



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

JUN 23 1997

Reply To
Attm Of: OAQ-107

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

Re: Final Supplemental Environmental Impact Statement for the Proposed Master Plan
Update Development Actions at Seattle-Tacoma International Airport

Dear Mr. Ossenkop:

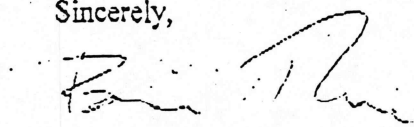
The Environmental Protection Agency has reviewed the subject environmental impact statement (FSEIS) in accordance with our responsibilities under Section 309 of the Clean Air Act (CAA) and the National Environmental Policy Act. The FSEIS assesses the impact of development of a third parallel runway as well as other airport improvements.

Over the past two years, we have worked with the Federal Aviation Administration (FAA), the Port of Seattle (POS), the Washington State Department of Ecology (Ecology), the Puget Sound Air Pollution Control Agency (PSAPCA) and local citizen groups to attempt to resolve issues of concern primarily regarding air pollution and noise impacts from airport development options. While the process has been time consuming, we believe the collective efforts of the agencies have resulted in meaningful disclosure of these environmental effects.

In our March 31, 1997, comments on the *Updated Draft Air Quality Conformity Determination*, we raised questions about the air quality analysis for the transportation conformity determination. Some of our questions related to the modeling of mobile source emission factors and annual aircraft operation emissions. We also expressed concern about the calculations of the construction emissions. Based on our review of the FSEIS, our concerns have now been adequately addressed and the *de minimis* thresholds have not been exceeded for general conformity under the CAA.

If you have any questions about our review, please contact me at (206) 553-2963, Claire Hong of my staff at (206)553-1813, or John Bregar at (206) 553-1984.

Sincerely,


Anita Frankel, Director
Office of Air Quality

cc: Doug Brown, Ecology
Barbara Hinkle, POS
Dennis McLerran, PSAPCA



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

REPLY TO
ATTN OF: WD-126

Barbara Hinkle
Port of Seattle
Seattle-Tacoma International Airport
P.O. Box 68727
Seattle, WA 98168

Re: Proposed Air Quality Modeling Protocol for Seattle-Tacoma International Airport

Dear Ms. Hinkle

In response to your November 16, 1994 letter to Jon Schweiss in our Environmental Services Division, we have provided the following comments on the proposed air quality modeling protocol for the Master Plan Update at Seattle-Tacoma International Airport.

Our contact for this air quality analysis has been Mr. Gene Peters of Landrum & Brown. We met with him in October to discuss the modeling protocol and he subsequently sent us a written memorandum for our review which was enclosed with your November 16th letter.

Our comments are as follows:

- 1) The protocol seems to suggest that both a screening-level and a refined-level analyses will be undertaken. It is not clear why both would need to be undertaken. Normally, if problems are identified in a screening assessment, the situation is evaluated further using more refined techniques. EPA recommends that the protocol include a list of criteria which would signify if and when a refined analysis is warranted.
- 2) EPA disagrees with the approach proposed for defining receptors to be evaluated in a refined analysis. Because the screening procedure proposed is independent of local meteorological conditions, locations of concern identified using this technique may not (probably will not) coincide with areas of maximum concentrations identified using a more refined technique with local meteorology. We recommend that the screening approach be used to indicate whether the potential for air quality problems exists. If it does, this would trigger the need to conduct a refined analysis. Receptors used in the refined analysis should be selected to divulge maximum air quality impacts in ambient air (independent of locations indicated in the screening assessment) to evaluate compliance with applicable NAAQS. The

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evaluation of impacts at additional specific "sensitive" receptor locations may also be warranted. —

3) The November 8, 1994 memo from Gene Peters of Landrum and Brown indicates that dispersion modeling in the vicinity of selected roadway intersections will be conducted using the CAL3QHC model. We recommend that a description of this component of the work be incorporated into the modeling protocol.

4) Phone discussions with Gene Peters have revealed that the Port is currently evaluating other projects that could have impacts that should be included as part of the analyses related to the 3rd runway project. We recommend that the protocol identify these projects and how they will be integrated into the analyses for the 3rd Runway EIS.

Thank you for the opportunity to review this proposal. If you have any questions about these comments, please contact either John Bregar in our Environmental Review Section at (206) 225-1984, or Bill Ryan in our Environmental Services Division at (206) 553-8561.

Sincerely,

Joan Cabreza
Joan Cabreza, Chief
Environmental Review Section

cc: Gene Peters, Landrum & Brown

not accomplished
Hotel
CTI
Prison



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105

July 21, 1995

Shirley Edwards, Esq.
Federal Aviation Administration
P.O. Box 92007
WWPC
Los Angeles, CA 90009-2007

Dear Shirley:

This letter responds to your inquiries with respect to Clean Air Act (CAA) general conformity determinations and certain FAA programs and is a follow-up to our previous telephone conversations. Specifically, you inquired about the applicability of conformity to aviation reuse activities and military base closures.

Section 93.150(c)(1) of EPA's general conformity regulations (40 CFR Part 93) grandfathers an action if NEPA has been completed for the action by January 31, 1994 (FEIS or FONSI). This grandfather provision does not mean that a conformity determination does not have to be made for the action. Rather, it provides only that such a determination does not have to be made pursuant to these regulations. A conformity determination is still required but can be made under the statutory criteria of § 176(c) of the CAA (see definition of "conformity"). Thus, if an FEIS for a base closure and airport reuse was issued by January 31, 1994, but no conformity determination was ever made for the reuse activity, any conformity determination required because of a subsequent federal action would not have to be made under the regulations but could be made under the statutory criteria.

Regarding FAA approvals of airport layout plans (ALP), however, the FAA may not have to make a determination at all. I understand that an ALP, which consists of the proposed location for the runways, terminals, and other associated airport structures, is submitted to the FAA for approval only because such approval is a precondition before an airport developer can apply for subsequent FAA funding. I also understand that ALP approval does not mean that an airport will be built with federal funds. Therefore, EPA would concur with the FAA if it decided not to make a conformity determination on ALP approvals because such approvals would not cause any new emissions (see §93.153(b)).

If, at a later date, the FAA receives an application for funding a project with ALP approval, the FAA would have to make a conformity determination before funding is approved because this action would cause new emissions by allowing the development to go forward. If this funding approval triggers NEPA for the FAA, the agency would have to make its conformity determination under the conformity regulations because the grandfather provision would no longer be applicable. If, for some reason, no new NEPA documentation is undertaken, and a previously issued NEPA document was approved prior to January 31, 1994, the FAA could avail itself of the

grandfather provision and make its conformity determination pursuant to the statute. In addition, the FAA could adopt DOD's previous conformity analysis, if any. Section 93.154 allows adoption of previous conformity analysis but does not exempt an agency from having to make its own determination.

Finally, I understand that under the Surplus Property Act, anytime a federal agency wants to transfer property outside the federal government for airport purposes, the FAA must determine that the property is essential, suitable, or desirable for a public airport. I also understand that because of this FAA approval, certain conditions (such as the airport cannot discriminate among carriers) are included in the deed from the federal agency (not the FAA) initiating the transfer. Since transfers of ownership in land by the federal government are exempt from the conformity requirements (see §93.153(c)(2)(xiv)), it is EPA's opinion that the FAA Surplus Property Act approval associated with the land transfer would also be exempt from conformity.

If you have any further questions regarding these matters, please do not hesitate to call me at (415) 744-1322.

Sincerely,

Robert E. Moyer
Senior Assistant Regional Counsel

cc:

Robert Pallarino, EPA

*'They're trying to make us out
to be some kind of
environmental monster. In
fact, we're fairly clean and
green as far as airports go.'*

PORT SPOKESMAN TERRY FINN

one of several "air-flow units" that help separate contaminants from water that enters the system. The air line had not been replaced since the system was installed in 1965, the letter said, and some "improper operations and maintenance" of the system have existed since that long.

Fitzpatrick said it is true that the industrial-waste-water system has been plagued by "management problems in the past," including late filing of periodical reports, and instances where airline workers were dumping cleaning solvents into the system. But Fitzpatrick added that there are no serious pollution problems at the airport.

The Port concedes the aging system needs fixing and is planning to spend \$20 million to \$40 million to upgrade or replace it.

The current system relies on a series of slot drains near the terminal gates, which catch de-icing chemicals, soap, oil, fuel and other fluids before they can get into the storm-sewer system.

The allegation about raw sewage ending up

Airport not big polluter, state says

Airport

CONTINUED FROM B 1

in Des Moines Creek is true, but it's likely coming from raccoons, opossums or other animals — not people flushing toilets at Sea-Tac — said Debbie North, an ecology official familiar with the Port's sanitary sewers

"There is no evidence that it is coming from the Port's sanitary (sewer) system," North said. The amount of fecal matter in the creek is not harmful, she added.

Michael Sheyne, a Port planner, said the sanitary lines are tested every three months to make sure they aren't leaking or crossed with the storm-water system, which empties into Miller Creek to the north and Des

Moines Creek to the south.

Suzanne Albright, who works with Wiley Brooks Co., a public-relations firm hired by third-runway opponents, said the pollution problems at Sea-Tac are real and should cause concern in nearby communities.

"Our point is that the Port has been saying all along that there are no pollution problems," Albright said. "What we're saying is that the Port has not been up front about this stuff."

North, who has no stake in the argument, said both the Port and opponents of the third runway are "engaging in hyperbole" about the Port's environmental record. "The truth," she said, "is probably somewhere in the middle."

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However, the applicability criteria for these rules are not exactly the same. The transportation conformity rule applies to each and every project regardless of size. In contrast, the general conformity rule only applies to projects that emit the pollutant of concern in high levels. These levels are specified in Section 51.853 of the general conformity rule, on page 63249. For example, Seattle is a nonattainment area for ozone, carbon monoxide and particulate matter, therefore the ozone, carbon monoxide and particulate matter emission levels in 51.853 apply. Since ozone has numerous applicability thresholds, looking at ozone may be useful. Seattle is designated as a marginal nonattainment area for ozone, but is not in an ozone transport region. Therefore, any federal agency that wants to conduct a project that emits more than 100 tons per year of ozone would have to determine that the project conforms to Washington's State Implementation Plan before it could conduct that project.

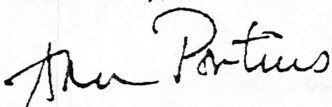
You should also note that it is possible that a project may be subject to both the transportation and general conformity rules. In that case, the federal agencies responsible for that project would have to determine whether the project conforms to the purposes of the SIP under the requirements of both the transportation and general conformity rules.

If you have any questions about the conformity rules, please feel free to call my staff. If you have questions on transportation issues, please contact Michael Lidgard at 553-4233. If your questions relate to the general conformity rule, please contact Claire Hong at 553-1813.

I am also enclosing copies of records that are responsive to your request. The cost of responding to this FOIA request in the All Other Request category is \$6.90 (46 pages at 0.15 per page.) No charge is made for the first 100 pages of duplication or for the first two hours of search time. However, as the total amount due is less than \$25, the fee is waived as de minimis.

This concludes the EPA Region 10 response to FOIA request number 10-RIN-01114-94.

Sincerely,

for 
Philip G. Millam, Chief
Air & Radiation Branch

Enclosures (1)

08.17.95 01:02 PM

*NTWRK ENGR&JURIS SEP

P02

00-00-95 01:58AM

FROM CONG R. TATE /FED WY TO 2485539

P003

08/08/95 08:20 FAX 206 533 0149

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Their findings are included in a January 1995 report. The development of the final EIS has been contracted by the FAA and the Port of Seattle to a Chicago firm by the name of Landrum and Brown, Inc. A draft report is in circulation explaining the impacts of a third runway, but does not contain any air quality monitoring it contains merely modeling data.

In answer to your second question, aircraft engine emission certification standards were established by EPA and are enforced primarily by the Secretary of Transportation Federal Aviation Administration. Other air quality regulations dealing with such issues as transportation and gasoline supply stations are enforced primarily by PSAPCA and WDOE with EPA as the overseeing agency. EPA would provide enforcement of the regulations if PSAPCA and WDOE requested it, or chose not to provide the enforcement themselves.

Should you wish to discuss this matter further, please do not hesitate in calling me at (206) 533-4198.

Sincerely,

Michael A. Bussell, Acting Director
Air & Radiation Programs

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TABLE II.3-1

Environmental Impact Statement
Master Plan Update

PRELIMINARY AIRSIDE SCREENING ANALYSIS

	1A	1B	3	4A	4C	5	6
Air Inventory (tons per day in year 2020)	13.86	13.86	10.18	6.82	6.82	5.86	4.86
Carbon Monoxide	6.82	6.82	6.49	6.19	6.19	6.11	6.02
Nitrogen Oxides	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Particulate Matter (PM10)	0.33	0.33	0.28	0.23	0.23	0.22	0.20
Sulfur Oxides	0	0	4.2	5.4	5.0	5.4	27.7
Wetland Impacts (acres)	0	0	1	7	2	7	30
100-Year Floodplain Impacts (acres)	0	0	2,760	2,970	2,760	2,970	12,240
Stream Relocation (linear feet)	0	0	12	17	13	17	28
Earth Impacts (million cubic yards)	0	0	330	410	400	420	700
Properties	0	0	260	330	300	320	500
Homes	0	0	0	0	0	0	1
Parks	0	0	1	1	1	1	3
Historic/Cultural sites	0	0	0	0	0	0	1
Schools	0	0	0	0	0	0	1

Master Plan Update Airside Options

Impacts presented in this table were prepared as a part of a preliminary screening, based on initial data collection. As was noted in presenting this data in July 1994, the base information was later updated by this Environmental Impact Statement.

Source: Landrum & Brown, Shapiro & Associates, and Gambrell Urban - Population and dwelling units using 1990 census.

- Option 1A/B - Do-Nothing
- Option 2 - Commuter Close Spaced - this option was not evaluated due to its similarity to Option 3.
- Option 3 - Commuter Dependent
- Option 4A - Programmatic Baseline
- Option 4B - Programmatic Staggered - this option was not evaluated due to its similarity to Options 4A, 4C and 5.
- Option 4C - 7,500 Foot - Staggered
- Option 5 - Dependent - Maximum Length
- Option 6 - Independent - Maximum Length

*by 2020 will have
the a...
while are the
patches...*