



Information Item

Date: March 24, 2016

To: Mayor and City Council
From: Martin Pastucha, Director of Public Works/Airport Director
Subject: Santa Monica Airport Proposition 65 Warranty Assessment

Introduction

This information item provides an update on the City request for a review to assess whether or not air toxics inhalation exposure levels at the Santa Monica Municipal Airport (SMO) outdoor observation decks would warrant Proposition 65 (Prop. 65) warning signage, were the City not exempt from Prop. 65 requirements.

Background

Prop. 65, the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted to “protect California citizens and the State’s drinking water sources from chemicals known to cause cancer, birth defects, or other reproductive harm, and to inform citizens about exposures to such chemicals.” A list of chemicals known to the State to cause cancer are published, at least on an annual basis.

SMO has two outdoor observation decks, the Runway View Deck and Public Sky-Deck, both of which are located at the administration building at 3223 Donald Douglas Loop South. The observations decks are open to the public 24 hours a day, seven days a week. Visitors to the observation decks include general public as well as the occasional school field trip.

A review of flight operations records from 2006 to 2014 found that on average 97 percent of the flight activity at the SMO is generated from a combination of jet and

piston-powered aircraft. In 2006, there were approximately 133,308 jet/piston takeoff or landings at the SMO. In 2014 this number had decreased to approximately 79,605, a near 40 percent decline in overall flight activity for these two types of aircraft. In 2015 there were approximately 86,976 jet/piston takeoff or landings at the SMO.

Discussion

Governmental agencies (federal, state and local) are exempt from Prop. 65. Since SMO is a general aviation airport owned and operated by the City of Santa Monica, it is exempt from the requirements of Prop. 65.

To address concerns raised by the public, the City retained an outside consultant, Tetra Tech, to undertake a review of three onsite air quality data reports and assess based on this data whether or not air reported toxics inhalation exposure levels at the Santa Monica Municipal Airport (SMO) outdoor observation decks would warrant Prop. 65 warning signage due to airport operations. The subject studies included air quality samples collected at various locations at the SMO and in the adjacent community. Locations were sampled during winter and summer. One such sample location was the end of the runway where aircraft rev their engines prior to take off. No air samples were collected from the airport's observation decks in any of the studies reviewed. One study was conducted by the United States Environmental Protection Agency (U.S. EPA) in 2009, and two were conducted by the South Coast Air Quality Management District (SCAQMD) in 2006 and 2010. Tetra Tech also reviewed SMO flight operation numbers from the testing periods, and compared them to more recent operational data.

The review provided information on the concentrations and chemical constituents of previous air emissions measured at the airport, and an understanding of how those levels compared to Prop. 65 thresholds, as defined as 'No Significant Risk Levels' (NSRL) and/or 'Maximum Allowable Dose Levels' (MADL). Tetra Tech noted three chemicals of concern at SMO as shown in the Table 1 below. The 1,3-butadiene concentrations measured via the inhalation exposure route were above the No

Significant Risk Levels (NSRL). Benzene via inhalation exposure was above the NSRL but below the Maximum Allowable Dose Levels (MADL). Carbon tetrachloride was also above the NSRL.

Table 1. Dose Calculations as Compared to NSRL and MADL Values

Chemical of Concern	SMO Average Study Measured value (µg/day)	NSRL* (µg/day)	MADL** (µg/day)
1,3 Butadiene	3.36	0.4	N/A
Benzene	21.06	13	49
Carbon Tetrachloride	8.77	5	N/A

*No Significant Risk Levels (NSRL)

**Maximum Allowable Dose Levels (MADL)

The key findings of the Tetra Tech review and assessment are:

- Previous studies conducted by the SCAQMD (2006, 2010) determined that SMO air emissions were similar to and often lower than those measured elsewhere in the South Coast Air Basin.
- There are concentrations of certain chemicals of concern present in historic SMO air samples at sampling locations remote to the observation decks, which, if found at the observation decks, would warrant Prop. 65 signage, were the City not exempt. These chemicals include 1,3-butadiene, benzene, and carbon tetrachloride.
- A general decline in jet turbine and piston-powered flight operations at SMO over the last nine years may have contributed to a decrease in the previously identified levels of chemicals of concern in air at the SMO.
- To evaluate what changes, if any, the documented decline in overall flight operations may have had on SMO air quality it is recommended that a multi-path health risk assessment be conducted. Such an assessment would utilize focused onsite data collected during both the summer and winter months, and compare this data with Prop. 65 thresholds.

Summary

Base on previous studies, there were elevated levels of chemicals of concern in excess of Prop. 65 thresholds, detected at sampling locations remote to the observation decks.

In assessing these concentrations, the City has decided, in an abundance of caution, to post Proposition 65 signage on SMO's upper and lower observation decks.

Prepared By: Stelios Makrides, Airport Manager