

O'HARE SCHEME FAILS AIR QUALITY CONFORMITY

According to documents filed on behalf of the "PEOPLE", by The Alliance of Residents Concerning O'Hare and Mothers Against Airport Pollution, overall there are serious problems with the "determination" and the O'Hare airport expansion plan does conform to the state's plans to achieve legal "attainment" status for Chicago area ozone and fine particulate matter (PM2.5) pollution.

On May 20th the Federal Aviation Administration (FAA) released a Draft General Conformity Determination for the O'Hare "Modernization" Environmental Impact Statement, for which the PEOPLE had to rush to file comments within the short 30-day due date, June 20, 2005.

The PEOPLE found:

1) There is no current State Implementation Plan (SIP) for PM2.5: The FAA interprets this to mean that there is therefore no significant PM2.5 issue. Indeed, there is a serious issue and the FAA's and Chicago's attempt to just wave it off, in the hope that massive expansion can be hurriedly put in place before the Illinois EPA (IEPA) creates an action plan, is totally unacceptable. Additionally, we have clearly stated before and here that the FAA's PM2.5 inventory is wrong and must be corrected before any OMP EIS and Conformance approvals are given.

2) The PEOPLE have previously stated that there are huge inconsistencies in the OMP air emissions inventories, compared to the previously calculated Illinois EPA State Implementation Plan values, for the ozone precursors, nitrous oxides (NOx) and volatile organic hydrocarbons (VOC's) and this "determination" document confirms that (Table 5-23). We reject the current IEPA position that these "new" numbers (some 600% lower!) must be correct and will be incorporated into a new SIP. We reject acceptance of these numbers, both in the FAA's EIS and by the IEPA, until our FAA-rejected request for an independent third party audit is satisfied.

3) Another major problem is that the existing IEPA ozone SIP may already be in serious trouble, as its main plan to reduce precursor emissions depended heavily on reducing electric power plant NOx emissions, including those being blown into the Chicago non-attainment area from downstate, and recent federal actions have potentially stifled those plans. Thus, this "determination" has been made against a possible now-unacceptable Illinois SIP.

4) OMP calculated emissions inventories are worthless without operational level guarantees. The "determination" of conformance assumes that O'Hare flight operations will only increase by about 20% (to 1.2 million operations per year), yet the newly configured airport, as proposed, would have a maximum capacity exceeding 2 million operations per year (with existing delays) and without exceeding FAA safety requirements), with no controls in place to prevent that level of operations. The PEOPLE restated that either controls to limit the operational level to that analyzed (1.2 million ops/yr), with resulting emissions inventories, or reanalysis of inventories to the maximum capability is required before any determination of "conformity" can be made.

While these issues can be very technical, the bottom line is this: "Even without the aircraft toxic emissions, O'Hare emits about as much pollution as a medium sized city; directly affecting the health of millions of people. This FAA-industry scheme fails to protect the health and general welfare of those people, especially those downwind of the airport; and yes, especially in the city of Chicago. The public's health is in serious jeopardy and especially our children, the elderly and infirmed need to be protected," states Jack Saporito, spokesperson for the two organizations.

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*editor's Note: AReCO-MAAP filing document: <http://www.areco.org/Conformity.pdf>