

1989 DOE <sup>5</sup>	360,000 <sup>6</sup>	2066	- 225,200	-116
1993 Chicago O'Hare <sup>7</sup>	383,362 L/T/O /year	4650	+ 23,362	+2584

I would tend to believe that if you increase the number of yearly polluters, the amount of pollution would also increase. But this is not the case with these three documents. The annual tons per year of NOx has gone up and down arbitrarily regardless of the number of aircraft takeoffs/operations.

For the SEIS 2005 condition at 445,000 annual operations, there are 565 less tons per year of NOx over the DEIS 2020 case although the DEIS used only 1131 less annual operations. If the documents had shown consistency between the numbers evaluated, there would actually be an increase in NOx between the Do-Nothing condition existing and With-Project scenario of over 628.1 tons per year with the addition of 59,305 possible airplane operations if I consider the original numbers and compare to the most recent. However, the SEIS, I believe, has biased the outcome of their analysis and managed to be below de-minimus levels. I do not trust this most current analysis since it is so different from previous and independent analyses done in the past. While there is a significant increase of airplane operations, the increase of NOx in tons per year is insignificant and where the inventory is increased considerably such as the Case 2 + 10%, no dispersion analysis is conducted so we do not know what additional exceedances might occur.

Compare the increase in operations in 2010 between the DEIS 2010 scenario at 408,040 and the SEIS 2010 at 474,000 or an increase of 65,960 annual aircraft operations but one less ton per year of NOx. In the SEIS 2010 Case 2 condition at 521,400 annual operations there is 542.4 less NOx than the 1991 Ecology study even though there are 161,400 more aircraft operations.

I have used the average fleet mix, not the adjusted fleet the consultant uses for increases in peak hour takeoffs, gathered an average number from the most consistent figures in the tables above and increased the NOx incrementally based upon increases in aircraft operations. There is no other way to obtain examples from the data without re-running the model and there is not time to do this in the brief comment period. The new figures are given in the tables as below:

1994 existing [baseline]	384,564 annual operations	1378.30 tons/year NOx
FEIS 2010 [baseline add]	408,040 (23,476 more)	1523.50 + 145.2 tons/year or equal to 0.0062/plane
SEIS 2010 [example 1]	474,000 + 65,960 x .0062	1932.45 + 408.9 TPY
SEIS Case 2 + 10% [example 2]	521,400 + 47,400 x .0062	2226.33 + 293.8 TPY

<sup>5</sup> Department of Ecology Seattle Tacoma International Airport; Air Pollutant Contribution May 91 pg. 16

<sup>6</sup>1992 Flight Plan Project Final EIS 1990 aircraft operations

<sup>7</sup>NRDC Flying Off Course October 1996 page 44 (Attachment #1, selected pages)