEC, and the Municipality of Anchorage to determine how the CNG technology demonstration and initiatives at Elmendorf can contribute to the overall air quality improvement efforts in the Anchorage area. Elmendorf will continually evaluate the CNG program over the life of the ENVVEST project, to demonstrate the viability of alternative-fuel vehicle programs in Anchorage. Criteria and milestones for evaluating the success of the other project(s) will be decided upon when the project(s) is chosen.

The ENVVEST Team will inform the stakeholders as the project evolves, in accordance with the Public Outreach Plan. Elmendorf will prepare progress reports at least annually, in conjunction with submittal of the facility operating report to ADEC or on a basis agreed to by all stakeholders, which will document progress toward the stated goals of this proposal.

6. Environmental Justice

Environmental Justice, pursuant to Executive Order 12898, is not applicable to this proposal. Unjust or disproportionate environmental impacts will not be realized as a result of this project.

III. Implementation of the Elmendorf Initiative

A. Elmendorf Responsibilities

The alternative-fuel vehicle program will also be phased over the six-year period, with the construction of the fueling station commencing in 1999. Elmendorf expects to award a construction contract for the compressed natural gas fueling station in 1999, with an anticipated completion in 2000. Fleet vehicle conversion will begin concurrent with the completion of the CNG infrastructure.

The additional pollution prevention project will be initiated prior to expiration of this Agreement, and will be funded with the cost savings over and above what is applied to the CNG project.

Preliminary milestones are as follows:

Late 1998/Early 1999 – Complete design for CNG fueling station
(Complete)

FY ~~2000~~1999 – Begin construction of CNG fueling station

Late 1999/Early 2000 – Begin vehicle conversions/purchases

Before end of FY 2002 – Supplementary Agreement on additional P2
project

B. ADEC Responsibilities

The ADEC will provide technical assistance to Elmendorf regarding opportunities for HAC and criteria pollutant emission reductions. As the permitting authority for the State of Alaska, ADEC will be responsible for **expeditious** development and public notice of a draft operating permit(s) and for making a final permit determination pursuant to 18 AAC 50.340. ADEC will, to the maximum extent practicable, assist Elmendorf in developing an approvable permit application. ADEC will implement EPA's August 2, 1996 guidance 'Major Source Determinations for Military Installations Under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act' as it applies to the Base, by issuance of a Title V permit. ADEC will also assist Elmendorf with efforts to calculate the PTE of emission sources on the Base, taking into account pollution control equipment and enforceable operating limitations due to the use of pre-approved or owner-requested limits **and expeditiously approve the owner-requested limits.**

C. EPA Responsibilities

EPA will also provide technical and administrative assistance to Elmendorf and ADEC in their pursuit of this Agreement. A portion of that assistance will involve review and approval of the manner in which the sources on the Base were segregated by SIC code. EPA will review and, as appropriate, approve the regulatory relief approaches adopted by ADEC.

IV. Administration of the Agreement

A. Duration and Renewal of Agreement

This FPA expires September 30, 2004. Notwithstanding expiration of this FPA, it is the intent of the Parties that this Agreement will result in permanent reductions of criteria pollutant air emissions from Elmendorf and that Elmendorf will continue to benefit from the regulatory flexibility provided through this Agreement. The Parties agree to make good faith efforts to carry out this intent when Elmendorf's Title V operating permit(s) and any necessary supporting Agreements come up for renewal.

B. Funding

Upon execution of this Agreement, Elmendorf will redirect, with the assistance of its major command, Headquarters, Pacific Air Forces, Hickam Air Force Base, Hawaii, Title V permit funds required to implement program emission reduction projects. The following projected funding strategy has been agreed to:

| | |
|------------|-----------|
| FY 99..... | \$550,000 |
| FY 00..... | \$170,000 |
| FY 01..... | \$200,000 |
| FY 02..... | \$200,000 |
| FY 03..... | \$207,000 |
| FY 04..... | \$200,000 |

TOTAL.....\$1,527,000

All funding commitments by Elmendorf will be subject to approved funding and will be in accordance with the Anti- Deficiency Act (31 U.S.C. 1341). Pollution prevention projects will be funded from the funds estimated to be available in the totals identified above. If the costs of implementing the Title V permit and enforceable potential to emit limits exceed the amount currently estimated, those costs will be deducted from the funds programmed for ENVVEST, in the year where required. All Parties agree that administrative costs should be minimized to enhance the benefits of pursuing this initiative.

C. Effect of Future Changes to Regulations or Emission Sources

Future changes to regulations or emission sources, such as new EPA regulations, changes to EPA regulations and/or ADEC rules, the addition of new emission units at the Base, or changes in emissions at the Base, could affect the scope and coverage of the Title V and potential to emit permits for the Base. Nothing in this FPA affects the obligation of the Base to comply with any future regulations or requirements.

D. Events Preventing Implementation of Agreement

If at any time during implementation of this FPA, Elmendorf determines, and EPA and ADEC concur, that any requirement of such Agreement cannot be met due to circumstances beyond the control of Elmendorf (including, but not limited to, materially changed site conditions that could not reasonably have been anticipated, insufficient availability of appropriated funds, or the significant failure of an innovative technology) Elmendorf, EPA and ADEC will use their best efforts to negotiate mutually acceptable changes to this FPA.

If during FPA implementation, all opportunities for dispute resolution are exhausted and this FPA is terminated after a permit application completeness determination is rendered under 18 AAC 50.340, the Base will be required to submit a revised Title V permit application. ADEC will notify the base in writing of that requirement, describing in particular the information requested. Elmendorf will have 12 months from the date the notification is received to submit its revised application.

E. Dispute Resolution

Any dispute that arises with respect to the meaning, application, implementation, interpretation, amendment, termination, or modification of the FPA, the resolution of which is not expressly provided for in the FPA, will in the first instance, be the subject of informal negotiations. To initiate informal negotiations, any signatory, which believes it has a dispute with any other party, will simultaneously notify all of the parties, in writing, setting forth the matter(s) in dispute. If the dispute cannot be resolved by the parties within 30 days of receipt of such notice, then one or both parties may invoke non-binding mediation by setting forth the nature of the dispute, with a proposal for its resolution, in a letter, and submit it to a three-person dispute resolution committee consisting of one member designated by each party.

F. Public Records and the Administrative Record

Elmendorf will issue, within 30 days of execution of this Agreement, and every year thereafter, until completion of the air quality initiative, progress reports, which document progress toward goals, established by this Agreement. The reports will document equipment changes and replacement, process changes, and other relevant facts, which support any assertions of actual emission reductions or the progress thereof, or successes and benefits achieved through the alternative-fuel vehicle initiative. The reports will be provided to EPA, ADEC, and any interested party that requests such reports. In addition, Elmendorf shall maintain a central records repository to maintain a copy of all ENVVEST related materials.

G. Enforcement

While this Agreement is not legally binding, the requirements of 18 AAC 50, Air Quality Control, the terms and conditions of the Title V operating permit, and any pre-approved or owner requested limits are legally enforceable.

H. Periodic Review and Evaluation Activities

Each party will review this Agreement, on an annual basis to measure progress towards mutually agreed milestones. The review will be an evaluation of the progress towards achieving the objectives of this Agreement.

I. Means of Giving Notice

When giving notice with regard to FPA modification or termination, the Parties will contact the FPA signatories in writing. Informal communication may be given by phone or in writing to the following contact offices:

William R. Hanson, P.E., Environmental Flight Chief
U.S. Air Force, Elmendorf Air Force Base
3 CES/CEV
22040 Maple Street
Elmendorf AFB AK 99506-3240

Charles E. Findley, Deputy Regional Administrator
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

John Stone, P.E., Air Quality Maintenance
Alaska Department of Environmental Conservation
410 Willoughby Avenue, Suite 105
Juneau, Alaska 99801

J. Effective Date

This Agreement is effective upon the date of the last signature by the Parties.

Chuck Clarke
Regional Administrator
United States Environmental Protection Agency, Region 10

Jonathan S. Gration, Colonel, ~~(BG?)~~, USAF
Commander
3rd Wing, Elmendorf Air Force Base

Michelle Brown
Commissioner
Alaska Department of Environmental Conservation

List of Attachments

1. Memorandum of Agreement between the Department of Defense and the U.S. Environmental Protection Agency on Regulatory Reinvention Project, November 2, 1995 **TO BE INSERTED BY EPA**
2. SIC Code Breakup of Elmendorf AFB
3. Elmendorf AFB ENVVEST Public Outreach Plan

Attachment
1

Attachment

2

SIC CodeSIC Title

| | | |
|----|----|---|
| | 35 | Construction, mining and Materials handling equipment (asphalt plant-contractor) |
| 45 | | Transportation by air (flightline operations) |
| 48 | | Communications |
| 49 | | Electric and gas utility services (CH&PP) |
| 55 | | Gasoline service stations (AAFES-amenity) |
| 65 | | Real Estate (housing) |
| 75 | | Automotive repair and gasoline service stations (non-AAFES) |
| 80 | | Health services (hospital and clinics) |
| 87 | | Engineering, accounting, research, management and related services |
| 92 | | Justice, public order, and safety (fire and police) |
| 97 | | National security (military weapons) |

Attachment

3

ENVVEST

Public Outreach Plan

Elmendorf Air Force Base

**Prepared By
3rd Civil Engineer Squadron
Environmental Management Flight
Elmendorf Air Force Base
Alaska**

US EPA ARCHIVE DOCUMENT

Public outreach and education are a vital component of a successful environmental program. This Public Outreach Plan outlines the means by which the public and regulatory community (hereinafter referred to as 'Stakeholders') will be afforded the opportunity to gain active involvement in the ENVVEST initiative at Elmendorf Air Force Base, Alaska (hereinafter referred to as 'Elmendorf').

STAKEHOLDER IDENTIFICATION

Elmendorf requests that Air Force command structure, base environmental management personnel, the United States Environmental Protection Agency (EPA), the Alaska Department of Environmental Conservation (ADEC), and the Municipality of Anchorage (MOA) become involved in the public participation process. These agencies will be invited to participate in the negotiation and implementation of the project and to engage in active discussions concerning project goals and progress. All other interested parties, including local community councils and environmental groups, are also invited to become involved in the public participation process and will have an active voice in the discussions.

Stakeholders fall into three basic categories, to include (1) primary participants, (2) interested parties, and (3) members of the general public.

Primary participants include the regulatory community of EPA and ADEC, the Restoration Advisory Board, local community councils and government officials, and interested members of the public. EPA and ADEC have had considerable influence on the details of the project proposal and will continue their active involvement during the implementation phase.

Interested parties have demonstrated some interest in the project, yet do not wish to actively participate in project development and implementation. Interested parties will usually want to be kept informed of project development and progress, and may wish to attend public meetings and contribute their comments in written or verbal form.

Members of the general public will, most likely, not become actively involved in project development and implementation. Although not actively involved, members will be provided with project information through the local media and central information repository. Members of the general public have the opportunity to participate more actively if they choose to do so.

The following organizations and individuals will be contacted and asked to participate in the public process:

The Government Hill, Mountain View, and Russian Jack Community Councils
The Anchorage Clean Air Coalition
The Alaska Center for the Environment
The Anchorage Metropolitan Area Transport Study (AMATS) Citizens' Air Quality Advisory Board
The Anchorage Chamber of Commerce
The Anchorage Assembly
Anchorage Mayor Rick Mystrom
State legislators from local districts
Others, as deemed appropriate

NOTIFICATION AND EDUCATION OF THE GENERAL PUBLIC

Elmendorf will notify the public of its intent to develop a Final Project Agreement (FPA) with EPA and ADEC. The public will be invited to request inclusion on a mailing list for continued receipt of information concerning Elmendorf's ENVVEST initiative.

The following methods will be used to contact and inform potential Stakeholders.

Local Newspapers: Notices will be taken out in local newspapers to inform the general public of public meetings and public notices and comment periods. The local newspaper will also be invited to report on the project, as it evolves.

Elmendorf Newspapers: Notices will be published in the "Sourdough Sentinel", to encourage involvement from the base populace. The "Sourdough Sentinel" and the "Environmental Update" will also be asked to report on the project, as it evolves.

Fact Sheets: Fact sheets, announcing public meetings and notices, and information on project implementation, will be provided to parties included on the mailing list.

Central Records Repository: A central records repository will be chosen to maintain copies of project related materials

PUBLIC MEETINGS AND WORKSHOPS

Public meetings and workshops will be conducted to inform the general public of project development, and to invite participation and comments. Public meetings may be held during development of the Final Project Agreement, based on public interest, or as decided by the primary participants.

Elmendorf will meet with members of the three surrounding community councils, AMATS, and other concerned groups to explain in-depth what the project entails and the expected benefit to the local community. This will provide another public forum to address concerns that the general public may have concerning Project XL/ENVVEST process. Elmendorf will compile the questions, comments, and suggestions that arise from these and other public comment forums and provide them to EPA and ADEC. The record of the workshop will also be made available to any workshop participant, upon request.

ADVISORY BOARD

The goal of the Restoration Advisory Board (RAB), created in 1994, is to provide a forum to enhance the communication and coordination among the Air Force, EPA, ADEC, and affected communities in response to actions undertaken by the Environmental Restoration Program at Elmendorf. In addition to providing their own comments, RAB community members are responsible for gathering and communicating to the board any specific concerns from their communities about proposals or projects under consideration. Elmendorf briefs all important environmental issues to the RAB. The RAB is effectively functioning as a Community Advisory Board (CAB).

ELMENDORF POINT OF CONTACT

The central point of contact for the Elmendorf ENVVEST initiative is David Bennett, Air Quality Program Manager, at (907) 552-2760.

