

Mr. Andrew Wheeler  
Acting Administrator of the  
Environmental Protection Agency  
Washington D. C.

Dear Mr. Wheeler,

The Centralized Aircraft Ground Deicing Facility Program developed for direct use by the FAA modernization elements provides for by design mitigating environmental impact pursuant to the Clean Water Act by eliminating the possibility of chemical runoff entering the Airports Stormwater System. The Centralized Deicing Facility Airport Renovation Plan ( Re: Figure 1 and 2, pgs 23 & 34 ) requires the installation of an underground Chemical Collection System connecting all deicing pads of the Facility to a single underground collection and recovery vessel. The newly devised deicing apparatus and application method utilizing forced hot air in conjunction with ADF, along with the expedient deicing operation capabilities equates to a 50% reduction in the use of ADF. This optimization of ADF usage percentage exceeds that of the reduction expectations of the Airport Cooperative Research Program Report 45 - Optimizing the Use of ADF. Stage II of the Deicing Facility "Threshold Deicing" located at the head of the runway employing forced hot air only for final drying and heating of the aircraft surfaces just before takeoff, reducing or eliminating entirely the necessity for the use of all types of anti-icing chemical formulas, as reported on and advocated by the Environmental Protection Agency.