

THE ALLIANCE OF RESIDENTS CONCERNING O'HARE, Inc.

A Not-for-Profit Corporation

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*"To achieve a balance between public health and the economy"*

September 22, 2003

Via regular mail and e-mail  
Marianne Lamont Horinko, Acting Administrator  
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Reply to correspondence of Mar. 26, 2003, Bharat Mathur, Deputy Regional Administrator, Region 5, in response to previous ARECO correspondence to Christine Whitman.

Dear Administrator Horinko

In your agency's response to ARECO's 2/26/03 letter to Christine T. Whitman, Administrator, you provided copies of Illinois' most recent (monitor) network review (Oct. '02) as well as the associated US EPA Region 5's approval letter, stating that "Beyond these letters, however, there is no specific review document, as you suggest, which would detail the site selection and approval process."

The stated "Illinois network review" is in fact not a review at all, just merely a list of the existing monitors in the Illinois network (inadequate as well e.g. no PM2.5 monitors identified). That document provides no further information, study results or rationalization for the current network configuration nor its sufficiency or insufficiency, especially as it relates to our initial appeal to the USEPA that the network is woefully inadequate as it relates to monitoring of emission concentrations from O'Hare Airport (and Midway).

Your stated "approval letter" also fails to provide any additional illumination on the subject, merely rubber-stamping the Illinois EPA "review" submission.

No supporting data or information is provided in either of these documents that would demonstrate the parameters used in choosing existing monitor site locations while rejecting others. Your letter states that "The IEPA selected the sites for their existing network as required in Appendix D [40 CFR 58] by taking into account the meteorology, topography, location of sensitive populations, and emissions for the overall Chicago metropolitan area." You also state "We evaluated IEPA's monitoring sites when they were proposed and

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confirmed that the locations met the prerequisites specified in Appendix D for each criteria pollutant.”

We are at a total loss as to how you can make that statement in the face of your earlier statement that “Beyond these letters, however, there is no specific review document, as you suggest, which would detail the site selection and approval process.” We can only conclude that no USEPA file and data exists relating to earlier approvals and that you are merely providing an opinion that such approval must have occurred.

Your assurance that “the current network meets all [US EPA] requirements...” may be correct but is at minimum disingenuous in that you are surely aware that current EPA requirements specify minimum quantities of required monitors for a population area e.g., the Chicago MSA but provide only “guidelines” for location decisions, leaving those decisions to the local authority (IEPA), which returns us once again to the subject of lack of such decision-making documentation. [Refer for instance to section 4.0 of “GUIDANCE FOR NETWORK DESIGN AND OPTIMUM SITE EXPOSURE FOR PM2.5 AND PM10, Office of Air Quality Planning and Standards, EPA-454/R-99-022.]

Worse, though the guidelines suggest that monitor location decisions should consider adjacency to significant emission sources, especially for “maximum” determinations, O’Hare and the nation’s airports have historically been purposely excluded as aggregated emission sources (airport operations both on and off-site plus aircraft operations), which then removes them from the location decision process. This is indeed one of our major contentions as to why the relative lack of critical monitors around the airport(s) exists. We contend that if O’Hare Airport, one of our nation’s largest man-made polluters, if not the largest<sup>o</sup> (both “criteria” and hazardous emissions) was indeed properly characterized, that more monitors would be located in the surrounding communities. That is why we strongly disagree with your further assurance that “... the current network ... is sufficient to characterize concentrations of criteria air pollutants in the Chicago metropolitan area.”

We have also contended that the complex meteorology of the Chicago area demands extra-ordinary monitor consideration, yet you indicate that USEPA is not in possession of any such current or past study information. At a very minimum level, we had hoped that appropriate wind rose data associated to emission sources and population concentrations might exist, but even that minimal requirement appears to be not satisfied.

These severe inadequacies only serve to substantiate and highlight our concerns about use of the IEPA monitor network information for purposes such as daily-published populace alerts/warnings, trend analysis, area pollution modeling characterization verification and predictions, etc.

Your statements providing reasons for the total lack of ambient air monitoring of toxic emissions provides little solace to those citizens exposed to such toxics emissions from O’Hare Airport (or Midway Airport or other sources) and does not change our fundamental call for such monitoring.

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<sup>o</sup> Northeast States for Coordinated Air Use Management and Center for Clean Air Policy. "Controlling Airport-Related Air Pollution," June 2003.

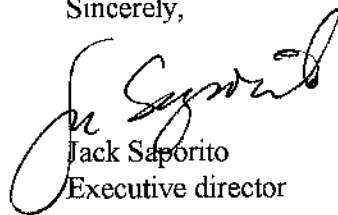
Finally, we are shocked that your Office of Research and Development concluded, upon review of the AReCO and Illinois Department of Public Health (IDPH) studies (cancer incidence near O'Hare Airport) that "...there doesn't appear to be any evidence of elevated cancer incidences surrounding O'Hare." We are amazed that the rather straightforward summary of Cancer Registry data in the AReCO report (showing considerable elevations of incidence) was rejected in favor of the broad, flawed, IDPH report (which basically averages together the incidence rates of the entire Chicagoland area in order to conclude that the result are... average). We request written documentation of this claimed examination and conclusion and maintain our request to the USEPA to initiate epidemiological studies of the cancer incidence rates in these communities surrounding O'Hare Airport.

AReCO, even more so now than before, believes the Illinois Monitor Network disregards the existence of O'Hare (and Midway) airports as major pollution sources and we call for restudy of the network basis assumptions and modification of the network to adequately recognize and characterize these sources.

As you may know since the Agency uses our website extensively for research, AReCO's website contains numerous studies showing the harm caused to the public's health, our environment and also, the tremendous amount of pollution emitted by airport operations. O'Hare is a horrible local source polluter, which is basically a major city with aircraft operations that is located on just about four (4) square miles of land in a densely populated area. The public and our environment need to be protected from it.

Thank you.

Sincerely,



Jack Saporito  
Executive director

c: B. Mathur

- Encl. AReCO initial petition for air monitoring and epidemiological study, 9/6/02.  
USEPA, Thomas Skinner, first denial, 11/12/02.  
AReCO request for reconsideration and documents to C. Whitman, 2/26/03.  
USEPA, Bharat Mathur, second denial for documents and original requests, 3/26/03.  
TECHNICAL NOTE 5/31/02 [Revised 9/21/02]: Comments on the Illinois Department of Public Health's 11/01 report: Cancer Incidence in Populations Living Near Chicago O'Hare and Midway Airports, Illinois 1987-1997.

Ref.

"A Perspective on O'Hare Airport vs. Peotone (proposed) Airport Pollution Impact," R.E. Ruthenberg, May 15, 2003.

"Asthma in exercising children exposed to ozone: a cohort study," Rob McConnell, et al. Lancet. Volume 359, Number 9304. 02 Feb 2002. p. 386-91.

"Comparison of Criteria Emissions from O'Hare Airport Aircraft to Those of Electric Power Generating Plants," R.E. Ruthenberg, 7/28/02.

"Controlling Airport-Related Air Pollution," Northeast States for Coordinated Air Use Management and Center for Clean Air Policy. June 2003.

"Environmental Toxins and Breast Cancer on Long Island. Polycyclic Aromatic Hydrocarbon DNA Adducts," Gammon, Marilie D., et. al. Cancer Epidemiology Biomarkers & Prevention Vol. 11, 677-685, August 2002.

"Estimation and Evaluation of Cancer Risks Attributable to Air pollution in Southwest Chicago: Final Summary Report," EPA, prepared by ViGYAN, Inc. April 1993

"Investigation of the Cancer Incidence Rates in the Vicinity of O'Hare Airport," R.E. Ruthenberg, 3/13/02.

"Lung Cancer, Cardiopulmonary Mortality, and Long-term Exposure to Fine Particulate Air Pollution." C. Arden Pope III, PhD; et al. JAMA: Vol. 287 No. 9, March 6, 2002.

"Preliminary Study and Analysis of Toxic Air Pollutant Emissions from O'Hare International Airport and the Resulting Health Risks Created by These Toxic Emissions in Surrounding Residential Communities," City of Park Ridge, et. al. August 2000.

"Santa Monica Airport: A Report on the Generation and Downwind Extent of Emissions Generated from Aircraft and Ground Support Operations," Bill Piazza, Los Angeles Unified School District, Environmental Health And Safety Branch, June 1999.

TECHNICAL NOTE Date: Tue, 04 Jun 2002 [Revised 9/21/02]: Comments on IEPA Final Report, Chicago O'Hare Airport Air Toxic Monitoring Program.

"The Sea-breeze or Lake-breeze Effect and Impact on Pollution Concentrations/dispersions from Sources such as Airports," R. E. Ruthenberg 6/6/02.

Winthrop Community Health Survey, Winthrop Environmental Health Facts Subcommittee (Winthrop Airport Hazards Committee) Winthrop Board of Health AIR, August 18, 1999.

See <http://www.areco.org/studies.htm> for dozens more of relevant studies and documentation.

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