



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"

July 6, 2004

Sent via email and regular mail
Mr. Michael W. MacMullen
Airports Environmental Program Manager
Federal Aviation Administration
Chicago Airports District Office
2300 East Devon Avenue
Des Plaines, IL 60018
michael.w.macmullen@faa.gov

Dear Mr. MacMullen:

The Alliance of Residents Concerning O'Hare (ARECO) submits to the O'Hare Modernization Program Environmental Impact Statement record, the attached American Heart Association (AHA) study and public statement of April 5, 2004, regarding the substantial negative cardiovascular health impacts of particulate matter, especially fine PM (i.e., PM_{2.5}).

ARECO believes that this study and official statement by the AHA is importantly supportive of ARECO's previously stated positions regarding the need to include full and expansive investigation of the PM impact of such proposed O'Hare expansion on the public health and well-being, especially in consideration of the fact that the United States Environmental Protection Agency (USEPA) has recently confirmed and officially implemented its new PM_{2.5} standards and has just published its rulings on U.S. counties currently in non-attainment status of the new standards, the multiple-county Chicago area being one of them.

ARECO has been consistent in its positions in these regards, that O'Hare airport operations are a huge source of local PM as well as regional impacts due to the extreme mobility of airborne fine PM. We have also been outspoken on the issue of continued foot-dragging by the authorities to (1) officially determine, define and set standard limits for jet aircraft PM emissions (both primarily emitted and secondarily formed) and (2) that O'Hare airport (and Midway, DuPage, Palwaukee airports) should be treated as pollution emission "bubbles" for the purpose of pollution regulation (i.e., like a single source) due to their close proximity.

The public, including citizens in the areas surrounding Chicago's O'Hare airport, remain largely uninformed on the fact that there are no PM emission standards in existence for the hugely polluting jet aircraft flying over their heads each day, nor are they informed as to the fact that such PM emissions can and do travel great distances (tens-to-hundreds of miles) due to their very small size, nor are they substantially stimulated to action because of the invisible nature of such PM emissions. Yet, as the AHA study and statement says:

"Epidemiological studies have demonstrated a consistent increased risk for cardiovascular events in relation to both short-and long-term exposure to present-

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day concentrations of ambient particulate matter. Several plausible mechanistic pathways have been described, including enhanced coagulation/thrombosis, a propensity for arrhythmias, acute arterial vasoconstriction, systemic inflammatory responses, and the chronic promotion of atherosclerosis."

The FAA and the USEPA will be derelict in their duties to protect the public health without a full and complete vetting of the PM impact issues associated with O'Hare proposed expansion, and claims that such PM characterizations are not possible or are not within current legal mandates because measurements and standards do not exist for jet aircraft should be considered unjust and spurious to the matter.

The FAA and EPA are well aware, and have been so for years, that the existing aircraft "smoke number" standard is totally inadequate and does not at all characterize aircraft PM emissions, except as to their visible "smokiness". They are also aware that the International Civil Aviation Organization (ICAO), which drives world-wide standards, is dominated by aviation interests; said interests precluding an aggressive pursuit of adequate PM emissions characterization and standard-setting.

The FAA and the EPA should be embarrassed that they continue to allow airports and their massive associated operations to be considered as numbers of separate polluting elements rather than one, integrated "bubble" of pollution, as they in-fact consider most major industrial polluters, for which "new-source" emission rules pertain within any non-attainment area, as the Chicago area is for PM. This has the effect that each of the parts might be meeting the related pollution requirement but the whole (the "bubble") is still badly unacceptable. The FAA and the EPA should correct this in the subject EIS and treat the O'Hare operations as a single polluting bubble source, including any expected increases in associated vehicular traffic to/from the airport, as well as the other local airports mentioned above.

AReCO recommends that if the FAA cannot, in due time, accomplish proper and complete characterization of the expanded O'Hare airport PM emissions and the associated health impacts, based on up-to-date aircraft emission data, then they should delay any airport expansion approvals until such characterizations and representations to the public are possible. At a very minimum, PM calculations based on approximate formulations should be absolutely required. Such approximate formulas have been presented and used to varying degrees in pollution analyses over the years (see recent Oakland airport expansion documents for instance).

The EPA should be required to hold hearings on and approve such formulations for use in the O'Hare expansion EIS, including the ability to estimate PM_{2.5} levels out of any total PM emission content, both primary and secondary in nature (for all operations below 1000 meters altitude) and the application of expected negative health and mortality impact factors to any PM_{2.5} atmospheric concentration increases due to expanded operations.

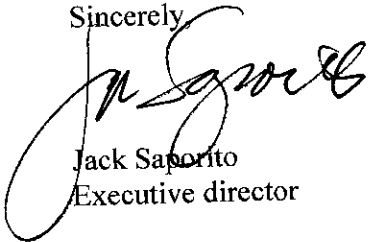
AReCO believes the AHA has done a great service to the public by providing their informative and compelling study and official statement and we believe that the FAA and the EPA should act in-kind to similarly protect the public by incorporating strong PM considerations into the O'Hare expansion EIS proceedings and decisions. AReCO continues to believe that any such expanded air operations should be removed to the maximum extent possible from highly populated areas, such as those surrounding O'Hare, to lower populated areas, such as to a new (proposed) "third airport" south of Chicago, in order to minimize negative public health impacts.

Additionally, AReCO believes that the federal government should follow its own findings not to expand O'Hare airport, to effectively relieve delays and for long-term transportation capacity needs (GAO-02-185 and later publications).

Please contact me if you have any questions.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Saporito", written over the printed name and title.

Jack Saporito
Executive director

c: U.S. Senator Peter Fitzgerald
U.S. Congressman Henry Hyde
Secretary Norman Y. Mineta
Bryan Manning
Ken Westlake
Eric Whitaker
M. Cass Wheeler