



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, Washington 98101

Reply To  
Attn Of: OAQ-107

Mr. Dennis Ossenkop  
Federal Aviation Administration  
Northwest Mountain Region  
1601 Lind Ave, S.W.  
Renton, Washington 98055-4056

JUN 06 1996

Dear Mr. Ossenkop:

This letter supplements our March 18, 1996 comments on the Final Environmental Impact Statement for Proposed Master Plan Update Development Actions at Seattle-Tacoma International Airport (final EIS) and it details our concerns with this and adjacent projects regarding air quality. Our review is in accordance with our responsibilities under Section 309 of the Clean Air Act (CAA) and the National Environmental Policy Act (NEPA).

We continue to have concerns about future air quality around the airport as well as the air quality analysis in the final EIS. Our comments are based primarily on conformity with the State Implementation Plan as required by the Clean Air Act (CAA) and cumulative impacts from other projects around the airport.

The conformity analysis in the final EIS is a draft conformity analysis. While we have been discussing this with FAA and other agency representatives in recent weeks, the draft EIS did not contain such an analysis and therefore this is the first formal opportunity EPA has had to comment on this issue. The intent of our comments is to provide the information needed for a final conformity analysis that will meet the requirements of the CAA.

The conformity provisions of the CAA mandate that any federal agency proposing a project in a non-attainment or maintenance area for air pollutants must demonstrate that the project conforms with the State Implementation Plan for pollutants of concern. Because with the project there is an increase in the severity of exceedances of the National Ambient Air Quality Standard for carbon monoxide (CO) at two intersections near the Seatac Airport, we do not support your conclusion that the project conforms with the SIP.

To conform with the SIP, the final conformity analysis should

include a conformity analysis that includes: (a) all reasonably foreseeable direct and indirect emissions of pollutants of concern for the year of peak construction



emissions prior to 2000<sup>1</sup>, the years 2010 and 2020; (b) emissions from sources such as construction and haul vehicles, associated increased congestion; and (c) mobile emissions associated with the use of regular gasoline.

2. An air quality analysis that compares the "no project" and "with project" air quality impacts for the years stated in item one above.
3. Appropriate mitigation measures--if the "with project" scenario results in an increase in either the frequency or severity of exceedances above the levels in the "no project" scenario, measures should be developed to mitigate these impacts.
4. Commitments from appropriate governmental entities to conduct adequate, specific and enforceable mitigation measures that will prevent any increase in the severity or frequency of predicted exceedances of the National Ambient Air Quality Standards (NAAQS). Since the increased modeled exceedances occur at intersections outside of airport property, it may be necessary to obtain commitments to conduct these mitigation measures from other agencies or local authorities.

We have discussed our comments with the Washington Department of Ecology (WDOE) and the Puget Sound Air Pollution Control Agency (PSAPCA). All three agencies believe that monitoring is needed to assess the actual air quality near the airport and to determine the measures needed to mitigate any adverse air quality impacts from the project. Accordingly, we support the comments set out in WDOE's and PSAPCA's letters. In particular, we support the steps identified in PSAPCA's comment letter for establishing a monitoring program, which could be used for subsequent modeling and air quality analysis.

EPA understands that several major projects are proposed for the area around the airport, including the extension of SR 509 which will connect to the airport at the south end. We are concerned that cumulative air quality impacts from these projects are not understood. For this reason, we believe the Record Of Decision (ROD) should contain a more comprehensive cumulative impacts analysis, including a commitment to working with other agencies to implement a short-term and long-term air quality monitoring program that will accurately reflect baseline conditions and reflect the changes in air quality as several proposed projects in and around the Seatac Airport are developed.

We expect that the FAA and the Port of Seattle will address these issues as well as provide commitments to work with regional and local authorities to ensure that air quality standards are not violated around Seatac Airport. EPA, along with WDOE and PSAPCA, is committed to continue to work with FAA and the Port on developing appropriate monitoring, modeling and air quality analyses.

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<sup>1</sup> Because conformity requirements for "worst case analysis" differ from NEPA requirements, analysis of emissions during the year of highest impact is required.

Detailed comments are enclosed, and if you have any further questions please contact me at (206) 553-1234 or Anita Frankel, Director of the Office of Air Quality at (206) 553-0218. Thank you for the opportunity to review this document.

Sincerely,

  
for Chuck Clarke  
Regional Administrator

Enclosure

cc: Doug Brown, Ecology  
Paul Carr, Ecology  
Barbara Hinkle, Port of Seattle  
Gene Peters, Landrum and Brown  
Mary Vigilante, Synergy Consultants  
Dennis McLerran, PSAPCA  
Brian O'Sullivan, PSAPCA