



**ALLIANCE OF RESIDENTS CONCERNING O'HARE, Inc.**

"a grass roots organization"

P.O. Box 1702 ○ Arlington Heights, IL 60006-1702 ○ Fax: 847/506-0202 ○ Tel: 847/506-0670 ○ www.areco.org

August 5, 2003

Sent via all outlets below:

Sharon Pinkerton, Assistant Administrator for Aviation  
Policy and the Environment, AEP-1  
Federal Aviation Administration  
800 Independence Ave., S.W.  
Washington, DC 20591  
Email: < sharon.pinkerton@faa.gov >  
Facsimile: Chuck Dennis, (202) 267-5370

Comments from the Alliance of Residents Concerning O'Hare, Inc.  
to the Federal Aviation Administration regarding the *Draft FAA  
Five-Year Strategic Plan "Flight Plan" 2004-2008* by Jack Saporito

Dear Ms. Pinkerton and the Federal Aviation Administration:

As the Federal Aviation Administration (FAA) knows, our organization is one of at least hundreds of organizations and cities that are concerned about airport community issues and the Alliance of Residents Concerning O'Hare (ARECO) has been one of the leaders of this movement.

We have submitted and are sure that the FAA has received our request for a 120-day extension to the public comment period. We await your decision.

Most importantly, the FAA does not have "Environmental Protection" as one of its goals, which are (p.6): (1) Safety, (2) Capacity (increase) and (3) Organizational Excellence. Environment is addressed only as a peripheral to these goals, even though the FAA notes that the Department of Transportation has Environment as a priority goal. We need to elevate Environment and Public Health, both local/regional and global, to its priority goal level.

Airports and its aircraft are among the worst polluters in the world, causing significant damage not only with its extraordinary contribution to climate change, but, also pandemic public health problems caused by its toxic pollution.

In fact, a recent multi-state study's findings extrapolate the fact that Chicago's O'Hare Airport and all its related aircraft operations are not only the worst polluter in the state of Illinois, but among the worst, if not the worst man-made polluter in the whole United States!

O'Hare is basically a small city, with a daily population of several hundreds of thousands of people plus all of the supporting operations to keep the city of O'Hare functioning. Plus, it has an onsite incinerator, thousands of daily jet aircraft operations, etc. This entire medium sized city is located on just 4 (four) square miles in a densely populated area. Additionally, over 90% of the emissions from the aircraft are emitted at or relatively near the airport, making O'Hare just not the worst polluter but a massive, local public health hazard.

We know that the agency is fully aware of these problems. In fact, in 1997, during the agency's public comment period of your last strategic plan, Environmental Research Beyond 2000, I testified on behalf of US-Citizens Aviation Watch Association and also AReCO about the same problems that I am submitting today. As you can see, nothing has changed since then, so we are resubmitting our comments from 1997. (See attachment #1.)

We do not want the agency to study the environmental and health effects, it will most certainly side with the industry and not in the best interests of the American public. We are wondering why you would want to study the environmental and health issues, since the agency has hindered the Environmental Protection Agency in doing such studies and protection.

As we stated in 1997, an agency is needed to oversee the FAA in these matters, in order to address the concerns of the American public. The FAA has spent years of denial and deception even against solid proof; it has spent years building rules, regulations and laws protecting the industry against the best interests of the American public.

Item #3 from our 1997 testimony, shows that there is no change in your industry's major water pollution problems associated with deicing and anti-icing practices. This is even after it has been shown that once you poison our water with these chemicals, it is poisoned forever. We thought that especially after our lawsuit settlements against the airports that there would be change by your agency; and yet, even after the EPA ordered airports to follow the Clean Water Act, we see none. (See attachment #2, for most recent example.)

Item #4 of our 1997 testimony, showed the agency some of the basic steps needed to be taken in order to protect the American public; yet, as we have said before, nothing has changed and according to this most recent Strategic Plan, you will do nothing substantial.

## **STRATEGIC PLAN COMMENTS**

**SAFETY & SECURITY:** There appears to be no evidence of initiatives or strategies regarding aircraft design. This seems surprising in the face of such incidents as in New York City where the entire tail assembly came off (killing a lot of people). Also, inherent aircraft public safety must include overall design considerations, an example being the French A-380, which will carry 85,000 gallons of jet fuel on takeoff. There should be limits placed on aircraft designs, or at least aircraft designs allowed in U.S. airspace. It is astounding that fuel capacity is not one of those current limits, considering that aircraft are potential WMD, viz. 9-11 in New York and Washington. We suggest 50,000 gallons max.

**GREATER CAPACITY, page #2:** FAA must clearly define the need for growth, specifically long-term capacity planning. Explain why expand now, why expand that airport? **The FAA's mission is to expand regardless**, so it must always be made to answer to this. Capacity and expansion are words the airlines throw around but rarely define a true need for.

**FUNDING, page #4:** The FAA gets a disproportional amount of money from the Department of Transportation and others; yet, it never has enough. Sounds like an excuse for a dismal track record

when it comes to safety, security, health and environmental concerns. Before the FAA requests more funds, it must clearly demonstrate a legitimate need.

**INTRODUCTION, page #5:** The FAA talks about the need to work with other governmental agencies on expanding existing and building new airports. What about the public and their needs? Will the public's input be entered into the decision-making process or will it be effectively be cut out or ignored, as it has been in the past?

**FAA GOALS, page #6:** The FAA talks about how both safety and environmental concerns are a priority; yet, past and even present actions counter that statement. If the FAA is so concerned about properly addressing environmental concerns (noise, air, water, ground quality and climate change concerns) why has it opted to "streamline" (SHORTCUT) the National Environmental Protection Act (Environmental Review) process? Why has it fought so hard in the courts against communities to defeat these needed protections? Why has it failed to address health concerns? How does it plan to address these concerns effectively?

**Could the answer be that the industry cannot operate and/or expand airports under existing environmental and public health protections as stated in many reports?** *For example:* "According to officials from the American Association of Airport Executives and Airports Council International, many state air quality plans contain unrealistically low airport emissions budgets, and few realistically anticipate reasonable airport growth. They believe that coordinating airport development activity with the state air quality plans causes a major source of delay and risk to airport projects. The officials also noted that the Governor's Certificate requirement duplicates requirements found in the Clean Air Act and Clean Water Act.<sup>1</sup>" (GAO Report: Challenges Related to Building Runways and Actions to Address Them.)

Please note that we do not consider your intention **"To triple flight volume in U.S. airspace in the coming years" reasonable airport growth.**<sup>2</sup> **We are especially skeptical when the Government Accounting Office continues to release reports showing that there are better alternatives to relieve air and ground capacity congestion than massively expanding existing airports and that other long-term capacity fixes are needed.**

How can the FAA make any claims regarding safety until it fully explains how it intends to alleviate congestion while massively expanding flights without making it (more) unsafe to fly? The FAA needs to explain how and why adding BOTH more runways and planes into already heavily congested airspace will alleviate congestion and be more safe? Mathematically, it's impossible even with all the new technology functioning properly. The National Transportation Safety Board has been after the FAA for years to take this issue more seriously, it's about time they do. This is crucial because it goes to the very heart of the matter and accurately defines the true intent of the FAA with respect to the public's safety.

Regarding air quality, there have been dozens of credible studies from around the globe on air quality and the health hazards of airport and aircraft related emissions, especially fine particulate matter. Is the FAA claiming this is junk science or do they intend to actually read these studies and take these facts into consideration and act responsibly on them?

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<sup>1</sup> Government Accounting Office. Challenges Related to Building Runways and Actions to Address Them, GAO-03-164, June 2003.

<sup>2</sup> Testimony of the FAA to the Senate Science Committee, July 22, 2003, on HR 2734

**Page #8:** The FAA talks about implementing the RNP (Required Navigation Performance), where is this already in use, what is the track record? The FAA must demonstrate that this is a better system before going ahead with the changes.

**RUNWAY INCURSIONS, page #17, Objective #5:** Surprisingly makes no mention of any improvements to airport runway layouts to minimize incursions potential. The FAA should highlight, especially in light of their safety and capacity goals, that new or modified airport layouts that inherently increase risk of incursions (e.g. by forced runway cross-overs) will be summarily rejected.

**GREATER CAPACITY- OVERVIEW, page 21:** How will the FAA accurately and effectively address noise, water, ground and air quality concerns? The FAA also says it wants to meet and exceed demands. The FAA must clearly define what the current needs are and clarify what data it's using in order to meet and even exceed these needs. Again, the FAA must demonstrate that it intends to include the public's input, honestly.

There are several big problems in the agency's proclamation below:

“Objectives:

Increase airport capacity to provide a system that meets exceeds air traffic demand.

Improve efficient air traffic flow over land and sea.

Increase or improve airspace capacity in the eight major metropolitan areas and corridors that most affect total system delay: New York, Philadelphia, Boston, Chicago, Washington/Baltimore, Atlanta, LA Basin, and San Francisco.

Increase on-time performance of scheduled carriers.”

The first being the issue of designing and implementing massive airport redesigns based on forecasted demand. That puts the forecast in the "driving seat" and to the extent it is in error, all expansion plans are in (irrecoverable) error. The FAA states (p.21):

“Passenger levels are down 8 percent from where they were in early 2001, and current industry forecasts suggest that demand will not rebound until 2005 at the earliest. It will rebound, however.”

This "will" emphasis is more wishful thinking than fact and should be modified to "We are hopeful that it will rebound."

The entire FAA demand forecasting system needs overhaul and conversion to a scenario-based system that recognizes that predicting the future is not "economic science" but rather crystal ball gazing and that probabilistic scenario approaches, with associated "costs of error", need to be incorporated in the decision making process.

The second problem is the issue of "on-time performance". The glaring omission is that most non-weather related delays are created by the airlines/airports scheduling more plane departures than is physically possible in a given time-frame or "bank". The FAA should regulate that an airport and the airlines using it, cannot schedule more departures (and/or arrivals) than is physically possible, against

the FAA certified maximum airport capacity, on a 15-minute basis. Spreading the flights out throughout the hour or day and reinstating operational and management controls will relieve delays<sup>3</sup>.

The third issue is airspace capacity in the 8 major areas. The FAA should give preference in those areas to new airports that are spread out more, rather than attempting to pack more flights into existing airports. In order to augment this, the FAA should modify the Passenger Facility Charge (PFC) administrative processes to place 50% of all PFC collections into a separate federal trust fund that is earmarked only for implementation of new airports, with distribution priority given to the region of collection. However, we know that this goes against the major stakeholders (airlines), who know that real market competition is between airports.

**GREATER CAPACITY – STRATEGY, page 24:** The FAA says it plans to take certain initiatives regarding environmental concerns. How does the FAA intend to build support for among stakeholders and just who does the FAA define as stakeholders? (We ask this as the initial environmental community stakeholder who has been systematically left out of the process, even though we bring many tools to the table, including the top experts of the world.) What tools will the FAA develop to better understand the relationship between noise and also, emissions? What type of timely review is the FAA referring to? How will the FAA educate and inform the community about aviation and the environment or will this just end up being another form of solicitation of support on behalf of the airlines? Does the intention of the FAA truly reflect the desire to actively involve the public or is this just another “PR JOB” like in the past?

On page 24, one finally gets to the "Oh yes, there is that pesky environmental issue", sub-headed under "Increased Capacity" criteria, to wit:

Strategy

Address environmental issues *associated with capacity enhancements*.

Initiatives

Build stakeholder support for funding and technology models to address environmental impacts.

Develop tools to understand the relationship between noise and emissions and different types of emissions.

Ensure timely review of planning and environmental efforts at all OEP airports examining new runways and airfield reconfigurations.

Improve data on the environmental benefits, technological feasibility, and economic reasonableness of technologies and other measures to support sound and cost-effective decision-making.

Develop “best practices” for airport/airline community relations to educate and inform the public about aviation and the environment.

Develop tools to reduce airborne delay.

Implement airspace redesign to increase efficiency with consideration for environmental impacts.

with the only Performance Target being:

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<sup>3</sup> It is to be noted, with much interest, that many of the massive and unparalleled delay problems the flying public experienced in the summer of 2000, were predicted, if Congress were to remove flight caps at slot controlled airports, by a 1995 Department of Transportation (DOT) Report to Congress on the High Density Rule.

Maintain or reduce the number of people exposed to significant noise through 2008, as measured by a 3-year moving average, from the 3-year average for FY 1999-2001.

This weak, ineffective and purposely de-prioritized area needs a complete overhaul, with Environmental Protection changed to a specific FAA Goal. The FAA should establish an objective (in the next 12 months) to transfer their environmental responsibility and authority to a different agency, more responsive to environmental and public health issues and needs and more considerate of the "environment for the people" concept instead of the "environment for airlines, airplanes and airports" concepts.

**CAPACITY OBJECTIVES 3, page 28:**

Performance Targets

Achieve an Airport Arrival Capacity for the 8 major metropolitan areas of 21,355 per day by 2008.

See previous comments on setting massive airport programs based on "target" numbers that are of doubtful veracity. Where did 21,355 come from and what is the probability that it is correct...and what are the implications if it's incorrect?

**ON-TIME PERFORMANCE, page #29:** See previous comment re. airlines scheduling more flights than physically possible at an airport.

**INTERNATIONAL LEADERSHIP, page #36:** Obviously the FAA wants to be the world leader in order to achieve its goals of economic globalization, but they have a long road ahead to do so. The International Civil Aviation Organization (ICAO) will have a committee - CAED (Community on Aviation Environmental Protection). Who will be on this committee and will they hold public hearings? Again will the FAA allow the public to be actively involved? What about emission reduction, why will this be voluntary? There is much history on this: You know that voluntary controls do not work in this industry. What about the poor nations that cannot achieve basic goals and also, ICAO's need to protect the industry's pocketbook? Will the bar be set so low that nothing changes, as is what happened when ICAO set the standards for Stage IV aircraft for decades to come? If the FAA truly wants to concern itself with air quality issues, as well as being a world leader, they should mandate emission reduction, not simply make it voluntary. That's a "cop out", a purposeful evasion and the FAA knows it!

Finally, we are concerned about just more "empty promises" from your agency. We know that even if by some miracle, you had all the "fixes" today, it would be decades away before even adequate protection was realized.

Thank you.

c: President George W. Bush  
Both Houses of Congress and both Republican and Democratic leaderships  
Senator Peter Fitzgerald  
Congressman Henry J. Hyde  
Congressman Jim Matheson  
Inspector General  
Others

# ATTACHMENT #1

# US-Citizens Aviation Watch

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

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

*Executive Committee:*

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Jack Saporito - Chicago

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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 health<sup>4</sup> and property; safety, neighborhood losses, property value and resale, other educational, social and other quality of life issues.

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 objective<sup>5</sup>. The Stage III is program inadequate. Studies have shown that the soundproofing program is inadequate in producing real noise reduction<sup>6-7</sup>. Ninety-nine percent of the complaints come from noise levels below the LDN ~65<sup>8</sup>. 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 increases<sup>9</sup>.

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

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<sup>4</sup> Casey Gordon Davis for Georgetown Crime Prevention and Community Council. "Master Plan Comments: Seattle-King County Department of Public Health Summary." Oct. 24, 1997.

<sup>5</sup> 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

<sup>6</sup> 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.

<sup>7</sup> Natural Resources Defense Council. "Under the Flight Path." Mar. 1997.

<sup>8</sup> *ibid.*

<sup>9</sup> 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

are combined with other aircraft operation sources they produce **twice**<sup>10</sup> 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 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]).<sup>11</sup>
- 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.<sup>12</sup>
- 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 facts<sup>13</sup> 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 burden<sup>14</sup>.

Discharges of hazardous chemicals to the waters of the United States, such as glycols, metals, solvents, etc., are not being controlled<sup>15</sup>. Many hazardous and toxic discharges are not disclosed to the Environmental Protection Agency or public<sup>16</sup>. Property and

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<sup>10</sup> Mary Gade, IEPA, correspondence to Illinois Senator Peter Fitzgerald, Sept. 26, 1996 p. 2.

<sup>11</sup> Mary Gade, IEPA, correspondence to Illinois Senator Peter Fitzgerald, Sept. 23, 1996. p.2.

<sup>12</sup> ViGYAN Inc. EPA Air and Radiation Report. "Estimation and Evaluation of Cancer Risks Attributed to Air Pollution in Southwest Chicago." April 1993. p. 13.

<sup>13</sup> Natural Resources Defense Council. "Flying Off Course: Environmental Impacts of America's Airports. Oct. 1996.

<sup>14</sup> *ibid.* p. 72

<sup>15</sup> Alliance of Residents Concerning O'Hare. "Summary of Chicago's O'Hare International Airport Water Pollution." Chicago, IL. May 28, 1997.

<sup>16</sup> 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.

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?

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 operations<sup>17-18-19</sup>. 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 interests<sup>20</sup>. 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

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<sup>17</sup> Airport Coordinating Team, Inc. "BWI Discharges Toxins into Local Waters." Baltimore, MA. Feb. 26, 1997.

<sup>18</sup> A. Scott McDowell. *Sawmill Creek - Watershed "Restoration" Project*. Baltimore, MA. Mar 1997.

<sup>19</sup> Waste Action Project vs. Port of Seattle.

<sup>20</sup> US-CAW cited letter to President Clinton. Nov. 8, 1987.

operations. Technology alone will not solve the air pollution problem. NO<sub>x</sub> 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 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:

AReCO

8/5/03

p. 13

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.

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

## ATTACHMENT #2

WCPO Local Shows and Segments



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## July 31: Kentucky Stream Pollution

**Reported and Web Produced by:** [I-Team](#)

Updated: 07/31/03 22:52:15

**Carol Williams, 9News anchor, on set:** Tonight the I-Team looks at a classic clash between big business, government and the rest of us.

**Clyde Gray, 9News anchor, on set:** The business is the Cincinnati-Northern Kentucky Airport. The government is the state of Kentucky. and we are the public who want to fly safely but don't want to pay the price in unnecessary pollution. Hagit Limor joins us.

**Hagit Limor, I-Team reporter, on set:** We started looking into this several months ago and ran across some pollution so severe, we had to warn people immediately back in June. But here's what you didn't hear: why the state has allowed two streams -- that flow into our Ohio River -- to get so polluted, they're like raw sewage at times.

**I-Team bong and animation.**

**Hagit Limor, I-Team reporter, on tape:** On a beautiful summer day, Matt Bell heads to the creek behind his house.

**Matt Bell, lives next to creek, on tape:** "Well, I used to go in there like every other day."

**Hagit Limor, I-Team reporter, voice over video:** He'd love to jump in.

**Matt Bell, lives next to stream, on tape:** "It used to be crystal clear. I mean, you could like see everything."

**Hagit Limor, I-Team reporter, voice over video:** But he can't.

**Matt Bell, lives next to stream, on tape:** "Now it's, you can't see two inches down."

### AUDIO/VIDEO

 [Watch this 9News video](#)

We use RealVideo format only. [Click here](#) for help.

**Heather Mayfield, biologist and environmentalist, on tape:** "It's just dead. It's decay. This is a dead, sick, dead stream."

**Hagit Limor, I-Team reporter, voice over video:** Heather Mayfield is a biologist and environmentalist. She says the putrid white haze in this stream spells death for fish and worries her about people.

**Heather Mayfield, biologist and environmentalist, on tape:** "The condition of the stream now is such that, it kind of mimics that of raw sewage...so if you have little kids playing in this stream and they don't wash their hands, that could definitely pose a problem. I don't think any kid should be playing here."

**Hagit Limor, I-Team reporter, on camera:** You're looking at an environmental mess. The white haze comes and goes, but nothing much lives in Gunpowder or Elijah's creeks, flowing off the Cincinnati/Northern Kentucky International Airport. The reason's up there.

**Natural sound of airplanes taking off.**

**Hagit Limor, I-Team reporter, voice over video:** Every day 600 planes take off from the airport. The place would shut down in the winter if it weren't for glycol -- de-icing fluid -- an antifreeze sprayed on the wings. Some of it runs off or flies off at takeoff. It ends up in the stormwater that feeds the streams. and there it gobbles up the oxygen.

**Heather Mayfield, biologist and environmentalist, on tape:** "It would be bad for the creek because all the aquatic organisms, whether they be fish, bugs, plants, you name it, need oxygen to survive. And if there's no oxygen in the water, then you get a dead stream."

**Hagit Limor, I-Team reporter, voice over video:** No one's denying the problem, not the state of Kentucky.

**Jeff Pratt, Division of Water Director, on tape:** They are impaired due to the long term presence of deicing fluid.

**Hagit Limor, I-Team reporter, on tape:** Not the airport

**Dale Keith, Airport Director of Operations, on tape:** We had a record winter with the amount of deicing fluid, and I believe that's probably what caused it.

**Hagit Limor, I-Team reporter, voice over video:** And certainly not the neighbors who live creekside:

**Tom Brothers, neighbor, on tape:** Well, it is polluted. I mean you can see it for yourself.

**Hagit Limor, I-Team reporter, voice over video:** Tom Brothers has lived 28 years on Elijah's creek, north of the airport.

**Deloris Burke, neighbor, on tape:** There's chemicals of some kind because they stink.

**Hagit Limor, I-Team reporter, voice over video:** Deloris Burke has lived 53 years on gunpowder, to the airport's south.



**Deloris Burke, neighbor, on tape:** It was just perfect for our family.

**Hagit Limor, I-Team reporter, voice over video:** Burke remembers a creek so pristine, she filled her pool with its clear cool waters.

**Deloris Burke, neighbor, on tape:** We thought it was the most beautiful place in the world. And all our friends came out from town and turned our kids loose 'cause they couldn't get hurt. They'd catch fish and they'd catch crawdads. Now all that's dead. There's nothing living in it.

**Hagit Limor, I-Team reporter, voice over video:** So what's the state doing to fix the streams? The Kentucky division of water first started looking into problems here ten years ago. Five years ago it wrote the airport a cleanup order saying the creeks are severely impacted by deicing. Conditions are in violation of Kentucky water quality regulations.

**Hagit Limor, I-Team reporter, voice over video:** Today, they still violate. The airport's own data show it far exceeds state levels, which already, environmentalists argue, are higher than any U.S. airport they've found.

**Dale Keith, on tape:** We violated our permit. There's basically because we don't have our systems on line.

**Hagit Limor, I-Team reporter, voice over video:** The airport's director of operations says it's spending \$30 million trying to fix the problem. Planes now deice on special pads with drains that lead to storage tanks that lead to a new recycling plant. The airport's also building a stormwater treatment system.

**Hagit Limor, I-Team reporter, on tape:** Have you noticed a change since the airport started spending all these millions of dollars to fix the problem?

**Rob Bell, neighbor, on tape:** Yea, I've noticed a change. It's got a lot worse.

**Hagit Limor, I-Team reporter, voice over video:** Matt's father, Rob Bell, is suspicious the new systems will work. They're coming on line under a permit that expired more than a year ago!

**Hagit Limor, I-Team reporter, on tape:** How many other industries are out there that can operate on what are basically expired permits?

**Jeff Pratt, Division of Water Director, on tape:** As far as how many I don't have a number on that on the top of my head. Is it common? It does occasionally happen. I wouldn't say it's common. It's infrequent.

**Hagit Limor, I-Team reporter, voice over video:** With the old permit in place, Kentucky is supposed to fine the airport every time it exceeds state pollution limits. But it hasn't in the past five years.

**Hagit Limor, I-Team reporter, on tape:** Yet you know that they have repeatedly violated.

**Jeff Pratt, Division of Water Director, on tape:** Uh, yea, as far as meeting their permit limits, yes, there has been excursions in which they have, and that's not uncommon for us to exercise enforcement discretion.

**Jeff Pratt, Division of Water Director, on tape:** As for a new permit? the state promised it would be ready last summer. a year later, no new permit.

**Hagit Limor, I-Team reporter, on tape:** What is taking so long?

**Jeff Pratt, Division of Water Director, on tape:** Well, as I said before this is a complex site. And we're just now coming to the point where we've got a handle on everything that they're going to be doing to address that problem. And those have to be taken into considering in the drafting and issuing of the permit.

**Heather Mayfield, biologist and environmentalist, on tape:** It seems like our Division of Water is basically catering this permit to what the airport is able to do. And that's not supposed to be how it's done. You make the industry follow those limits. You don't set limits based on what that industry can do.

**Jeff Pratt, Division of Water Director, on tape:** They do have limits and they will have limits in the new permit.

**Heather Mayfield, biologist and environmentalist, on tape:** They have to give the airport incentives for restoring the stream. There's nothing, nothing in their permit that said, 'In a year you have to reduce your discharge amounts by this much.'

**Hagit Limor, I-Team reporter, voice over video:** But Pratt says the state now plans to reopen that cleanup order it wrote five years ago to place goals and time frames for progress.

**Jeff Pratt, Division of Water Director, on tape:** If you look back to 1990 to where we are now we've come a long way.

**Hagit Limor, I-Team reporter, on tape:** You think the situation there is getting better.

**Jeff Pratt, Division of Water Director, on tape:** I think it's minimal but it is a little better.

**Heather Mayfield, biologist and environmentalist, on tape:** This is a dead stream. This is unacceptable.

**Jeff Pratt, Division of Water Director, on tape:** They are impaired principally from the standpoint of aquatic life. It is not a direct hazard to human health.

**Hagit Limor, I-Team reporter, on tape:** Ethylene glycol is a known carcinogen. It is harmful to the brain, the heart, the lungs, the liver, the kidneys and muscles. You don't think it's impacting humans at all?

**Jeff Pratt, Division of Water Director, on tape:** Well I, uh, I don't feel safe saying at, you know, with those you know.

**Hagit Limor, I-Team reporter, on tape:** Would you let your kids go wade in those streams?

**Jeff Pratt, Division of Water Director, on tape:** I wouldn't say, well, I wouldn't encourage them to.

**Heather Mayfield, biologist and environmentalist, on tape:** This is a classic case of enforcement gone wrong in Kentucky

**Jeff Pratt, Division of Water Director, on tape:** I would beg to differ from that. I don't think it's enforcement gone wrong. I think it's a very difficult, complex issue to address in a very timely manner.

**Hagit Limor, I-Team reporter, voice over video:** That's small consolation to Matt Bell: Kind of gross.

**Tom Brothers, neighbor, on tape:** Now I can't catch nothing.

**Deloris Burke, neighbor, on tape:** I just think that it's wrong.

**Hagit Limor, I-Team reporter, voice over video:** They say, if ten years isn't enough to fix a clear-cut source of pollution like here, what hope is there for the rest of Kentucky's streams?

**Deloris Burke, neighbor, on tape:** I think they're making a mistake to not look after what God gave us.

**I-Team bong and animaton out.**

**Hagit Limor, I-Team reporter, on set:** Remember, those streams flow into the Ohio river now normally, streams are in their best shape in the summer because spring rains wash out much of the pollution. But all the rain we had this year wasn't enough to let the streams bounce back.

The airport says its new systems go on line this fall and should improve the situation as soon as this upcoming winter. All this becomes even more important when you consider the expansion at the airport, a new runway for one. It will mean more planes and more deicing.

**Contact the I-Team**

Stephen Hill < [shill@wcpo.com](mailto:shill@wcpo.com) >

Hagit Limor < [hlimor@wcpo.com](mailto:hlimor@wcpo.com) >

Laure Quinlivan < [lquinlivan@wcpo.com](mailto:lquinlivan@wcpo.com) >