



Flight Plan Project  
Post Office Box 68727  
Seattle, Washington 98168

February 18, 1992

Flight Plan Project Final Report DPEIS

After a careful review of the Puget Sound Air Transportation Committee's Flight Plan Project Draft Programmatic Environmental Impact Statement we have two major concerns about the adequacy of the air quality element.

First, no attempt is made to evaluate the impact of motor vehicle or aircraft emissions on air quality in the vicinity of the airport(s). Second, there is no documentation of the methodology or emission factors used to prepare this report, thus making it impossible to verify the results.

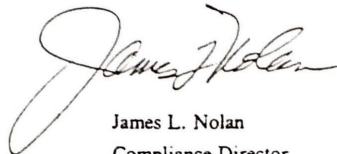
Motor vehicle emissions appear to be based solely on the average trip length to the airport(s) from each of the Puget Sound Regional Council's Forecast Analysis Zones. This implies that people will be able to use the nearest airport to board a flight to their destination; it also completely ignores the impact of traffic congestion on local air quality. Dispersion modeling is required in order to properly assess this impact and was not conducted.

Similarly, the impact of aircraft operations was limited to a cursory evaluation of regional air pollutant emissions. Although the model used to calculate these emissions is also capable of estimating their impact, no dispersion modeling results appear in the report.

In addition, existing air quality around the airports was not addressed, even though a comparison between the various flight plan alternatives and present conditions would seem to be fundamental. We believe estimates of interim conditions between now and the year 2020 are also relevant.

For the above reasons we believe this air quality analysis is totally inadequate for making an informed decision.

Sincerely,



James L. Nolan  
Compliance Director

JLN:ls

Air Pollution Control Officer

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PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY \* KITSAP COUNTY \* PIERCE COUNTY \* SNOHOMISH COUNTY

May 26, 1992

Chuck Clark, Director  
Department of Ecology  
Mail Stop PV-11  
Olympia, WA 98504-8711

343-8800

Dear Mr. Clark:

De-icing at Sea-Tac Airport

Our Board of Directors has requested that the Agency evaluate potential air quality issues with regard to the use of ethylene glycol as a de-icing agent at Sea-Tac Airport. Discussions with the Port of Seattle have disclosed that antifreeze used at the airport to de-ice the aircraft and runways is classified as a hazardous waste if greater than 10% of the material is ethylene glycol, and therefore is subject to all applicable requirements of Ecology's Dangerous Waste Regulations. It is our understanding that wastewater runoff from the Port is directed to the wastewater treatment plant and eventually discharged to the Sound. Ethylene glycol is diluted in the process, but not treated. It is also our understanding that the discharge from the wastewater treatment plant is permitted by the state.

Because of the low vapor pressure of ethylene glycol, it is unlikely that significant quantities of ethylene glycol are volatilizing into the atmosphere. Therefore, our Agency does not consider the de-icing problem an air toxics issue.

Discussions with your staff (Dave Davies and Steve Chick) have confirmed that aircraft de-icing was not discussed in Ecology's TIM No. 90-1 in order to avoid confusion within the regulated community, and that aircraft de-icing will be addressed in a separate document.

We would appreciate a short summary of how aircraft de-icing is regulated at Sea-Tac airport, as this will assist us in answering questions on this subject. Also, any further information on the release of a TIM that will address de-icing would be appreciated.

If you have any questions, feel free to contact me. The staff person who is responsible for matters related to Sea-Tac is Margaret Corbin. She can be reached at 296-7469.

Sincerely,

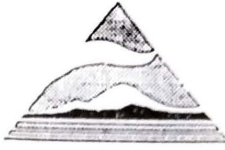
Anita J. Frankel  
Air Pollution Control Officer

MLC: shw  
cc: Maggie Corbin

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ANITA J. FRANKEL, Air Pollution Control Officer  
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## Memo

Date: February 2, 1993  
To: Board of Directors, Puget Sound Air Pollution Control Agency  
From: Anita J. Frankel  
Subject: PSAPCA's Role Regarding Airport Air Quality

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### Honorable Members:

The Board of Directors of the Puget Sound Air Pollution Control Agency (PSAPCA) directed the staff to assess air quality issues at Sea-Tac Airport and determine the role PSAPCA should play at all airports in our jurisdiction. This report summarizes PSAPCA's role in regulating airports located within our jurisdiction.

### Review of Environmental Impact Statements:

It is clearly the role of PSAPCA to review any Environmental Impact Statement (EIS) for airport projects which may impact the air quality in our region. However, the Port authority has the responsibility to approve or disapprove the EIS since the Port is the lead agency. Agency staff will provide technical assistance to the party preparing the EIS, and will identify shortcomings in the EIS. The staff will participate in the process as early as possible, including review of documents developed in preparation for writing an EIS. For example, the staff reviewed and commented on the Puget Sound Air Transportation Committee's Flight Plan Draft Programmatic Environmental Impact Statement for the Sea-Tac Airport expansion project.

Specific issues that may need to be addressed when evaluating an EIS with significant air quality impacts include procedures for queuing aircraft before takeoff, the use of alternative fuels for ground vehicles used at the airport, reducing vehicle traffic around the airport, and techniques used for fueling aircraft and ground vehicles.

### Basic Equipment and Control Devices Located at Airports:

Agency staff will perform annual inspections of all registered equipment on airport properties to determine compliance with Agency's Regulation I, II and III. This includes equipment registered to tenants at the airport as well as the airport itself. Registered equipment includes gas storage tanks, wastewater treatment plants, and spray booths. Violations of any regulation will be treated in the same manner as with any other registered facility in our jurisdiction.