



**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"*

February 26, 2003

Via Facsimile and Regular mail  
Christine T. Whitman, Administrator  
1101A  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Washington, DC 20460  
Facsimile: (202) 501-1450

We are very concerned regarding the EPA's denial<sup>1</sup> of our request<sup>II</sup> to place additional needed full spectrum air quality monitors down (prevailing) wind of Chicago O'Hare Airport.

This will continue to perpetrate significant harm to the health interests of several communities and millions of people. As we mentioned, the existing monitors are either not monitoring for the correct pollutants and/or are not placed to correctly monitor O'Hare Airport's ground and/or aircraft emissions. We are asking for reconsideration of our request of September 6, 2002.

ARECO is appreciative of the re-establishment of hazardous air pollutant monitoring at the Schiller Park site, as noted in your response, but we believe that is only one improvement of many needed. We are also not questioning at this time the technical methods being used to measure the pollutants, as indicated by your statement "We think that the state is following appropriate methods in conducting this monitoring." We are also in full agreement that such monitoring in the O'Hare Airport provides "...important information about air quality in the area."

However, we reiterate that our primary issue is with the extent and applicability of that information, as it is influenced by insufficient monitor locations in pollution prone and meteorological influenced areas, such as those generally northeast (the east to north quadrant) of the airport. We restate our request for expanded, continuous, monitoring in these areas.

You indicate that the "EPA carefully considered issues of meteorology, topography, and the locations of sensitive populations and emissions sources before approving this network." We believe that the EPA originally erred in these considerations, particularly meteorologically, and request that a copy of the official EPA review file containing these considerations be forwarded to us for our examination. Also, as you pointed out, the

Proud Recipient: 1995 Environmental Merit Award, Arlington Heights - 1996, '99 Illinois State Senate Recognition  
*Protecting the Health and Safety of Millions of O'Hare Affected Citizens*

Illinois Environmental Protection Agency (IEPA) conducted the Chicago O'Hare Air Toxic Monitoring Program. We note for the record that it was at our request that this was done, so we have been somewhat involved in that program since the beginning<sup>III</sup>. We pointed out to the IEPA, in fact, in the planning stages of this limited-duration event that the monitors were going to be placed in the wrong places and too close together.

In the beginning, when we were trying to work with the state as a stakeholder, we offered the IEPA expert help, especially when they did not even know the definition of what a wind rose was. So as not to color the study, we even offered the state the free assistance of a very qualified, independent Los Angeles School District environmental researcher, or other researchers. Our offer was declined.

Knowing that air quality monitoring of airports and aircraft emissions is not straightforward (e.g., smokestack), due to volumetric and meteorological considerations, etc., we recommended to the state that the best way to do such an airport study, based on the many that we have been involved in, was to first model all airport and aircraft operations related activity both on and off the airport site as an aggregate. The second step would be to then structure the monitoring program using the modeling results to guide such parameters as monitor placement, and finally, to launch vigorous long-term monitoring (if possible for most of the 200+ known airport toxics). Such monitoring could then be used to justify model predictive accuracy and to cause adjustments to the model or to demonstrate the need for different models to achieve acceptably accurate predictions.<sup>IV</sup> None of our recommendations were accepted by the state for whatever reasons.<sup>V</sup>

As a result of this failure to listen to important stakeholders, the state's "final study" result is (still) seriously flawed, though it does graciously conclude that measurements demonstrate that O'Hare Airport does indeed contribute to the area pollution and resultant decrease in air quality. The state's study (and the promotion thereof) appears more oriented toward promoting the expansion of the airport, rather than protecting the environment and citizen's health and welfare, purposefully minimizing impacts on the local community.

We say "graciously conclude," due to the fact that the city of Chicago's own study (KM Chng) shows, not surprisingly, that O'Hare is the largest hazardous and toxic polluter in the whole state. Also, data from both the Illinois and U.S. Environmental Protection agencies show that O'Hare's aircraft alone emit more Volatile Organic Compounds than those from all (70-100) Illinois electric power plants combined, with Carbon Monoxide emissions as much as 60% of that total! Adding the associated ground, mobile and stationary emissions would at least double that! This is a far cry from the "lilywhite" picture presented by the state of Illinois.

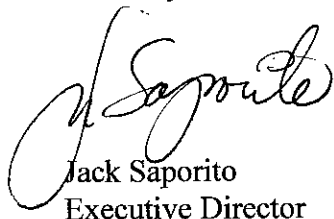
We reiterate our original request of September 6, for the EPA to implement additional monitors in optimum locations to correct the serious deficiencies in the communities that are generally downwind (northeast) of the airport.

Also, we reemphasize our request for a copy of the EPA file associated with the EPA's original review and considerations leading to approval of the state's existing monitor location plan.

Finally, we await your review decision on the epidemiological issue, as noted in your letter.

Thank you.

Sincerely,



Jack Saporito  
Executive Director

C: Thomas Skinner, Regional Director  
Mayor Tony Arredia  
Mayor Nicholas Blaise  
President Nancy Canafax  
President Lawrence Carlson  
President Mark Damisch  
Mayor Lorraine Morton  
Mayor Peter Moy  
Mayor Norbert Pabich  
Mayor Daniel D. Scanlon  
Mayor George Van Dusen  
Mayor Ronald Wietecha

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<sup>i</sup> Ref. R-19J, Nov. 12, 2002, Thomas Skinner. Copy enclosed.

<sup>ii</sup> <http://www.areco.org/epapetition.pdf>

<sup>iii</sup> Our very initial request of the state legislature was for a comprehensive "bubble study" to be preformed; however, the IEPA strongly opposed that request when we were testifying in the Senate.

<sup>iv</sup> The "mandated" EDMS model is incapable of accurate predictions under certain conditions.

<sup>v</sup> We attempted to determine these reasons and others related to various incidents, via a Freedom Of Information Act request, but were unsuccessful.