

US-Citizens Aviation Watch

“Protecting the public’s health, environment, property and promoting safety.”

Box 1702 → Arlington Hts., IL 60006 → Fax: 847/506-0202 → Tel: 847/506-0670

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November 20, 1997

Testimony of Jack Saporito to the Federal Aviation Administration on behalf of US-Citizens Aviation Watch Association and the Alliance of Residents Concerning O'Hare.

Federal Aviation Administration (FAA), DOT.
Office of Environment and Energy

Environmental Research Beyond 2000

Dear OEE Members:

US-CAW is a national organization comprised of local airport noise/environmental groups. Although recently formed last August, US-CAW presently represents over one million members.

While recognizing the contributions of aviation, the organization is aimed at protecting the public from adverse environmental impacts that aviation and airport activities have on public health, air/water/ground/noise pollution and property issues affecting everyone on our planet.

1. What aviation environmental issues concern you most and how does each affect you?

A: Air, water, ground and noise pollution; severe damage to public health¹ and property; safety, neighborhood losses, property value and resale, other educational, social and other quality of life issues.

¹ Casey Gordon Davis for Georgetown Crime Prevention and Community Council. "Master Plan Comments: Seattle-King County Department of Public Health Summary." Oct. 24, 1997.

How they affect us is obvious as we read on.

2. How successful have existing aviation remediation and mitigation policies been in responding to the impact of aviation activities on the environment?

A: Minimal at best. The Federal Aviation Administration has represented the air transport industry; however, there is no agency protecting the rights of the public. There are few, if any, regulatory checks and balances. Studies have shown noise monitoring programs are not objective². The Stage III is program inadequate. Studies have shown that the soundproofing program is inadequate in producing real noise reduction³⁻⁴. Ninety-nine percent of the complaints come from noise levels below the LDN ~65⁵. Federal agencies have not acknowledged or protected public health due to aviation noise, air, water, ground pollution.

To date, mitigation policies have addressed mostly the noise issue, but inadequately. Hazardous and toxic air pollution from aircraft exhaust, is a major source, although it has been largely ignored and addressed as a side issue. Concern or focus upon automobile and other air pollution impacts at airports has been used as a tactic to sidetrack the danger to public health induced cancer risk increases and other disease increases⁶.

All pollution produced by airport/aircraft operations should be weighed as from one source. Airports/aircraft and its collateral operations are a significant source polluter. (The "bubble" concept is the area in and around the airport.) When aircraft emissions are combined with other aircraft operation sources they produce **twice**⁷ the Volatile Organic Materials (VOM) per year than all the on-road vehicles at and near Chicago O'Hare International Airport, including automobiles, which are supposedly known to be the primary source of air pollution problems in the region.

What this means for the local residents living near O'Hare is that they are exposed to **double** the levels of daily criteria and toxic air pollution as other residents of

² US-CAW testimony to the House Subcommittee on Technology Committee on Science re. Hearing to review the federal research and technology development activities to reduce aviation noise. October 21, 1997

³ State of Washington, Puget Sound Regional Council. "Expert Arbitration Panel's Review of Noise and Demand/System Management Issues at SEA-TAC International Airport -- Final Decision." Mar. 27, 1996.

⁴ Natural Resources Defense Council. "Under the Flight Path." Mar. 1997.

⁵ *ibid.*

⁶ A- McCulley, Frick and Gilman Inc. Air Quality Survey Final Result January 1995, pp.26,27,36

B- EPA Toxics Emissions from Aircraft Engines Air RISC Information Support Center July 22, 1993, p.13

C- McCartney, M. Airplane Emissions Department of Environmental Health Sciences 21 April 1986, p.99

D- VIGYAN Inc. USEPA Estimation and Evaluation of Cancer Risks Attributed to Air Pollution in Southwest Chicago Final Summary Report Region 5 Air and Radiation Division April 1993

E- Lewis, R.A. Hazardous Chemical Desk Reference 2nd Edition 1991 Van Nostrand Reinhold

F- Puget Sound Air Pollution Control Agency 1993 Air Quality Data Summary, p.62

⁷ Mary Gade, IEPA, correspondence to Illinois Senator Peter Fitzgerald, Sept. 26, 1996 p. 2.

the region located some distance from the airport sources. (Area residents already suffer from immense amounts of ground vehicle traffic pollution. O'Hare is one of the busiest ground traffic sites in Illinois, if not the world, with close to 200,000 cars and trucks entering and leaving the airport daily.) Similar conditions exist at airports around our nation and are totally unacceptable.

- According to the Illinois Environmental Protection Agency, O'Hare Airport operations emit -- 2679.1 Tons Per Year (TPY) of VOMs. (This does NOT include On-Road Vehicles [Those on-near airport property]).⁸
- In 1993, it was estimated that O'Hare Aircraft operations emit 25 Tons of benzene, 21 Tons of 1,3-butadiene, 140 Tons of formaldehyde per year.⁹
- One two minute 747 take-off is equal to operating 2.4 million lawnmowers for 20 minutes (NOx). That is four states' worth of lawnmowers.
- One, one minute DC-10 takeoff is equal to driving 21,530 cars one mile (NOx).

An independent study of airport pollution facts¹⁰ disclosed serious environmental risks to communities and the environment adjacent to airports, as well as a significant contribution to global warming from stratospheric aircraft air pollution.

Due to the mode of delivery, aircraft emissions are responsible for one-half of the atmospheric man-made nitrogen oxides burden¹¹.

Discharges of hazardous chemicals to the waters of the United States, such as glycols, metals, solvents, etc., are not being controlled¹². Many hazardous and toxic discharges are not disclosed to the Environmental Protection Agency or public¹³. Property and health value losses are not compensated. Loss of salability of homes near airports is being ignored.

Safety, which can be considered an environmental issue, is being compromised and subordinated to capacity increases.

3. What is being done to address your concerns and how effective is it?

⁸ Mary Gade, IEPA, correspondence to Illinois Senator Peter Fitzgerald, Sept. 23, 1996. p.2.

⁹ ViGYAN Inc. EPA Air and Radiation Report. "Estimation and Evaluation of Cancer Risks Attributed to Air Pollution in Southwest Chicago." April 1993. p. 13.

¹⁰ Natural Resources Defense Council. "Flying Off Course: Environmental Impacts of America's Airports." Oct. 1996.

¹¹ *ibid.* p. 72

¹² Alliance of Residents Concerning O'Hare. "Summary of Chicago's O'Hare International Airport Water Pollution." Chicago, IL. May 28, 1997.

¹³ Letter to C. Browner, EPA, from Natural Resources Defense Council et. al. *Petition to Add Standard Industrial Classification Code 45, Transportation by Air, to the List of Facilities Required to Report Releases of Toxic Chemicals.* Apr. 16, 1997.

A: Air pollution is not being regulated near airports, although ambient violations of the Air Quality Standards are considered likely. Glycol recovery/treatment, alternatives are not being implemented. Underground tank leaks are being ignored. So far, we have found that our drinking water in Baltimore and Seattle is likely poisoned by deicing and anti-icing operations¹⁴⁻¹⁵⁻¹⁶. Citizens must sue to collect damages to property value. The FAA has to date, ignored our citizens groups' safety concerns.

For decades the whole process has been inadequate. We cannot rely on an agency with such close ties to the industry to protect us. Thus, whatever has been done to address our concerns has been inadequate.

4. What should be done to address your concerns?

A: As the air transportation industry has a government agency, the FAA, that protects its best interests, citizens need to have an agency that protects their best interests¹⁷. Establish an agency to protect the public from the abuses of the aviation industry, an agency that will advocate a sustainable, equitable and accountable aviation industry.

The new agency should perform a comprehensive air monitoring study to determine baseline conditions. Establish High-Speed Rail to reduce need for regional air travel. Subsequent implementation of control measures to cap flights, remove residential and other sensitive land uses or whatever necessary means to protect public health and the environment. Infrared de-icing facilities, 100% recovery, treatment and/or transfer of hazardous waste for proper disposal. Complete remediation of all fuel and petroleum contaminated sites at all airports. Compensation for property losses commensurate with real measurable losses in replacement cost/value. Worst case consideration in all capacity enhancement simulation studies, rather than compromises.

5. What role does research have in addressing your concerns?

A: As you can see, to date the aviation industry high-tech "fixes" have had little effect on protecting the countless millions of residents affected by the massive airport/aircraft operations. Technology alone will not solve the air pollution problem. NOx continues to increase, creating a problem for ozone and nitrogen dioxide, while reducing carbon monoxide in the new aircraft engine manufacture. Aircraft engine related particulate impacts must be disclosed and real solutions discovered. Alternative, environment friendly fuels, additives, de-icing and anti-icing agents must be researched. Leaking storage tanks and lines, solvent use, fuel spills, other hazardous chemicals used at airports must be controlled and cleaned

¹⁴ Airport Coordinating Team, Inc. "BWI Discharges Toxins into Local Waters." Baltimore, MA. Feb. 26, 1997.

¹⁵ A. Scott McDowell. *Sawmill Creek-Watershed "Restoration" Project*. Baltimore, MA. Mar 1997.

¹⁶ Waste Action Project vs. Port of Seattle.

¹⁷ US-CAW cited letter to President Clinton. Nov. 8, 1987.

up. Not released into the environment. Search for ways to control spills, releases, etc., must be a priority. Sound barriers, berms, hush-houses have proven to be somewhat capable in controlling on-the-ground noise can be re-designed to be more effective. Airborne noise impacts will be difficult to mitigate without greater engine technology advances and commitment by the air transport industry to purchase the technology.

Scientific and medical research on the reliability of home insulation to protect public health must be funded. Compromises must be eliminated. Countless millions of real people, experiencing real world impacts known to cause adverse health effects, are being left unaided and injured by the current programs.

6. Are important effects of aviation activities on environmental quality currently not addressed in government policy and scientific research?

A: Besides the above mentioned, we hear only rumors of nitrogen oxide reduction in newer aircraft engine manufacture, no timeline, no cost, no promise of implementation. We have heard of infrared de-icing facilities, but only limited in use. We have been told repeatedly that home insulation and phase out of Stage II is the solution to the noise problem. We know the opposite to be true.

We realize this is an expensive list of essential items to implement. However, we also know that airport funds are fueling massive capacity increases, either adding runways, gates or initiating technological advances, costing billions of dollars each at dozens of airports across the country. We believe that for every dollar spent on expansion, the costs to the environment, local communities and real people continue to climb exponentially. For decades, in the genuine world, little has been accomplished when it comes to the above-mentioned. Before this situation gets any further out of hand, the time is now to take real, meaningful action.

Thank you.

Jack Saporito
 President, US-Citizens Aviation Watch
 Director, Alliance of Residents Concerning O'Hare

Encl. supporting documentation:

US-CAW cited letter to President Clinton. Nov. 8, 1987.

Casey Gordon Davis for Georgetown Crime Prevention and Community Council.
 "Master Plan Comments: Seattle-King County Department of Public Health Summary."
 Oct. 24, 1997.

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[Notices]
[Page 53870-53871]
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DEPARTMENT OF TRANSPORTATION

Federal Aviation Administration

Office of Environment and Energy Meeting Agenda

AGENCY: Federal Aviation Administration (FAA), DOT.

ACTION: Notice of public forum.

SUMMARY: The FAA is issuing this notice to advise the public of a forum sponsored by the Office of Environment and Energy (AEE) to discuss aviation-related environmental issues.

DATES: The forum will be held on November 20, 1997 from 9:30 a.m. to 12:00 p.m.

ADDRESSES: The forum will be held in room 3246B at the Department of Transportation, 400 F Street SW, Washington, DC 20591.

FOR FURTHER INFORMATION CONTACT: Mr. James Littleton, Office of Environment and Energy, Federal Aviation Administration, 800 Independence Avenue SW, Washington, DC 20591, fax (202) 267-5594.

SUPPLEMENTARY INFORMATION: Notice is hereby given of a public forum sponsored by the Federal Aviation Administration Office of Environment and Energy (AEE) to be held on November 20, 1997.

The FAA Office of Environment and Energy (AEE) is developing a research agenda, called "Environmental Research Beyond 2000," for identifying and addressing aviation-related environmental issues. These issues include but are not limited to aviation-related noise and emissions. As part of its effort to obtain input from all affected parties, AEE will hold a public forum to present its preliminary research agenda and to obtain information from the public for developing and refining this agenda. The public forum will be part of

the first stage in the agenda building process; later activities will include a issue workshop, which will result in a findings report to guide AEE's research strategies.

The agenda for the meeting will include:

- Presentation of the Environmental Research Beyond 2000 program, outlining objectives and goals for research activities undertaken by the Office of Environment and Energy.
- Presentation of examples of recent and on-going environmental research by FAA and other Federal agencies and interagency groups.
- Public comment and discussion of aviation-related environmental issues and concerns.

Commercial aviation provides great economic benefits to the United States, and with the "Environmental Research Beyond 2000" project, AEE is seeking to identify Research and Development (R&D) strategies that can resolve or remediate environmental impediments to aviation activities and fulfill AEE's environmental obligations. These objectives can best be realized by obtaining participation and information from all interested parties.

In addition, AEE is seeking public comment and information regarding the following six questions. Input from the public and other aviation stakeholders on these questions will serve as guidance for AEE as it develops an aviation-related environmental research strategy that

best addresses the concerns and needs of those affected by aviation activities.

1. What aviation environmental issues concern you most and how does each affect you?
2. How successful have existing aviation remediation and mitigation policies been in responding to the impact of aviation activities on the environment?
3. What is being done to address your concerns and how effective is it?
4. What should be done to address your concerns?
5. What role does research have in addressing your concerns?
6. Are important effects of aviation activities on environmental quality currently not addressed in government policy and scientific research?

Attendance is open to the public, but will be limited to the space available. The public must make arrangements by November 6, 1997 to present oral statements at the forum.

Arrangements may be made by contacting the person listed under the heading FOR FURTHER INFORMATION CONTACT. Sign and oral interpretation can be made available at the meeting, as well as an assistive listening device, if requested 10 calendar days before the forum. Written comments should be addressed to the person listed under the heading FOR FURTHER INFORMATION CONTACT.

Comments must be received on or before December 15, 1997.

James R. Littleton, Jr.,

Office of Environment and Energy Analysis & Evaluation Branch.

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