At the first meeting I showed you the environmental impact statement for the third runway EIS and then talked about how the air quality model input had not been included in that document. After opening up the model input I found the figures did not agree with published data taken from certification of aircraft engines or standard calculations from EPA. Examples of differences in the EIS were:

- 1) Time in mode was lower
- 2) Aircraft emission factors were lower
- 3) All particulate data for all jet aircraft had been eliminated from the model

EPA data from new engine certification is published in AP-42 with engine type and corresponding emission factors in kilograms or pounds per hour per engine. Accordingly, the FAA's standard airport emissions model called EDMS uses this data as input. I am supplying you with a letter from FAA explaining how the FAA takes the data from EPA and also explains how the default settings within the model are open for users to enter airport specific data. Please notice that the figures the FAA used for the third runway project are smaller in every case for aircraft when compared to AP-42. Please also note that the recommended taxi in/out queue time in mode for all aircraft was set at 11 minutes rather than the recommended 26 minutes. Two experienced pilots who have flown Sea-Tac and other airports both assert this is not realistic and the 11 minutes would only happen if there is no other traffic on the airfield.

I made the claim that all particulate data for all jet aircraft had been removed from the model prior to the third runway's use of EDMS. I asked FAA for an explanation of this removal and received a response that the data was found to be inaccurate. At the end of the third runway EIS process, no data had ever been entered to estimate particulate emissions from jet aircraft and the total predicted impact through 2020 for the project for all jet aircraft operations remained at zero which is false.

In 1991 Department of Ecology ran a screening analysis using the same model and found the particulate inventory to be over 60 tons per year for just jets. Contrast this to 3 years later for the draft EIS for the third runway at a tiny fraction of 0.23. In 1991 DOE had predicted violations of the federal Clean Air Act for particulate matter. In 1994 the FAA and Port of Seattle estimated zero impact.

Unlike the EIS, Department of Ecology had included their input into the model in their document and I've enclosed a sample that shows it agrees with EPA's AP-42 and EPA's recommendations for time in mode.

Please know that if the model input had not been dramatically altered, the third runway project would never have been able to be approved, funded or supported by FAA. Even with the drastically underestimated impacts, it still violated the federal standards. So we have been living with a terrible threat to our public health because of manipulated and falsified data and now we are sick. This is a public outrage and tragedy.

Dete Waghn



U.S. Department of Transportation

Federal Aviation Administration Northwest Mountain Region Colorado, Idaho, Montana Oregon, Utah, Washington Wyoming 1601 Lind Avenue, S. W. Renton, Washington 98055-4056

December 13, 1995

Mrs. Debi L. DesMarais 24322 22nd Ave. S. Des Moines, WA 98198

Dear Mrs. DesMarais:

This is in response to your letter of November 13, 1995. I will address your questions in the order asked.

1. This is the type of question that should have been asked as part of your comments on the draft EIS. I believe it would be improper to answer this question since the draft EIS comment period has long since closed. Addressing this type of question, at this time, would be viewed by many as preferential treatment or selectively re-opening the comment period.

2. through 5: Are general technical questions about EDMS. The following answers have been provided by the Office of Environment and Energy in our Washington, D. C. Headquarters office:

Have the emission rates contained within the model been approved by EPA? If not, were previous rates approved? When? Is the EDMS model approved by EPA?

On July 20, 1993, the Environmental Protection Agency (EPA) formally accepted EDMS as a "Preferred Guideline" model for use at civil airports and military air bases. The emission rates contained within EDMS come from EPA's AP-42 <u>Compilation of Air Pollutant Emission Factors</u> and the FAA Engine Emission Database (FAEED).

If the emission rates come from manufacturers specifications, who exempted aircraft engine manufacturers from estimating particulate matter (smoke number)? If FAA exempted, do manufacturers estimates exist? Are they available for viewing?

The particulate matter (PM-10) come from EPA's AP-42 database. The aircraft engine manufacturers are required to estimate smoke number for certification purposes. For further information, please contact Richard Wilcox at EPA, Ann Arbor, Michigan.

Does FAA update emission data periodically with newer aircraft engine emission rates? If so, can those rates be substantiated with appropriate documentation?

The FAA updates aircraft emission data as information becomes available. The EDMS model is flexible in allowing users to add new aircraft emission data into the database and to override defaults for more detailed or site specific values.

"Expect Excellence"

Since there is such disparity between the 1985 EPA AP-42 engine emission rates and today FAA EDMS rates, can the reduction in CO and HC by approximately 2/3 be substantiated?

The emission rate in EPA's AP-42 and EDMS are very close. We are in the process of updating the EDMS database to incorporate data from the recent update of the AP-42 database. If Ms DeMarais can specify how she used the EDMS model to calculate the emission rate, then we would be willing to look at the cause of any disparities.

A further contact for EDMS questions is Ms Diana Liang at 202-267-3494.

Sincerely, Den Orsentrop

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Dennis Ossenkop Environmental Protection Specialist

As indicated on page D-38, a separate analysis also confirmed that even if the average annual fleet (i.e., all aircraft types in use) and the highest peak hour level of departures, maximized peak hour departure queue time could occur at the same time, the change in pollutant levels would be minimal. This analysis was also conducted for the future annual aircraft fleet. Except at South 154th Street, all pollutant concentrations would still be below the AAQS.

The test case analysis indicated that increased departure queue time would result in increased CO levels, while increased aircraft departures would result in increased NO_2 levels. However, as observed by historic FAA data, peak hour departures and peak hour queuing are mutually exclusive and do not occur at the same time. Nonetheless, the analysis indicates that all concentrations except at South 154th Street would be below the AAQS.

<u>Comment 14</u>: Commentor questioned the time-in-mode/taxi and requested a clarification of these assumptions.

Response: Appendix D, page D-5 discusses the determination of taxi-in and taxi-out times. Actual field observations were used to estimate the amount of time an aircraft spends in different modes, such as apron idling, taxiing, and idling at the end of the runway. Taxi-in and taxi-out times were based on a determination of existing airfield taxi distances and aircraft speed for seven different points on the airfield. The addition of the South Aviation Support Area (SASA) and the proposed terminal improvements were modeled in combination with the proposed third parallel runway. The average taxi distance was then calculated by applying the existing or future runway end use based on a constant aircraft taxi speed of 15 knots.

The use of the proposed new parallel runway for departures is expected to be limited for the reasons discussed in the Final EIS. Accordingly, taxi times are not expected to be substantially different over existing conditions (i.e., taxi times take into consideration runway use). For the existing conditions, each aircraft operation is expected to experience approximately 8.11 minutes of taxi-time (for both arrival and departure operations).

<u>Comment 15</u>: Commentor stated that the EDMS write-up in the EIS should have noted that all particulate data for jet aircraft had been removed.

<u>Response</u>: As stated in the EIS in Appendix R, response to comment R-10-2, the aircraft emission rates included in the EDMS for particulates was revised by the FAA to include only that data for which reliable particulate information is known. Accordingly, the most current EPA approved version of the EDMS model (which was used in preparing the analysis for the Final EIS) includes little information on particulates in comparison to older versions of the model. The FAA has not updated the particulate data because no reliable data on aircraft particulate emissions is available.

<u>Comment 16</u>: Requested an explanation of why the aircraft emissions in the Final EIS are less than those presented in the Draft EIS.

<u>Response</u>: As noted in Appendix D, page D-34, in re-evaluating the air quality analysis, all input assumptions used in preparation of the Draft EIS were re-examined. As part of that review, the hourly aircraft temporal factors used in the Final EIS analysis for the existing condition were revised to reflect hourly departure activity based on the FAA's Capacity Enhancement Study. The revised

AIRCRAFT EMISSIONS RA	TES OR TOTAL GS	E EMISSION PER	LANDING/TAKEC	FF CYCLE
Geographic mode G	UEL.CD 13	Geomode 1 - Tal Geomode 2 - Run Geomode 3 - Tou Geomode 4 - Tau Geomode 5 - Gru Geomode 6 - Tes Geomode 7 - Clu Geomode 8 - App	nway Queue (uch & Go (ki in/out (nd supp equip st (imb (kg/hr/eng) kg/hr/eng) kg/hr/eng) (kg/LTO) (kg/LTO) kg/hr/eng) kg/hr/eng)
Time in mode T	IMEMOD 2.89	minutes		
Sum of GSE costs per LTO	GSE	.00 dollars/	/hours	
Aircraft engine emissions emissions from all ground	s per unit time 1 support equip	(kg/hr/eng) or ment per aircraf	t LTO (kg/LTC)
HC 20.499287 24	84	E EMISSION PER L	ANDING/TAKEO	F CYCLE
	RCFT 747 OMODE 4	Geomode 1 - Tak Geomode 2 - Run Geomode 3 - Tou Geomode 4 - Tax	way Queue () ch & Go ()	g/hr/eng) g/hr/eng) g/hr/eng)
Fuel FU Number of engines EN	IG • NOM4	Coomoda E . Com	d supp equip t (k mb (k	(kg/LTO) (kg/LTO) (kg/hr/eng) (g/hr/eng) (g/hr/eng)
Time in mode TI	MEMOD 8.11	minutes		
Sum of GSE costs per LTO	GSE	.00 dollars/	hours	
Aircraft engine emissions emissions from all ground	per unit time support equipm	(kg/hr/eng) or ent per aircraft	t LTO (kg/LTO)
CO 42.575443 HC 20.499287 NOX 2.444146 SOX .425754 Part .000000 AIRCRAFT EMISSIONS RATE	es or total gse	EMISSION PER LA	ANDING/TAKEOF	F CYCLE
Geographic mode GEO	RCFT 757 OMODE 2	Geómode 1 - Take Geomode 2 - Runy Geomode 3 - Touc Geomode 4 - Taxi Geomode 5 - Crud	vay Queue (k ch & Go (k in/out (k	g/hr/eng) g/hr/eng) g/hr/eng) g/hr/eng)
	G.NUM 20	Geomode 5 - Grnd Geomode 6 - Test Geomode 7 - Clim Geomode 8 - Appr	ab (k	(kg/LTO) g/hr/eng) g/hr/eng) g/hr/eng)
Time in mode TIM	MEMOD 2.89	minutes		
Sum of GSE costs per LTO	GSE	.00 dollars/h	ours	

Sea-Tac Airport Master Plan Update Draft EIS

TABLE II.3-1 Page 2 of 2

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Environmental Impact Statement Master Plan Update

PRELIMINARY AIRSIDE SCREENING ANALYSIS

		Maste	r Plan Updat	te Airside Or	otions		
	1A	1B	3	<u>4A</u>	<u>4C</u>	_5	_6
		6					-
Air Inventory (tons per day in year 202	0)			< 91	6.82	5.86	4.86/
Carbon Monoxide	13.86	13.86	10.18	6.82 6.19	6.19	6.11	6.02
Nitrogen Oxides	6.82	6.82	6.49	0.00	0.00	0.00	0.00
Particulate Matter (PM10)	0.00	0.00	0.00	0.00	0.23	0.22	0.20
Sulfur Oxides	0.33	0.33	0.28	0.25			
	•	0	4.2	5,4	5.0	5.4	27.7
Wetland Impacts (acres)	0	v	7.2				
	0	0	1	7	2	7	30
100-Year Floodplain Impacts (acres)	v	· ·					10.040
Stream Relocation (linear feet)	0	0	2,760	2,970	2,760	2,970	12,240
Stream Renocation (minum 1000)					12	17	28
Earth Impacts (million cubic yards)	0	0	12	17	13	17	20
							Negative Statement
Construction Impact (units displaced):			220	410	400	420	700
Properties	0	0	330		300	320	500
Homes	0	0	260	330	0	0	1
Parks	0	0	0	0	1	1	3
Historic/Cultural sites	0	0	1	1	1	0	1
Schools	0	0	0	0	0	v	*
CHOOLS							1

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

				ersion 944	odeling System (EDMS) V March, 1995	Source: Emission Dispersion Modeling System (EDMS) Version 944 Landrum & Brown Inc., March, 1995	MANY	
24,569.63	16.42	68.20	3,673.47	2,000.34	18,811.20	TOTALS	e f	
27.31 783.95 3,205.19	$\begin{array}{c} 0.00 \\ 2.30 \\ 2 54.67 \\ - 1 \\ -3.71 \\ 0.23 \\ \end{array}$	0.00 2.30 [672 54.67	,000kp 27.51 0.00 120.78 105.85 いこついて406.89 いてつく 1,378.30-		0.00 548.35 ≳(ス) ≈ 1,365.10	Tank Farms Grnd. Sup. Equip. Aircraft	7	
3.58	0.00	9.79 0.00	0.32	24.48 3.58	42.72 0.00	Training Fires Surf. Coating		
202.21	. 118 4. 0.05	0.0 2 0.01		37. × 14.07 23.03 12.30	••••	Parking Lots	all Edmes	
TOTAL 20,252.69	PM10 9.12	SOX	NOx	VOC'S	CO	1994 Do-Nothing SOURCES		
INVENTORY CONDITIONS TONS/YEAR	EMISSION INVENTORY 1994 EXISTING CONDITIONS TONS/YEAR	1994	ł					

Seattle - Tacoma International Airport Environmental Impact Statement

TABLE D-3 Page 1 of 4



May 1991 AltenQuality Program Departments of Scoliory Olympia, Washington

This is the suport they tisher worked for,

Stranger Strand

Boy # 3



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LTCOKK	2

constitute a small source compared to motor vehicle and aircraft emissions. The boiler, which is powered with natural gas, is also a minor source. The rest of the figures pertaining to emissions will include only the major sources: aircraft and motor vehicles.

Source	CO.	HC	NOx	SOx	TSP
Tank Farms	0	0.006	0	0	0
Motor Vehicles	502	37.2	23.03	0.018	0.118
Aircraft	3121	1277	1874	162	61.44
Boiler	3.36	2.77	0.012	0.003	0.371
Total	3628	1315	1897	163	62

D

22

597 79 16

 $C \rightarrow c$

EMISSIONS FACTORS ALKCKAFT 2-10 - Takeoff Geomode 1 Geomode 2 - Runway Queue Geomode 3 - Touch & Go AIRCFT 747 Aircraft GEOMODE 1 Geomode 4 - Taxi in/out Geographic mode Geomode 9 - Taxi Inford Geomode 5 - Aircraft Parkin Geomode 6 - Engine Testing Geomode 7 - Aircraft Approa - 13 FUEL.CD Fuel 4 ENG.NUM Number of engines NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (Reoff speed TOSPEED .00 meters/sec (it has meaning only for geomode #1, it is ignored otherwith .70 minutes Time in mode Takeoff speed Emission rates in kg/hr (per engine) 1.470000 CO HC .360000 215.300000 NOX 7.320000 SOX Part Geomode 1 - Takeoff Geomode 2 - Runway Queue Geomode 3 - Touch & Go AIRCFT 747 Aircraft Geomode 3 - Touch a do Geomode 4 - Taxi in/out Geomode 5 - Aircraft Parkin Geomode 6 - Engine Testing Geomode 7 - Aircraft Climb Geomode 8 - Aircraft Approa GEOMODE 2 Geographic mode FUEL.CD 13 Fuel ENG.NUM 4 Number of engines (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) 20.00 minutes Time in mode Takeoff speed Emission rates in kg/hr (per engine) 64.590000 CO HC 24.990000 2.600000 NOx .840000 SOX 1.000000 Part Geomode 1 - Takeoff Geomode 2 - Runway Queue Geomode 3 - Touch 6 Go Geomode 4 - Taxi in/out AIRCFT 747 Aircraft GEOMODE 3 Geographic mode Geomode 5 - Aircraft Parking Geomode 6 - Engine Testing Geomode 7 - Aircraft Climb Geomode 8 - Aircraft Approach 13 FUEL.CD Fuel ENG.NUM 4 Number of engines (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) keoff speed TOSPEED .00 meters/sec (it has meaning only for Time in mode geomode #1, it is ignored otherwise) Takeoff speed Emission rates in kg/hr (per engine) 64.590000 CO HC 24.990000 2.600000 NOX .340000 SOX 1.000000 Part Geomode 1 - Takeoff Geomode 2 - Runway Queue Geomode 3 - Touch & Go Geomode 4 - Taxi in/out 13 Geomode 5 - Aircraft Parking Geomode 6 - Engine Testing Geomode 7 - Aircraft Climb 6.00 minutes Geomode 8 - Aircraft Approach eomode 2. are entered in the runway screen: 747 AIRCFT Aircraft GEOMODE Geographic mode FUEL.CD Fuel ENG.NUM Number of engines (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) .00 meters/sec (it has meaning only for geomode \$1, it is ignored otherwise) Time in mode TOSPEED Takeoff speed Emission rates in kg/hr (per engine) 64.590000 CO 24.990000 2.600000 HC NOX .840000 SOX 1.000000 Part Geomode 1 - Takeoff Geomode 2 - Runway Queue Geomode 3 - Touch & Go AIRCFT 747 Geomode 3 - Touch & Go Geomode 4 - Taxi in/out Geomode 5 - Aircraft Parking Geomode 6 - Engine Testing Aircraft 5 GEOMODE Geographic mode 13 LENGINGE LENGINGE & Geomode 6 - Engine Testing Geomode 7 - Aircraft Climb Geomode 7 - Aircraft Approach (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) (NOTE: Queueing Times in mode, Geomode 2, are entered in the runway screen) ukeoff speed TOSPEED .00 meters/sec (it has meaning only for geomode \$1, it is ignored otherwise) FUEL.CD Fuel Number of engines Time in mode Takeoff speed Emission rates in kg/hr (per engine) 64.590000 CO A1-8

24.990000

HC

III. CONCLUSIONS AND RECOMMENDATIONS

A. Results and Conclusions

EDMS calculated emission rates for all the criteria pollutants plus hydrocarbons for Sea-Tac Airport's typical activity on an annual basis. Those emission reported in figures 2 through 8 and in Appendix 4.

After calculating emission rates, EDMS was used to calculate ambient concentrations during peak-hour activity. This dispersion output was contoured with an interpolating and plotting package called SURFER. The interpolating technique used was Krigning. The results obtained from the plotting exercise are shown in figures 9 through 22 found in Appendix 5, and, although they serve the purpose of providing a graphical illustration of the results, they must be used with caution. Because of the low density of points in certain data sets, some contours were not completed. Other contours contain waves and other artifacts that are not a true reflection of the data, but rather reflect weaknesses of the interpolating algorithm in handling the steep gradients in regions with few data points. Practical considerations relating to computer run time precluded using more calculation points.

1. Sea-Tac Airport is a major indirect source of air pollutants. It contributes approximately 8% of the carbon monoxide and 5% of the nitrogen oxide emissions in King County. Refer to Figure 2.

2. The emission inventory obtained for Sea-Tac Airport shows that the boilers, tank farms, and training fire are minor, even insignificant, sources compared to aircraft and motor vehicles which together comprise 99.9% of the emissions.

Refer to Table 1 and Figure 3. Note that Figure 3 depicts the airport's hydrocarbon emissions in a logarithmic scale. Appendix 4 contains Sea-Tac's emission inventory in more detail.

The tank farms contribute only hydrocarbons from evaporation loses. The training fires take place quarterly, at night, and particular run EDMS predicted a concentration of 19 ppm NO_2 in a receptor location right on 154th street. With the wind blowing directly from the north (0 degrees) the Tyee Golf Course can be getting as much as 12 ppm NO_2 one-hour average during worst-case conditions.

6. Predicted maximum one-hour concentrations of carbon monoxide during worst-case conditions are about 20 ppm in the terminal area, due almost entirely to traffic, and range up to 59 ppm at the runway, rapidly decreasing to about 15 ppm one kilometer downwind of the maximum concentration. In the case where the wind direction is zero degrees, the plume spreads out around the queuing area, and 1 km south of the queue the impact is still about 10 ppm. In figure 9 an island of zero concentration is located next to the 2 ppm contour. As expected, due to the meteorology chosen and the nature of the source, there is a steep gradient in the east-west direction and a more moderate one along the north-south axis. In the 345 degree case illustrated in figure 11, a one-hour average contribution to the housing development immediately east of the Tyee Golf Course, Angle Lake School and Seattle Christian School of approximately 9-5 ppm was predicted.

The one-hour standard for CO is 35 ppm. It is predicted that the maximum one-hour concentration of CO due to aircraft alone is about 20 ppm, or 57% of the standard, in an area of public access during a peak hour and low-dispersive meteorological conditions.

7. EDMS revealed localized hot-spots of particulate concentrations in the range of 800 micrograms per cubic meter, particularly in the 170 degree case illustrated in figure 22. Note that 154th. Street is located at the hot spot. At approximately 1 km north of the runway, the concentration has decreased to 157 micrograms per cubic meter.

> dangerow level or

particulates

The 24-hour standard for fine particulate matter (PM-10) is 150 micrograms per cubic meter. Measurements have shown that all of the particulate matter from aircraft exhaust can be classified as fine, ranging in diameter from 0.03 to 0.1 micrometers.¹⁷

8. The airport is also a significant source of hydrocarbons contributing up to 5 ppm worst-case, ground-level concentrations. The housing development around Seattle Christian School and the school itself may get around 4 ppm of hydrocarbons as illustrated in figure 14, the 345 degree case. From a toxics standpoint that may be quite significant depending on the actual composition of the hydrocarbons. For example, assuming that 4% (based on the Radian estimates) of the hydrocarbon emissions are benzene, the benzene contribution to the hourly average from the airport would be of about 0.16 parts per million (or 24000 parts per trillion annual average). As a point of reference, the acceptable source impact level (ASIL) for new sources proposed in WAC 173-460 is 0.063 parts per trillion.

9. The contribution of traffic to sulfur oxide pollution is minimal. A high of 0.5 ppm SO_2 was predicted on the runway in the 0 degree case on figure 18 decreasing to 0.1 ppm 1 km south of the queuing area, in the vicinity of 200th Street. A one-hour average national standard for SO_2 does not exist, Washington's one-hour average standard is 0.4 ppm.

10. It is important to mention the conclusions that the FAA/EPA team reached in their 1980 report Impact of Aircraft Emissions on Air Quality in the Vicinity of Airports mentioned earlier. This report compiled both monitoring and modeling analyses of airports throughout the country: Washington National, Los Angeles International, Dulles International, Lakeland, John F. Kennedy, and Chicago O'Hare. They summarized their conclusions in the following manner:

" * Maximum hourly average CO concentrations from aircraft are unlikely to exceed 5 ppm in areas of public exposure and are thus small in comparison to the NAAQS of 35 ppm.

* Maximum hourly HC concentrations from aircraft can exceed 0.25 ppm over an area several times the size of the airport.

* While annual average NO_2 concentrations from aircraft are estimated to contribute only 10 to 20 percent of the NAAQS limit level, these concentrations, when averaged over a one hour time period are estimated to produce concentrations as high as 0.5 ppm if one assumes that all engine produced NO is converted to NO_2 by the time these emissions reach public exposure. This value is at the upper end of the concentration range being considered for the short term NO_2 standard presently under review and cannot be ignored."

The above excerpt identifies nitrogen oxides and hydrocarbons as two pollutants to be concerned about at airports; however, this screening study of Sea-Tac's emissions showed that the airport's contribution to ground-level pollutant concentrations is higher than expected.

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2	Particulated	lb/hr	0.45		0.368.1	. e	1.5	3.75	4.0 2.3		(ลรยบเ	(ata)														10.0					
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	SO	ib/hr	10.1	9.96 8.19	1.15	9.98	2.81	1.85	13.19	1.80	19.38	15.98 F 85	22.0	1.41	1.2		0.43				0.47		5.73	4							
	P Q	kg/hr	56,52	2.26	2.94	0.227	0.640	24.99	0.599	2.11	1.32	1.09	1.19	ود.د 0	0	0.721	79.2 0	0	17.0	0,404	0.435	18.2	13.4	1.1		36.34 6.34	0.0 9.33		8 0.326 7 0.287		
	Total HCd	lb/hr	4-6	~ ~		205.01	.40	55.10	1.32	4.65	15.64	2.40	2.63	7.48	00	1.59	5.77	00		14.94		- 1	86.0 20 5	5.2	- 1		0.0		0.718	1	
ED)		kg/hr 11		57.34			55.97 8.80	2.60	215.3	16.44	2.61	272.5 175.4	21.50	0.245	5, 15	1.11	0.127	12.1	0.816	0.132	29.1	0.576	0.7	31.2	4.6	0.356	52.98	02.7	14.66	11.42	
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-1-7 (C		•		-			3.59 12		1.47 47		ļ		3.45			0.567 5.19		0.195	2.24	7.69	1.18	4.31	37.7	0.0	15.8	47.36	7.33	22.09	25.23	4.30	
ABLE II		CO IL/hr kg/hr		40.8 63.87 8.96 4.06		-	6.9	- 1-	3.23		~	3.88	4.79			1.25		0.43			2.60	3.07	01.2	5.0	14.8		9		55.63	9.48	
E			kg/nr 10	459.5 1.		6	4527 3588		B38.7 7322			816.5 8791	7248	2654	97.32 637.3	565.6	218.2	52.10 192.8	181.4	36.14	60.03 731.3	214.6	123.8	415 2600	2121	162	3201	2609 999.7	166.0	1628 1433 484 D	404.V
		Fuel Rate	1b/hr	6101	9956 8188 222	3084	9980	2810	1849	13193	4648	1800	15980	5850	215	1247	481	115	400	215	147	473	273	915	4677	1744	946 7057	5752	366	3590	1067
	*	Mode		Idle	Takeoff Climbout	Approach	ldle Takcoff	Climbout A pproach	Idle	Takeoff Climbout	Approach	Idle	Takeoff Climbout	Approach	Idle	Takeolf	Approach	Idle	Takeull Climbout	Approach	Idle	Takeoff	Approach	1	Takeoll Climbout	Approach	rildie Takeoff	Climbout	Approach		Approach
			Migh Type		PLW TF			09		PLW TF	007 111	1740-70	PLW TF	1 2 1	1-115(1-1	PWC TF		PT6A-27	PWC TP		076A -41	PWC TP		Gairy 555-15	RR TF		Spey MK518, Idle	RR TE		M45H-01' RR (Bristol)	14 11
								i	'≊‡ ∦															*							1

Internal Combustion Engine Sources

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Table II-1-3. TYPICAL DURATION FOR CIVIL LTO CYCLES

AT LARGE CONGESTED METROPOLITAN AIRPORTS^a

Ircraft	Taxi/	Takeoff	<u>Mode</u> Climbout	Approach	Taxi/ Idle in	Total
	Idle out			·	4	
ommercial carrier				i.		
Jumbo, long and medium		0.7	2.2	4.0	7.0	32.9
range jet ⁰	19.0 19.0	0.5	2.5	4.5	7.0	33.5
Turboprop Transport- piston	6.5	0.6	5.0	4.6	6.5	23.2
General aviation			0.5	1.6	6.5	15.5
Business je		0.4	2.5	4.5	7.0	33.5
Turboprop ^c d	19.0	0.5 0.3	5.0	6.0	4.0	27.3
Piston Helicopter	12.0		6.5	6.5	8 3.5	20.0

Reference 3. Data given in minutes. Same times as EPA Classes T1 and P2 (Note b, Table II-1-5). Same times as EPA Classes T1 and P2 (Note b, Table II-1-5). d Same times as EPA Class Pl (Note b, Table II- 1-5).

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