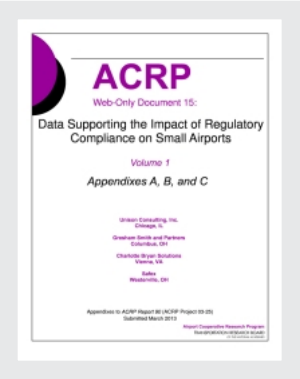

Data Supporting the Impact of Regulatory Compliance Costs on Small Airports, Volume 1: Appendixes to ACRP Report 90

DETAILS

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Note: The appendixes published herein are the appendixes to *ACRP Report 90*. Readers can read or purchase *ACRP Report 90* at http://www.trb.org/Main/Blurbs/168945.aspx.

ACRP 03-25, REGULATORY COMPLIANCE COSTS AND THE IMPACT ON SMALL AIRPORTS

APPENDIX A

SUMMARIES OF REGULATORY AND COMPLIANCE ACTIONS AND PUBLISHED COST DATA

TABLE A-1

FEDERAL AVIATION ADMINISTRATION (FAA) AND DEPARTMENT OF TRANSPORTATION (DOT)

SUMMARY OF REQUIREMENTS AND PUBLISHED COSTS

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
1	FAA	Cert Alert #00-01, Public Safety Personnel Operating in the Movement Area http://www.faa.gov/airports/airport_safety/certalerts/media/cert0001.pdf	New Cert Alert	The cert alert outlines requirements for operating in the movement area. It includes a request for airport operators to provide a copy of the Cert Alert to public safety providers operating on the airport and those located adjacent to the airport. The Cert Alert is advisory in nature	3/30/2000	___	No published cost estimate. This Cert Alert would not cause a cost impact to airports.	N/A
2	FAA	14 CFR Part 158, Passenger Facility Charge Progam, 65 Fed. Reg. 34536 http://www.faa.gov/airports/resources/publications/federal_register_notices/media/pfc_65fr34536.pdf	Amendment to regulations	Part 158 governs passenger facility charge program, including project eligibility, application procedures, project implementation and record-keeping and reporting. The amendment implments various statutory and administrative changes to the program including: Prohibition on PFC collection for frequent flyer redemption tickets Exception to collection requirements for flights to small isolated communities Standards for approval of collection at $4 or $4.50 Competition Plan filing requirements for certain medium and large hub airports Protection of former small hub airports from net losses of combined PFC and passenger entitlement funds due to passenger entitlement turn-back requirement. The changes are mandatory for airports imposing PFCs.	5/30/2000	$0	Costs of compliance listed as de minimis. Further, costs are recoverable with PFC revenue as administrative costs	Final Regulatory Evaluation, Final Regulatory Flexibility Determination, and Trade Impact Assessment, FAA Docket 2000-7402 (May 2000), p. 9
3	FAA	14 CFR Part 158, Passenger Facility Charge Program, 69 Fed. Reg. 12940 http://www.faa.gov/airports/resources/publications/federal_register_notices/media/pfc_69fr18Mr0415.pdf	Amendment to regulations	Part 158 establishes requirements and procedures for imposition and use of PFCs by airports, including requirements for compensation of air carriers for collection of PFCs on behalf of airports. This amendment increases the required compensation to 11 cents per PFC collected.	3/18/2004	$0	Increase in collection compensation rate redistributes $21 million in PFC revenue annually from airports to carriers, but does not increase costs to airports, because approved amounts are net of collection compensation. An airport that collected at a rate of $1 million per year at the prior compnesation level would need 3.3 additional days of collection under the new compensation level,	69 Fed. Reg. 12947 (03/18/2004)
4	FAA	14 CFR Part 158, Passenger Facility Charge Program, 70 Fed. Reg. 14928 http://www.faa.gov/airports/resources/publications/federal_register_notices/media/pfc_70fr14928.pdf	Amendment to regulations	Part 158 governs the PFC program. This amendment implements the non-hub pilot program, which provides for streamlined application and review procedures for requests to collect PFCs submitted by non-hub airports. Revisions to streamline application and amendment procedures for other categories of airports are also included.	3/23/2005	-$9,500	Projected average annual cost reduction per small airport 2004 dollars	70 Fed. Reg. 14933 (03/25/2005)
5	FAA	14 CFR Part 158, Passenger Facility Charge Program, 72 Fed. Reg. 28837 http://www.faa.gov/airports/resources/publications/federal_register_notices/media/pfc_72fr28837.pdf	Amendment to regulations	Part 158 governs passenger facility charge program. This amendment implements the following statutory changes to the PFC program adopted in Vision 100, Pub. L. 108-176 (December 12, 2003): PFC eligibility of low emission airport vehicles and ground support equipment Use of PFCs to pay debt service on otherwise ineligible projects based on the financial need of the airport Prohibiting collection of PFCs on military charter flights PFC account requirements for carriers in bankruptcy PFC eligibility for local match of projects under the Air Traffic Modernization Program	5/23/2007	$0	FAA estimated total cost of rule to all airports at $17,000 (over 10 years) and cost savings of $1.6 million Cost estimates are based on discretionary provisions of the rule. Costs associated with statutory requiremjents were considered non-discretionary and not included in the estimate 2006 dollars	Notice of Proposed Rulemaking, 71 Fed. Reg. 5188, 5194 (02/01/2006)
6	FAA	Cert Alert #00-02, NOTAM Procedural Changes: Snow Notices to Airmen http://www.faa.gov/airports/airport_safety/certalerts/media/cert0002.pdf	New Cert Alert	The Cert Alert provides notice of new procedures for issuing snow NOTAMS, base on Air Traffic Policy and Procedures Notice N7930.63. Per the latter notice, "Upon publication of this NOTICE, all snow NOTAM's and friction measurements will be issued in accordance with these new NOTAM formats."	7/7/2000	___	No published cost estimate. It is unlikely that this Cert Alert would cause a cost impact to airports.	N/A
7	FAA	Order 5100.39A, Airports Capital Improvement Plan http://www.faa.gov/airports/resources/publications/orders/media/AIP_5100_39A.pdf	Cancellation and reissuance of Order	The Order prescribes the development of the national Airports Capital Improvement Plan (ACIP), which serves as the primary planning tool for systematically identifying, prioritizing, and assigning funds to critical airport development and associated capital needs. This reissuance changes the process through which the FAA formulates the ACIP.	8/22/2000	___	No published cost estimate	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
8	FAA	AC 150/5100-19B, Guide for Airport Financial Reports Filed by Sponsors	Cancellation and reissuance of AC	The AC provides airport sponsors with guidance for complying with statutory airport financial reporting requirements. This reissuance incorporates public comments, and it incorporates changes to statutes and the FAA's airport revenue diversion policy. Specifically, this reissuance accomplishes the following: Reduces the cost of reporting Standardizes the reporting of revenue and expense Incorporates revised information from the policy Provides for the gathering of information pertaining to the single audit. Per the AC, it "does not impose new obligations on airport sponsors."	4/20/2001	$0	No published cost impact. Per the AC, this reissuance reduces reporting rcosts.	AC 150/5100-19B, p. 1 (04/21/2001)
9	FAA	AC 150/5100-19B, Change 2 Guide for Airport Financial Reports Filed by Sponsors, http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/8e17c23e2f26e8018625726d006ce776/b4abec093894311f86256d0f006f764a/$FILE/150-5100-19b%20change%202.pdf	Change to Existing AC	The AC provides airport sponsors with guidance for complying with statutory airport financial reporting requirements. Per the AC, "it does not impose new obligatoins" on airports. This change announces procedures for submitting financial reports through FAA's newly activated web-site.	1/15/2003	$0	Per the AC, this change does not initiate new obligations on airports and therefore, would not result in any new costs. FAA projects that by enabling web-based filing, the AC will reduce airports' compliance costs.	AC 150-5100-19B, Change 2, pp. 1-2 (01-17-2003)
10	FAA	AC 150/5100-19C, Guide for Airport Financial Reports Filed by Airport Sponsors http://www.faa.gov/documentLibrary/media/advisory_circular/150-5100-19C/150_5100_19C.pdf	Cancellation and reissuance of AC	The AC provides guidance on compliance with statutory financial reporting requirements for commercial service airports that have accepted grants. This reissuance implements the following changes: Provides for a separate listing of amounts received as reimbursement of security costs Provides for FAA to input enplanement data into FAA financial reporting form data-base Eliminates automatic acceptance of hard copy filings Unless a waiver is granted, airports will have to enter data electronically through the airport financial reporting web-site.	4/19/2004	—	No published cost estimate. This AC requires minimal changes in the financial reporting requirement and should not have any cost impacts.	N/A
11	FAA	Order 5500.1, Passenger Facility Charges http://www.faa.gov/documentLibrary/media/Order/PFC_55001.pdf	New Order	The Order provides guidance and procedures to be used in administering the PFC Program. The Order applies indirectly to airports to the extent that the guidance or procedures affect actions to be taken by airports in seeking PFC approval or administering PFC projects.	8/9/2001	—	No published cost estimate. Costs to airports of meeting requirements of the Order are reimbursable with PFCs as PFC program administrative costs	N/A
12	FAA	Cert Alert #02-01, Aircraft Departing/Landing on Closed Runways http://www.faa.gov/airports/airport_safety/certalerts/	New Cert Alert	The Cert Alert provides guidance on procedures and marking of closed runways to reduce risk of use of closed runways by air carriers. The Cert Alert was issued as a "as a reminder to airport operators of requirements for marking and lighting a closed runway and procedures for coordinating and notifying airport users of such closures. "	1/8/2002	—	No published cost estimate. The Cert Alert was a reminder to airports of existing requirements and should not have a cost impact.	N/A
13	FAA	Cert Alert #02-03, Air Carrier Accident Critique http://www.faa.gov/airports/airport_safety/certalerts/	New Cert Alert	The Cert Alert encourages Part 139 certificated airports to conduct an aircraft accident critique within 60 days, pending action by the Aviation Rulemaking Advisory Committee. The Cert Alert is advisory per its terms.	4/25/2002	—	No published cost estimate. This Cert Alert encourages airports to complete accident critiques withing 60 days and should not cause a cost impact to airports.	N/A
14	FAA	AC 150/5190-5, Exclusive Rights and Minimum Standards for Commercial Service Airports http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/49e2daf545cd691b86256c75007071fe/$FILE/150-5190-5.pdf	New AC cancels other Acs addressing same topics	The AC provides information on the the FAA's exclusive rights and minimum standards policies, which, in part, describe the contractual grant obligations assumed by the operators of public airports. Topics addressed include the following: FAA policy on exclusive rights In-depth discussion of minimum standards Guidance on developing minimum standards in question and answer format FAA enforcement process Airports that have accepted Federal assistance must comply with the statutory prohibition on exclusive rights. Advice provided with respect to minimum standards is optional but highly recommended.	6/10/2002	—	No published cost estimate. The AC did not initiate any new requirements upon airports and it is unlikely to cause a cost impact.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
15	FAA	AC 150/5210-20, Ground Vehicle Operations on Airports http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-20/150_5210_20.pdf	New AC	The AC provides guidance on vehicle operations on aircraft movement areas. The AC addresses the following: Vehicle access Vehicle inspection and marking Driver training curriculum Emergency operations Enforcement and control Following the AC may materially assist airport operators in complying with applicable requirements of Part 139 and AIP grant assurances.	6/21/2002	___	No published cost estimate. The AC could potentially cause a cost impact to those airports that choose to implement a driver training program in accordance with the recommendations.	N/A
16	FAA	AC 150/5210-20, Ground Vehicle Operations on Airports, Change 1 http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5210_20_chg1.pdf	Change to existing AC	The AC and the attached appendixes provide guidance to airport operators in developing training programs for safe ground vehicle operations and pedestrian control on the airside of an airport. This change addresses driver training and specifies that initial and recurrent driver training is required for airport personnel. Only initial training is required for tenants and contractors, but recurrent training is strongly recommended Following the AC may materially assist airport operators in complying with applicable requirements of Part 139 and AIP grant assurances.	3/31/2008	___	No published cost estimate. The AC requires recurrent driver training for airport personnel which could have a minor cost impact for airports that currently do not require recurrent training.	N/A
17	FAA	Cert Alert #02-04, Aqueous Film Forming Foam (AFFF) Concentrations, Restrictions and Other User Guidelines http://www.faa.gov/airports/airport_safety/certalerts/	New Cert Alert	The Cert Alert states that AFFF in less than 3% concentration is not acceptable. Use of alcohol foams (in lieu of AFFF) in ARFF vehicles is not approved for Part 139 airports.The FAA does not recommend foaming of runways in an emergency and advises against using anything other than a "Protein" foam.	7/11/2002	___	No published cost estimate. The Cert Alert could cause a cost impact to those airports that were using AFFF in the wrong concentrations or did not have protein foam for runway emergencies.	N/A
18	FAA	Cer Alert #02-07, Air Show Event Ground Operations Plan http://www.faa.gov/airports/airport_safety/certalerts/	New Cert Alert	The Cert Alert notes that a prerequisite for an airport waiver to conduct an air-show is the approval by the FAA Regional Airports Division of an air show events ground operations plan. The issues to be addressed in the plan are listed. The Cert Alert characterizes its contents as a guide to airports.	10/18/2002	___	No published cost estimate. The Cert Alert could cause a cost impact to airports that want to host an air show but have not created and had the appropriate plan approved by the FAA.	N/A
19	FAA	Cert Alert #02-08, PAPI Operation http://www.faa.gov/airports/airport_safety/certalerts/	New Cert Alert	The Cert Alert provides FAA recommendations for operation of pilot activated PAPIs to address potential of condensation or frost during periods of inactivity. PAPIs should be operated at reduce power at all times. References to PAPIs in facility directories should be changed. The actions listed in the cert alert are identified as recommendations.	12/12/2002	___	No published cost estimate. Continuous operation at reduced power would lead to increased electric utility costs and possibly more frequent replacement of lighting elements.	N/A
20	FAA	AC 150/5370-2E, Operational Safety on Airports During Construction http://www.faa.gov/documentLibrary/media/advisory_circular/150-5370-2E/150_5370_2e.pdf	Cancellation and reissuance of AC	The AC sets forth guidelines for operational safety on airports during construction. This reissuance contains major changes to the guidance for the following areas: Runway Safety Area Taxiway Safety Areas/Object-Free Areas Marking guidelines for temporary thresholds Hazard marking and lighting The guidance assists Part 139 airports in complying with certificate requirements and assists airports in complying with construction requirements for AIP funded projects.	1/17/2003	___	No published cost estimate. A change in requirements for supplemental hazard lighting noted in the AC may result in added replacement or retrofitting costs for airports.	N/A
21	FAA	AC 150/5380-6A, Guidelines and Procedures for Maintenance of Airport Pavements http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/d64e80527a2b7c3f86256d640063b59a/$FILE/150-5380-6A.pdf	Cancellation and reissuance of AC	The AC provides guidelines and procedures for maintaining rigid and flexible airport pavements. This reissuance provides updated guidance, including information on systematic pavement maintenance. The guidance in the AC is recommended practice.	7/14/2003	___	No published cost estimate. The AC is recommended but not mandatory. It could potentially have a cost impact on airports that follow the recommendations.	N/A
22	FAA	AC 150/5380-6B, Guidelines and Procedures for Maintenance of Airport Pavements http://www.faa.gov/documentLibrary/media/advisory_circular/150-5380-6B/150_5380_6b.pdf	Cancellation and reissuance of AC	This AC provides guidelines and procedures for maintaining rigid and flexible airport pavements. principal changes in this reissuance include: Adding distress types and information on distress types Adding a specification for maintenance products Addiing information on installation of materials and repair procedures The guidance in the AC is a recommended practice only.	9/28/2007	___	No published cost estimate. The AC is not mandatory but could have a cost impact upon airports that chose to implement the recommendations.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
23	FAA	PGL 03-2, Determining Justification of Projects for the Noise Set-Aside Based on Currency of Noise Exposure Maps http://www.faa.gov/airports/aip/guidance_letters/media/PGL_03-02.pdf	Cancellation and revision of PGL	The PGL addresses the use of Noise Exposure Maps (NEMs) to determine priority of funding for noise compatibility projects. This PGL reflects the results of 2002 report by the FAA Office of Airport Planning and Policy evaluating the AIP Noise Set Aside. The revised PGL requires FAA to make funding decisions for Part 150 noise grants based on either a noise exposure map (NEM) that is less than 5 years old or a determination that the older NEM still reflects current conditions.	8/4/2003	___	No published cost estimate. The PGL requires FAA to make funding decisions on NEMs less than 5 years old or those that reflect current conditions. This could have a cost impact on airports if they are required to update their NEMs.	N/A
24	FAA	Cert Alert #03-07, Personnel and Equipment in the Runway Safety Area http://www.faa.gov/airports/airport_safety/certalerts/	Cancellation and reissuance of Cert Alert	The Cert Alert addresses the presence of personnel and equipment in runway safety areas (RSAs). By its terms, the Cert Alert "reinforces the requirements of 14 CFR Part 139.309(b)(4)."	11/12/2003	___	No published cost estimate. The Cert Alert addresses existing regulation and should not have a cost impact to airports.	N/A
25	FAA	14 CFR Parts 121 and 139, 69 Fed. Reg. 6380, Certification of Airports, http://www.faa.gov/airports/airport_safety/part139_cert/media/part139_final_rule.pdf	Amendment to regulations	Part 139 implements the statutory requirement for airports serving passenger air carrier flights to hold airport operating certificates. This amendment implements the requirement for airports receiving scheduled passenger service with 10-30 seat aircraft to hold an airport operating certificate. Issues addressed in the regulation and the amendment include, but are not limited to the following: Preparing and maintaining the Airport Certification Manual Preparing and updating the Airport Emergency Plan Aircraft rescue and fire fighting requirements Snow and ice control Safety areas Wildlife hazard management The regulation is mandatory for Part 139 certificated airports.	2/10/2004	**Class I Airports** Initial costs -- $1,360 Recurring costs -- $8,479 **Class II Airports** Initial costs -- $8,370 Recurring costs -- $15,509 **Class IV Airports** Initial costs -- $1,791 Recurring costs -- $911 **Class III Airports** Initial costs -- $97,634 Recurring costs -- $118,734	Average cost per airport Class I, II and IV airports were current certificate holders. Class III airports were required to obtain certificates under the rule. Class I airports ranged in size from Chicago O'Hare to Cortez, CO Municipal Airport 2001 dollars	Final Regulatory Evaluation, Final Regulatory Flexibility Determination, and Trade Impact Assessment, FAA Docket 2000-7479 (November 21, 2001), Tables V-1 through V-6
26	FAA	Order 5200.9, Financial Feasibility and Equivalincy of Runway Safety Area Improvements and Engineered Material Arresting Systems http://www.faa.gov/airports/resources/publications/orders/media/Construction_5200_9.pdf	New Order	The Order provides guidance for (a) comparing runway safety area (RSA) improvement alternatives with improvements that use Engineered Material Arresting Systems (EMAS); and (b) determining the maximum financially feasible cost for RSA improvements, whether they involve EMAS or not. This guidance is intended to help airport sponsors develop a sound proposed action for environmental review purposes.	3/15/2004	___	No published cost estimate AC provides a cost standard for financial feasibility. This cost standard may enable some airports to avoid the cost of implementing a full standard RSA or EMAS installation	N/A
27	FAA	AC 150/5210-13B, Airport Water Rescue Plans and Equipment http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-13B/150_5210_13b.pdf	Cancellation and reissuance of AC	The AC provides general guidance on Airport Water Rescue Plans. This reissuance states that Part 139 certificated airports "are to include in their airport emergency plans provisions for the rescue of aircraft accident victims from significant bodies of water or marshland situated adjacent to the airport and beneath the departure and approach flight paths of air carriers. The AC applies to civil airports where aeronautical activity is conducted near significant bodies of water. Certificated airports may use the guidance to comply with Part 139.	4/15/2004	___	No published cost estimate. Depending on role in rescue plan, there could be a cost impact for rescue equipment and personnel training.	N/A
28	FAA	AC 150/5210-13C, Airport Water Rescue Plans and Equipment http://www.google.com/url?sa=t&source=web&cd=1&ved=0CBYQFjAA&url=http%3A%2F%2Fwww.faa.gov%2FdocumentLibrary%2Fmedia%2FAdvisory_Circular%2F150_5210_13C.doc&rct=j&q=AC%20150%2F5210-13C&ei=coRCTpynIoWutwf46Nm-CQ&usg=AFQjCNFNAGYhZNT_x8XxCbeRW0GC33HfWQ&sig2=ekh11znjN-YrbfYwAb5jOA&cad=rja	Cancellation and reissuance of AC	The AC provides guidance to assist airport operators in preparing for water rescue operations. This reissuance adds information on swift water rescues, sample aircraft water rescue plan and sample water rescue checklist. It also adds references to National Fire Prevention (NFPA) documents, and an ACRP Research Report. The AC appears to require preparation of a water rescue plan for the first time. The requireuirement is limited to airports with a significant body of water or marshland (at least 1/4 square mile) adjacent to the airport or under departure and approach flight paths of air carriers. The guidance in the AC is recommended practice. However, the AC is mandatory for projects funded with AIP grants or PFCs. In addition, the AC is mandatory for Part 139 certificated airports. The standards must be used to develop new Airport Water Rescue Plans and are to be implemented at all Part 139 certificated airports within one year of issuance.	9/29/2010	___	No published cost estimate. The AC is mandatory for Part 139 airports and airport water rescue equipment and plans funded with AIP or PFC grants. It could potentially have a cost impact on some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
29	FAA	Cert Alert #04-03, Part Time ARFF Coverage and Air Carriers Operating Outside Scheduled Arrival and Departure Times http://www.faa.gov/airports/airport_safety/certalerts/	New Cert Alert	The cert alert directs Airport Certification Safety Inspectors to advise airports with part-time ARFF service to include a notice in their airport facilities directory advising carriers to coordinate in advance with the airport for early or late arrivals or departures.	4/21/2004	___	No published cost estimate. The cert alert requires aircraft to notify airports of early and late arrivals and departures and would not have a cost impact.	N/A
30	FAA	AC 150/5200-18C, Airport Safety Self-Inspection http://www.faa.gov/documentLibrary/media/advisory_circular/150-5200-18C/150_5200_18C.pdf	Cancellation and reissuance of AC	The AC provides information on airport safety self-inspection programs and identifies the items airports should include in such programs. The AC includes information on the following: Inspection frequency Inspection records Followup Inspection techniques Knowledge and equipment for self-inspection Components of a self-inspection program Use of Guidance in the AC is an acceptable means of compliance with Part 139.	4/23/2004	___	No published cost estimate. The AC provides suggestions to airports to enhance or improve their existing airport safety self-inspections.	N/A
31	FAA	PFC Update 45-04	New PFC Update	This PFC Update addresses the following issues: Status of rulemaking to implement statutory changes in Vision 100, Pub. L. 108-176 (December 12, 2003) Procedures for reviewing applications to use PFCs for debt service on otherwise ineligible projects due to financial need of airport Statutory prohibition on collection of PFCs on military charter flights PFC eligibility of low emission vehicles Electronic transmission procedures for PFC documents	4/27/2004	___	No published cost estimate. The PFC Update reflects completed or pending rulemakings and does not independently affect airport practices in administering PFCs.	N/A
32	FAA	Order 5200.10, Procedures for Conducting Investigations of Vehicle/Pedestrian Deviations http://www.faa.gov/airports/resources/publications/orders/media/Safety_5200_10.pdf	New Order	The Order establishes procedures for and provides information on conducting investigations of vehicle/pedestrian deviations and completing FAA Form 8020-25 The Order is addressed to FAA personnel conducting the investigations. However, airports will be required to submit information to FAA personnel as part of the investigation.	4/28/2004	___	No published cost estimate. This AC establishes reporting proceedures and should not have any cost impacts.	N/A
33	FAA	AC 150/5200-35, Submitting the Airport Master Record in Order to Activate a New Airport http://www.faa.gov/documentLibrary/media/advisory_circular/150-5200-35/150_5200_35.pdf	New AC.	The AC provides guidance on completing forms FAA requires to compile safety data on proposed new airports. The AC includes instructions and blank forms. The AC applies to proponents of new public-use and private-use airports. The guidance is not written to suggest it is mandatory. The AC is organized to minimize the information a proponent needs to correctly complete the forms.	5/20/2004	___	No published cost estimate. This AC provides guidance on the completion of forms required for a new airport and should not have any cost impacts.	N/A
34	FAA	AC 150/5200-35A, Submitting the Airport Master Record in Order to Activate a New Airport http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5200_35a.pdf	Cancellation and reissuance of AC	The AC provides guidelines on supplying airport data to the FAA using FAA Forms 5010-3 and 5010-5. This reissuance reorganizes the guidance to reduce the effort needed to correctly completing FAA forms required when a new airport is established. The AC applies to proponents of new public-use and private-use airports.	9/23/2010	___	No published cost estimate. The AC is is limited to newly established airports and could potentially lower the cost associated with filing paperwork for those airports.	N/A
35	FAA	PGL 04-03, Weather Support to Deicing Decision-Making (WSDDM) http://www.faa.gov/airports/aip/guidance_letters/media/PGL_04-03.pdf	New PGL	The PGL limits AIP eligibility of WSDDM equipment to instances when the equipment is included in an FAA approved snow plan. If FAA issues a grant for WSDDM equipment that is not in an approved snow plan, the grant must include a special condition requiring the airport sponsor to prepare or update a snow plan that incorporates the WSDDM.	6/9/2004	___	No published cost estimate. There should be minimal cost impact since the sponsor can continue to obtain grant funding in the same federal share by adding the equipment into its existing snow plan.	N/A
36	FAA	AC 150/5230-4A, Aircraft Fuel Storage, Handling and Dispensing on Airports http://www.faa.gov/documentLibrary/media/advisory_circular/150-5230-4A/150_5230_4a.pdf	Cancellation and reissuance of AC	The AC provides standards and procedures for storage, handling and dispensing of aviation fuel on airports. This reissuance incorporates current published guidance. The AC is one means of compliance with Part 139 requirements for fire safety in storage, handling and dispensing of aircraft fuel, but not for quality control. The AC is recommended for other airports.	6/18/2004	___	No published cost estimate. This AC could have a cost impact if the airport's policies and proceedures for stoing, handling and dispensing of fuel are not in accordance with the currently published guidance.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
37	FAA	AC 150/5210-6D, Aircraft Fire Extinguishing Agents http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-6D/150_5210_6d.pdf	Cancellation and reissuance of AC	The AC provides guidance for reference material covering Aircraft Fire Extinguishing Agents. This reissuance includes the following: Listing of the types of acceptable foaming agents and characteristics Performance and testing standards Recommended quantities of agents for various categories of airports The AC is recommended practice. The AC provides one means of compliance with applicable Part 139 requirements.	7/8/2004	___	No published cost estimate. This AC is unlikely to have a cost impact since it is not mandatory and does not constitute a regulation.	N/A
38	FAA	AC 150/5345-44G, Specification for Runway and Taxiway Signs http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/8ce3f88c034ae31a85256981007848e7/8ccd7b7ace6a2ec386256efa0066eed3/$FILE/150-5345-44G.pdf	Cancellation and reissuance of of AC	The AC contains the FAA specifications for unlighted and lighted signs to be used on taxiways and runways. Principal changes address the following: Alternate light sources such as fiber optics and light emitting diodes Standards for lighted signs located in areas of significant jet blast The guidance in the AC is recommended practice. However, the guidance is mandatory for projects with AIP grant funds or PFCs	7/8/2004	___	No published cost estimate. The AC is mandatory for airport projects receiving Federal funds under the airport grant assistance or the passenger facility charge programs. Cost impact would be limited to the local matching share of any incremental costs of meeting the AC's standards. It could have a greater cost impact at airports that want to meet the standards of the AC without using AIP or PFC funds.	N/A
39	FAA	AC 150/5345-44H, Specification for Runway and Taxiway Signs http://www.faa.gov/documentLibrary/media/advisory_circular/150-5345-44H/150_5345_44h.pdf	Cancellation and reissuance of AC	The AC contains the FAA specifications for unlighted and lighted signs to be used on taxiways and runways. This reissuance lists 20 principal changes The guidance in the AC is recommended practice. However, the guidance is mandatory for projects with AIP grant funds or PFCs	9/28/2007	___	No published cost estimate. The AC is mandatory for airport projects receiving Federal funds under the airport grant assistance or the passenger facility charge programs. Cost impact would be limited to the local matching share of any incremental costs of meeting the AC's standards. It could have a greater cost impact at airports that want to meet the standards of the AC without using AIP or PFC funds.	N/A
40	FAA	AC 150/5345-44J, Specificatons for Runway and Taxiway Signs http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5345_44j.pdf	Cancellation and reissuance of AC	The AC contains the FAA specifications for unlighted and lighted signs to be used on taxiways and runways. Forty-two "principal changes" are listed in the reissuance. Changes range from clarifications of standards for sign size, borders, lettering and characters to clarification of standards for luminance levels to discussion of wind tunnel testing. The guidance in the AC is recommended practice. However, the ACis mandatory for projects funded with AIP grant funds or PFCs. In addition, the lighting designs contained in the standard are the only means to meet the lighting requirements of 14 CFR §139.311. However, retrofitting of signs to meet the changes in this AC is not required.	9/29/2010	___	No published cost estimate. The AC is mandatory for signage projects funded with AIP or PFC grants. It is also the only way to meet the lighting requirements of 14 CFR §139.311. It could potentially have a cost impact on some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
41	FAA	AC 150/5200-33A, Hazardous Wildlife Attractants On or Near Airports http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/51eb9ab12a224e8586256f160052c678/$FILE/150-5200-33A.pdf	Cancellation and reissuance of AC	The AC provides guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports. It also discusses airport development projects affecting aircraft movement near hazardous wildlife attractants. The guidance in the AC is recommended practice. However, the AC is mandatory for airports that have received FAA grants. Part 139 certificated airports may use the AC to comply with wildlife hazard management requirements of Part 139.	7/27/2004	___	No published cost estimate. The AC has the potential to have a cost impact on airports that need to remove hazardous wildlife attractants. It is mandatory for airports that have received FAA grants. Incremental costs could be defrayed with a combination of AIP and PFC funds	N/A
42	FAA	AC 150/5200-33B, Hazardous Wildlife Attractants On or Near Airports http://www.faa.gov/documentLibrary/media/advisory_circular/150-5200-33B/150_5200_33b.pdf	Cancellation and reissuance of AC	The AC provides guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports. It also discusses airport development projects (including airport construction, expansion, and renovation) affecting aircraft movement near hazardous wildlife attractants. The principal change in this reissuance is to modify guidance on storm water detention ponds. AC is recommended practice. However, recipients of federal financial assistance must follow the AC. Part 139 certificated airports may use the AC to comply with wildlife hazard requirements of Part 139.	8/28/2007	___	No published cost estimate. The AC has the potential to have a cost impact on airports that need to remove hazardous wildlife attractants. Some or all of the costs may be defrayed with a combination of AIP and PFC funds.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
43	FAA	AC 150/5210-22, Airport Certification Manual (ACM) http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-22/150_5210_22.pdf	Cancellation and reissuance of AC	The AC provides acceptable methods for showing compliance with the Airport Certification Manual requirements of Part 139. The AC is being reissued to help airports in complying with the new requirements of Part 139 adopted in February 2004. The AC addresses the following: ACM function and form ACM overview ACM review and revision Tchnical resources and limits of authority ACM contents	8/26/2004	___	No published cost estimate. The AC presents acceptable methods for showing compliance with the Airport Certification Manual requirements of Part 139 and should not have a cost impact.	N/A
44	FAA	AC 150/5300-13, Airport Design Standards, Change 8 http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5300_13_chg8.pdf	AC change	The AC contains the FAA standards and recommendations for airport design. This change accomplishes the following: Revises RSA standards for engineered material arresting systems (EMS) Removes precision object free area (POFA) and establishes precision object free zone (POFZ) Allows more flexibility in threshold siting criteria The AC (including Change 8) is recommended practice. However, the AC is mandatory for projects funded with AIP grants or PFCs. The AC may be used to comply with applicable Part 139 requirements.	9/30/2004	___	No published cost estimate. The AC has the potential to have a cost impact for airports that want to adhere to the recommendation. It is mandatory for airports that have received FAA grants. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
45	FAA	AC 150/5300-13, Airport Design Standards, Change 9 http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5300_13_chg9.pdf	AC Change	The AC contains the FAA standards and recommendations for airport design. This change includes new standards for runway end siting requirements and eliminates a previously deleted requirement to increase RSA width at higher altitudes that was inadvertently reinstated. The AC (including Change 9) is recommended practice. The AC is mandatory for projects funded with AIP grants or PFCs. The AC may be used to comply with applicable Part 139 requirements.	9/26/2005	___	No published cost estimate. The AC includes new standards for runway end siting requirements which could have a cost impact at some airports (which could be defrayed by AIP and PFC funds). The AC is mandatory for projects funded with AIP grants and PFCs.	N/A
46	FAA	AC 150/5300-13, Airport Design Standards, Change 10 http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5300_13_chg10.pdf	AC Change	The AC contains the FAA standards and recommendations for airport design. This change accomplishes the following: Adds information on tail height and table specifying tail height and wing span for each aircraft design group Adds taxiway and taxilane centerline separation standards for Aircraft Design Group VI Adds separation standards between certain airport features and on-airport agricultural crops The giudance in the AC (including Change 10) is recommended practice. However, the AC is mandatory for projects funded with AIP grants or PFCs. The AC may be used to comply with applicable Part 139 requirements.	9/29/2006	___	No published cost estimate. Compliance with the AC is mandatory for projects funded with AIP grants and/or PFCs. It may have a cost impact on some airports if changes need to be made to get in compliance with the standards. Costs of compliance could be defrayed with AIP and PFC funds.	N/A
47	FAA	AC 150/5300-13, Airport Design Standards, Change 11 http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5300_13_chg11.pdf	AC Change	The AC contains the FAA standards and recommendations for airport design. This change clarifies standards for RPZ's to explictly prohibit automobile parking in Central Portion of the RPZ. Automobile parking is discouraged elsewhere in the RPZ, but permitted if specified conditions are met The AC (including Change 11) is recommended practice. The AC is mandatory for projects funded with AIP grants or PFCs. The AC may be used to comply with applicable Part 139 requirements.	3/28/2007	___	No published cost estimate. The AC could have a cost impact to airports that are required to relocate prohibited items from within the RPZ. A portion of these costs could be defrayed with AIP or PFC funds.	N/A
48	FAA	AC 150/5300-13, Airport Design Standards, Change 12 http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5300_13_chg12.pdf	AC Change	This AC contains the FAA standards and recommendations for airport design. This change includes the following actions: Delays implementation date of OEI procedures Requires FAA HQ approval of end-around taxiway projects Other technical revisions The AC (including Change 12) is recommended practice. The AC is mandatory for projects funded with AIP grants or PFCs. The AC may be used to comply with applicable Part 139 requirements.	1/3/2008	___	No published cost estimate. The AC is mandatory for projects funded with AIP or PFCs. The AC could potentially create a cost impact for some airports to revise and implement design standards. The incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
49	FAA	AC 150/5300-13, Airport Design Standards, Change 13 http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5300_13_chg13.pdf	AC change	This AC contains the FAA standards and recommendations for airport design. This change clarifies standards for runway hold lines. The AC (including Change 13) is recommended practice. The AC is mandatory for projects funded with AIP grants or PFCs. The AC may be used to comply with applicable Part 139 requirements.	6/19/2008	___	No published cost estimate. Compliance with the AC is mandatory for projects funded with AIP grants and/or PFCs. It may have a cost impact on some airports if changes need to be made to get in compliance with the regulations. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
50	FAA	AC 150/5300-13, Airport Design Standards, Change 14 http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5300_13_chg14.pdf	AC change	This AC contains the FAA standards and recommendations for airport design. This change postpones the effective date of new One Engine Inoperative standards. The AC (including Change 14) is recommended practice. The AC is mandatory for projects funded with AIP grants or PFCs. The AC may be used to comply with applicable Part 139 requirements.	11/1/2008	___	No published cost estimate. This change postpones the effectivve date of new standards, and thus delays the imposition of any potential costs of compliance.	N/A
51	FAA	AC 150/5300-13, Airport Design Standards, Change 15 http://www.faa.gov/documentLibrary/media/150_5300_13_chg15.pdf	AC Change	The AC contains the FAA standards and recommendations for airport design. This change includes the following modifications: Delays implementation date of One Engine Inoperative (OEI) procedures Corrects references to RSA dimension for upgrades to aircraft approach categories Adjusts runway separation requirements table to reflect a change in Terminal Instrument Procedures (TERPS) Modifies requirements for use of declared distances and inclusion of information on same in NOTAMS The guidance in the AC (including Change 15) is recommended practice. However, the AC is mandatory for projects funded with AIP grants or PFCs. The AC may be used to comply with applicable Part 139 requirements.	12/21/2009	___	No published cost estimate. Compliance with the AC is mandatory for projects funded with AIP grants and/or PFCs. It may have a cost impact on some airports if changes need to be made to get in compliance with the regulations. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
52	FAA	AC 150/5345-56, Specification for L-890 Airport Lighting Control and Monitoring System (ALCMS) http://www.faa.gov/documentLibrary/media/advisory_circular/150-5345-56/150_5345_56.pdf	New AC	The AC establishes spefications for touch screen control and monitoring systems for airport lighting. The AC is recommended practice. However, use of the AC is mandatory for projects receiving federal assistance funds.	9/30/2004	___	No published cost estimate. The AC is unlikely to have a cost impact. It provides the specifications that must be used if an airport decides to install a touchscreen for ALCMS but it does not require a touchscreen.	N/A
53	FAA	Cert Alert #04-12, Dry Chemical Systems Inspection and Maintenance http://www.faa.gov/airports/airport_safety/certalerts/	New Cert Alert	The Cert Alert provides recommendations for inspection and maintenance of dry chemical systems. Use of a contractor to perform maintenance is recommended if ARFF personnel have not been certificated to perform maintenance. The Cert Alert is labelled cautionary and non-directive.	10/22/2004	___	No published cost estimate. The Cert. Alert could potentially have a cost impact associated with inspecting the dry chemical system if the airport does not have maintenance certified ARFF personnel.	N/A
54	FAA	AC 150/5340-18D, Standards for Airport Sign Systems http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/8ce3f88c034ae31a85256981007848e7/27274540e3a4f16c86256fda006ae564/$FILE/150-5340-18D.pdf	Cancellation and Reissuance of AC	The AC incorporates new mandatory hold signs that reflect changed standards for the Precision Obstacle Free Zone (POFZ) and Category (CAT II/III) operations. The AC also incorporates new standards for low visibility operations and tunway taxiway separation standards for Cat II/III operations.. This reissuance includes 19 principal changes to standards for sign system to reflect the changed airport design standards discussed above.	12/6/2004	___	No published cost estimate. The AC will likely have a cost impact on some airports because it requires new signage.	N/A
55	FAA	AC 150/5340-18E, Standards for Airport Sign Systems http://www.faa.gov/documentLibrary/media/advisory_circular/150-5340-18E/150_5340_18e.pdf	Cancellation and Reissuance of AC	The AC contains the FAA standards for the siting and installation of signs on airport runways and taxiways. This reissuance incorporates mandatory hold signs that reflect changed standards for the POFZ and CAT II and III operations. These changes correspond to revisions to AC 150/5300-13, *Airport Design,* that change the Precision Object Free Area (POFA) to the POFZ and incorporate new separation standards for taxiways that parallel runways used for certain low visibility operations. The AC is mandatory for Part 139 certificated airports. AC is mandatory for projects funded with AIP grants and PFCs.	9/12/2008	___	No published cost estimate. The AC is mandatory for Part 139 airports and projects funded with AIP and PFC. The AC would likely have a cost impact at some airports to bring their signage into compliance. Incremental costs could be defrayed by a combination of AIP and PFC funds.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
56	FAA	AC 150/5340-18F, Standards for Airport Sign Systems http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5340_18f.pdf	Cancellation and Reissuance of AC	The AC contains the Federal Aviation Administration standards for the siting and installation of signs on airport runways and taxiways. This reissuance incorporates mandatory hold signs for PrecisionObsatacle Free Zone and CAT. II and III operations Incorporates new requirements for low visibility operations procedures Revised sign standards are intended to assure that airports and operators using the airport comply with new standards. The AC is mandatory for Part 139 certificated airports The AC is mandatory for projects funded with AIP grants and PFCs.	8/16/2010	___	No published cost estimate. The AC is mandatory for Part 139 airports and for signage projects funded with AIP or PFCs. It could potentially have a cost impact for some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds	N/A
57	FAA	Cert Alert #04-16, Deer Hazard to Aircraft and Deer Fencing http://www.faa.gov/airports/airport_safety/certalerts/	Cancellation and reissuance of Cert Alert	The Cert Alert provides guidance on acceptable deer fencing and installation requirements. The Cert Alert is labelled cautionary and non-directive.	12/14/2004	___	No published cost estimate. The Cert Alert is non-directive and is unlikely to have a cost impact.	N/A
58	FAA	AC 150/5370-11A, Use of Nondestructive Testing in the Evaluation of Airport Pavements http://www.faa.gov/documentLibrary/media/advisory_circular/150-5370-11A/150_5370_11a.pdf	Cancellation and reissuance of AC	The AC focuses on nondestructive testing (NDT) equipment that measures pavement surface deflections after applying a static or dynamic load to the pavement. The AC is recommended practice. Other pavement testing methods may be used with FAA approval.	12/29/2004	___	No published cost estimate. The AC provides guidance and recommendations on data collection equipment and methods of data analysis. It would only have cost impacts if an airport decided to implement the recommendations.	N/A
59	FAA	AC 150/5340-26A, Maintenance of Airport Visual Aid Facilities http://www.faa.gov/documentLibrary/media/advisory_circular/150-5340-26A/150_5340_26a.pdf	Cancellation and reissuance of AC	The AC provides recommended guidelines for maintenance of airport visual aid facilities. This reissuance updates guidance in the following areas: Series circuitry Maintenance management and preventive maintenance Preventative maintenance Airfield lighted guidance signs, precision approach path indicators (PAPIs) and airport lighting control and monitoring systems (ALCMs) The AC is recommended practice	4/4/2005	___	No published cost estimate. The A/C expands upon and revises certain requirements which could have a cost impact on some airports.	N/A
60	FAA	AC 150/5340-26B, Maintenance of Airport Visual Aid Facilities http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5340_26b.pdf	Cancellation and reissuance of AC	The AC provides recommended guidelines for maintenance of airport visual aid facilities. This reissuance incorporates maintenance methodology for Runway Status Light Systems. The guidance in the AC is recommended practice. However, the AC is mandatory for projects funded with AIP grants or PFCs.	9/30/2009	___	No published cost estimate. The AC is mandatory for projects airport visual aid projects funded with AIP or PFCs and could potentially have a cost impact for some airports. Incremental costs could be defrayed by a combination of AIP and PFC funds.	N/A
61	FAA	AC 150/5340-1J, Standards for Airport Markings http://www.faa.gov/documentLibrary/media/advisory_circular/150-5340-1J/150_5340_1j.pdf	Cancellation and reissuance of AC.	The AC contains the FAA standards for markings used on airport runways, taxiways, and aprons. This revision adopts new standards for taxiway centerline markings. The new standards are required to be implemented by all commercial service airports with at least 1.5 million passengers. Per the AC, the standards are to be used on all new projects that are under development and are to be implemented at all Part 139 certificated airports no later than one year from the date of the AC.	4/29/2005	___	No published cost estimate. The A/C standards are mandatory for Part 139 airports and for airports that receive federal grants or are a part of the PFC program. It will likely have a cost impact on airports that revise markings to comply with the standards. Incremental costs could be defrayed with a combination of AIP and PFC funds	N/A
62	FAA	AC 150/5340-1J, Standards for Airport Markings, Change 1 http://www.faa.gov/documentLibrary/media/advisory_circular/150-5340-1J/150_5340_1j.pdf	Change to existing AC	The AC contains the FAA standards for markings used on airport runways, taxiways, and aprons. This change adopts firm compliance dates for taxiway centerline marking standards (1 year after issuance for airports with 370,000 to 1.5 million passengers and 2 years from issuances for airports with less than 370,000 passengers). A new standard for painted holding position signs will become mandatory two years after issuance of Change 1 for all Part 139 airports.	3/31/2008	___	No published cost estimate. The AC impements new standards for runway, taxiway and apron markings and will eventually have a cost impact on all Part 139 airports. The incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
63	FAA	AC 150/5340-1J, Standards for Airport Marking, Change 2 http://www.airspacecoordination.org/coord/150_5340_1j.pdf	Change to existing AC	The AC contains the Federal Aviation Administration (FAA) standards for markings used on airport runways, taxiways, and aprons. This change clarifies Change 1, which adopts three new surface painted markings to reduce runway incursions. The guidance in the AC is recommended practice. However the guidance is mandatory for projects funded with AIP grants or PFCs. Also, the AC is the only means of compliance with Part 139 requirements for runway and taxiway marking. Certain revised Part 139 marking requirements have a compliance date of December 31, 2010.	6/6/2008	___	No published cost estimate. The AC clarifies the current standards for runway, taxiway and apron markings and should have no cost impact.	N/A
64	FAA	AC 150/5340-1K, Standards For Airport Markings http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5340_1k_consolidated.pdf	Cancellation and reissuance of AC	The AC contains the FAA standards for markings used on airport runways, taxiways, and aprons. This reissuance includes 29 "principal changes." The changes for the most part address the problem of pilots confusing taxiways for runways when landing. The AC also incorporates guidance from other documents The guidance in the AC is recommended practice. However, guidance is mandatory for Part 139 certificated airports and mandatory for projects funded with AIP grants or PFCs.	9/3/2010	___	No published cost estimate. The AC is mandatory for Part 139 airports and for projects funded with AIP or PFCs. It could potentially have a cost impact for some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds	
65	FAA	AC 150/5340-1K, Standards For Airport Markings, Change 1 http://www.faa.gov/documentLibrary/media/150_5340_1K_change1.pdf	Change to existing AC.	The AC contains the FAA standards for markings used on airport runways, taxiways, and aprons. This change corrects text and formatting errors, clarifies instructions and marking characteristics, and incorporates the corrections noted in the errata sheet for AC 150/5340-1K. The AC is mandatory for Part 139 Airports and for projects funded with AIP grants and PFCs. Per the AC, the standards "are to be used on all new airport projects that are under development and are to be implemented at all Part 139 certificated airports."	11/17/2010	___	No published cost estimate. The AC is mandatory for Part 139 airports and for runway, taxiway and apron markings funded with AIP or PFC grants. It could have a cost impact on airports that are required to revise markings to comply with the AC. Incremental costs could be defrayed with a combination of AIP and PFC funds	N/A
66	FAA	PFC Update 49-05	New PFC Update	The PFC Update provides guidance on implementing the amendments to 14 CFR Part 158 adopted in 2005 and discussed above (non-hub pilot program and other changes to application procedures).	4/29/2005	___	No published cost estimate. The PFC Update interprets amendments to the PFC regulation and does not itself require public agencies to modify administration of their PFC programs.	N/A
67	FAA	PGL 05-03, Updated Grant Assurances http://www.faa.gov/airports/aip/guidance_letters/media/PGL_05-03.pdf	New PGL	The PGL adds two new grant assurances required by Vision 100, Pub. L. 108-176 (December 12, 2003). Only one assurance affects small airports. This assurance (Assurance No. 38) requires airport sponsors to grant long-term leases to aircraft owners that want to construct a hangar at the owners' expense. The lease is subject to the terms and conditions that the sponsor may adopt.	6/3/2005	___	No published cost estimate. The updated grant assurances in the PGL are unlikely to have a cost impact.	N/A
68	FAA	Order 5100.38C, Airport Improvement Program Handbook http://www.faa.gov/airports/resources/publications/orders/media/aip_5100_38c.pdf	Cancellation and reissuance of Order	The Order provides guidance and sets forth policy and procedures to be used in the administration of the Airport Improvement Program. The order addresses the following, among other things: Funding levels and formulas Project and sponsor eligibility Project formulation Application procedures Project implementation Project record-keeping and oversight Project close-out. This reissuance incorporates changes to the AIP included in Vision 100, Pub. L. 108-176 (December 12, 2003), as well as other policy changes adopted by the FAA since the prior version of the Order.	6/28/2005	___	No published cost estimate. Cost impacts for changes to grant application or administration requirements may be recoverable up to the standard federal share as project admiinistration costs	N/A
69	FAA	Order 5100.37B, Land Acquisition and Relocation Assistance for Airport Projects http://www.faa.gov/airports/resources/publications/orders/media/environmental_5100_37b.pdf	Cancellation and reissuance of Order	The Order provides guidelines and identifies responsibilities for FAA acceptance and monitoring of airport sponsor compliance with provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act. Compliance is required on airport projects involving land acquisition receiving Federal financial assistance. This reissuance incorprates changes to DOT's implementing regulation 49 CFR Part 24 issued in 2005 and discussed above.	8/1/2005	___	No published cost estimate The Order implements regulatory changes and provides guidance to FAA staff. The Order itself, therefore is unlikely to have a cost impact on airports.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
70	FAA	AC 150/5220-22A, Engineered Materials Arresting Systems (EMAS) for Aircraft Overruns http://www.faa.gov/documentLibrary/media/advisory_circular/150-5220-22A/150_5220_22a.pdf	Cancellation and reissuance of AC	The AC contains standards for the planning, design, installation, and maintenance of EMAS in runway safety areas. This reissuance reflects the results of testing and field experience with aircraft overruns where EMAS was installed. the guidance in the AC is recommended practice. However, the guidance is mandatory for airports installing EMAS using AIP grant funds and is mandatory for Part 139 certificated airports.	9/30/2005	___	No published cost estimate. The AC is mandatory for Part 139 airports and those receiving AIP grants for an EMAS project. The AC would likely have a cost impact at those airports (which could be defrayed by AIP and PFC funds).	N/A
71	FAA	AC 150/5100-14D, Architectural, Engineering, and Planning Consultant Services for Airport Grant Projects http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5100_14d.pdf	Cancellation and reissuance of AC	The AC provides guidance for airport sponsors in the selection and engagement of architectural, engineering, and planning consultants. It also discusses contract types, format and provisions, and guidelines for determining the reasonableness of consultant fees. Principal changes in this reissuance include the following: Clarification of Broad Form Indemnification Expansion of selection criteria and method of evalutating potential consultants Expansion of Contractor Contractual Requirements section and new information on Methods of Contracting and Allowable Costs. Increase in the limit for use of informal procedures from $25,000 to $100,000 Clarification of Independent Fee Estimates and addition of methods of determining fair and reasonable fees Addition of discussion of Alternative Delivery Methods Update of discussion of contract provisions consistent with current laws and regulations. The guidelines in the AC are recommended for consultant selection process to comply with requirements of 49 CFR Part 18 when airport sponsors are selecting consultants for project funded with AIP grants. The AC does not apply to projects that are fully funded with PFCs or a combination of PFCs and airport revenue.	9/30/2005	___	No published cost estimate. The changes provided in the AC are unlikely to increase costs but could potentially lower the cost of selecting and engaging consultants.	N/A
72	FAA	AC 150/5100-17, Land Acquisition and Relocation Assistance for Airport Improvement Program Assisted Projects, Change 6 http://www.faa.gov/documentLibrary/media/advisory_circular/150-5100-17/150_5100_17_chg6.pdf	Revision to AC	The AC provides guidance to sponsors of AIP assisted projects to develop their land acquisition and relocation assistance procedures in conformance to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. This revision incorporates changes to the DOT implementing regulation 49 CFR Part 24, discussed previously. The FAA shall monitor sponsor compliance with the provisions of 49 CFR Part 24, and the sponsor shall take whatever corrective action necessary to comply with the Uniform Act and 49 CFR Part 24.	11/7/2005	___	No published cost estimate. The AC implements regulatory changes and provides guidance to FAA staff. The AC itself, therefore is unlikely to have a cost impact on airports.	N/A
73	FAA	Cer Alert #06-02, Aqueous Film Forming Foam (AFFF) meeting MIL-F-24385 http://www.faa.gov/airports/airport_safety/certalerts/media/cert0602.pdf	New Cert Alert	The Cert Alert clarifies a recent AC and specifies that any AFFF purchased after July 1, 2006 by a Part 139 airport must meet the referenced military specification.	2/8/2006	___	No published cost estimate. This AC is not mandatory but all future purchases of AFFF must conform to MIL-F-24385 which may have a minor cost impact at some airports.	N/A
74	FAA	Cert Alert #06-05, Stop Runway Incursions & Surface Incedents Now http://www.faa.gov/airports/airport_safety/certalerts/media/cert0605.pdf	New Cert Alert	The Cert Alert provides recommended practices for airports to reduce the frequency of runway incursion incidents involving vehiclular traffic. Recommendations include (but are not limited to) the following: Audit vehicle operating permits Update driver training programs Require "practical" testing excercises involving driving on the airfield Employ airport operations officers to monitor vehicle operations Establish and enforce consequences for violations of procedures for vehicle operation on the airfield	4/18/2006	___	No published cost estimate. An airport could face a minor cost impact if it chooses to implement the recommendations of the Cert Alert.	N/A
75	FAA	AC 150/5210-17A, Programs for Training of Aircraft Rescue and Firefighting Personnel http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-17A/150_5210_17a.pdf	AC cancellation and reissuance	The AC provides information on courses and reference materials for training of Aircraft Rescue and Firefighting (ARFF) personnel. This reissuance provides guidance on frequency and content of ARFF training. The AC is one means of compliance with ARFF personnel training requirements for Part 139 certificated airports. The AC is applicable to all airports, but does not specify that it is mandatory for projects funded with AIP grants and PFCs	4/28/2006	___	No published cost estimate. An airport could face a cost impact if it chooses to implement the recommendations of the AC.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
76	FAA	AC 150/5210-17B, Programs for Training of Aircraft Rescue and Firefighting Personnel http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5210_17b.pdf	Cancellation and reissuance of AC	The AC provides guidance on frequency and content of training for ARFF personnel. This reissuance updates the list of training and reference material as well as training standards. The guidance in the AC is recommended practice. However the AC is mandatory for all projects funded with AIP grants or PFCs.	9/23/2009	___	No published cost estimate. The AC is required for ARFF training programs funded with AIP or PFCs. It could have a cost impact on airports that wish to comply with the recommendations.	N/A
77	FAA	AC 150/5200-34A, Construction or Establishment of Landfills near Public Airports http://www.faa.gov/documentLibrary/media/advisory_circular/150-5200-34A/150_5200_34a.pdf	Cancellation and reissuance of AC	The AC contains guidance on complying with Federal statutory requirements regarding the construction or establishment of landfills near public airports. This reissuance updates the guidance to reflect changes to statutory requirements adopted in the Air-21 legislation, Pub. L. No. 106-181 (April 5, 2000). Per the AC, the guidance "should be used to comply with" statutory limitations on siting landfills near airports. Per the statute, the site limitations are not applicable in Alaska. No substantive changes to prior AC	6/26/2006	___	No published cost estimate. There are no cost impacts as a result of this AC. There are no substantive changes to the prior AC, and it applies to the builder of a landfill, not the airport.	N/A
78	FAA	AC 150/5200-28C, Notices to Airmen (NOTAMS) For Airport Operators http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5200_28c_cancelled.pdf	Cancellation and reissuance of AC	The AC provides guidance on using the NOTAM system for airport condition reporting. This reissuance provides updated guidance on the NOTAM system and its function, guidance on preparing NOTAMS, and sample forms.	7/24/2006	___	No published cost estimate. There should be no cost impacts associated with this AC.	N/A
79	FAA	AC 150/5200-28D, Notices to Airmen (NOTAMS) For Airport Operators http://www.faa.gov/documentLibrary/media/advisory_circular/150-5200-28D/150_5200_28d.pdf	Cancellation and reissuance of AC	This AC provides guidance on using the NOTAM system for airport condition reporting. This reissuance provides updated guidance on preparing and issuing NOTAMS and revises formating and nomenclature.	1/28/2008	___	No published cost estimate. The AC should have no cost impact to airports.	N/A
80	FAA	AC 150/5190-7, Minimum Standards for Commercial Aeronautical Activities http://www.faa.gov/documentLibrary/media/advisory_circular/150-5190-7/150_5190_7.pdf	Cancellation and reissuance of AC	The AC provides information on the FAA's recommendations on commercial minimum standards and related policies. Although minimum standards are optional, the FAA highly recommends their use and implementation as a means to minimize the potential for violations of Federal obligations at federally obligated airports. This reissuance provides updated guidance on the sponsor's prerogative to establish minimum standards for commercial aeronautical service providers. It also guidance for self-service operations and self-service rules and regulation of other aeronautical activities.	8/28/2006	___	No published cost iestimate. The AC is not mandatory but could have a cost impact upon airports that chose to develop minimum standards based upon the AC.	N/A
81	FAA	PFC Update 50-06, Detailed Basis of Cost Information http://www.faa.gov/airports/pfc/pfc_updates/media/pfc_50_06_basis_cost.pdf	New PFC Update	The PFC update provides new documentation requirements for certain PFC projects. Among other things, the update makes the following modifications: Requires submission of additional cost justification information and data for projects over $10 million in value Adds a new required determination in the "For FAA Use" portion of Attachment B Adds new required finding to FAA recommendation form Adds new standard language to final agency decision (FAD template) All changes are the result of an adverse court decision, finding that FAA had not adequately documented or supported its finding that $110 million was not an excessive cost to complete an Environmental Impact Statement.	9/8/2006	___	No published cost estimate. Additional documentation requirements could increase the cost of submitting PFC applications with projects over $10 million in value. This cost can be defrayed with PFC funds.	
82	FAA	AC 150/5370-13A, Off-Peak Construction of Airport Pavements Using Hot-Mix Asphalt http://www.faa.gov/documentLibrary/media/advisory_circular/150-5370-13A/150_5370_13a.pdf	Cancellation and reissuance of AC	The AC provides guidance for the planning, coordination, management, design, testing, inspection, and execution of off-peak construction of airport pavements using hot-mix asphalt (HMA) paving materials. This reissuance updates the guidance to reflect current developments. The guidance in the AC is recommended practice.	9/26/2006	___	No published cost estimate. The AC is unlikely to have a cost impact to airports.	N/A
83	FAA	AC 150/5335-5A, Standardized Method of Reporting Airport Pavement Strength PCN http://www.faa.gov/documentLibrary/media/advisory_circular/150-5335-5A/150_5335_5a.pdf	Cancellation and reissuance of AC	The AC provides guidance on new standardized method for reporting pavement strength. The new standard was adopted by ICAO	9/28/2006	___	No published cost estimate. The AC is unlikely to have a cost impact to airports.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
84	FAA	Order 5280.5C, Airport Certification Handbook http://www.faa.gov/documentLibrary/media/Order/ND/5280.5.pdf	Cancellation and reissuance of Order	The Order provides FAA personnel with the policies, standards, and procedures by which to conduct the Airport Certification Program. The Order helps ensure standardization and uniformity in the application of the program and in enforcing 14 CFR Part 139, Certification of Airports. The order is directed at airport certification safety inspectors, rather than at airports.	9/28/2006	___	No published cost estimate. The Order is directed at certification safety inspectors. The Order is unlikely to have a cost impact to airports, unless an airport is required to incur costs to address an inspector's finding or recommendation based on the order.	
85	FAA	PGL 07-03, Revised and Updated Requirements for Letter of Intent (LOI) Requsts http://www.faa.gov/airports/aip/guidance_letters/media/PGL_07_03.pdf	New PGL, revises AIP Order 5100.38C	The PGL specifies revised and updated guidance for submission and evaluation of LOI requests. Among other things, the PGL addresses the following issues: Eligibility and administrative requirements The LOI request process Evaluation criteria and decision process Administration of LOIs Amendments to LOIs LOI Finance Plan Template	11/20/2006	___	No published cost estimate. The PGL provides guidance related to the submission and evaluation of LOI requests. The PGL could increae the coss of preparing a LOI application. However, a portion of these costs could be defrayed with AIP funds as a project formulation cost.	N/A
86	FAA	AC 150/5220-9A, Aircraft Arresting Systems on Civil Airports http://www.faa.gov/documentLibrary/media/advisory_circular/150-5220-9A/150_5220_9a.pdf	Cancellation and reissuance of AC	The AC provides standards for installation, signage and marking for permanent and temporary aircraft arresting systems at joint use airports. This reissuance provides FAA's current guidance on the subject. Among other things, the AC specifies that: Arresting systems must be installed according to current military standards. The FAA must determine that the installation will not adversely affect safety and meets, to the extent practicable, FAA airport design standards. The arresting system must be noted in the Airport Data System and/or NOTAMS. The AC is mandatory for federally obligated airports. The AC is one means of compliance for Part 139 certificated airport	12/20/2006	___	No published cost iestimate. The AC is mandatory for federally obligated airports and could have a cost impact for those airports serving military aircraft.	N/A
87	FAA	AC 150/5190-6, Exclusive Rights at Federally-Obligated Airports http://www.faa.gov/documentLibrary/media/advisory_circular/150-5190-6/150_5190_6.pdf	Cancellation and reissuance of AC	The AC provides information on FAA's prohibition on the grant of exclusive rights at federally obligated airports. The prohibition applies to airports that have accepted federal grants or donation of federal property. This reissuance provides FAA's current guidance on the subject. The AC contains a discussion of FAA's policy on exclusive rights, exceptions to the policy and FAA methods to assure compliance.	1/4/2007	___	No published cost estimate. The AC is unlikely to have a cost impact to airports.	N/A
88	FAA	Cert Alert #07-03, Part 139 Airport Inactive Status http://www.faa.gov/airports/airport_safety/certalerts/media/cert0703.pdf	New cert alert	The cert alert announces the Inactive certificate program. Airports without recent passenger flight activity subject to Part 139 may go on incactive status. Inactive status relieves the airport of the annual inspection requirement Inactive status airports must give FAA 90 days notice before Part 139 passenger flights resume.	2/2/2007	___	No published cost estimate. The AC is unlikely to have a cost impact to airports.	N/A
89	FAA	Cert Alert #07-10, Vehicle Pedestrian Deviation Runway Incursions http://www.faa.gov/airports/airport_safety/certalerts/media/cert0710.pdf	New Cert Alert	The Cert Alert provides guidance on strategies to reduce Vehicle Pedestrian Deviation (VPD) runway incursions. The cert alert appears to summarize and highlight existing guidance and requirements.	8/10/2007	___	No published cost estimate. An airport could face a minor cost impact if it chooses to implement the recommendations of the Cert Alert.	N/A
90	FAA	AC 150/5210-5C, Painting, Marking, and Lighting of Vehicles Used on an Airport http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-5C/150_5210_5c.pdf	Cancellation and Reissuance of AC	The AC provides guidance, specifications, and standards for painting, marking, and lighting of vehicles operating in the airport air operations area (AOA). This reissuance deletes and adds references to various specifications and standards, including EB #67 The AC is recommended practice. The AC is mandatory for vehicles funded with AIP grants and PFCs	8/31/2007	___	No published cost estimate. The AC is mandatory for vehicles funded with AIP grants and PFCs and could have a cost impact to certain airports.	N/A
91	FAA	AC 150/5210-5D, Painting, Marking, and Lighting of Vehicles Used on an Airport http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5210_5d.pdf	Cancellation and reissuance of AC	The AC provides guidance, specifications, and standards for painting, marking, and lighting of vehicles operating in the airport air operations area (AOA). This reissuance contains new specifications and recommendations for the painting, marking, and lighting of Towbarless Tow Vehicles (TLTVs). The guidance in the AC is recommended practice. However, the AC is mandatory for vehicles funded with AIP grants and PFCs. Any repainting required by the AC must be completed by 12/31/2010.	4/1/2010	___	No published cost estimate. The AC is mandatory for vehicles puchased with AIP or PFCs and could potentially have a cost impact for some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
92	FAA	AC 150/5300-16A, General Guidance and Specifications for Aeronautical Surveys: Establishment of Geodetic Control and Submission to the National Geodetic Survey http://www.faa.gov/documentLibrary/media/advisory_circular/150-5300-16A/150_5300_16a.pdf	Cancellation and reissuance of AC.	The AC explains the specifications for establishing geodetic control on or near an airport. It also describes how to submit the information to the National Geodetic Survey (NGS) for approval and inclusion in the National Spatial Reference System (NSRS) in support of aeronautical information surveys. The AC supports FAA initiative to convert to Geospatial Information System (GIS) and Electronic Airport Layout Plan (E-ALP) The AC is recommended practice. However, it is mandatory for surveys funded under federal assistance programs. The AC provides one, but not the only, means of complying with 14 CFR Part 139.	9/15/2007	___	No published cost estimate. The AC is mandatory for surverys funded with AIP grants and PFCs and could have a cost impact to certain airports. However, incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
93	FAA	AC 150/5300-18A, General Guidance and Specifications for Submission of Aeronautical Surveys to NGS: Field Data Collection and Geographic Information System (GIS) Standards	Cancellation and reissuance of AC	This AC provides the specifications for the collection of airport survey data through field and office methodologies in support of aeronautical information and airport engineering surveys. It also explains how to submit data to the FAA, which will forward the data to the NGS for quality control purposes. The primary purpose of these guidelines and specifications is to list the requirements for aeronautical surveys conducted at airports in support of the FAA Airport Surveying–GIS Program. This reissuance supports implementation of Wide Area Augmentation System (WAAS) Lateral Performance With Visual Guidance (LPV) approaches. The guidance in the AC is recommended practice for submitting airport survey and GIS data. However, it is mandatory for surveys funded with AIP grants or PFCs	9/15/2007	___	No published cost estimate. The AC is mandatory for surverys funded with AIP grants and PFCs and could have a cost impact to certain airports. However, incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
94	FAA	AC 150/5300-18B, General Guidance and Specifications For Submission of Aeronautical Surveys to NGS: Field Data Collection and Geographic Information System (GIS) Standards http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5300_18b.pdf	Cancellation and reissuance of AC.	The AC provides the specifications for the collection of airport data through field and office methodologies in support of the FAA's GIS Program. It also explains how to submit data to the FAA, who will forward the safety critical data to the National Geodetic Survey (NGS) for independent verification and validation. This reissuance modifies the specifications for data collection. In particular, the AC incorporates new standards addressing the collection of a greater spectrum of airport related data. The AC is recommended practice. However, according to the AC, the guidance is "mandatory for the collection of geospatial airport and aeronautical data funded under Federal grant assistance programs. It also provides one, but not the only, acceptable means of meeting the requirements of 14 CFR Part 139 for the collection of geospatial airport and aeronautical data.	5/17/2009	___	No published cost estimate. The AC provides the specifications for the collection of data in support of the FAA Airport Surveying – Geographic Information System (GIS) Program. It is required for projects funded with AIP or PFCs and could have a cost impact for some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
95	FAA	AC 150/5300-14A, Design of Aircraft Deicing Facilities http://rgl.faa.gov/REGULATORY_AND_GUIDANCE_LIBRARY%5CRGADVISORYCIRCULAR.NSF/0/FBA78D44CD44A12086257364006879D6?OpenDocument	Cancellation and reissuance of AC	This AC provides standards, specifications, and guidance for designing aircraft deicing facilities This reissuance incorporates the following principal changes for off-gate deicing zones: New marking requirements Marking of vehicle safety zones and incorporation of vehicle safety zones in separation standards Recommended standards for electronic message boards. The guidance in the AC is recommended practice.. However, the AC is mandatory for aircraft deicing facilities funded with AIP grants or PFCs.	9/18/2007	___	No published cost estimate. The AC is mandatory for aircraft deicing facilities funded with AIP grants and PFCs and could have a minor cost impact to certain airports.	N/A
96	FAA	AC 150/5300-14B, Design of Aircraft Deicing Facilities http://www.faa.gov/documentLibrary/media/advisory_circular/150-5300-14B/150_5300_14b.pdf	Cancellation and reissuance of AC	The AC provides standards, specifications, and guidance for designing aircraft deicing facilities. This reissuance includes the following: Revised separation standards for off-gate facilities Revised tables The guidance in the AC is recommended practice. However, the AC is mandatory for aircraft deicing facility projects funded with AIP grants or PFCs.	2/5/2008	___	No published cost estimate. The AC is mandatory for deicing projects funded with AIP or PFC and could have a cost impact for those airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
97	FAA	AC 150/5340-30C, Design and Installation Details for Airport Visual Aids http://rgl.faa.gov/Regulatory_and_Guidance_Library%5CrgAdvisoryCircular.nsf/0/9832A31E47465E7486257375006F8860?OpenDocument	Cancellation and reissuance of AC	This AC provides guidance and recommendations on the installation of airport visual aids. This reissuance includes the following principal changes: Revised PAPI siting methods Clarification to standards on lighting system protection Addition of standards for Omnidirectional Approach Lighting System (ODALS) Addition of drawings throughout AC The guidance in the AC is recommended practice. However, the AC is mandatory for visual aids purchased with AIP grants or PFCs. Also, the lighting standards in the AC are the only means to comply with the lighting requirements of Part 139.	9/20/2007	___	No published cost estimate. The AC could have cost impacts on some airports. The lighting requirements are necessary to comply with Part 139 and the other standards are mandatory for visual aids purchased with AIP grants or PFCs. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
98	FAA	AC 150/5340-30D, Design and Installation Details for Airport Visual Aids http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5340_30d.pdf	Candellation and reissuance of AC	The AC provides guidance and recommendations on the installation of airport visual aids. This reissuance includes the following changes: Modifies the standards for design and installation of airport visual aids Adds Appendix 7, containing standards for Runway Status Lights (RWSL) Adds a new standard for Stopway Edge Lights Updates the standard for Beacon Towers Updates the standard for Wind Cones The AC is recommended practice. However, the guidance is mandatory for projects funded with AIP grants and PFCs. In addition, "All lighting configurations contained in this standard are the only means acceptable to the Administrator to meet the lighting requirements of Title 14 CFR Part 139, Certification of Airports, Section 139.311, Marking, Signs and Lighting."	9/30/2008	___	No published cost estimate. The AC is mandatory for Part 139 airports and airport visual aid projects funded with AIP and PFC. The changes and recommendations of the AC would likely have a cost impact at some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
99	FAA	AC 150/5340-30E, Design and Installation Details for Airport Visual Aids http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5340_30e.pdf	Candellation and reissuance of AC	The AC provides guidance and recommendations on the installation of airport visual aids. This reissuance lists 24 specific "principal changes" including: Revisions and clarifications to guidance on color coded taxiway centerline lights Addition of exothermic weld requirements for zinc coated light bases Update of standards for light-base ground Updates, corrections to various figures and tables The guidance in the AC is recommended practice. However, the guidance is mandatory for projects funded with AIP grants and PFCs. In addition, "All lighting configurations contained in this standard are the only means acceptable to the Administrator to meet the lighting requirements" of 14 CFR §139.311, Marking, Signs and Lighting.	9/29/2010	___	No published cost estimate. The AC is mandatory for Part 139 airports and for visual aid projects funded with AIP or PFC grants. It could have cost impacts on some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
100	FAA	AC 150/5370-12A, Quality Control of Construction for Airport Grant Projects http://www.faa.gov/documentLibrary/media/advisory_circular/150-5370-12A/150_5370_12a.pdf	Cancellation and reissuance of AC	This AC provides information to ensure the quality of construction accomplished under the AIP. The reissuance specifies quality control responsibilities for the sponsor, the project engineer and the FAA project manager. Use of the AC is not mandatory. However, the AC is mandatory for projects funded with AIP grants.	9/29/2007	___	No published cost estimate. The AC is mandatory for projects funded with AIP and could create a small cost impact. The incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
101	FAA	PGL 08-02, Management of Acquired Noise Land, Inventory, Reuse, Disposal http://www.faa.gov/airports/aip/guidance_letters/media/PGL_08_02.pdf	New PGL	The PGL implements the grant assurance requiring airports to dispose of noise land acquired with AIP grants promptly after the land is no longer needed for noise compatibility (Noise Land Assurance). Under the Noise Land Assurance, the federal share of the proceeds of disposal must be applied to noise compatibility projects or returned to the FAA. Among other things, the PGL: Requires development of a noise land inventory and noise land reuse plan Discusses the criteria for determining when land is needed for noise compatibility Discusses acceptable methods of disposal Discusses acceptable methods of accounting for and applying the federal share of disposal proceeds.	2/1/2008	___	No published cost estimate. The PGL requires a noise land inventory and noise land reuse plan. This will have a minor cost impact to those airports with noise land. Development of the noise land reuse plan as a component of a master plan update project may be eligible for AIP funding.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
102	FAA	PGL 08-03, Compliance with Trafficing Victims Protection Act http://www.faa.gov/airports/aip/guidance_letters/media/PGL_08_03.pdf	New PGL	The PGL adopts a special condition requiring compliance with provisions of Trafficking Victims Protection Act related to the use of federal funds. The special condition applies to funds granted directly to private entities and funds originally granted to public agencies that are redistributed to private entities, including funds paid to contractors. The special condition is mandatory upon execution of a grant agreement.	2/20/2008	___	No published cost estimate. This PGL is unlikely to have a cost impact.	N/A
103	FAA	Program Information Memorandum (PIM) #1, Acquiring Paint Striping Machines to Complete Enhanced Centerline Markings http://www.faa.gov/airports/aip/guidance_letters/media/pim_1_force_account.pdf	New PIM	The PIM establishes partial eligibility for costs of paint striping machines when they are used in "force account" work on an AIP-eligible marking project. The guidance on eligibility in the PIM is mandatory for review of AIP funding requests that include the costs of paint-striping machines.	3/8/2008	___	No published cost estimate. This PGL could create a minimal cost savings to some airports.	N/A
104	FAA	AC 150/5210-7D, Aircraft Rescue and Fire Fighting Communications http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-7D/150_5210_7d.pdf	AC cancellation and reissuance	The AC provides guidance to assist airport operators in preparing for Aircraft Rescue and Fire Fighting (ARFF) communications. The reissuance provides current guidance on the following: ARFF communications systems Initial notification and communication of alarm to first responders Communications between ARFF responders and others Lost communications Radio call signs and discipline Part 139 certificated airports may use the guidance to comply with applicable Part 139 requirements.	4/14/2008	___	No published cost estimate. The AC provides current guidance on ARFF communications. It could have a cost impact on airport if its communication system is not in compliance with Part 139. Some or all of incremental costs for communications systems could be defrayed with a combination of AIP and PFC funds.	N/A
105	FAA	Cert Alert #08-07, Guidance on the High-Reach Extendable Turret (HRET) http://www.faa.gov/airports/airport_safety/certalerts/media/cert0807.pdf	New Cert Alert	The Cert Alert encourages airports to provide hands-on training for HRET operation and clarifies AIP eligibility for training. Training aids are authorized for purchase as part of an AIP funded vehicle purchase.	7/18/2008	___	No published cost estimate. The Cert Alert could have a cost impact if airports choose to follow the recommendations to provide hands-on-training for HRET operation. A portion of training costs (attributable to purchase of training aids) may be defrayed by a combination of AIP and PFC funds.	N/A
106	FAA	PGL 08-06, Public Access to Airport Planning and Environmental Documents http://www.faa.gov/airports/aip/guidance_letters/media/PGL_08_06.pdf	New PGL	The PGL prohibits access restrictions, registration requirements or requirements for personal information for public internet access access to planning and environmental documents prepared with AIP funds	7/21/2008	___	No published cost estimate. The PGL can have a cost impact for those airports that have documents posted that have restricted access.	N/A
107	FAA	AC 150/5210-15A, Aircraft Rescue and Firefighting Station Building Design http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-15A/150_5210_15a.pdf	AC cancellation and reissuance	Updates accident site distribution Incorporates specific NFPA standards Expands ARFF project phases Furrther defines station site selection criteria Expands station elements and facility requirements to meet current standards Expands and incorporates detailed hazard and safety features Provides new table on ARFF vehicle dimensions and thresholds Revises typical station furnishings and equipment requirements Revises station design checklist The AC is not mandatory. However the AC is mandatory for projects funded with AIP grants or PFCs.	9/10/2008	___	No published cost estimate. The AC is required for ARFF stations funded with AIP or PFC and could have a cost impact on some airports. Incremental costs could be defrayed by a combination of AIP and PFC funds.	N/A
108	FAA	AC 150/5210-18A, Systems for Interactive Training of Airport Personnel http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-18A/150_5210_18a.pdf	Cancellation and reissuance of AC	The AC provides guidance in the design of systems for interactive training of airport personnel. This reissuance specifies current FAA standards for interactive airport personnel training systems to qualify for funding. The guidance in this AC is recommended practice. However, the AC is mandatory for projects funded with AIP grants or PFCs.	9/28/2008	___	No published cost estimate. The AC is required for projects funded with AIP or PFCs. It could have a cost impact for airports that wish to implement the recommendations of the AC. Incremental costs could be defrayed by a combination of AIP and PFC funds.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
109	FAA	AC 150/5300-17B, General Guidance and Specifications for Aeronautical Survey Airport Imagery Acquisition and Submission to the National Geodetic Survey http://www.faa.gov/documentLibrary/media/advisory_circular/150-5300-17B/150_5300_17b.pdf	Cancellation and reissuance of AC.	The AC provides the specifications for Airport Imagery acquisition and how to submit the imagery for review and approval in support of aeronautical information and airport engineering surveys. This reissuance includes the following changes: Updates standards for imagery acquisition for geodedic surveys Adds requirement for submission and approval of an imagery plan prior to imagery acquisition Eliminates requirement for a final report unless there is a change from the provided plan or an unusual circumstance was encountered during the collection effort Adds a requirement for development and delivery to FAA of digital orthoimagery. Adds a requirement for the use of the Airports GIS to submit and track project requirements such as the plan and deliverables Changes the exterior orientation reporting units for omega, phi, kappa, from radians to decimal degrees Allows the use of state plane coordinates, reported in meters The guidance in the AC is recommended practice. However, the AC is mandatory for projects funded with AIP grants or PFCs.	9/29/2008	___	No published cost estimate. The AC provides the specifications for imagery acquisition and submission in support of engineering surveys. It is required for projects funded with AIP or PFCs and could have a cost impact for those airports.	N/A
110	FAA	AC 150/5210-14B, Aircraft Rescue Fir Fight Equipment, Tools and Clothing http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-14B/150_5210_14b.pdf	AC cancellation and reiussance.	The AC contains references to the minimum requirements for the selection and performance of aircraft rescue and firefighting personal protective equipment (PPE), self contained breathing apparatus (SCBA), and powered rescue tools. This reissuance makes the following changes: Incorporates by reference certain NFPA standards Adds standards for SCBA and powered rescue tools The guidance in the AC is recommended practice. However, the standards for PPE, SCBA and powered rescue tools are the minimum acceptable for federally funded projects. Part 139 airports may use the AC as one means of compliance with applicable Part 139 requirements.	9/30/2008	___	No published cost estimate. The AC stipulates the minimum standards of compliance for federally funded projects. The AC could potentially have a cost impact at some airports if they want their equipment procurement specifications to comply with the AC. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
111	FAA	AC 150/5300-15A, Use of Value Engineering for Engineering and Design of Airport Grant Projects http://www.faa.gov/documentLibrary/media/advisory_circular/150-5300-15A/150_5300_15a.pdf	Cancellation and reissuance of AC.	The AC provides guidance on using value engineering (VE) in AIP funded airport projects. This reissuannce provides current information on the benefits of value engineering and the currently required steps in the VE process. The guidance in the AC is recommended practice. However, the AC is mandatory for projects funded with AIP grants of PFCs.	9/30/2008	___	No published cost estimate. The AC is required for projects funded with AIP or PFCs. It could potentially lower the cost of projects at airports that implement the recommendations.	N/A
112	FAA	Cert Alert #08-12, Safety Risks for Operating Supertugs (TLTV) in the Movement Area and Air Operations Area (AOA) when Towing Large Air Carrier Aircraft. http://www.faa.gov/airports/airport_safety/certalerts/media/cert0812.pdf	New Cert Alert	The Cert Alert provides instructions to airports on requirements for operators of towbarless tow vehicles (TLTVs), especially during night operations.	11/25/2008	___	No published cost estimate. The Cert Alert will likey have no cost impact for airports.	N/A
113	FAA	AC 150/5200-30C, Airport Winter Safety and Operations http://www.faa.gov/documentLibrary/media/advisory_circular/150-5200-30C/150_5200_30C.pdf	Cancellation and reissuance of AC	The AC provides guidance to assist airport operators in developing a snow and ice control plan, conducting and reporting runway friction surveys, and establishing snow removal and control procedures. This reissuance accomplishes the following: Requires Part 139 airports to submit revised Snow and Ice Control Plans to the FAA by April 30, 2009 Establishes winter-related conditions that require closure of a runway The AC is mandatory for Part 139 certificated airports.	12/9/2008	___	No published cost estimate. The AC is mandatory for Part 139 airports and could potentially have a cost impact for airports to bring their snow plan into compliance.	
114	FAA	AC 150/5210-19A, Driver's Enhanced Vision System (DEVS) http://www.faa.gov/documentLibrary/media/advisory_circular/150-5210-19A/150_5210_19a.pdf	Cancellation and reissuance of AC	The AC contains performance standards, specifications, and recommendations for DEVS. This reissuance provides current guidance on the following: DEVS system components Performance standards for DEVS and individual system components The guidance in the AC is recommended practice. However, the AC is mandatory for all projects funded with AIP grants or PFCs.	6/12/2009	___	No published cost estimate. The AC is required for DEVS projects funded with AIP or PFCs and could potentially have a slight cost impact on some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
115	FAA	Cert Alert #09-11, Safety During Construction and Reducing Runway Incursions http://www.faa.gov/airports/airport_safety/certalerts/media/cert0911.pdf	New Cert Alert	The Cert Alert contains recommendations for actions to reduce frequency of construction related vehicle/pedestrian deviations (V/PD). The actions listed in the Cert Alert are characterized as recommendations.	7/1/2009	___	No published cost estimate. The Cert Alert could have a minor cost impact if airports choose to follow all of the recommendations provided.	N/A
116	FAA	Cert Alert #09-12, Airport Planning for Pandemic Flu Including H1N1(Swine Flu) Update http://www.faa.gov/airports/airport_safety/certalerts/media/cert0912.pdf	Cancellation and reissuance of Cert Alert	The Cert Alert provides information on addressing the threat of pandemic flu outbreaks. This reissuance encourages airports to develop or modify pandemic flu plans to include business continuity and operations response plans.	7/16/2009	___	No published cost estimate.	N/A
117	FAA	Cert Alert #09-13, Aircraft Surface Excursions During Winter Operations Update http://www.faa.gov/airports/airport_safety/certalerts/media/cert0913.pdf	Cancellation and reissuance of Cert Alert	The Cert Alert provides updated winter opertion information. The guidance addresses implementation of snow removal plans and notification of pilots. The focus of this cert alert is on freezeover following snow removal operations.	7/17/2009	___	No published cost estimate.	N/A
118	FAA	PFC Update 59-09, Completion of "For FAA Use" portions of Attachment Bs http://www.faa.gov/airports/pfc/pfc_updates/media/pfc_59_09_attachb.pdf	PFC Update	The PFC udate requires FAA staff to make additional findings and add documentation to the" For FAA Use" portions of Attachment Bs. The requirements indirectly affect airports to the extent that FAA staff require public agencies to supply additional information to support FAA findings or new documentation requirements.	7/30/2009	___	No published cost estimate. The PFC Update may increase the cost of preparing and submitting PFC application if FAA staff require public agencies to supply additional information to comply with the update. Incremental costs could be defrayed with PFC funds	
119	FAA	PGL 09-02, Oversight, Inspection of Projects Funded by the American Recovery and Reinvestment Act http://www.faa.gov/airports/aip/guidance_letters/media/PGL_09_02.pdf	New PGL	The PGL provides instruction on inspection and oversight of airport development projects funded by the American Recovery and Reinvestment Act. Airport sponsors are to document their oversight by photographs and completion of FAA Form 5370-1. Davis Bacon Act and Department of Labor Equal Opportunity Employment signs are to be prominently displayed. The PGL applies to all ARRA financed projects initiated after issuance date of the PGL.	8/31/2009	___	No published cost estimate. The PGL should have at most a nominal cost impact.	N/A
120	FAA	PIM #3, Use of USDA for Wildlife Hazard Assessments http://www.faa.gov/airports/aip/guidance_letters/media/pim_3_wildlife.pdf	New PIM	The PIM describes requirements for airports that select Department of Agriculture Wildlife Services (WS) to perform a Wildlife Hazard Assessment after completing a private sector selection process The WS is not to be considered during the qualifications based selection process. If an airport selects the WS, the airport must provide a written certification that "the private enterprise system cannot reasonably and expeditiously provide these services through ordinary business channels."	9/14/2009	___	No published cost estimate. The PGL should not have a cost impact.	N/A
121	FAA	AC 150/5370-10E, Standards for Specifying Construction of Airports http://www.faa.gov/documentLibrary/media/advisory_circular/150-5370-10E/150_5370_10e.pdf	Cancellation and reissuance of AC	The AC provides standards for the construction of airports. This reissuance revises the requirements for runway and taxiway painting to: Add standards for preformed Thermoplastic Airport Pavement Markings Add standards for application of the above markings Clarify limits on the use of prohibited materials This version also includes a standard for saw-cut grooves. The AC is recommended practice. However, the AC is mandatory for projects funded with AIP grants and PFCs.	9/20/2009	___	No published cost estimate. The AC updates construction standards, is required for projects funded with AIP or PFCs, and could have a cost impact on some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
122	FAA	AC 150/5200-12C, First Responders Responsibility For Protecting Evidence At the Scene of an Aircraft Accident/Incident http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5200_12c.pdf	Cancellation and reissuance of AC.	The AC furnishes guidance for airport employees, airport management, and first responders at the scene of an aircraft accident on the proper preservation of evidence. This reissuance adds new related reading material; revises the title of AC; and adds illustrative pictures of flight data and cockpit voice recorders. The guidancde in the AC is recommended practice. However, the AC is mandatory for AIP/PFC funded projects.	9/28/2009	___	No published cost estimate. The AC is required for projects funded with AIP or PFCs and is unlikely to have a cost impact.	N/A
123	FAA	AC 150/5380-9, Guidelines and Procedures for Measuring Airfield Pavement Roughness http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5380_9.pdf	New AC	The AC provides guidelines and procedures for measuring and evaluating runway roughness as identified by surface profile data of rigid and flexible airport pavements. The guidance in this AC provides technical procedures to quantify surface irregularities and to determine how surface irregularities may affect specific categories of airplanes. The guidance in the AC is recommended practice. However, use of the AC is mandatory for projects funded with AIP grants or PFCs	9/30/2009	___	No published cost estimate. The AC is mandatory for projects funded with AIP or PFCs and could potentially have a cost impact for some airports.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
124	FAA	150/5370-15A, Airside Applications for Aritificial Turf http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5370_15a.pdf	New AC	The AC provides guidance on planning, design, installation, and maintenance of aviation grade artificial turf in areas adjacent to the operational areas of an airport. Artificial turf systems that meet the requirements of this AC can be used at locations adjacent to taxiway and apron pavement where the use of natural turf has resulted in repeated soil erosion, where natural turf is impractical (e.g. paved islands), or where natural turf has unusually high costs associated with its maintenance. Design requirements for aritificial turf systems are specified. The guidance in the AC is recommended practice. However, use of the AC is mandatory for projects funded with AIP grants or PFCs	9/30/2009	—	No published cost estimate. The AC is mandatory for artificial turf projects funded with AIP or PFCs and could potentially have a minor cost impact for some airports. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
125	FAA	AC 150/5300-9B, Predesign, Prebid, and Preconstruction Conferences for Airport Grant Projects http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5300_9b.pdf	Cancellation and reissuance of AC	This advisory circular (AC) provides guidance for conducting predesign, prebid, and preconstruction conferences for projects funded under the Federal Aviation Administration (FAA) airport grant program. This reissuance accomplishes the following: Updates references to DBE programs Adds quality acceptance as a topic for pre-construction conference Adds items to be addressed in engineer's report during design phase Adds details to phasing plan requirements for construction conference Adds requirement for discussion of construction management The guidance in the AC is recommended practice. However, the AC is mandatory for projects funded with AIP grants or PFCs.	9/30/2009	—	No published cost estimate. The AC is mandatory for projects funded with AIP or PFCs. It is unlikely to have a cost impact.	N/A
126	FAA	Order 5190.6B, FAA Airport Compliance Manual http://www.faa.gov/airports/resources/publications/orders/compliance_5190_6/media/5190_6b.pdf	Cancellation and reissuance of Order	The order sets forth policies and procedures for the FAA Airport Compliance Program. It provides basic guidance for FAA personnel in interpreting and administering the various continuing commitments airport owners make to the United States as a condition for the grant of federal funds or the conveyance of federal property for airport purposes. The order discusses the obligations set forth in the standard airport sponsor assurances, addresses the application of the assurances in the operation of public-use airports, and facilitates interpretation of the assurances by FAA personnel. This reissuance is a comprehensive update of compliance guidance, replacing the prior version of the order published in 1989. The order provides guidance to FAA personnel. It's provisions are applied on a case-by-case basis to specific airport compliance questions.	9/30/2009	—	No published cost estimate. The Order itself does not require any change in airport practices or procedures. Any change to airport practice or procedure would be the result of a specific FAA inquiry or investigation into a particular practice.	N/A
127	FAA	PGL 10-01, Federal Financial Report SF 425 http://www.faa.gov/airports/aip/guidance_letters/media/PGL_10_01.pdf	New PGL	The PGL is issued to comply with a requirement of the Office of Management and Budget that all federal agencies begin using a new financial reporting form (SF-425) for federally assisted projects. Existing federal financial reporting forms are being replaced and references to those forms in other FAA guidance should be read to refer to SF-425.	10/7/2009	—	No published cost estimate. The PGL should not have a cost impact.	N/A
128	FAA	PFC Update 61-10, Common Use Terminal Equipment http://www.faa.gov/airports/pfc/pfc_updates/media/pfc_61_10_terminal_equipment.pdf	New PFC Update	The PFC Update revises an earlier determination that common use terminal equipment is ineligible for PFCs. Equipment is PFC eligible, as a project for gates and related areas.	12/1/2009	—	No published cost estimate. The PFC Update rescinds an earlier update that specified certain common-use equipment to be ineligible for PFC funding. By restoring PFC eligibility, this PFC Update permits airports to acquire the equipment without using rates and charges or airport discretionary funds or other airport revenue.	N/A
129	FAA	PGL 10-02, Buy American Requirements http://www.faa.gov/airports/aip/guidance_letters/media/PGL_10_02.pdf	New PGL	The PGL provides guidance on Buy American requirements applicable to projects funded with AIP grants and ARRA grants. The PGL discusses each element of the requirement and each condition required to obtain a waiver.	2/24/2010	—	No published cost estimate. The PGL is required for projects funded with AIP and ARRA grants. It could potenially have a cost impact. Incremental costs could be defrayed with a combination of AIP and PFC funds.	N/A
130	FAA	Cert. Alert #10-01, Clarification of term "consecutive calendar months" http://www.faa.gov/airports/airport_safety/certalerts/media/cert1001.pdf	New Cert. Alert	The Cert. Alert clarifes meaning of twelve consecutive calendar months to specify the end-date for 12 consecutive months is January 31, 2011 for any Part 139 airport that was subject to periodic inspections in January 2010. The interpretation applies to any requirements for training, exercises, testing required during a period of twelve consecutive calendar months.	4/26/2010	—	No published cost estimate. The Cert. Alert should not have a cost impact.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
131	FAA	AC 150/5200-31B, Airport Emergency Plans http://www.aci-na.org/static/entransit/draft_150_5200_31b.pdf	Cancellation and reissuance of AC	The AC provides guidance to the airport operator in the development and implementation of an Airport Emergency Plan (AEP). This reissuance incorporates two Homeland Security Presidential Directives (HSPD-5 and HSPD-8). The guidance in the AC is recommended practice. However, the airport's AEP must follow the general guidances contained in the HSPDs. An airport may follow an alternative method, if FAA finds the alternative complies with applicable Part 139 certification requirements.	Draft	___	No published cost estimate. The AC could have a cost impact for airports with existing AEPs that are not in compliance with HSPD-5 and HSPD-8.	N/A
132	FAA	AC 150/5200-31C, Airport Emergency Plans http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5200_31c_consolidated.pdf	Cancellation and reissuance of AC.	The AC provides guidance to the airport operator in the development and implementation of an Airport Emergency Plan (AEP). This reissuance includes the following provisions: Requires certificated airports to develop an airport emergency plan Incorporates updated referencing documents Incorporates by reference the National Incident Management System and Incident Command System Incorporates Essential Response Actions into Hazard Specific Details The AC is mandatory for Part 139 airports and recommended practice for others.	5/21/2010	___	No published cost estimate. The AC is mandatory for Part 139 airports and could potentially have a cost impact for airports that need to revise their AEP.	N/A
133	FAA	14 CFR Part 77, 75 Fed, Reg. 44296, Safe, Efficient Use and Preservation of Navigable Airspace http://www.gpo.gov/fdsys/pkg/FR-2010-07-21/pdf/2010-17767.pdf	Amendment to regulations	The regulation establishes requirements for notification to the FAA of proposed construction that may result in obstructions to air navigation and standards for reviewing proposed construction and determining whether proposals would result in an obstruction. This amendment updates the regulations to reflect changes in statutes, regulations and policies since the prior update.	7/21/2010	$0	Per the supplementary information, the impact of the rule will be on proponents of certain projects near airports, rather than airports themselves. Therefore, there should be no cost impact to airports	Initial Regulatory Evaluation, Initial Regulatory Flexibility Determination, Initermational Trade Assessment, Unfunded Mandates Assessment, p. I (12/12/2004) Notice of Proposed Rulemaking, 71 Fed. Reg. 34028, 34038 (June 13, 206)
134	FAA	PFC Update 64-10, OMB Approval of PFC Application Forms http://www.faa.gov/airports/pfc/pfc_updates/media/pfc_64_10_forms.pdf	PFC Update	The PFC Update announces OMB approval of revised PFC application forms. OMB approval means FAA can require the use of the forms. Form changes are the subject of a separate PFC Update.	9/15/2010	___	No published cost estimate. This update does not itself modify forms. It should not have any cost impacts on airports.	
135	FAA	Air Carrier Incentive Program Guidebook http://www.faa.gov/airports/airport_compliance/media/air_carrier_incentive_2010.pdf	Guidebook	The Guidebook states that it is a summary and compendium of existing guidance and case-by-case determinations. It provides guidance on structuring air carrier incentive programs to comply with AIP grant assurances.	9/15/2010	___	No published cost estimate. The Guidebook explains existing policies and requirements and should not have a cost impact to airports.	N/A
136	FAA	PFC Update 63-10, Air Carrier Reporting Module http://www.faa.gov/airports/pfc/pfc_updates/media/pfc_63_10_air_carrier_reporting.pdf	PFC Update	The PFC Update announces availability of Air Carrier Reporting Module for inputting PFC data in SOAR. With implementation of Air Carrier Module, public agencies using SOAR will no longer need to submit quarterly reports to individual carriers.	9/17/2010	___	No published cost estimate. Elimination of quarterly PFC reporting to individual carriers could reduce airport costs.	N/A
137	FAA	AC 150/5220-17B Aircraft Rescue and Fire Fighting (ARFF) Training http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5220_17b.pdf	Cancellation and reissuance of AC.	The AC provides guidance on the design, construction, and operation of aircraft rescue and fire fighting (ARFF) training facilities. This reissuance focuses on to permanent and mobile ARFF training facilities that use flammable liquified hydrocarbon (FLH) or propane. Required elements for the mobile ARFF trainer have been modified to improve safety, reduce costs, and improve overall ease of use. The alternate sizing provisions (using agent application and apparatus discharge rates) have been removed. The AC is recommended practice. However, the guidance is mandatory for the design, construction and operation of projects funded with AIP grants or PFCs.	9/30/2010	___	No published cost estimate. The AC is mandatory for projects funded with AIP or PFC grants. It could potentially have a cost impact on some airports.	N/A
138	FAA	AC 150/5210-23, ARFF Vehicle and High Reach Extendable Turret (HRET) Operation, Training and Qualifications http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5210_24.pdf	New AC	The AC contains the FAA's standards, and recommendations for the training of airport firefighting and rescue personnel in the proper operation and tactical use of ARFF vehicles and ARFF Vehicles equipped with HRETs. The guidance in the AC is recommended practice. However, the AC is mandatory for projects funded with AIP grants and PFCs. Further, "The training and qualification guidance provided may be adopted or amended by the airport based on their specific circumstances, but the ARFF program must meet the intent of the guidance."	9/30/2010	___	No published cost estimate. The AC is mandatory for ARFF vehicles funded with AIP or PFC grants. It could potentially have a cost impact on some airports.	N/A

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139	FAA	AC 150/5210-24, Airport Foreign Object Debris (FOD) Management http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5210_24.pdf	New AC	The AC provides guidance for developing and managing an airport foreign object debris (FOD) program. In addition, this AC provides specifications for the equipment used in FOD removal operations. The AC addresses the following areas: Prevention Detection Removal Evaluation The guidance in the AC is recommended practice. However, the AC is mandatory for acquisition of FOD removal equipment with AIP grant funds or PFCs.	9/30/2010	___	No published cost estimate. The AC is mandatory for FOD equipment purchased with AIP or PFC grants. It could potentially have a minor cost impact on some airports. Incremental costs of FOD removal equipment could be defrayed with a combination of AIP and PFC funds.	N/A
140	FAA	AC 150/5220-25, Airport Avian Radar Systems http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5220_25.pdf	New AC.	The AC provides guidance on the use of avian radar systems to supplement an airport's Wildlife Hazard Management Plan (WHMP) and reduce the potential avian threats to aircraft. Specifically, the AC sets forth standards for selection, procurement, deployment, performance specifications, operations and management of Airport Avian Radar System. The AC notes that observation of birds is required for Wildlife Hazard Assessments and Wildlife Management Plans. The AC does not specify that an Avian Radar System is the only means of compliance. The guidance in the AC is recommended practice. However, the AC is mandatory for projects funded with AIP or PFC funds.	11/23/2010	___	No published cost estimate. The AC is mandatory for avian radar systems funded with AIP or PFCs. It could have a cost impact on airports that attempt to design their WHMP to the standards of the AC. Incremental costs of avian radar equipment could be defrayed by a combination of AIP and PFC funds.	N/A
141	DOT	49 CFR Part 26, Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs, 65 Fed. Reg. 68951 http://www.gpo.gov/fdsys/pkg/FR-2000-11-15/pdf/00-29100.pdf	Amendment to regulations	Part 26 establishes the requirements for participation by disadvantaged business enterprises (DBEs) in projects funded with federal assistance administered by the DOT. The amendment implements the following changes (among others): Revises the threshold for the requirement to develop a DBE participation plan for airports to $250,00 in potential AIP funded contracting opportunities (excluding land acquisition). Exempts airports from annual goal setting requirements for any year they anticipate having less than $250,000 in eligible prime contracts Clarifies requirements for developing and using bidders lists Clarifies requirement to monitor actual DBE participation in contracts Clarifies obligation to use certain information in goal setting process The amendment is mandatory for airports accepting AIP funds.	11/15/2000	___	No published cost estimate Supplemental Information states that the amendments will reduce the costs to some small entities, but does not specify which entities Exemption from goal setting requirements for airports with less than $250,000 in eligible prime contracts may reduce costs for qualifying small airports.	65 Fed. Reg. 68950 (11/15/2000)
142	DOT	49 CFR Part 26, Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs, 68 Fed. Reg. 35553 http://www.gpo.gov/fdsys/pkg/FR-2003-06-16/pdf/03-14989.pdf	Amendment to regulations	Part 26 establishes requirements for assuring DBE participation in contracts funded by DOT assistance programs including the AIP. This amendment modifies provisions of the the rule in addressing the following areas (among others): Uniform reporting and application forms Personal net worth, retainage, size standards, ethnicity and proof of disadvantage Eligibility of firms owned by Alaska Native Corporations Multi-year project goals	6/16/2003	$0	Per the final rule supplemental information, the rule will not add new costs to grantees.	68 Fed. Reg. 35553 (06/16/2003)
143	DOT	49 CFR Part 27, Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance, 66 Fed. Reg. 22115 http://www.gpo.gov/fdsys/pkg/FR-2001-05-03/pdf/01-11201.pdf	Amendment to regulations	Part 27 carries out the intent of section 504 of the Rehabilitation Act of 1973 to prevent any individual from being denied participation in or the benefits of any program or activity receiving Federal financial assistance soley by reason of the individual's disability This amendment requires airports in cooperation with air carriers to provide ramps, lifts or other mechanical assistance for individuals with disabilities boarding aircraft with 31 or more seats if level entry boarding is not available. The requirement applies to all primary airports	5/3/2001	$0	Per the regulatory evaluation for the rule, the rule will have only incidental financial impact on airports because few, if any new lifts will need to be acquired Costs of lifts acquired by airports for common use could be paid with a combination of AIP and PFC funds --- Per comment from a small airport, compliance costs will include cost of lift, maintenance, insurance and training	Regulatory Evaluation: Analysis of the Impact of Requiring Lifts on Aircraft With Seating Capacity of 31 or More Seats, Docket OST-1999-6159, pg. 10 --- Comments of City of Billings, Aviation and Transit Department, Docket OST -1999-6159 (11/18/1999)

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
144	DOT	49 CFR Part 27, Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance, 68 Fed. Reg. 51390 http://www.gpo.gov/fdsys/pkg/FR-2003-08-26/pdf/03-21140.pdf	Amendment to regulations	Part 27 is the DOT version of the joint government-wide rule implementing prohibitions on discrimination on the basis of disability in federally assisted programs or activities. This amendment modifies the regulation to implement provisions of the Civil Rights Restoration Act of 1987, by revising language on "program or activity" to conform to that legislation. Many agencies had been following the legislation in administering their programs, but had not revised regulatory language, which led to confusion.	8/26/2003	$0	Per the final rule supplemental information there will probably be no cost impacts because the final rule reflects long-standing policies of the agencies' and does not affect agencies' practices.	68 Fed. Reg. 51339 (08/26/2003)
145	DOT	49 CFR Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation -- Effectuation of Title VI of the Civil Rights Act of 1964, 68 Fed. Reg. 51390 http://www.gpo.gov/fdsys/pkg/FR-2003-08-26/pdf/03-21140.pdf	Amendmemt to regulations	Part 21 implements Title VI of the Civil Rights Act of 1964 for programs or activities receiving federal assistance from DOT and its modal administrations. This amendment modifies the regulation to implement provisions of the Civil Rights Restoration Act of 1987, by revising language on "program or activity" to conform to that legislation. Many agencies had been following the legislation in administering their programs, but had not revised regulatory language, which led to confusion.	8/26/2003	$0	Per the final rule supplemental information, there will be no cost impacts because the final rule clarifies longstanding policies and does not change agency practice	68 Fed. Reg. 51339 (08/26/2003)
146	DOT	49 CFR Part 29, Government Wide Debarment and Suspension (Nonprocurement) 68 Fed. Reg. 66534, 66644 http://www.gpo.gov/fdsys/pkg/FR-2003-11-26/pdf/03-28454.pdf	Revision and reissuance of rule	Part 29 implements for DOT and its modal administrations the government-wide requirements for suspension or disbarment of contractors from federally funded projects implemented by grants or cooperative agreement. The reissuance provides for the following: Reconciling technical differences in policies and procedures for procurement and nonprocurement suspension and debarment Restating the regulations in plain language Making other improvements to the common rule consistent with the purpose of the suspension and debarment system Separating rules implementing the Drug Free Workplace Act of 1988 into a separate regulation	11/26/2003	___	No published cost estimate Per supplementary information, the participating agencies (including DOT) certified that the rule would not have a significant impact on a substantial number of small entities	68 Fed. Reg. 66544 (11/26/2003)
147	DOT	49 CFR Part 32, Governmentwide Requirements for Drug-Free WorkPlace (Financial Assistance), 68 Fed. Reg. 66534, 66645 http://www.gpo.gov/fdsys/pkg/FR-2003-11-26/pdf/03-28454.pdf	Revision and reissuance of rule	Part 32 is the DOT's version of the government-wide rule implementing the provisions of the Drug Free Workplace Act of 1988 applicable to federally assisted programs and activities. The revision separates the rules implementing the Drug Free Work Place Act into a separate regulation from the suspension and debarment rules. The revision restates the regulations in plain English.	11/26/2003	___	No published cost estimate.	N/A
148	DOT	49 CFR Part 24, Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs, 70 Fed. Reg. 611 http://www.gpo.gov/fdsys/pkg/FR-2005-01-04/pdf/05-6.pdf	Revision, reissuance of regulations	Part 24 establishes government-wide requirements for implementation of the Uniform Relocation Assistance and Real Property Acquisition Policies Act. This revision clarifies present requirements, meets modern needs and improves the service to individuals and businesses affected by Federal or federally-assisted projects. At the same time the revision reduces the impacts of government regulations.	1/4/2005	___	Supplementary information states that the rule made only nominal adjustments and that costs of increased benefits will continue to be funded through federal and federally-assisted projects. The rule applies to 13 federal agencies and total costs for state, local tribal and private entities for programs administered by all 13 agencies is less than $120.7 million Incremental costs to airports could be defrayed with AIP and PFC funds	70 Fed. Reg. 610-611 (01/04/2005)
149	DOT	49 CFR Part 23, Participation of Disadvantaged Business Enterprise in Airport Concessions, 70 Fed. Reg. 14508 http://www.gpo.gov/fdsys/pkg/FR-2005-03-22/pdf/05-5530.pdf	Revision, reissuance of regulations	Part 23 implements the requirement for participation by airport concessionaire disadvantaged business enterprises (ACDBEs) in airport concession programs. This revision makes the ACDBE rule parellel to the rule for DBE participation in federally funded contracts. It also addresses the following issues, among others: Goal-setting Personal net worth and business size standards Counting ACDBE participation by car rental companies	3/22/2005	___	No published cost estimte. Supplementary information estimates that information collection requirements of the rule will total 41,000 hours annually for recipients and contractors combined. A breakdown of hours between the two groups and a dollar estimate was not provided. A one time burden of 44,000 hours for recipients was also projected for development of new airport concession disadvantaged business enterprise participation plans.	70 Fed. Reg. 14507 (03/22/2005)
150	DOT	Policy Statement on Airport Rates and Charges, 73 FR 40430 http://www.gpo.gov/fdsys/pkg/FR-2008-07-14/pdf/08-1430.pdf	Amendment to Policy Statement	The Policy Statement provides guidance on federal requirements for reasonable and not unjustly discriminatory fees and charges for aeronautical use. This amendment includes revisions and clarifications to the policy to provide more flexibility to operators of congested airports to adjust their fee structures to encourage users to shift their operations from congested to uncongested periods. The amendment also permits the use of fees at congested airports to encourage greater use of secondary airports in the local airport system.	7/14/2008	___	No published cost estimate. An airport taking advantage of the amendment may face additional costs to develop justification for revised rates and fees, but there is no obligation to implement the amendment.	N/A

[1] If published source indicates "no cost" or "de minimis cost", zero value entered
Annual costs per airport unless otherwise noted

TABLE A-2

SUMMARY OF ENVIRONMENTAL REQUIREMENTS ADOPTED DURING STUDY PERIOD AND PUBLISHED COSTS

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
1	Environmental Protection Agency (EPA)	40 CFR Parts 261 and 268 - Hazardous Waste Identification Rule: Revisions to the Mixture and Derived-From Rules, 66 Fed. Reg. 27266 http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2001_register&docid=01-11408-filed.pdf	Amendment to regulations	Under the Resource Conservation and Recovery Act of 1976 (RCRA), land disposal units, such as landfills and surface impoundments, must comply with stringent requirements for liners, leak detection systems, and groundwater monitoring. The land disposal restrictions (LDR) provide a second measure of protection from threats posed by hazardous waste disposal. The LDR program ensures that hazardous waste cannot be placed on the land until the waste meets specific treatment standards to reduce the mobility or toxicity of the hazardous constituents in the waste. This amendment revises the RCRA mixture rule (i.e., mixtures of solid waste with listed hazardous waste) and the derived-from rule (i.e., solid waste generated from the treatment, storage, or disposal of a listed hazardous waste remains regulated as a hazardous waste). The revision applicable to airports is an expanded exclusion for mixtures and/or derivatives of wastes listed solely for the ignitability, corrosivity, and/or reactivity characteristics which no longer exhibit any characteristic of hazardous waste.	5/16/2001	Cost savings: $80/ton Manifest preparation: $159	Based on information collected from a USEPA database of hazardous waste generators and surveys Cost savings are provided for non-airport SIC sectors Cost includes average truck shipment to disposal site 1.3 hours needed for manifest preparation and $122 loaded wage rate Need typical waste tonnage from small airports to estimate costs.	U.S. EPA, Office of Solid Waste. 2001. Economic Assessment of the USEPA's 2001 Final Rule Revising the RCRA "Mixture and Derived-from" Rules: Estimate of National Cost Savings for the Expanded Exemption of "Decharacterized" Hazardous Wastes from These Rules.
2	EPA	40 CFR Parts 261 and 279 - Hazardous Waste Management System; Identification and Listing of Hazardous Waste; Recycled Used Oil Management Standards, 68 Fed. Reg. 44659 http://edocket.access.gpo.gov/2003/pdf/03-19275.pdf	Revision to regulations	Used oil is excluded from the hazardous waste regulations under the Resource Conservation and Recovery Act of 1976 (RCRA) provided it is recycled properly and not intentionally mixed with hazardous wastes. Part 279 incorporates used oil management standards to encourage used oil recycling. This revision clarifies the used oil management standards. Those changes applicable to airports include rules for when PCB-contaminated used oil is regulated under the RCRA and that mixtures of CESQG waste and used oil are subject to the RCRA used oil management standards irrespective of how that mixture is to be recycled.	7/30/2003	$0	According to the supplementary information, this rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. Management of used oil will vary depending on the concentration of PCBs in the used oil (i.e., can be recycled or cannot be burned). Clarification may result in reduced costs to CESQGs for used oil disposal since mixtures can be managed under the used oil standards instead of the hazardous waste standards.	68 Fed. Reg. 44663 (07/30/2003)
3	EPA	40 CFR Parts 260, 261, 262, 263, 264, 265, and 271 - Hazardous Waste Management System; Modification of the Hazardous Waste Manifest System, 70 Fed. Reg. 10775 http://edocket.access.gpo.gov/2005/pdf/05-1966.pdf	Revision to regulations	Regulations under the Resource Conservation and Recovery Act of 1976 (RCRA) include appropriate documentation of wastes from "cradle to grave" to protect human health and the environment from the dangers associated with generation, transportation, treatment, storage, and disposal of hazardous waste. This amendment revises the following: Content and standardization of the hazardous waste manifest form and continuation sheet (Forms 8700-22 and 22a) Availability of forms Procedures for tracking certain types of waste shipments with the manifest.	3/4/2005	Cost savings for preparing initial manifest form: $4 Cost savings for preparing continuation sheet: $3 Training: $64	Costs are based on average labor wage and time reduction from manifest revision for SQGs Training is based on the average annualized costs and number of SQGs 2004 dollars	U.S. EPA, Office of Solid Waste. 2004. Economic Analysis of the EPA's Final Rule Revisions to the RCRA Hazardous Waste Management Form.
4	EPA	40 CFR Parts 260, 261, 264, 265, 268, 270, and 273 - Hazardous Waste Management System; Modification of the Hazardous Waste Program; Mercury Containing Equipment, 70 Fed. Reg. 45507 http://edocket.access.gpo.gov/2005/pdf/05-15437.pdf	Amendment to regulations	Part 273 was promulgated under the Resource Conservation and Recovery Act of 1976 (RCRA) to reduce the hazardous waste management requirements for certain commonly generated hazardous wastes, defined as universal wastes, to encourage recycling and to prevent disposal with municipal solid waste. Handlers of universal wastes are subject to less stringent standards for storing, transporting, and collecting these wastes. This amendment adds mercury-containing equipment to the federal list of universal wastes.	8/5/2005	Cost savings: $106	Costs were provided from a BRS analysis, which included information for two- and four-digit SIC codes, assumed annual MCE generation rate, status as an LQG or SQG in the baseline, and status as an LQHUW or SQHUW in the post rule scenario. Costs for generators were developed based in number of shipments, shipment size, and MCE generation rate.	U.S. EPA, Office of Solid Waste. 2005. Economic Analysis of Including Mercury Containing Equipment in the Universal Waste System: Final Rule.

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
5	EPA	40 CFR Part 261 - Expansion of RCRA Comparable Fuel Exclusion, 73 Fed. Reg. 77953 http://edocket.access.gpo.gov/2008/pdf/E8-29956.pdf	Amendment to regulations	A portion of the Resource Conservation and Recovery Act of 1976 (RCRA) applies to comparable fuels, which are hazardous secondary materials which have fuel value and whose hazardous constituent levels are comparable to those found in fuel oil that could be burned in their place. These materials are not solid wastes, and hence not hazardous wastes. This amendment excludes emission-comparable fuel (ECF) that, when generated, is handled in such a way that it is not discarded in any phase of management, but used as a commodity (i.e., burning for heat). The rule specifies conditions on burning to assure emissions from industrial boilers are comparable to those burning fuel oil. The exclusion also includes conditions for tanks and containers storing ECF to assure that discard does not occur.	12/19/2008	Cost savings: $20,300	Cost savings reflect estimate of total annual cost savings for affected entities. This rule was withdrawn on June 6, 2010, meaning the cost savings are no longer being realized.	73 Fed. Reg. 77995 (12/19/2008) Unison calculations)
6	Federal Aviation Administration (FAA)	AC - 150/5320-15A Management Of Airport Industrial Waste http://www.faa.gov/documentLibrary/media/advisory_circular/150-5320-15A/150_5320_15a.pdf	Cancellation and reissuance of AC	The AC includes basic information on the characteristics, management, and regulations of industrial wastes generated at airports. The AC also provides guidance for the development of a Storm Water Pollution Prevention Plan that applies best management practices to eliminate, prevent, or reduce pollutants in storm water runoff associated with particular airport industrial activities. This reissuance include the following: Incorporating by reference ACRP document #02-02, Planning Guidelines and Best Management Practices for Aircraft and Airfield Deicing Storm water Management Systems Identifying waste minimization and recycling deicing fluids Adding supplementary Pollution Prevention techniques at airports Distinguishing between hazardous waste and non-hazardous waste	9/8/2008	___	No published cost estimate. Reference to ACRP #02-02 includes consideration of managing airport and aircraft deicing storm water. Costs vary depending on management technology chosen. Waste minimization and recycling and pollution prevention should decrease compliance costs.	N/A
7	Department of Transportation (DOT)	49 CFR Parts 172, 174, 175, 176, and 177 - Hazardous Materials: Retention of Shipping Papers, 67 Fed. Reg. 46123 http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002_register&docid=02-17566-filed.pdf	Amendment to regulations	The Hazardous Materials Regulations establish requirements for the safe transport of hazardous materials in commerce (e.g., by air, highway, rail, or water). This amendment requires shippers of hazardous materials to retain a copy of each hazardous material shipping paper, or an electronic image for a period of 375 days after the date the hazardous material is accepted by a carrier.	7/12/2002	$0	According to the supplementary information, this rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. Rule is not expected to result in significant changes to existing recordkeeping practices.	67 Fed. Reg. 46126 (07/12/2002)
8	DOT	49 CFR Parts 171, 172, 173, 177, and 178 - Hazardous Materials: Revision to Standards for Infectious Substances, 67 Fed. Reg. 53118 http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002_register&docid=02-20118-filed.pdf	Amendment to regulations	The Hazardous Materials Regulations establish requirements for the safe transport of hazardous materials in commerce (e.g., by air, highway, rail, or water). This amendment revises transportation requirements for infectious substances. Most of the regulatory changes do not apply to airports, but those that do include bulk packaging for regulated medical waste.	8/14/2002	Initial cost: $33,332 Annual cost: $28,351	According to the supplementary information, this rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. Costs represent total costs for all affected entities. Costs are not expected to result in significant compliance costs for airports.	67 Fed. Reg. 53131 (08/14/2002)
9	DOT	49 CFR 171 - Applicability of the Hazardous Materials Regulations to a "Person Who Offers" a Hazardous Material for Transportation in Commerce, 70 Fed. Reg. 43638 http://edocket.access.gpo.gov/2005/pdf/05-14912.pdf	Amendment to regulations	The Hazardous Materials Regulations establishes requirements for the safe transport of hazardous materials in commerce (e.g., by air, highway, rail, or water). This amendment adds a definition for a "person who offers or offeror," to clarify applicability.	7/28/2005	$0	According to the supplementary information, this rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. This clarification should not result in additional compliance costs.	70 Fed. Reg. 43642 (07/28/2005)

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
10	EPA	40 CFR Parts 9, 141, and 142 - National Primary Drinking Water Regulations: Long Term 1 Enhanced Surface Water Treatment Rule, 67 Fed. Reg. 1811 http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002_register&docid=02-409-filed.pdf	Promulgation of regulations	The regulations promulgate the Long Term 1 Enhanced Surface Water Treatment Rule under the National Primary Drinking Water Regulations to improve control of microbial pathogens (i.e., Cryptosporidium) in drinking water and address risk trade-offs with disinfection byproducts. The rule requires public water systems that use surface water or ground water under the direct influence of surface water and serve fewer than 10,000 persons to meet strengthened filtration requirements as well as to calculate levels of microbial inactivation to ensure that microbial protection is not jeopardized if systems make changes to comply with disinfection requirements of the Stage 1 Disinfection and Disinfection Byproducts Rule.	1/14/2002	Turbidity provision: installation of treatment measures: $11,000,000-$13,000,000 Turbidity monitoring: $4,500,000-$4,700,000/year Treatment measures: $16,000,000-$19,000,000 Exceedance reporting: $600,000/year	A final economic impact analysis was prepared, but could not be located. Costs presented are national costs annualized over 20 years $27.1 million annual cost for rule. 41% of total cost is for capital costs and 59% of the total cost is for O&M 3 and 7% discount rate 1999 dollars	67 Fed. Reg. 1822-1823 (01/14/2002)
						Disinfection benchmarking start-up: $200,000-$300,000/year Benchmarking and profiling: $400,000-$500,000/year	Assume small airport drinking water systems typically obtain water from ground water sources and service less than 1,000 people. Need to identify typically treatment measures, monitoring, reporting practices, etc. Costs presented are national costs annualized over 20 years 1999 dollars	67 Fed. Reg. 1822-1823 (01/14/2002)
						Installation of covered finish water: $800,000	Costs presented are national costs annualized over 20 years Includes 1 year O&M costs 1999 dollars	67 Fed. Reg. 1822-1823 (01/14/2002)
11	EPA	40 CFR Parts 9, 141, and 142 - National Primary Drinking Water Regulations: Long Term 2 Enhanced Surface Water Treatment Rule, 71 Fed. Reg. 653 http://edocket.access.gpo.gov/2006/pdf/06-4.pdf	Promulgation of regulations	The regulations promulgate the Long Term 2 Enhanced Surface Water Treatment Rule under the National Primary Drinking Water Regulations for public water systems (including small water systems) to protect public health from illness due to Cryptosporidium and other microbial pathogens in drinking water and to address risk-risk trade-offs with the control of disinfection byproducts. Key provisions include the following: Source water monitoring Risk-targeted treatment Inactivation of Cryptosporidium by unfiltered systems Criteria for the use of Cryptosporidium treatment and control processes Covering or treating uncovered finished water storage facilities.	1/5/2006	Non-treatment: read and understand the rule: $1,120,000-$1,040,000 Bi-weekly E. Coli monitoring for 1 year: $20,881-$284,722 (NTNCWS) $26,659-$1,301,202 (TNCWS)	Additional monitoring costs are associated with Cryptosporidium if E. Coli levels are exceeded. Profiling and benchmarking costs are not provided for systems proposing to change its disinfection process. Costs presented are national costs Costs are based on wage rates, laboratory fees, and estimated hours to conduct task Costs are annualized over 25 years Costs are presented as ranges for systems serving 0-10,000 people 2003 dollars	U.S. EPA, Office of Water. 2005. Economic Analysis for the Final Long Term 2 Enhanced Surface Water Treatment Rule.
						Treatment: $39,710,000-$53,770,000 (filtered systems) $4,200,000-$5,690,000 (unfiltered systems) Uncovered finish water reservoirs: $10,000 Operational costs for treatment: $2,420,000-$2,940,000 (filtered systems) $230,000-$280,000 (unfiltered systems)	Costs are not presented for systems proposing to change their disinfection process. All systems with uncovered finished reservoirs must cover their reservoir or treat the effluent. Costs are mean values for systems serving less than 10,000 people O&M costs are annualized over 25 years Costs are discounted at 3 and 7%	U.S. EPA, Office of Water. 2005. Economic Analysis for the Final Long Term 2 Enhanced Surface Water Treatment Rule.

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
12	EPA	40 CFR Parts 9, 141, and 142 - National Primary Drinking Water Regulations: Stage 2 Disinfectants and Disinfection Byproducts Rule, 71 Fed. Reg. 387 http://edocket.access.gpo.gov/2006/pdf/06-3.pdf	New regulations	The regulations promulgate the Stage 2 Disinfectants and Disinfection Byproducts Rule under the National Primary Drinking Water Regulations for increased protection against disinfection byproducts. The rule applies to public water systems that are community water systems or non-transient non-community water systems that add a primary or residual disinfectant other than ultraviolet light or deliver water that has been treated with a primary or residual disinfectant other than ultraviolet light. The rule incorporates the following: Maximum contaminant levels (MCLs) for chloroform, monochloroacetic acid and trichloroacetic acid MCLs and monitoring, reporting, and public notification requirements for total trihalomethanes and halo acetic acids Revisions to the reduced monitoring requirements for bromate Best available technologies for final MCLs Analytical methods for determination of disinfectants and byproducts in drinking water.	1/4/2006	Non-treatment: read and understand the rule: $6,591-$63,891 Prepare Monitoring Plan: $1,216-$5,245 Annual cost for routine monitoring and operational evaluations: $25,473/year	Treatment costs for NTNCWS are not presented in the text. The report identifies these costs can be calculated using Appendix I and estimated plant flow rates. Costs are presented as ranges for NTNCWS that serve 0-10,000 people Costs presented are based on estimated number of plants making changes, labor hours, laboratory fees, and weighted labor rates 2003 dollars	U.S. EPA, Office of Water. 2005. Economic Analysis for the Final Long Term 2 Enhanced Surface Water Treatment Rule.
13	EPA	40 CFR Parts 141 and 143 - National Primary Drinking Water Regulations: Minor Correction to Stage 2 Disinfectants and Disinfection Byproducts Rule and Changes in References to Analytical Methods, 74 Fed. Reg. 30953 http://edocket.access.gpo.gov/2009/pdf/E9-14598.pdf	Amendment to regulations	Parts 141 and 142 established the National Primary Drinking Water Regulations for public water systems to protect public health through regulation of drinking water supplies and sources. This amendment corrects the final Stage 2 Disinfectants and Disinfection Byproducts Rule by including ground water systems serving 500 to 9,999 people in the rule.	6/29/2009	$0	According to the supplementary information, this rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. Rule correction requires systems serving 500-9,999 people to monitor for both total trihalomethanes (TTHM) and halo acetic acids (HAA5) concentrations at two locations. Due to the error, they were only required to monitor for either TTHM or HAA5 at two locations. This changes the number of samples from 2 to 4 samples. This error is already accounted for in the costs presented for the Stage 2 Disinfectants and Disinfection Byproducts Rule (1/4/2006).	74 Fed. Reg. 30995 (06/29/2009)

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
14	EPA	40 CFR Parts 9, 141, and 142 - National Primary Drinking Water Regulations: Ground Water Rule, 71 Fed. Reg. 65573 http://edocket.access.gpo.gov/2006/pdf/06-8763.pdf	New regulations	The regulations promulgate the Ground Water Rule under the National Primary Drinking Water Regulations to provide for increased protection against microbial pathogens in public water systems that use ground water sources susceptible to fecal contamination. The rule requires these systems to take corrective action to reduce cases of illnesses and deaths due to exposure to microbial pathogens.	11/8/2006	Read and understand the rule: $107-$153 (NTNCWS and TNCWS) Prepare Corrective Action Plan: $257-$1,769 (NTNCWS and TNCWS) State notification and disinfection reports: $54-$76	Costs based on labor rates, laboratory fees, different technologies to achieve MCL Costs are presented based on size of system served Costs presented are based on labor rates and estimated number of hours to complete task Cost ranges presented are for systems serving 0-10,000 people 2003 dollars	U.S. EPA, Office of Water. 2006. Economic Impact Analysis for the Final Ground Water Rule.
						$87-$188 (NTNCWS with treatment) $ 59-$147 (TNCWS with treatment) $70-$142 (NTNCWS without treatment) $46-$107 (TNCWS without treatment)	Costs on performing incremental surveys is also provided Costs presented are based on labor rates and estimated number of hours to complete task Cost ranges presented are for systems serving 0-10,000 people 2003 dollars	U.S. EPA, Office of Water. 2006. Economic Impact Analysis for the Final Ground Water Rule.
						Source water monitoring: $54-$76 (NTNCWS and TNCWS) Compliance monitoring for systems serving >3,300: $4,042-$4,645 Compliance monitoring for systems serving >3,300: $3,094-$3,100 Operational cost for compliance monitoring for systems serving >3,300: $2,470-$2,527	Costs presented are based on estimated number of samples, labor rates and estimated number of hours to complete task Cost ranges presented are for systems serving 0-10,000 people 2003 dollars	U.S. EPA, Office of Water. 2006. Economic Impact Analysis for the Final Ground Water Rule.
						Rehabilitate existing well: $11,986 Drill a new well: $30,172 Purchase water: $173,180-$242,618 Operational cost for purchase water: $0.63-$2.09/kgal.	Costs presented are based on number of sources requiring corrective action Cost ranges presented are for systems serving 0-10,000 people 2003 dollars	U.S. EPA, Office of Water. 2006. Economic Impact Analysis for the Final Ground Water Rule.
						Chlorine gas feed: $29,868 Chlorine gas feed and storage: $31,216-$46,039 Hypochlorite feed: $8,970-$24,402 Hypochlorite feed and storage: $10,318-$60,593 Chloride dioxide: $35,011-$42,363 Chloride dioxide and storage: $46,196-$89,439 Anodic: $47,219-$151,129 Anodic and storage: $48,568-$187,320 Ozone: $347,027-$622,023 Nano: $62,691-$573,460 System upgrade: $1,349-$36,191 Operational costs: Chlorine gas feed, Chlorine gas feed and storage: $6,192-$6,857 Hypochlorite feed, Hypochlorite feed and storage: $1,585-$7,326 Chloride dioxide: $15,261-$117,901 Chloride dioxide and storage: $16,251-$18,733 Anodic: $2,911-$12,855 Ozone: $55,668-$60,789 Nano: $7,250-$63,670 System upgrade: $72-$470	Costs presented are based on number of sources requiring corrective action Cost ranges presented are for systems serving 0-10,000 people 2003 dollars	U.S. EPA, Office of Water. 2006. Economic Impact Analysis for the Final Ground Water Rule.

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
15	EPA	40 CFR Parts 141 and 142 - National Primary Drinking Water Regulations for Lead and Copper: Short-Term Regulatory Revisions and Clarifications, 72 Fed. Reg. 57781 http://edocket.access.gpo.gov/2007/pdf/E7-19432.pdf	Amendment to regulations	Parts 141 and 142 established the National Primary Drinking Water Regulations for public water systems to protect public health through regulation of drinking water supplies and sources. This amendment applies to community water systems or non-transient non-community water systems. The rule finalizes the National Primary Drinking Water Regulations for lead and copper in the following areas: monitoring, treatment processes, public education, customer awareness, and lead service line replacement to reduce exposure to lead in drinking water.	10/10/2007	State notifications for treatment changes or new sources: $506,000-$765,000 Operational costs: reporting: $61,000 Public notifications/per system: $450-$2,400	Costs presented are totals for all systems nationally unless specified. Costs presented are for NTNCWS and are based on estimated number of systems 2006 dollars	U.S. EPA, Office of Water. 2007. Economic and Supporting Analyses: Short-Term Regulatory Changes to the Lead and Copper Rule.
						Sampling: $104,000 Monitoring: $2,635,000	Costs presented are totals for all systems nationally unless specified. Costs presented are for NTNCWS and are based on estimated number of systems 2006 dollars	U.S. EPA, Office of Water. 2007. Economic and Supporting Analyses: Short-Term Regulatory Changes to the Lead and Copper Rule.

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
16	EPA	40 CFR Part 112 - Oil Pollution Prevention and Response; Non-Transportation-Related Onshore and Offshore Facilities, 67 Fed. Reg. 47041 http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002_register&docid=page+47041-47090.pdf http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002_register&docid=page+47091-47140.pdf http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2002_register&docid=page+47141-47152.pdf	Amendment to regulations	Part 112 is the Spill Prevention, Control, and Countermeasure (SPCC) rule, which includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement an SPCC Plan. This amendment accomplishes the following: Outlines requirements for various classes of oil Revises applicability of the regulation Amends requirements for completing SPCC Plans The amendment also contains provisions designed to decrease regulatory impact on facility owners or operators.	7/22/2002	Read/understand the rule: $130	Costs for small airports should be categorized based on typical airport operations, i.e., airport operates as FBO, airport has own FBO, etc. Cost based on other information collection requests of similar magnitude 3.5 total hours of review time 2001 dollars	U.S. EPA, Office of Emergency and Remedial Response, 2002. Economic Analysis for the Final Revisions to the Oil Pollution Prevention Regulation (40 CFR Part 112).
						Regulatory cross reference: $16 Facility diagram: $34 Cost savings for 5-year reviews compared to 3-year reviews: $23-$57/year	Costs presented are for small storage facilities Small facilities include those with a total aboveground storage capacity >1,320 gallons of oil but less than or equal to 42,000 gallons. Facilities are equipped with 2 containers. Costs presented weighted based on estimated hourly burden per task and hourly rates Recordkeeping costs for small facilities are negligible 2001 dollars	U.S. EPA, Office of Emergency and Remedial Response, 2002. Economic Analysis for the Final Revisions to the Oil Pollution Prevention Regulation (40 CFR Part 112).
						Maintenance, drainage system upkeep, and training: $191/year (existing facilities) $3,136/year (new facilities)	Costs were provided from a 1997 screening analysis for impacts on small entities 2001 dollars	U.S. EPA, Office of Emergency and Remedial Response, 2002. Economic Analysis for the Final Revisions to the Oil Pollution Prevention Regulation (40 CFR Part 112).
						New facilities : $4,230-$8,740 (in-house labor) $6,520-$13,000 (professional labor) Existing facilities: $3,020-$6,050 (in-house labor) $4,000-$8,800 (professional labor) 5-year reviews: $981-$1,790 (in-house labor) $2,410-$4,210 (professional labor) Recordkeeping and discharge reporting: $536 (new facilities) $263-$290 (existing facilities)	Costs presented are for category 1 and II storage facilities Category I: total aboveground storage capacity 1,320-10,000 gallons Category II: total aboveground storage capacity 10,001-42,000 gallons. Costs presented are weighted based on the estimated hourly burden per task and hourly rates 2007 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2008. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112).
						Secondary containment: $25,700-$42,700 Concrete containment: $3,300-$19,800 (Cat I) $23,000-$38,300 (Cat II) Anti-corrosive measures: $6,150-$7,470 Installation of drainage measures: $5,240-$9,400 Security: $7,100-$7,710 Unspecified other capital costs: $1,240-$12,000 Install liquid level sensing devices: $12,000 Install diversion systems: $1,240 Vehicle warnings: $2,600 Integrity testing: $500-$955 Inspections: $3,060-$6,780/year $643 (Cat I) Liquid level sensing testing: $1,290-$2,570 (Cat II) Training: $1,930-$3,650/year	More detailed information on cost range is provided in text. Costs are based on estimates from EPA, PEs, consulting firms, and interviews 2007 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2008. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112).

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
17	EPA	40 CFR Part 112 - Oil Pollution Prevention; Spill Prevention, Control, and Countermeasure Plan Requirements--Amendments, 71 Fed. Reg. 77266 http://edocket.access.gpo.gov/2006/pdf/E6-21509.pdf	Amendment to regulation	Part 112 is the Spill Prevention, Control, and Countermeasure (SPCC) rule, which includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement an SPCC Plan. This amendment includes: Optional self-certification of SPCC plans by owners and operators of facilities that store 10,000 gallons of oil or less and meet other qualifying criteria Alternatives to the general secondary containment requirements without requiring a determination of impracticability for facilities that have particular types of oil-filled equipment Exemption of particular vehicle fuel tanks and other on-board bulk oil storage containers used for motive power Exemption of mobile refuelers from the sized secondary containment requirements for bulk storage containers.	12/26/2006	Modify existing plan: $991 New plan: $3,360 5-year review with no amendments: $188 5-year review with amendments: $1,190 Oil discharge reporting: $114 (not a rule change, but cost estimates provided) Recordkeeping: $108 (not a rule change, but cost estimates provided)	Costs for 2002 SPCC amendments also provided in the 2006 economic analysis. Costs presented are for category 1 and II facilities Category I: total aboveground storage capacity is 1,320-10,000 gallons Category II: total aboveground storage capacity is 10,001-42,000 gallons. Costs are weighted based estimated hourly burden per task and hourly rates 2005 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2006. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112).
						Modify existing plan for qualified facilities: $22 New plan: $1,520 5-year review: $42 Oil discharge reporting: $1 (not a rule change, but cost estimates provided) Recordkeeping: $90-$130 (not a rule change, but cost estimates provided)	No PE certification 2005 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2006. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112).
						Prepare oil spill contingency plan for qualified facility: $815 Upgrade communication equipment: $300 Provide response equipment $2,120 Cost savings for not requiring secondary containment for Equipment: $11,000 Training: $240	Costs are based on information obtained from the 2005 Information Collection Request 2005 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2006. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112).
						Construction of new containment systems: $14,800-$63,800 Installation of valves on existing diked areas: $56 (not a rule change, but cost estimates provided) Cost savings for not requiring sized secondary containment for mobile refuelers: $13,000 Cost savings for motive power exemption: $28 (existing) $563 (new) Integrity testing: $170 (not a rule change, but cost estimates provided) Spill prevention briefings: $154 (not a rule change, but cost estimates provided)	Estimates provided by the EPA, GE interviews, and comments received during draft rule Sized secondary containment for mobile refuelers cost $6,500 Airports have an average of 2 mobile refuelers 2005 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2006. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112).
						Unspecified other capital costs: $206 (existing) $3,590 (new) Integrity testing: $119 (not a rule change, but cost estimates provided)	Does not specify what "other capital costs" include 2005 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2006. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112).

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
18	EPA	40 CFR Part 112 - Oil Pollution Prevention; Spill Prevention, Control, and Countermeasure Rule Requirements--Amendments, 73 Fed. Reg. 74235 http://edocket.access.gpo.gov/2008/pdf/E8-28159.pdf	Amendment to regulations	Part 112 is the Spill Prevention, Control, and Countermeasure (SPCC) rule, which includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement an SPCC Plan. This amendment includes: An exemption for hot-mix asphalt, pesticide application equipment and related mix containers and non-transportation-related tank trucks from the sized secondary containment requirements Amends the definition of ``facility'' and "loading/unloading rack" Amends the requirements for facility diagrams, loading/unloading racks, qualified facilities, general secondary containment, security, and integrity testing.	12/5/2008	Facility diagram updates: $144-$288	Regulatory revisions to the requirements for hot mix asphalt, farms, and residential heating oil are not expected to apply to small airport operations. Information on loading/unloading racks are only provided for farms and production facilities. Based on: category 1 and II facilities, and definition of "facility" Category I: total aboveground storage capacity 1,320-10,000 gallons Category II: total aboveground storage capacity 10,001-42,000 gallons. 2007 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2008. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112), Volumes I and II.
						Amend/develop SPCC plan for Tier I qualified facilities: $154	Costs for 2002 SPCC amendments also provided in the 2006 economic analysis. Costs presented are based on estimates provided by PEs, industry, and consulting firms Costs are for storage facilities Costs provided are to assess potential for a discharge, overfill systems, integrity testing program, and completing template 2007 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2008. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112), Volumes I and II.
						Cost savings for demonstrating environmental equivalence for security: $1,230-$1,840 Cost savings for demonstrating environmental equivalence for integrity testing: $1,230	Costs presented are based on estimates provided by PEs, industry, and consulting firms 2007 dollars	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2008. Regulatory Impact Analysis for the Final Revisions to the Oil Pollution Prevention Regulations (40 CFR 112), Volumes I and II.
19	EPA	40 CFR Part 112 - Oil Pollution Prevention; Spill Prevention, Control, and Countermeasure Rule; Revisions to the Regulatory Definition of "Navigable Waters", 73 Fed. Reg. 71941 http://www.access.gpo.gov/su_docs/fedreg/a081211c.html	Amendment to regulations	Part 112 is the Spill Prevention, Control, and Countermeasure (SPCC) rule, which includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement an SPCC Plan. This amendment updates the term ``navigable waters'' to restore the regulatory definition as promulgated by EPA in 1973. The 2002 amendments broadened the definition of a navigable water to include waters in the contiguous zone and those covered under the Outer Continental Shelf Lands Act, Deepwater Port Act, and Magnuson Fishery Conservation and Management Act. This rule repeals the broadened definition to only include all navigable waters of the United States, as defined in judicial decisions prior to passage of the 1972 Amendments to the Federal Water Pollution Control Act (FWPCA) and tributaries, interstate waters, intrastate lakes, rivers, and streams which are utilized by interstate travelers for recreational or other purposes, and intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.	12/11/2008	$0	According to the supplementary information, this is a correction to the rule. An economic analysis was not completed. Restoring the definition of "navigable waters" to the 1973 definition should result in decreased compliance costs. Costs based on the curtailed definition are not quantifiable.	73 Fed. Reg. 71943 (11/26/2003)

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
20	EPA	40 CFR Part 112 - Oil Pollution Prevention; Spill Prevention, Control, and Countermeasure (SPCC) Rule--Amendments, 74 Fed. Reg. 58783 http://edocket.access.gpo.gov/2009/pdf/E9-27156.pdf	Amendment to regulations	Part 112 is the Spill Prevention, Control, and Countermeasure (SPCC) rule, which includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement an SPCC Plan. This amendment allows owners or operators of Tier I qualified facilities to complete a self-certified SPCC Plan template in lieu of a full SPCC Plan.	11/13/2009	$0	An economic analysis was conducted as part of the 2008 rule change. This rule change was finalized with no additional economic analyses.	U.S. EPA, Office of Solid Waste and Emergency Response, Office of Emergency Management. 2009. Draft Regulatory Impact Analysis for the 2008 and 2009 Final Amendments to the Oil Pollution Prevention Regulations (40 CFR 112), Volumes I and II.
21	EPA	40 CFR Part 312 - Clarification to Interim Standards and Practices for All Appropriate Inquiry Under CERCLA, 68 Fed. Reg. 24888 http://edocket.access.gpo.gov/2003/pdf/03-11473.pdf	Revision to regulations	Part 312 establishes procedures to protect potential property purchasers from buying property that may have existing environmental contamination under the Comprehensive Environmental Response and Liability Act of 1980 (CERCLA). The rule includes criteria for innocent landowner defense through conduct of “all appropriate inquiries” into the previous ownership and uses of the property. This revision provides clarification of the requirements for conducting ``All Appropriate Inquiry,'' for property purchased on or after 5/31/1997, to permit the use of ASTM Standard E1527-00, entitled ``Standard Practice for Environmental Site Assessment: Phase I Environmental Site Assessment Process'' to qualify as a bona fide prospective purchaser and establish an innocent landowner defense. Also, recipients of Brownfields site assessment grants will be in compliance with the "All Appropriate Inquiry" requirements if they comply with either the ASTM Standard E1527-97 or E1527-00.	5/9/2003	$0	According to the supplementary information, this rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. Clarification to the rule is not anticipated to result in significant changes to existing practices, and therefore will not likely result in significant compliance costs.	68 Fed. Reg. 24890 (05/09/2003)
22	EPA	40 CFR Part 312 - Standards and Practices for All Appropriate Inquiries, 70 Fed. Reg. 66069 http://edocket.access.gpo.gov/2005/pdf/05-21455.pdf	Amendment to regulations	Part 312 establishes procedures to protect potential property purchasers from buying property that may have existing environmental contamination under the Comprehensive Environmental Response and Liability Act of 1980 (CERCLA). The rule includes criteria for innocent landowner defense through conduct of “All Appropriate Inquiries” into the previous ownership and uses of the property. This amendment establishes regulatory requirements and standards for conducting all appropriate inquiries into the previous ownership and uses of a property.	11/1/2005	Prepare Phase I: $2,185-$2,190/per Phase I (increase of $52-$58/per Phase I)	In addition to the regulation, FAA Order 1050.19B (2007) presents the FAA policy for Environmental Due Diligence Audits in the Conduct of Real Property Transactions. The Order specifies an EDDA is always required for the purchase or sale of FAA property, which affects airport costs. An EDDA waiver must be included in property transfer documents if an EDDA is not conducted. Average cost per Phase I ESA Costs are based on property type, size, and weighted hourly burden per task 2003 dollars	ICF Consulting. 2004. Economic Impact Analysis for the All Appropriate Inquiries Final Rule. Addendum to Economic Impact Analysis for the All Appropriate Inquiries Final Rule
23	EPA	40 CFR Part 312 - Amendment to Standards and Practices for All Appropriate Inquiries Under CERCLA, 73 Fed. Reg. 78651 http://edocket.access.gpo.gov/2008/pdf/E8-30536.pdf	Amendment to regulations	Part 312 establishes procedures to protect potential property purchasers from buying property that may have existing environmental contamination under CERCLA. The rule includes criteria for innocent landowner defense through conduct of “all appropriate inquiries” into the previous ownership and uses of the property. This amendment modifies the "All Appropriate Inquiries" Rule to reference ASTM Standard E2247-08 ``Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property'' and allow for its use to satisfy the statutory requirements for conducting all appropriate inquiries under CERCLA.	12/23/2008	$0	According to the supplementary information, this rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. No additional cost. This provides the option to use ASTM E2247-8 for forestland or rural property, but does not require it.	73 Fed. Reg. 78654 (12/23/2008)

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
24	FAA	Order 1050.1E - Environmental Impacts: Policies and Procedures http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgOrders.nsf/786843013bf2d049852569810075c599/9552db552fd4495b862570660068adb1/$FILE/Order1050-1E.pdf	Cancellation and reissuance of Order	The Order provides the FAA policy and procedures to ensure agency compliance with the requirements set forth in the Council on Environmental Quality regulations for implementing the provisions of the National Environmental Policy Act of 1969 (NEPA), 40 CFR Parts 1500-1508; Department of Transportation Order DOT 5610.1C, Procedures for Considering Environmental Impacts; and other related statutes and directives. This reissuance updates the policies and procedures for compliance with NEPA and implementing regulations issued by the Council on Environmental Quality. The update includes the following: New and modified categorical exclusions and guidance regarding applicability Addition of Tribes to the list of government agencies consulted and guidance on required consultations Revisions to criteria for extraordinary circumstances and procedures for approval. An appendix for Analyses of Environmental Impact Categories, which contains an overview of procedures for implementing other applicable environmental laws, regulations, and executive orders in the course of NEPA compliance, adds a significant threshold paragraph where thresholds have been established, and provides guidance on identifying impacts. Additional appendixes for contract coordination and environmental stewardship and streamlining.	6/8/2004	—	No published cost estimate. An economic analysis was not conducted as part of this Order update. Previous Order was 1050.1D, Policies and Procedures for Considering Environmental Impacts, dated December 5, 1986. Clarification on policies and procedures will likely reduce compliance costs in some areas (e.g., expanded categorical exclusions) and increase costs in others (agency coordination, impact analyses).	N/A
25	FAA	Order 1050.1E - Environmental Impacts: Policies and Procedures, Change 1 http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgOrders.nsf/0/2bb5c3876ba31261862571810047a403/$FILE/Order1050.1ECHG1.pdf	Order Change	The Order provides the FAA policy and procedures to ensure agency compliance with the requirements set forth in the Council on Environmental Quality regulations for implementing the provisions of the National Environmental Policy Act of 1969 (NEPA), 40 CFR Parts 1500-1508; Department of Transportation Order DOT 5610.1C, Procedures for Considering Environmental Impacts; and other related statutes and directives. This change incorporates revisions resulting from public comments on the 2004 publication and from internal review. 17 separate revisions are included in the change	3/20/2006	—	No published cost estimate The revision includes changes for clarification; consistency; addition of information; corrections; and editorial changes. Clarification on information updated in the order could reduce compliance costs in some areas and increase costs in others (e.g., T&E, DOT).	N/A
26	FAA	Order 5050.4B - National Environmental Policy Act (NEPA) Implementing Instructions for Airport Projects, http://www.faa.gov/airports/resources/publications/orders/environmental_5050_4/media/5050-4B_complete.pdf	Cancellation and reissuance of Order	The Order provides information to FAA Office of Airports personnel and others interested in fulfilling National Environmental Policy Act (NEPA) requirements for airport actions under FAA's authority. This Order supplements 1050.1E and is part of FAA's effort to ensure its personnel have clear instructions to address potential environmental effects resulting from major airport actions. This reissuance replaces Order 5050.4A, based on the changes in Federal laws and regulations, FAA policies and procedures (i.e., Order 1050.1E), and evolving environmental processing and evaluation for airports occurring since 1985.	4/28/2006	—	No published cost estimate. An economic analysis was not conducted as part of this Order update. Previous Order was 5050.4A, Airport Environmental Handbook, dated October 8, 1985. Clarification on policies and procedures will likely reduce compliance costs in some areas (e.g., expanded categorical exclusions) and increase costs in others (agency coordination, impact analyses).	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
27	FAA	14 CFR Part 150 - Airport Noise and Compatibility Planning, 69 Fed. Reg 57621 http://www.faa.gov/airports/resources/publications/federal_register_notices/media/environmental_69fr57622.pdf	Amendment to regulations	Part 150 prescribes requirements for airport operators who choose to develop airport planning compatibility programs and establishes a system of measuring airport noise and determining the exposure of individuals to airport noise under the Aviation Safety and Noise Abatement Act of 1979. This amendment implements new requirements for airport noise compatibility planning found in Vision 100 Pub. L. 108-176 (December 12, 2003), including noise exposure map criteria and public coordination.	9/24/2004	$0	According to the supplementary information, this rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. Costs from the rule add minor additional costs to airports that submit airport noise compatibility plans (i.e., new requirement for enlarged minimal map scales on submitted noise expose maps).	69 Fed. Reg. 57624
28	EPA	40 CFR Parts 51 and 93 - PM-2.5 De Minimis Emission Levels for General Conformity Applicability, 71 Fed. Reg. 40420 http://edocket.access.gpo.gov/2006/pdf/E6-11241.pdf	Amendment to regulations	The regulations comprise the General Conformity Rule under the Clean Air Act (CAA). The General Conformity Rule dictates that all reasonably foreseeable direct and indirect air emissions caused or contributed by federal actions in National Ambient Air Quality Standard (NAAQS) non-attainment and maintenance areas, of which the responsible federal agency can feasibly control, conform to the applicable State Implementation Plan. This amendment adds de minimis emissions levels for PM2.5 NAAQS and its precursors to the rule.	7/17/2006	$0	According to the supplemental information, this rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. Identification of de minimis levels clarify applicability for general conformity, which may reduce compliance costs for some projects (e.g., projects that do not exceed de minimis levels) and increase costs for others (e.g., projects expected to exceed de minimum levels).	71 Fed. Reg. 40424 (07/17/2006)
29	EPA	10 CFR Parts 490 - Alternative Fuel Transport Program; Private and Local Government Fleet Determination, 73 Fed. Reg. 13729 http://edocket.access.gpo.gov/2008/pdf/E8-5143.pdf	Revision to regulations	Part 490 implements the Department of Energy's (DOE) alternative fuel transportation program through rulemakings for state government fleets and alternative fuel providers. This revision provides a determination that DOE cannot issue a requirement for certain private and local government fleets to acquire alternative fueled vehicles.	3/14/2008	—	According to the supplementary information, this rule change was considered significant under Executive Order 12866, Regulatory Planning and Review. However, economic analysis information could not be located. Costs are not provided in the FR but identifies the rule will not result in compliance costs for small entities. The rule does not include requirements for private and local government fleets.	73 Fed. Reg. 13739
30	EPA	40 CFR Part 82 - Protection of the Stratospheric Ozone: Alternatives for the Motor Vehicle Air Conditioning Sector Under the Significant New Alternatives Policy Program, 73 Fed. Reg. 33304 http://edocket.access.gpo.gov/2008/pdf/E8-13086.pdf	Amendment to regulations	Title VI of the Clean Air Act (CAA) allows EPA to regulate air pollutants that can have a damaging effect on the ozone layer, including many compounds commonly used as refrigerants or propellants. Title VI also allows EPA to set up monitoring and reporting requirements for sources emitting, producing, exporting, or otherwise transferring these compounds. Part 82 implements this authority. This amendment expands the list of acceptable substitutes for ozone-depleting substances, R-152a, for the motor vehicle air conditioning end-use, under the Significant New Alternatives Policy (SNAP) program.	6/12/2008	—	According to the supplementary information, this rule change was considered significant under Executive Order 12866, Regulatory Planning and Review. However, economic analysis information could not be located. Costs are not provided in the FR. Expanding the list of allowable substances to R-152a should result in decreased compliance costs for small airports since they would have additional options for servicing MVAC systems. In general, availability of additional acceptable refrigerants should lower costs, but not significantly.	73 Fed. Reg. 33308 (6/12/2008)

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
31	EPA	40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, 73 Fed. Reg. 35939 http://edocket.access.gpo.gov/2008/pdf/E8-14377.pdf	Amendment to regulations	Part 63 under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) includes a series of emissions standards set by EPA describing the maximum levels of pollutants for specific source categories. Operators of hazardous air pollutant emission sources must apply control technologies to ensure that emission levels do not exceed the NESHAP. This amendment revises the pressure and vacuum vent valve cracking pressure and leak rate requirements for vapor balance systems used to control emissions from gasoline storage tanks at gasoline dispensing facilities with a monthly throughput of 100,000 gallons of gasoline or more. Newly constructed or reconstructed gasoline dispensing facilities must comply with the amendments by the effective date, or upon start-up, whichever is later.	6/25/2008	$0	According to the supplemental information, this rule change is not a significant regulatory action, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. Costs would include installing vapor recovery systems on tanks.	73 Fed. 35942-35943 (6/25/2008)
32	EPA	40 CFR Part 122 - Application of Pesticides to Waters of the United States in Compliance With FIFRA, 71 Fed. Reg. 68483 http://edocket.access.gpo.gov/2006/pdf/E6-20002.pdf	Revision to regulations	Part 122 establishes the National Pollutant Discharge Elimination System (NPDES), which regulates direct discharges of pollutants into waters of the U.S. through effluent limitations. This revision clarifies that application of a pesticide in compliance with Federal Insecticide, Fungicide and Rodenticide Act of 1947 (FIFRA) does not require a NPDES permit when application is made directly to waters of the United States to control pests that are present in the water or when the application is made to control pests that are over, including near, waters of the United States.	11/27/2006	—	According to the supplementary information, supplementary information, this rule change is a significant regulatory action under Executive Order 12866, Regulatory Planning and Review. However, economic analysis information could not be located. Costs are not provided in the FR. Because the rule identifies two circumstances in which pesticides may be discharged without a NPDES permit under the Clean Water Act, the rule does not add new requirements to small entities	71 Fed. Reg. 68490-68491
33	EPA	40 CFR Parts 355 and 370 - EPCRA; Amendments to Emergency Planning and Notification; Emergency Release Notification and Hazardous Chemical Reporting, 73 Fed. Reg. 65452 http://edocket.access.gpo.gov/2008/pdf/E8-25329.pdf	Amendment to regulations	Parts 355 and 370 implements the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), which established emergency planning and reporting requirements and community right-to-know requirements for facilities storing hazardous materials and substances to protect workers, public, environment, and emergency responders. This rule finalizes changes to the emergency planning notification, release notification, and hazardous chemical reporting regulations proposed on June 8, 1998. Major changes applicable to airports include threshold quantities and reporting of mixtures.	11/3/2008	—	No published cost estimates. According to the supplemental information, this rule change is a significant regulatory action under Executive Order 12866, Regulatory Planning and Review. However, economic analysis information could not be located. Costs are not provided in the FR. The rule change includes only minor modifications to Parts 355 and 370. It codifies statutory changes and clarifies certain policy statements and interpretations. The rule change does not add new reporting or recordkeeping costs	73 Fed. Reg. 65460
34	EPA	40 CFR Parts 355 and 370 - EPCRA; Guidance on Reporting Options for Sections 311 and 312 and Interpretations, 75 Fed. Reg. 39852 http://edocket.access.gpo.gov/2010/pdf/2010-17031.pdf	Notice of availability	Parts 355 and 370 establish emergency planning and reporting requirements and community right-to-know requirements for facilities storing hazardous materials and substances to protect workers, public, environment, and emergency responders. This notice identifies availability of a guidance document to assist with implementation of sections 311 and 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA). The document provides guidance on various reporting options that States and local agencies may choose in implementing EPCRA.	7/13/2010	—	No published cost estimates. Costs savings for some of the interpretations may be able to be estimated (e.g., electronic submissions, forms. etc.)	U.S. EPA, Office of Solid Waste. 2010. Guidance on Reporting Options for Sections 311 and 312 and Some Interpretations..

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
35	EPA	40 CFR Part 450 - Effluent Limitations Guidelines and Standards for the Construction and Development Point Source Category, 74 Fed. Reg. 62995 http://edocket.access.gpo.gov/2009/pdf/E9-28446.pdf	Promulgation of regulations	This rule promulgates regulations under the Clean Water Act (CWA) establishing technology-based Effluent Limitations Guidelines (ELGs) and New Source Performance Standards (NSPS) for the Construction and Development point sources.	12/1/2009	—	The economic analysis identifies total compliance costs for the construction industry. Construction activities at airports would be affected by increased project costs as a result of contractors meeting compliance requirements, i.e., cost pass-through. Cost pass-through is analyzed by number of affected entities. The dollar amount for cost pass-through is not provided. Small airports would be required to implement erosion and sediment control measures and pollution prevention practices to control pollutants in discharges from construction sites. The economic analysis provides benefit costs for sediment and erosion control, but does not provide costs for controls themselves.	U.S. EPA, Office of Water. 2009. Economic Analysis of Final Effluent Limitation Guidelines and Standards for the Construction and Development Industry.
36	EPA	40 CFR 450 - Direct Final Rule Staying Numeric Limitation for the Construction and Development Point Source Category, 75 Fed. Reg. 68215 http://edocket.access.gpo.gov/2010/pdf/2010-28033.pdf	Revision to regulations	Part 450 regulates storm water discharges from construction sites under the National Pollutant Discharge Elimination System (NPDES) program. Recently, the EPA published Effluent Limitation Guidelines (ELGs) to further control construction storm water discharges to reduce the amount of sediment and other pollutants typically discharged from construction sites. The regulation also requires construction sites to implement a range of erosion and sediment control BMPs. This amendment stays the numeric effluent limitation of 280 Nephelometric Turbidity Units (NTU) and associated monitoring requirements for the Construction and Development Point Source Category.	11/5/2010	$0	This rule change does not result in a significant economic impact, as defined by Executive Order 12866, Regulatory Planning and Review. Therefore, an economic analysis was not conducted. No costs are associated with this rule since it stays the implementation of the 280 NTU requirement.	75 Fed. Reg. 68216 (11/15/2010)
37	FAA	AC 150/5370-10B-E - Standards for Specifying Construction of Airports (5370-10F is current, but was issued after the Study Period) http://www.faa.gov/documentLibrary/media/advisory_circular/150-5370-10E/150_5370_10e.pdf	Cancellation and reissuance of AC	This AC incorporates standards when performing earthwork activities, including temporary air and water pollution, soil erosion, and siltation controls.	4/5/2005 9/29/2007 9/30/2008 9/30/2009	—	No published cost information. Costs are associated with installation or implementation of air, water, soil erosion and siltation controls during earthwork activities.	N/A
38	Office of the Executive	Marine Protected Areas (E.O. 13158), 65 Fed. Reg. 34909 http://www.mpa.gov/pdf/eo/execordermpa.pdf	New Executive Order	The Executive Order is intended to protect the significant natural and cultural resources within the marine environment through the following: Strengthening management, protection, and conservation of existing marine protected areas (MPAs) and establishing new or expanded MPAs Developing a scientifically based, comprehensive national system of MPAs representing diverse U.S. marine ecosystems, and the Nation's natural and cultural resources Avoiding causing harm to MPAs through federally conducted, approved, or funded activities.	5/26/2000	—	No published cost estimate. Typically, there are not economic analyses conducted for Executive Orders. Costs to small airports would be related to coordination with state and local resource agencies responsible for managing MPAs.	N/A
39	FAA	Advisory Circular (AC) 150/5200-36 - Qualifications for Wildlife Biologist Conducting Wildlife Hazard Assessments and Training Curriculums for Airport Personnel Involved in Controlling Wildlife Hazards on Airports http://www.faa.gov/documentLibrary/media/advisory_circular/150-5200-36/150_5200_36.pdf	New AC	The new advisory circular describes the qualifications for wildlife biologists who conduct Wildlife Hazard Assessments for Part 139-certified airports. The circular addresses the minimum wildlife hazard management curriculum for the initial and recurrent training of airport personnel involved in implementing an FAA-approved Wildlife Hazard Management Plan.	6/28/2006	—	No published cost estimate. Costs include initial and continuing training of wildlife biologists.	N/A

[1] If published source indicates "no cost" or "de minimis cost", zero value entered
Costs are annual costs per entity unless otherwise noted

TABLE A-3

Typical Small Airport Activities and the Associated Environmental Regulatory Topics and Programs

	Aircraft Deicing/Anti-icing	Aircraft Operation	Aircraft Lavatory Service	Airport Layout Plan (ALP) Changes	Auxiliary Power Unit Operation	Building Operation/Maintenance	Bulk Fuel and Oil Storage/Handling	Cargo Handling	Chemical Storage/Handling	Degreasing	Demolition/Construction/Development	Fire Fighting Training/Testing/Flushing	Ground Service Equipment Operation	Grounds Maintenance/Landscaping	Incinerator Operation	Motor Vehicle Operation	On-airport Power Generation	Painting	Pavement Deicing	Property Acquisition	Refueling	Runway Rubber Removal	Spill Response	Vehicle/Equipment/Aircraft Maintenance	Washing	Waste Generation/Disposal
Air Quality																										
Jurisdictional Authority																										
General Regulations	•	•	•		•	•	•	•	•	•	•	•	•	•	•	•	•	•	•		•	•	•	•	•	•
Air Pollutant Regulations✓	•	•	•		•	•	•	•	•	•	•	•	•	•	•	•	•	•	•		•	•		•	•	•
General Conformity Regulations✓	•	•	•		•	•	•	•	•	•	•	•	•	•	•	•	•	•	•		•					•
Mobile Source Regulations		•	•		•			•			•		•	•		•					•			•	•	
Stationary Source Regulations	•					•	•		•	•		•			•		•	•	•					•	•	•
Regulations on Ozone Depleting Substances✓						•			•															•		
Airports and Greenhouse Gases	•	•	•		•	•		•	•		•	•	•	•	•	•	•	•	•		•					•
Airports and Ultrafine Particulate Matter		•			•			•			•	•	•	•	•	•	•									•
Emergency Planning and Response																										
Community Emergency Planning, Storage and Release Reporting✓	•					•	•	•	•	•	•			•					•		•		•	•		

	Aircraft Deicing/Anti-icing	Aircraft Operation	Aircraft Lavatory Service	Airport Layout Plan (ALP) Changes	Auxiliary Power Unit Operation	Building Operation/Maintenance	Bulk Fuel and Oil Storage/Handling	Cargo Handling	Chemical Storage/Handling	Degreasing	Demolition/Construction/Development	Fire Fighting Training/Testing/Flushing	Ground Service Equipment Operation	Grounds Maintenance/Landscaping	Incinerator Operation	Motor Vehicle Operation	On-airport Power Generation	Painting	Pavement Deicing	Property Acquisition	Refueling	Runway Rubber Removal	Spill Response	Vehicle/Equipment/Aircraft Maintenance	Washing	Waste Generation/Disposal
Spill Prevention, Control and Countermeasure✓					•	•	•						•			•	•				•		•	•		
Pesticide Application, Certification, and Disposal						•		•	•					•									•			•
Underground Storage Tanks						•	•		•								•			•	•		•	•		
Hazardous Material Transport✓	•					•		•	•	•	•			•				•	•		•		•	•		•
Noise																										
Part 150 Programs✓				•																•						
Part 161 Access Restrictions																				•						
Planning and Development																										
Historic, Archaeological, and Ethnological Resources											•									•						
Environmental Protection✓											•									•						
Property Transfer✓											•									•						•
Public Involvement											•									•						
Fish, Wildlife and Plants											•			•						•						•
Waste Management																										
Hazardous Waste Regulations✓		•				•	•	•	•	•	•		•			•	•	•			•		•	•		•

	Aircraft Deicing/Anti-icing	Aircraft Operation	Aircraft Lavatory Service	Airport Layout Plan (ALP) Changes	Auxiliary Power Unit Operation	Building Operation/Maintenance	Bulk Fuel and Oil Storage/Handling	Cargo Handling	Chemical Storage/Handling	Degreasing	Demolition/Construction/Development	Fire Fighting Training/Testing/Flushing	Ground Service Equipment Operation	Grounds Maintenance/Landscaping	Incinerator Operation	Motor Vehicle Operation	On-airport Power Generation	Painting	Pavement Deicing	Property Acquisition	Refueling	Runway Rubber Removal	Spill Response	Vehicle/Equipment/Aircraft Maintenance	Washing	Waste Generation/Disposal
Universal Waste Requirements✓						•			•		•			•									•	•		•
Used Oil and Used Oil Filters✓		•				•	•		•				•			•	•						•	•		•
PCB Waste						•	•		•		•									•			•			•
Asbestos Containing Material Management						•					•									•			•	•		•
Lead-based Paint						•					•							•		•			•			•
Water Resources																										
Drinking Water✓						•																				
Storm Water Discharges Associated with Industrial Activities✓	•	•	•			•	•	•	•	•		•	•	•		•	•	•	•		•	•	•	•	•	•
Storm Water Discharges Associated with Construction Activities✓							•		•		•							•								
Storm Water Discharges Associated with Municipal Separate Storm Sewer Systems	•	•	•			•	•	•	•	•	•	•	•	•		•	•	•	•		•	•	•	•	•	•
Industrial Wastewater Pretreatment	•		•				•		•	•									•				•	•	•	
Surface Waters and Wetlands											•			•						•						

TABLE A-4

AIRPORT SECURITY REQUIREMENTS AND PUBLISHED COSTS

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs	Notes on Published Costs	Source
1	Federal Aviation Administration (FAA)	Airport (AP) 00-01 Section C, Past Employment Checks	Amendment to airport security plan (ASP) requirements	This document required mandatory audits of past employment checks on employees	5/31/2000	___	No published cost estimate.	N/A
2	FAA	EA 107-00-01, Additional Security Procedures for US Airports	New Emergency Amendment	Security-sensitive information (SSI) which cannot be publicly disclosed. The EA is mandatory.	6/8/2000	____	No published cost estimate.	N/A
3	FAA	EA 107-00-01A, Additional Security Procedures for US Airports	New Emergency Amendment	Security-sensitive information (SSI) which cannot be publicly disclosed. The EA is mandatory.	6/23/2000	____	No published cost estimate.	N/A
4	FAA	EA 107-00-01B, Additional Security Procedures for US Airports	New Emergency Amendment	Security-sensitive information (SSI) which cannot be publicly disclosed. The EA is mandatory.	8/21/2000	____	No published cost estimate.	N/A
5	FAA	AP 01-01, Airport Categorization for Security	Amendment to ASP requirements	The AP updates category qualifications and law enforcement officer (LEO) response times. The guidance is mandatory	2001	___	No published cost estimate.	N/A
6	FAA	EA 107-00-0lC, Additional Security Procedures for US Airports	New Emergency Amendment	Security-sensitive information (SSI) which cannot be publicly disclosed. The EA is mandatory.	1/24/2001	____	No published cost estimate.	N/A
7	FAA	EA 107-00-0lD, Additional Security Procedures for US Airports	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	7/27/2001	____	No published cost estimate.	N/A
8	FAA	EA 107-00-01E, Additional Security Procedures for US Airports	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	9/27/2001	____	No published cost estimate.	N/A
9	FAA	EA 107-01-01, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	9/12/2001	____	No published cost estimate.	N/A
10	FAA	EA 107-01-01A, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	9/20/2001	____	No published cost estimate.	N/A
11	FAA	EA 107-01-06, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	9/18/2001	____	No published cost estimate.	N/A
12	FAA	EA 107-01-06A, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	9/19/2001	____	No published cost estimate.	N/A
13	FAA	EA 107-01-06B, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	9/21/2001	____	No published cost estimate.	N/A
14	FAA	EA 107-01-06C, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	9/27/2001	____	No published cost estimate.	N/A
15	FAA	EA 107-01-07, Theat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	9/26/2001	____	No published cost estimate.	N/A
16	FAA	EA 107-01-07A, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	10/8/2001	____	No published cost estimate.	N/A
17	FAA	EA 107-01-07B, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	10/24/2001	____	No published cost estimate.	N/A
18	FAA	EA 107-01-07C, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	11/2/2001	____	No pblished cost estimate.	N/A
19	FAA	EA 107-01-08, Threat to/from Ronald Reagan Washington National Airport (DCA)	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	10/3/2001	____	No published cost estimate.	N/A
20	Transportation Security Administration (TSA)	EA 107-01-07D, Threat to US Airports-multiple security requirements	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	3/19/2002	____	No published cost estimate.	N/A
21	FAA	EA 107-01-08A, Threat to/from DCA	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	10/24/2001	____	No published cost estimate.	N/A
22	TSA	EA 107-01-08B, Threat to/from DCA	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	12/28/2001	____	No published cost estimate.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs	Notes on Published Costs	Source
23	TSA	EA 107-01-08C, Threat to/from DCA	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	1/28/2002	____	No published cost estimate.	N/A
24	TSA	EA 107-01-08D, Threat to/from DCA	New Emergency Amendment	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The EA is mandatory.	2/2/2002	____	No published cost estimate.	N/A
25	FAA	14 CFR Parts 107 and 108, Criminal History Records Checks, 66 Fed. Reg. 63474 http://frwebgate3.access.gpo.gov/cgi-bin/PDFgate.cgi?WAISdocID=7sv3b7/0/2/0&WAISaction=retrieve	Amendment to regulations	Parts 107 established security program requirements for airport operators and aircraft operators, respectively. This amendment requires Criminal History Records Check (CHRC) all airport employees eliminating "grandfather" exceptions for certain employees in the prior rules.	12/6/2001	$2,783,353 annually	This rule will constitute an additional recordkeeping requirement for certificate holders since all personnel will need to be fingerprinted. Published costs are total annual costs for all entities subject to Parts 107 and 108	66 Fed. Reg. 63480 (12/06/2001)
26	TSA	SD 107-01-10, Name comparison	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	12/18/2001	____	No published cost estimate.	N/A
27	TSA	SD 107-01-10A, No Fly and Selectee Lists	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	12/18/2001	____	No published cost estimate.	N/A
28	FAA and TSA	14 CFR Parts 91, 107-109, 121, 129, 135, 139, 191 49 CFR Parts 1500, 1510, 1520, 1540, 1542, 1544, 1546, 1548, 1550, Civil Aviation Security Rules, 67 Fed. Reg. 8340 http://frwebgate2.access.gpo.gov/cgi-bin/PDFgate.cgi?WAISdocID=7HzgCZ/0/2/0&WAISaction=retrieve	Cancellation and revision of regulations Issuance of new regulations	The rulemaking implemented the transfer of aviation security jurisdiction from FAA to TSA. The regulatory change required a complete update of airport security plans (ASPs) to reflect the terms in the new TSA regulations.	2/22/2002	___	No published cost estimate. TSA recognizes that this rule may add significant costs to aircraft operators and foreign air carriers. An assessment will be conducted in the future.	67 Fed. Reg. 8349 (02/22/2002)
29	TSA	SD 1542-01-08E, Threat to/from DCA	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	2/27/2002	____	No published cost estimate.	N/A
30	TSA	SD 1542-01-08F, Threat to/from DCA	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.		____	No published cost estimate.	N/A
31	TSA	SD 1542-02-01, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	4/2/2002	____	No published cost estimate.	N/A
32	TSA	SD 1542-01-07E, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	4/26/2002	____	No published cost estimate.	N/A
33	TSA	SD 1542-01-07F, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	5/7/2002	____	No published cost estimate.	N/A
34	TSA	SD 1542-01-07G, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	10/1/2002	____	No published cost estimate.	N/A
35	TSA	SD 1542-01-07H, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	12/9/2002	____	No published cost estimate.	N/A
36	TSA	SD 1542-01-07I, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	2/8/2003	____	No published cost estimate.	N/A
37	TSA	SD 1542-01-07J, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	2/27/2003	____	No published cost estimate.	N/A
38	TSA	SD 1542-01-07K, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	4/9/2003	____	No published cost estimate.	N/A
39	TSA	SD 1542-01-07L, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	5/27/2003	____	No published cost estimate.	N/A
40	TSA	SD 1542-01-07M, Threat to US Airports-multiple security requirements	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	6/2/2003	____	No published cost estimate.	N/A
41	TSA	SD 1542-01-08G, Threat to/from DCA	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	6/6/2002	____	No published cost estimate.	N/A
42	TSA	SD 1542-01-08H, Threat to/from DCA	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	4/15/2003	____	No published cost estimate.	N/A
43	TSA	SD 1542-01-08I, Threat to/from DCA	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	3/29/2004	___	No published cost estimate.	N/A
44	TSA	SD 1542-00-01F, Additional Security Procedures	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	10/1/2002	____	No published cost estimate.	N/A
45	TSA	SD 1542-00-01G, Law Enforcement Officer (LEO) verification	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	4/15/2003	____	No published cost estimate.	N/A
46	TSA	SD 1542-02-03, Background checks-Sterile Area	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	10/29/2002	____	No published cost estimate.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs	Notes on Published Costs	Source
47	TSA	SD 1542-02-03A, Background checks-Sterile Area	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	11/8/2002	____	No published cost estimate.	N/A
48	TSA	SD 1542-02-03B, Background checks-Sterile Area	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	12/20/2002	____	No published cost estimate.	N/A
49	TSA	SD 1542-03-04, Threats to US Airports (Orange)	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	3/18/2003	____	No published cost estimte.	N/A
50	TSA	SD 1542-01-10B, Threat to US Airports-No Fly and Selectee List Procedures	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	4/22/2003	____	No published cost estimate.	N/A
51	TSA	SD 1542-01-10C, Threat to US Airports-No Fly and Selectee List Procedures	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.		____	No published cost estimate.	N/A
52	TSA	SD 1542-03-08, Threat to US Airports (Orange)	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	5/20/2003	____	No published cost estimate.	N/A
53	TSA	SD 1542-03-12, Threat to US Airports (Orange)	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	12/21/2003	____	No published cost estimate.	N/A
54	TSA	SD 1542-04-08, Background Checks-Sterile Area/SIDA	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	7/6/2004	____	No published cost estimate.	N/A
55	TSA	SD 1542-04-08A, Background Checks-Sterile Area/SIDA	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	11/5/2004	____	No published cost estimate.	N/A
56	TSA	SD 1542-04-08B, Security Threat Assessment and Reporting Requirements Related to Individuals with Airport-issued Identification Media	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	9/20/2006	____	No published cost estimate.	N/A
57	TSA	SD 1542-04-08C, Security Threat Assessment and Reporting Requirements Related to Individuals with Airport-issued Identification Media	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	11/3/2006	____	No published cost estimate.	N/A
58	TSA	SD 1542-04-08D, Security Threat Assessment and Reporting Requirements Related to Individuals with Airport-issued Identification Media	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	1/31/2007	____	No published cost estimate.	N/A
59	TSA	SD 1542-04-08E, Security Threat Assessment and Reporting Requirements Related to Individuals with Airport-issued Identification Media	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	3/30/2007	____	No published cost estimate.	N/A
60	TSA	SD 1542-04-08F, Security Threat Assessment and Reporting Requirements Related to Individuals with Airport-issued Identification Media	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	12/10/2008	____	No published cost estimate.	N/A
61	TSA	SD 1542-04-08G, Security Threat Assessment and Reporting Requirements Related to Individuals with Airport-issued Identification Media	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	5/28/2009	___	No published cost estimate.	N/A
62	TSA	SD 1542-04-09, Enhanced Security Measures for Secured Areas and Security Identification Areas (SIDA)	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	7/6/2004	___	No published cost estimate.	N/A
63	TSA	SD 1542-04-10, Airport Tenant Access to Sterile Areas	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	7/6/2004	___	No published cost estimate.	N/A
64	TSA	SD 1542-01-10D, Threat to US Airports-No Fly and Selectee List Procedures	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	7/8/2004	____	No published cost estimate.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs	Notes on Published Costs	Source
65	TSA	SD 1542-01-10E, Threat to US Airports-No Fly and Selectee List Procedures	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	8/13/2008	____	No published cost estimate.	N/A
66	TSA	SD 1542-01-10F, Threat to US Airports-No Fly and Selectee List Procedures	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	10/28/2008	____	No published cost estimate.	N/A
67	TSA	SD 1542-01-10G, Threat to US Airports-No Fly and Selectee List Procedures	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	2/9/2009	___	No published cost estimate.	N/A
68	TSA	SD 1542-04-11, Incidents and Suspicious Activity Reporting	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	11/24/2004	____	No published cost estimate.	N/A
69	TSA	SD 1542-04-11A, Incidents and Suspicious Activity Reporting	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	11/26/2004	____	No published cost estimate.	N/A
70	TSA	SD 1542-04-11B, Incidents and Suspicious Activity Reporting	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	12/8/2004	____	No published cost estimate.	N/A
71	TSA	49 CFR Parts 1520, 1540, 1542, 1544, 1546, 1548, Air Cargo Security Requirements, 71 Fed. Reg. 30478	Amendment to regulations	The amendment requires airport operators, aircraft operators, foreign air carriers and indirect air carriers to implement security measures in the air cargo supply chain as directed by TSA. The amendment also revises certain regulations to apply to aircraft of more than 12,500 pounds, rather than aircraft of 12,500 pounds or more	5/26/2006	___	No published cost estimate.	N/A
72	TSA	SD 1542-06-01, Homeland Security Advisory System Threat Condition Orange Security Measures-US Airports	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	8/10/2006	____	No published cost estimate.	N/A
73	TSA	SD 1542-06-01A, Homeland Security Advisory System Threat Condition Orange Security Measures-US Airports	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	8/12/2006	____	No published cost estimate.	N/A
74	TSA	SD 1542-06-01B, Homeland Security Advisory System Threat Condition Orange Security Measuers-US Airports	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	8/16/2006	____	No published cost estimate.	N/A
75	TSA	SD 1542-06-01C, Homeland Security Advisory Ssystem Threat Condition Orange Security Measure-US Airports	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	9/25/2006	____	No published cost estimate.	N/A
76	TSA	SD 1542-06-01D, Homeland Security Advisory System Threat Condition Orange Security Measures-US Airports	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	11/9/2006	____	No published cost estimate.	N/A
77	Customs and Border Protection (CBP)	Airport Technical Design Standards Passenger Processing Facilities (ATDS)	New guidance and standards	The ATDS reflects the unification of Customs and Border Protection Functions in a single agency. The ATDS reflects current national policy procedures and standards for design and construction of CBP facilities at airports, preclearance facilities and general aviation airports. Specific issues addressed include the following: Facility planning and procedures Design and construction requirements Signage Security Data processing and telecommunications The ATDS is to serve as the primary reference documents for municipal airport authorities, architects and engineers and airport owners and operators. The standards are intended to establish minimum facility design requirements	Aug-06	___	No published cost estimate	N/A
78	TSA	Fuel farm guidance	New guidance in response to JFK threat	The guidance document requires airports to review and ensure adequate security controls exist for their fuel farms.	6/18/2007	___	No published cost estimate.	N/A
79	TSA	SD 1542-10-01, Sale and Business use of Toner and Ink Cartridges in the Sterile Area	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	11/8/2010	___	No published cost estimate.	N/A
80	TSA	SD 1542-10-01A, Sale and Business use of Toner and Ink Cartridges in the Sterile Area	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	12/8/2010	___	No published cost estimate.	N/A

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs	Notes on Published Costs	Source
81	TSA	SD 1542-10-01B, Sale and Business use of Toner and Ink Cartridges in the Sterile Area	New SD	Sensitive-security informaiton (SSI) which cannot be publicly disclosed. The SD is mandatory.	12/9/2010	___	No published cost estimate.	N/A

TABLE A-5

SUMMARY OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) REQUIREMENTS AND PUBLISHED COSTS

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
1	OSHA	Voluntary Protection Programs (VPP) Revision 65 Fed. Reg. 45650 http://www.gpo.gov/fdsys/pkg/FR-2000-07-24/pdf/00-18605.pdf	Revised guidance	The guidance document Increases the number of worksites eligible for VPP status It Implements new illness reporting requirement for VPP and improved requirements for contractor worker health & safety.	7/24/2000	___		N/A
2	OSHA	29 CFR Part 1926, Subparts M and R, Steel Erection Standard 66 Fed. Reg. 5196 http://www.gpo.gov/fdsys/pkg/FR-2001-01-18/pdf/01-979.pdf	New regulation	This new regulation provides protection for iron workers that work along side steel erectors. Regulations have been developed to protect workers against the most common hazards working under loads; hoisting, landing and placing decking; column stability; double connections; landing and placing steel joints; and falls to lower levels.	1/18/2001	$98 per construction firm	Annual cost per firm in construction and related trades Cost would be allocated among all projects undertaken by firm 1998 dollars	66 Fed. Reg. 5254, Table 1; 56 Fed. Reg. 5256-5257, Table 4 (01/18/2001) Unison calculations
3	OSHA	29 CFR Part 1926 Subpart G, Safety Standards for Signs, Signals, Barricades, 67 Fed. Reg. 57722 http://www.gpo.gov/fdsys/pkg/FR-2002-09-12/pdf/02-23142.pdf	Amendment to regulation	The regulation provides enhanced protection for roadside construction. It addresses the types of signs, signals, and barricades that must be used to protect construction employees from traffic hazards This amendment includes requirements for the following: Retro-reflective and illuminated devices at intermediate and long-term stationary temporary traffic control zones Warning devices for mobile operations at speeds above 20 mph Advance warning signs for certain closed paved shoulders Temporary traffic barriers separating opposing traffic on a two-way roadway	9/12/2002	$308 per small firm	Annual cost per small firm involved in highway and road construction Average cost for all firms not included in source document Costs would be allocated among all projects undertaken by firm Published costs may understate costs if equipment purchase or rental is required	67 Fed. Reg. 57730, 57734-57735, Table 5 (09/12/2002)
4	OSHA	29 CFR Part 1904, Occupational Injury and Illness Recording and Reporting Requirements 67 Fed. Reg. 44037 http://www.gpo.gov/fdsys/pkg/FR-2002-07-01/pdf/02-16392.pdf	Amendment to regulation	The regulation governs the recording and reporting of occupational injury and illness. This amendment adopts revised standards for reporting worker hearing loss. The new standard requires recording 10-decibel shifts from the employee's initial hearing test when they also result in an overall hearing level of 25 decibels.	7/1/2002	$996,064 total Maximum per small firm -- $2.00	Total cost is estimate for all firms required to maintain hearing loss records. Maximum per small firm assumes all reporting costs born by small firms. 2000 dollars	67 Fed. Reg. 44046-44047 (07/01/2002)
5	OSHA	29 CFR Part 1904 Occupational Injury and Illness Recording and Reporting Requirements 68 Fed. Reg. 38601 http://www.gpo.gov/fdsys/pkg/FR-2003-06-30/pdf/03-16482.pdf	Amendment to regulation	The regulation governs the recording and reporting of occupational injury and illness. This amendment eliminated a requirement for separate reporting of musculoskeletal disorders adopted in 2001. The separate reporting requirement was never implemented.	6/30/2003	___	No publised cost estimate	N/A
6	OSHA	eTool for Airline Baggage Handling http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=NEWS_RELEASES&p_id=10418	Revised guidance	This is a guidance tool for airline baggage handling. A new eTool will provide additional training for airline baggage handling.	9/12/2003	___	The guidance appears to be advisory in nature and does not require any changes to practices	N/A
7	OSHA	OSHA Form OSHA 300, Log of Work Related Illnesses and Injuries http://www.osha.gov/recordkeeping/new-osha300form1-1-04.pdf	Notice of revision to form	OSHA Form 300 provides a standard format for reporting work-related injuries and illnesses. This revision makes modifications to the structure of the form to facilitate completion and reporting of work related injuries and illness. This notice provided updated copies of the form to reflect regulatory changes discussed previously in this table.	10/2/2003	___	This notice provided updated copies of the form to reflect regulatory changes discussed previously in this table. Information, if available, on published costs is available in these entries.	N/A
8	OSHA	Hazard Communication Initiative http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=NEWS_RELEASES&p_id=10734	New guidance	The guidance document is aimed at improving the quality of hazard communication and helping employers and employees comply with the Hazard Communication Standard (HCS). The new guidance consists of compliance assistance and enforcement components. Compliance assistance includes the following: Guidance on hazard determination Model training program Guidance on preparing material safety data sheets (MSDSs). The enforcement component consists of sampling of hazard information in MSDSs.	3/16/2004	___	No published cost estimate	N/A
9	OSHA	REDON Fit Testing Protocol 69 Fed. Reg. 46986 http://www.gpo.gov/fdsys/pkg/FR-2004-08-04/pdf/04-17765.pdf	Amendment to regulation	The regulation establishes fit testing protocols and standards for controlled negative pressure (CNP) REDON breathing devices. This amendment includes testing for head shaking as well as redonning of respirator during fit test procedure.	8/4/2004	$0	Per the supplementary information the rule provides a new option for testing. The existing testing protocol may continue to be used	69 Fed. Reg. 49661 (08/04/2004)

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
10	OSHA	29 CFR Part 1910, Updating OSHA Standards Based On National Consensus Standards 70 Fed. Reg. 53925 http://www.gpo.gov/fdsys/pkg/FR-2005-09-13/pdf/05-17688.pdf	Amendment to regulation	The regulation contains various OSHA standards that are based on national consensus standards. This amendment eliminates references to five outdated standards. According to the final rule document, elimination of these references will not reduce employee protections.	9/13/2005	$0	Per the supplementary information, the final rule will add no additional costs to any employer. The rule simply deletes or revises outdated standards	70 Fed. Reg. 53928 (09/13/2005)
11	OSHA	29 CFR Part 1926, Subpart R Slip Resistance of Skeletal Structural Steel, 71 Fed. Reg. 2879 http://www.gpo.gov/fdsys/pkg/FR-2006-01-18/pdf/06-374.pdf	Amendment to regulation	The regulation establishes requirements to protect employees from hazards of steel erection activities in construction. This amendment revokes the standard for slip resistant skeletal steel due to a lack of reliable testing methods.	1/18/2006	($29,500,000)	Per the supplementary information, the final rule imposing the standard would have cost all affected firms $29.5 million annually. The revocation of the rule means those costs will not be incurred. Figure is the total annualized costs for all affected firms. Affected firms are in the construction and related industries costs savings would be allocated among each firm's customers. 1998 dollars	71 Fed. Reg. 2884(01/06/2004) 66 Fed. Reg. 5256-5257, Table 4 (01/18/2001)
12	OSHA	29 CFR Part 1910, 1915 and 1926, New Assigned Protection Factors for respiratory protection 71 Fed. Reg. 50122 http://www.gpo.gov/fdsys/pkg/FR-2006-08-24/pdf/06-6942.pdf	Amendment to regulation	The three regulations establish, respectively, occupational safety and health standards for the following: General industry Shipyards Construction. This amendment revises the Respiratory Protection Standard to introduce more stringent standards for assigned protection factors (APFs) and maximum use concentrations (MUCs).	8/24/2006	$16 per impacted firm	Figure is cost per firms for all firms that are subject to requirement for respirators. Construction firms and other firms performing work for airports under contract would allocate costs among all their projects	71 Fed. Reg. 50149, Table V-3B, 5051, Table V-4 (08/24/2006) Unison calculations
13	OSHA	29 CFR Parts 1910, 1915 and 1926, Revising the Notification Requirements in the Exposure Determination Provisions of the Hexavalent Chromium Standards 75 Fed. Reg. 12681 http://edocket.access.gpo.gov/2010/pdf/2010-5734.pdf	Amendment to regulation	The three regulations establish, respectively, occupational safety and health standards for the following: General industry Shipyards Construction. This amendment requires employers to inform employee of any hexavalent chromium exposure whether above or below the exposure limit.	3/17/2010	$1,526,731	Figure is total cost for all impacted firms Construction firms and other firms performing work for airports under contract would allocate costs among all their projects	75 Fed. Reg. 12684
14	OSHA	29 CFR Parts 1910, 1915, 1917, 1918. Updating OSHA Standards Based on National Consensus Standards; Personal Protective Equipment (PPE) 74 Fed. Reg. 46350 http://edocket.access.gpo.gov/2009/pdf/E9-21360.pdf	Amendment to regulation	The four regulations establish respectively occupational safety and health standards for the following: General industry Shipyards Longshoring Marine terminals This amendment updates standards for PPE (eye, face, head and foot protection) to reflect current national consensus standards	9/9/2009	$0	Per the supplementary information, the rule adds no additional costs to any employer. The rule gives employers greater flexibility in choosing PPE for their employees	74 Fed. Reg. 46354 (09/09/2009)
15	OSHA	OSHA Instruction CPL 02-02-074, Inspection Procedures for the Chromium (VI) Standards http://www.osha.gov/OshDoc/Directive_pdf/CPL_02-02-074.pdf	New Compliance Directive	The Compliance Directive provides guidance on enforcement of new Hexavalent Chromium standards that became effective in 2006	1/24/2008	$0	Per the Compliance Directive, it establishes no requirements independently of requirements established by statute or regulations.	CPL 02-02-074, Abstract 1
16	OSHA	29 CFR Parts 1910, 1915, 1917, 1918, 1925, Clarification of Employer Duty to Provide Personal Protective Equipment (PPE) and Train Each Employee 73 Fed. Reg. 75568 http://edocket.access.gpo.gov/2008/pdf/E8-29122.pdf	Amendment to regulation	The five regulations establish respectively occupational safety and health standards for the following: General industry Shipyards Longshoring Marine terminals Construction This guidance establishes that the obligation to provide PPE and training applies to each employee individually and that non-compliance may cause liability on a per employee basis.	12/12/2008	$0	Per the supplemental information the rule does not introduce new obligations but explicitly states current OSHA policy. For an airport required to provide PPE for the first time, costs could reach $200 per employee	73 Fed. Reg. 75581 (12/12/2008)

Item No.	Agency	Action	Type of Action	Summary of Action	Adoption Date	Published Costs[1]	Notes on Published Costs	Source
17	OSHA	Revisions to the Voluntary Protection Program to Provide Safe and Healthful Working Conditions 74 Fed. Reg. 927 http://www.gpo.gov/fdsys/pkg/FR-2009-01-09/pdf/E9-165.pdf	Revision to program	The Voluntary Protection Program encourages improvements to work-place safety and health through voluntary cooperation between industry, labor and government. This revision establishes guidance on new options for construction employers to participate in VPP through a mobile work-site program or a corporate program programs and makes the application process simpler.	1/9/2009	___	No published cost information	N/A
18	OSHA	29 CFR Part 1910, Revising Standards Referenced in the Acetylene Standard 74 Fed. Reg. 40442 http://www.gpo.gov/fdsys/pkg/FR-2009-08-11/pdf/E9-18644.pdf	Amendment to regulation	Part 1910 establishes occupational safety and health standards for general industry. This amendment revises the Acetylene Standard to reflect new standards developed by standard developing organizations (SDOs)	8/11/2009	$0	Per the supplemental information, the rule updates the Acetylene Standard to reflect current SDO standards. OSHA considers SDO standards to reflect usual and customary practices in the industry	74 Fed. Reg. 40445
19	OSHA	29 CFR Part 1926, Cranes and Derricks in Construction 75 Fed. Reg. 47906 http://www.gpo.gov/fdsys/pkg/FR-2010-08-09/pdf/2010-17818.pdf	Amendment to regulation	Part 1926 establishes occupational safety and health standards for the construction industry. This amendment updates the Cranes and Derricks Standard and related sections in the Construction Standard to reflect current industry practices and modern equipment design..	8/9/2010	$577 per affected firm	Affected firms include construction related firms and crane rental firms. Firms performing work or providing equipment to airports would allocate costs among their customers 2010 dollars	75 Fed. Reg. 48079-48082, Tables B-1, B-2 (08/09/2011) Unison calculations
20	OSHA	Compliance Directive STD-03-00-002, Fall Protection in Residential Construction, 75 Fed. Reg. 80315 http://69.175.53.6/register/2010/dec/22/2010-32154.pdf	New Compliance Directive	The Compliance Directive rescinds an earlier Directive that permitted residential construction firms to use alternative methods of compliance with fall protection requirements included in 29 CFR Part 1926	12/22/2010	___	The compliance directive would have a potential impact on airport operators only in the context of residential noise mitigation projects. Any costs born by construction firms would be allocated among all the firms customers.	N/A
21	OSHA	Recommendations for Workplace Violence Prevention Programs in Late-Night Retail Establishments, OSHA 3153-12R 2009 http://www.osha.gov/Publications/osha3153.pdf	New guidance	Guidance from OSHA is provided to protect late-night retail workers from workplace violence.	1/27/2010	___	N/A	N/A

[1]If published source indicates "no cost" or "de minimis cost", zero value entered
Annual costs per affected firm unless otherwise noted

ACRP 03-25, REGULATORY COMPLIANCE COSTS AND THE IMPACT ON SMALL AIRPORTS

APPENDIX B

PHASE 1 AND PHASE 2 AIRPORT SURVEY RESULTS

Table B-1
Summary of Phase 1 Survey Responses
Airports Affected by FAA/DOT Requirements

4. Since the beginning of Calendar Year (CY) 2000, has the airport modified its procedures for issuing NOTAMs on snow and ice conditions as a result of new or modified FAA requirements?

Yes	62%
No	37%
Don't Know	1%
** Total Responses*	93

5. Since the beginning of CY 2000, has your airport modified any policies or procedures related to vehicle operation in the Aircraft Operations Area as it relates to any of the following?

Vehicle access	88%	**Total Responses* 92
Vehicle inspection and marking	60%	**Total Responses* 90
Driver training curriculum	92%	**Total Responses* 92
Emergency operations	77%	**Total Responses* 92
Enforcement and control	73%	**Total Responses* 92

6. Since the beginning of CY 2000, has the FAA required your airport to update airport Noise Exposure Maps (NEMs) to justif issuing AIP grants for your noise compatibility program or to provide documentation of the validity of your existing NEM?

Yes	17%
No	76%
Don't Know	8%
** Total Responses*	90

7. How did the airport accomplish the NEM update or validate the existing NEM?

Airport staff	0%
Contractor or consultant	100%
Other (please specify)	0%
** Total Responses*	13

8. Was your airport required to obtain a Part 139 Airport Operating Certificate as a result of the FAA's 2004 amendments to Part 139?

Yes	10%
No	88%
** Total Airport Population*	84

(Non-hub airports plus Charleston & Phoenix-Mesa, which have unusual circumstances. Airports requiring Part 139 certificates include airports holding limited certificates in 2004)

9. What category of airport certificate does your airport hold?

Category I	73%
Category II	18%
Category III	3%
Category IV	6%
** Total Responses*	33

10. What is your airport's ARFF index?

Index A	24%
Index B	52%
Index C	24%
Index D	0%
Index E	0%
*Total Responses	33

11. What capital expenditures were required for compliance with the Part 139 ARFF requirements?

ARFF station construction & furnishing	38%
ARFF vehicles, clothing and ARFF personnel equipment	13%
Other (please specify)	13%
*Total Responses	8 (Count of airports requiring new Part 139 certificates)

12. Did the airport modify its perimeter fencing in order to comply with Part 139?

Yes	50%
No	50%
Don't Know	0%
*Total Responses	8

13. What resources did your airport use to develop its airport certification manual?

Airport staff	100%
Airport staff & contractor or consultant	0%
Other (please specify)	0%
*Total Responses	5

14. Was your airport required to develop a snow and ice control plan?

Yes	57%
No	43%
Don't Know	0%
*Total Responses	7

15. What resources did your airport use to develop its snow and ice control plan?

Airport staff	75%
Airport staff & contractor or consultant	25%
Other (please specify)	0%
*Total Responses	4

16. What resources did your airport use to develop its certificate application?

Airport staff	100%
Airport staff & contractor or consultant	5%
Other (please specify)	0%
*Total Responses	5

17. For airports holding an Airport Operating certificate in 2004, when the FAA amended Part 139, was the airport required to modify any of the following:

	Yes	No	Don't Know
ARFF facilities, vehicles, equipment, staffing, or procedures?	36%	54%	11%
Modify perimeter fencing?	35%	61%	5%
Modify the airport certification manual?	86%	10%	5%
Modify the snow and ice control plan?	61%	36%	4%

** Total Responses excluding N/A*

ARFF facilities, vehicles, equipment, staffing, or procedures?	84
Modify perimeter fencing?	84
Modify the airport certification manual?	84
Modify the snow and ice control plan?	76

18. Since the beginning of CY 2000, has your airport modified its perimeter fencing in response to FAA guidance or requirements on minimizing deer hazards?

Yes	57%
No	41%
Don't Know	2%
** Total Responses*	90

19. Was your airport affected by modifications to the DOT regulation implementing the Uniform Relocation Assistance Programs, 49 CFR Part 24, that were published in 2005?

Yes	9%
No	68%
Don't Know	23%
** Total Responses*	87

20. Was your airport affected by the DOT's issuance of modified regulations for the Airport Concession DBE Program in 2005?

Yes	44%
No	43%
Don't Know	14%
** Total Responses*	87

21. Was your airport affected by the DOT's issuance in 2003 of modified regulations for DBE participation in federally funded projects?

Yes	52%
No	34%
Don't Know	14%
** Total Responses*	86

22. Since CY 2004, has your airport developed or modified an airport water rescue plan as a result of guidance or requirements issued by the FAA?

Yes	29%
No	70%
Don't Know	1%
** Total Responses*	91

23. In 2004, the FAA increased the level of carrier compensation per PFC collected. Does your airport impose a PFC?

Yes	88%
No	12%
** Total Responses*	76

26. Has your airport submitted a PFC application since the FAA amended the PFC regulations to provide streamlined filing procedures for PFC requests from non-hub airports?
(asked of non-hub airports only)

Yes	47%
No	18%
Don't Know	35%
Total Responses	72

29. Since August 31, 2005, has your airport acquired real property (or an interest in real property) using AIP funds?

Yes	40%
No	60%
Total Responses	83

30. Was your airport affected by the modified requirements issued by the FAA in August 2005 (Order 5100.37B) or revisions to the Department of Transportation Regulation governing this subject (49 CFR Part 24)?

Yes	21%
No	33%
Don't Know	45%
Total Responses	33

31. Since October 1, 2005, has your airport selected and retained architects, engineers, project managers or other consultants for projects funded with AIP grants or other federal grant programs?

Yes	95%
No	2%
Don't Know	2%
Total Responses	85

32. Was your airport affected by new guidance issued on September 30, 2005, by the FAA on the subject of consultant selection (AC 150/5100-14D)?

Yes	60%
No	32%
Don't Know	7%
Total Responses	81

33. Has your airport modified its ARFF training policies and procedures in response to issuance of new ARFF training guidance by the FAA on April 28, 2006?

Yes	68%
No	23%
Don't Know	9%
Total Responses	82

34. Has your airport submitted a PFC application or amendment since September 8, 2006?
(only asked of airports which impose a PFC)

Yes	67%
No	33%
Total Responses	83

35. Did your airport incur any additional costs in preparing the application or amendment to comply with new FAA requirements on documentation of costs issued on that date (PFC Update 50-06)?

Yes	27%
No	47%
Don't Know	25%
Total Responses	55

36. Since March 28, 2007, has your airport moved automobile parking, a roadway, or other facility improvement outside a runway protection zone (RPZ) as a result of an advisory circular (AC) issued by the FAA on that date (AC 150/5300-13, Change 11)?

Yes	13%
No	85%
Don't Know	2%
Total Responses	84

37. Has your airport acquired property using AIP funds for noise compatibility purposes?

Yes	16%
No	84%
Total Responses	82

38. Has your airport completed the noise land inventory and reuse plan as required by FAA Program Guidance Letter (PGL) 08-02 (February 1, 2008)?

Yes	85%
No	8%
Don't Know	8%
Total Responses	13

39. How did the airport develop the noise land inventory and reuse plan?

Airport staff	73%
Contractor or consultant	27%
Other (please specify)	0%
Total Responses	11

40. Has your airport conducted or engaged consultants to conduct survey, mapping or charting work using Geospatial Information System (GIS) techniques or methodology in response to FAA guidance or requirements on this subject?

Yes	52%
No	48%
Don't Know	0%
Total Responses	84

41. Has your airport modified its policies, practices or procedures for disposing of industrial waste, including deicing fluid, as a result of FAA guidance issued on September 8, 2008 (AC 150/5320-15A)?

Yes	27%
No	64%
Don't Know	9%
Total Responses	81

42. Since January 1, 2000, has your airport added, modified or replaced airfield signs as a result of new or modified requirements or guidance adopted by the FAA?

Yes	79%
No	19%
Don't Know	2%
Total Responses	81

43. How did the airport complete the signage projects?

Airport staff	15%
Contractor or consultant	60%
Airport staff & contractor or consultant	21%
Other (please specify)	5%
Total Responses	62

44. Did your airport prepare a revised snow and ice control plan in response to a new AC issued by the FAA on December 8, 2008 (AC 150/5200-30C)?
(only included if applicable)

Yes	61%
No	39%
Total Responses	83

45. How did the airport develop the revised snow and ice control plan?

Airport staff	88%
Contractor or consultant	13%
Other (please specify)	0%
Total Responses	48

46. Has your airport submitted a PFC application or PFC amendment since July 30, 2009, when the FAA issued a new PFC update specifying additional requirements for completion of the "For FAA Use" portion of PFC application form Attachment B (PFC Update 59-09)?
(only included if applicable)

Yes	56%
No	42%
Don't Know	2%
Total Responses	81

47. Did FAA staff request the airport or the airport's PFC consultant to provide any additional data, documentation or analysis to assist them in meeting the requirements of PFC Update 59-09?

Yes	34%
No	50%
Don't Know	16%
Total Responses	44

48. Who provided the requested data, documentation or analysis?

Airport staff	47%
Contractor or consultant	33%
Airport staff & contractor or consultant	20%
Other (please specify)	0%
Total Responses	15

49. On October 7, 2009, the FAA issued guidance (PGL 10-01) on a new mandatory financial reporting form applicable to all recipients of federal grants, SF-425. Has the use of the new form materially changed your airports cost of compliance with financial reporting requirements for grants?

Yes	15%
No	64%
Don't Know	21%
Total Responses	66

50. How did the change to the new reporting form affect your airport's costs of administering AIP grants?

Costs increased	100%
Costs decreased	0%
Total Responses	9

53. Has your airport prepared or updated an Airport Emergency Plan in response to guidance issued by the FAA on May 21, 2010 (AC 150/5200-31C)?

Yes	95%
No	0%
Total Responses	87

54. How did the airport prepare or update the Airport Emergency Plan?

Airport staff	93%
Contractor or consultant	4%
Airport staff & contractor or consultant	4%
Other (please specify)	0%
Total Responses	80

73. Has your airport executed any project in the last 10 years to comply with new or updated regulations related to the Runway Safety Area?

Yes	61%
No	39%
Total Responses	41

Did your airport encounter or address any of the following in completing the RSA project?

Road relocation	22%
Utility relocation	24%
Major cutting	22%
Major grading	34%
Relocation of non-standard navaids	17%
Installation of EMAS	7%
Total Responses	41

74. Has your airport executed any project in the last 10 years to comply with new or updated regulations or requirements related to security fencing surrounding the AOA?

Yes	61%
No	39%
Total Responses	41

Table B-2
Summary of Additional Phase 2 Survey Responses
FAA/DOT Requirements (Initial Costs)

	Question(s)	Valid Responses (# of airports)	Estimated Cost of Compliance ($) Minimum	25th Percentile	50th Percentile	75th Percentile	Maximum	Mean	Interquartile Mean
INITIAL COSTS									
4.	Since the beginning of Calendar Year (CY) 2000, how much did it cost your airport to modify its procedures for issuing NOTAMs on snow and ice conditions as a result of new or modified FAA requirements?	9	$200	$500	$500	$3,000	$6,000	$2,167	$1,400
	Average Cost per thousand Enplanements	9	$0.64	$0.95	$9.90	$30.55	$111.46	$24.08	$11.31
	Average Cost per thousand Operations	9	$8.57	$16.15	$168.35	$230.39	$829.07	$206.87	$152.41
22.	Since CY 2004, how much has it cost your airport to develop or modify an airport water rescue plan as a result of guidance or requirements issued by the FAA?	3	$150	$325	$500	$4,450	$8,400	$3,017	$500
	Average Cost per thousand Enplanements	3	$6.39	$10.07	$13.76	$27.71	$41.65	$20.60	$13.76
	Average Cost per thousand Operations	3	$15.05	$91.70	$168.35	$421.80	$675.24	$286.21	$168.35
33.	How much did it cost your airport to modify its ARFF training policies and procedures in response to issuance of new ARFF training guidance by the FAA on April 28, 2006?	13	$1,000	$1,500	$3,000	$6,000	$15,000	$4,898	$3,383
	Average Cost per thousand Enplanements	13	$2.74	$14.36	$19.80	$82.58	$241.51	$60.28	$32.13
	Average Cost per thousand Operations	13	$51.03	$218.60	$308.31	$617.13	$1,916.08	$572.74	$439.69

The interquartile mean cannot be calculated for items with less than three responses. The mean value is used as a proxy.

Table B-3
Summary of Additional Phase 2 Survey Responses
FAA/DOT Requirements (Recurring Costs)

	Question(s)	Valid Responses (# of airports)	Estimated Cost of Compliance ($) Minimum	25th Percentile	50th Percentile	75th Percentile	Maximum	Mean	Interquartile Mean
RECURRING COSTS									
4.	Since the beginning of Calendar Year (CY) 2000, how much did it cost your airport to modify its procedures for issuing NOTAMs on snow and ice conditions as a result of new or modified FAA requirements?	3	$350	$425	$500	$750	$1,000	$617	$500
	Average Cost per thousand Enplanements	3	$1.65	$3.371	$5.09	$5.80	$6.50	$4.41	$5.09
	Average Cost per thousand Operations	3	$30.57	$39.46	$48.36	$56.11	$63.85	$47.59	$48.36
22.	Since CY 2004, how much has it cost your airport to develop or modify an airport water rescue plan as a result of guidance or requirements issued by the FAA?	2	$150	$413	$675	$938	$1,200	$675	$675
	Average Cost per thousand Enplanements	2	$5.95	$6.06	$6.17	$6.28	$6.39	$6.17	$6.17
	Average Cost per thousand Operations	2	$15.05	$35.41	$55.76	$76.11	$96.46	$55.76	$55.76
30.	What was the annual incremental cost to your airport to comply with the modified requirements issued by the FAA in August 2005 (Order 5100.37B) or revisions to the Department of **Transportation** Regulation governing this subject (49 CFR Part 24)?	1	$1,500	$1,500	$1,500	$1,500	$1,500	$1,500	N/A
	Average Cost per thousand Enplanements	1	$4.73	$4.73	$4.73	$4.73	$4.73	$4.73	N/A
	Average Cost per thousand Operations	1	$76.55	$76.55	$76.55	$76.55	$76.55	$76.55	N/A
33.	How much did it cost your airport to modify its ARFF training policies and procedures in response to issuance of new ARFF training guidance by the FAA on April 28, 2006?	11	$300	$750	$1,500	$3,950	$11,500	$2,944	$1,900
	Average Cost per thousand Enplanements	11	$0.95	$11.68	$21.29	$38.00	$136.10	$34.92	$21.73
	Average Cost per thousand Operations	11	$15.31	$99.20	$308.31	$582.34	$790.81	$334.31	$359.61

The interquartile mean cannot be calculated for items with less than three responses. The mean value is used as a proxy.

Table B-4
Estimated Industry Costs for Additional Phase 2 Responses for FAA/DOT Requirements

	Question(s)	Average Cost ($)[1]	Estimated Industry Cost of Compliance: Airports Subject to Requirement	Estimated Industry Cost of Compliance: Percentage of Airports Impacted by Requirements[2]	Estimated Industry Cost of Compliance: Industry Cost ($)
INITIAL COSTS					
4.	Since the beginning of Calendar Year (CY) 2000, how much did it cost your airport to modify its procedures for issuing NOTAMs on snow and ice conditions as a result of new or modified FAA requirements?	$1,400		62%	$269,000
22.	Since CY 2004, how much has it cost your airport to develop or modify an airport water rescue plan as a result of guidance or requirements issued by the FAA?	$500		29%	$45,000
33.	How much did it cost your airport to modify its ARFF training policies and procedures in response to issuance of new ARFF training guidance by the FAA on April 28, 2006?	$3,383		68%	$713,000
	Total Initial Costs				$1,027,000
RECURRING COSTS					
4.	Since the beginning of Calendar Year (CY) 2000, how much did it cost your airport to modify its procedures for issuing NOTAMs on snow and ice conditions as a result of new or modified FAA requirements?	$500	310	62%	$96,000
22.	Since CY 2004, how much has it cost your airport to develop or modify an airport water rescue plan as a result of guidance or requirements issued by the FAA?[3]	$675	310	29%	$61,000
30.	What was the annual incremental cost to your airport to comply **with** the modified requirements issued by the FAA in August 2005 (Order 5100.37B) or revisions to the Department of Transportation **Regulation** governing this subject (49 CFR Part 24)?[4]	$1,500	310	21%	$98,000
33.	How much did it cost your airport to modify its ARFF training policies and procedures in response to issuance of new ARFF training guidance by the FAA on April 28, 2006?	$1,900	310	68%	$401,000
	Total Recurring Costs				$656,000

[1] Interquartile mean cost, unless otherwise indicated

[2] Percentage based on Phase 1 survey results unless otherwise indicated

[3] Interquartile mean cannot be calculated for items with less than three responses. Arithmetic mean value used

[4] Single airport response. Value of response used.

Table B-5
Summary of Phase 1 Survey Responses
Airports Affected by Environmental Requirements

Out of the following activities that take place at the airport, please identify those for which the airport authority is responsible:	
Aircraft Deicing/Anti-icing	16%
Aircraft Lavatory Service	14%
Auxiliary Power Unit Operation	17%
Boiler Operations	66%
Building Operation/Maintenance	87%
Cargo Handling	12%
Degreasing/Parts Cleaner	35%
Emergency Generator Operations	84%
Deicer Collection/Treatment	28%
Fire Fighting Training/Testing/Flushing	75%
Ground Service Equipment Operation	23%
Grounds Maintenance/Landscaping	86%
Hazardous Material Generation/Storage/Disposal	45%
Incinerator Operation	8%
MVAC/HVAC Maintenance	84%
On-airport Power Generation	27%
Pavement Deicing	53%
Runway Rubber Removal/Maintenance	67%
Solid Waste Generation/Disposal	58%
Universal Waste Generation/Disposal	35%
Used Oil Generation/Recycling/Disposal	62%
Vehicle, Equipment, or Aircraft Fueling	55%
Vehicle, Equipment, or Aircraft Maintenance	58%
Vehicle, Equipment, or Aircraft Painting	16%
Vehicle, Equipment, or Aircraft Washing	51%
Water Sampling/Testing	64%
Welding	59%
Aboveground Storage Tanks (AST)	68%
Underground Storage Tanks (UST)	35%
Mobile Refueler Operations	17%
Animal Carcass Management	65%
Drinking Water Supplier	24%
Drum Storage/Handling	39%
Total Responses	95

Have any of the following plans/documents been prepared for activities/operations at the airport?	
Spill Prevention, Control and Countermeasure Plan	80%
Storm Water Pollution Prevention Plan	85%
Construction Storm Water Pollution Prevention Plan	71%
Phase I, II, or III Environmental Site Assessment	56%
Cultural or Archaeological Resource Survey	49%
Air Emissions Inventory	29%
Threatened and Endangered Species Survey	46%
Part 150 or 161 Study	37%
Categorical Exclusion (Catex)	65%
Environmental Assessment (EA)	69%
Environmental Impact Statement (EIS)	37%
Asbestos/PCB/Lead Assessment	47%
Tier I/II Report	23%
Total Responses	95

Please identify which of the following permits, certifications, or registrations the airport is subject to, or has applied for:	
Individual 404 Wetland Permit	29%
401 Water Quality Certification	21%
Nationwide Permit for Stream/Waterway impact, maintenance of ditches, etc.	21%
Individual NPDES permit for storm water discharges	36%
General NPDES Permit for storm water discharges	63%
Industrial Wastewater Pre-treatment Permit	14%
Title V air permit	8%
Permit-by-Rule	7%
Permit-to-Install	12%
Permit-to-Operate	9%
Construction Notice of Intent	48%
Other General or Regional Permit for air, storm water (industrial or construction)	33%
Bulk Fuel or Chemical Storage Tank Registration	41%
Offeror of Hazardous Materials	8%
Pesticide Applicator	36%
Generator of Hazardous Waste (CESQG, SQG, LQG)	23%
Total Responses	95

Table B-6
Summary of Additional Phase 2 Survey Responses
Costs of Environmental Requirements

Question(s)	Valid Responses (# of airports in the sample)	Estimated Cost of Compliance for Individual Airports based on Phase 2 Survey: Minimum	25th Percentile	50th Percentile	75th Percentile	Maximum	Mean	Interquartile Mean
57. Of those permits, certifications, or registrations the airport is subject to, or has applied for, please enter the requested follow-up information:								
Bulk Fuel or Chemical Storage Tank Registration								
a. Application/ certification/ registration cost (initial application and/or annual fee)	4	$60	$165	$850	$1,875	$3,000	$1,190	$587
b. Contractor/consultant cost	1	$20,000	$20,000	$20,000	$20,000	$20,000	$20,000	$ 20,000
c. Installation/construction cost for control(s)/ equipment/ mitigation/ remediation/disposal	2	$1,000	$5,750	$10,500	$15,250	$20,000	$10,500	$ 10,500
d. Cost for material/equipment replacement	1	$400	$400	$400	$400	$400	$400	$ 400
e. Cost for specialized training	0	-	-	-	-	-	-	-
Total Costs								$ 11,087
Generator of Hazardous Waste (CESQG, SQG, LQG)								
a.Application/ certification/ registration cost (initial application and/or annual fee)	1	$1,000	$1,000	$1,000	$1,000	$1,000	$1,000	$ 1,000
b. Contractor/consultant cost	1	$7,500	$7,500	$7,500	$7,500	$7,500	$7,500	$ 7,500
c. Installation/construction cost for control(s)/ equipment/ mitigation/ remediation/disposal	1	$500	$500	$500	$500	$500	$500	$ 500
d. Cost for material/equipment replacement	1	$500	$500	$500	$500	$500	$500	$ 500
e. Cost for specialized training	2	$250	$438	$625	$813	$1,000	$625	$ 625
Total Costs								**$ 10,125**

Interquartile mean value cannot be determined for items with less than 3 responses. Mean value is used as a proxy

Table B-7
Estimated Industry Costs for Additional
Phase 2 Environmental Requirements

Question(s)	Average Cost ($)[1]	Estimated Industry Cost of Compliance: Airports/Activity Subject to Requirement	Percentage of Airports Impacted by Requirements[2]	Industry Cost ($)
57. Of those permits, certifications, or registrations the airport is subject to, or has applied for, please enter the requested follow-up information:				
Bulk Fuel or Chemical Storage Tank Registration				
a. Application/ certification/ registration cost (initial application and/or annual fee)	$ 587	310	41%	$ 75,000
b. Contractor/consultant cost[3]	$ 20,000	310	41%	$ 2,542,000
c. Installation/construction cost for control(s)/ equipment/ mitigation/ remediation/ disposal[4]	$ 10,500	310	41%	$ 1,335,000
d. Cost for material/equipment replacement[3]	$ 400	310	41%	$ 51,000
e. Cost for specialized training	-			
Total Costs	$ 11,087	310	41%	$ 4,003,000
Generator of Hazardous Waste (CESQG, SQG, LQG)				
a.Application/ certification/ registration cost (initial application and/or annual fee)	$ 1,000	310	23%	$ 71,000
b. Contractor/consultant cost[3]	$ 7,500	310	23%	$ 535,000
c. Installation/construction cost for control(s)/ equipment/ mitigation/ remediation/ disposal[3]	$ 500	310	23%	$ 36,000
d. Cost for material/equipment replacement[3]	$ 500	310	23%	$ 36,000
e. Cost for specialized training[4]	$ 625	310	23%	$ 45,000
Total Costs	**$ 10,125**	310	**23%**	**$ 723,000**

[1] Interquartile mean value unless otherwise noted

[2] Percentage based on Phase 1 survey results unless otherwise noted

[3] Single airport response. Value of response used.

[4] Interquartile mean value cannot be determined for items with less than 3 responses. Arithmetic mean value is used

Table B-8
Summary of Phase 1 Survey Responses
Airports Affected by Security Requirements

Has your airport installed or modified any of the following between January 1, 2000, and December 31, 2010, as a result of a new Transportation Security Administration ("TSA") regulation, security directive or other TSA or Department of Homeland Security ("DHS") requirement?	Yes	No	N/A	*Response total*
Physical Access System?	78%	22%		*82*
Closed circuit television ("CCTV") monitoring system?	71%	29%		*83*
Credentialing and biometric (including biometric information on credentialing media)?	56%	44%		*75*
Any breach prevention systems or equipment?	49%	51%		*72*
Any perimeter security systems or equipment?	58%	42%		*76*
Any other equipment or systems related to or supporting access control?	68%	32%		*74*
Has your airport executed any project in the last 10 years to accommodate enhanced checked baggage screening?	78%	22%		*85*
Has your airport executed any project in the last 10 years to accommodate enhanced passenger screening?	79%	21%		*85*
Since 2000, airport has been affected by the Airport Technical Design Standards of U.S. CBP	27%	68%	5%	22

Table B-9
Summary of Phase 1 Survey Responses
Airports Affected by OSHA Requirements

	Yes	No	*Response total*
Have you added staff since 2000 to handle Occupational Safety and Health Administration (OSHA) related activities?	9%	91%	*82*
Are you pursuing OSHA VPP (Voluntary Protection Program) certification?	4%	96%	*81*
Do you utilize the OSHA On-Site Consultation Program?	13%	87%	*68*
Do you utilize your workers compensation insurance carrier for health and safety support?	58%	41%	*81*
If yes, is there a fee for those services?	39%	61%	*44*
Do you track the amount of hours staff spends in health and safety training?	43%	57%	*82*
Do you track the cost of personal protective equipment used by your staff?	50%	50%	*82*

Your airport's cost of OSHA compliance is influenced by the roles and responsibilities of airport staff and use of third party contractors. The next four questions address roles and responsibilities of airport staff versus contractors.	Yes	No	*Response total*
Does airport maintenance staff enter confined spaces?	40%	60%	*81*
Does airport staff do new construction?	26%	73%	*82*
Does airport staff do major building renovations?	22%	77%	*83*
Do you contract out construction and/or renovations?	98%	2%	*66*

ACRP 03-25, REGULATORY COMPLIANCE COSTS AND THE IMPACT ON SMALL AIRPORTS

APPENDIX C

CASE STUDIES

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APPENDIX C-1

Regulatory Compliance Costs and the Impact on Golden Triangle Regional Airport – A Case Study

Introduction

This case study is intended to provide more detailed data and analysis of the impact of Federal regulatory requirements on the Golden Triangle Regional Airport (GTR). A description of the airport and its operations is provided, followed by a general discussion of the regulatory impacts faced by GTR. An analysis of GTR's experience with compliance with each of the four regulatory areas addressed in the study then follows. As part of the analysis, GTR's expenditures will be compared to the results of the industry surveys, using the interquartile mean as a measure of the industry average. The final section of the case study presents a summary of findings and considerations.

Airport Characteristics

GTR is a non-hub airport located in Columbus, MS. It is owned and operated by the Golden Triangle Regional Airport Authority. In CY 2010, GTR had 36,329 passenger boardings, or enplanements. At its current level of enplanements, GTR qualifies for the minimum annual passenger apportionment of $1.0 million under the Airport Improvement Program (AIP). Any additional AIP funding received by the GTR is discretionary funding.

GTR currently receives scheduled service with three daily round trips to Atlanta operated by ExpressJet as a Delta Connection carrier. **Table C-1** provides additional data on operations and traffic at GTR.

Table C-1. GTR Operations and Activity

Passenger Enplanements	36,329
Commercial Operations	2,970
General Aviation Operations	8,857
Scheduled Air Service	3 daily round-trips to ATL Express Jet d/b/a Delta Connection CRJ-200

SOURCE: FAA data and airport staff

GTR has a single 8,002 foot-by-150 foot runway with a single parallel taxiway and a connector taxiway system. **Table C-2** provides additional data on airfield and terminal facilities at GTR.

Table C-2. GTR Airfield and Terminal Facilities

Runway 18/36	8,002 ft. x 150 ft. asphalt
Taxiways	Single, full length asphalt parallel taxiway with multiple connector taxiways
Aprons	2 concrete aprons; 2 asphalt aprons: 66,000 sq. ft. total
Acreage	1,000 acres
Perimeter fencing, gates	22,000 linear feet; 10 gates total, 9 radio controlled with access badge required; 1 key-pad controlled
Terminal: ticket counters	3 counters; 90 linear ft.
Gates and hold rooms	2 ground load gates 1 common hold room
Public space	15,000 sq. ft. in ticket lobby and pre-screening. 6,000 sq. ft. post screening (includes hold room)
Checked baggage	1 carousel
Security Screening	Passenger screening – 1 lane Checked baggage – 1 ETD

SOURCE: Airport staff

GTR has a single full service fixed-base operator (FBO). The FBO provides aircraft fuel with Jet A and 100LL avgas available. Information regarding services and amenities available to aircraft operators and passengers is provided in **Table C-3**.

Table C-3. GTR Services and Amenities for Aircraft Operators and Passengers

Full Service FBOs	RAS, Inc.
Specialized Aviation Service Operations (SASO)	Accessible Aviation – Flight School and Testing
Aviation fuel	Jet A Fuel and 100 LL avgas Mobile fuel trucks
Terminal Retail Concessions	Vending machines pre and post-security
Terminal Operating Hours	4:30 am-8:30 pm
Car Rental	Three companies, on airport

Source: Airport Staff

GTR has a small staff. **Table C-4** summarizes the organization and staffing levels of the airport.

Table C-4. GTR Departments and Staffing Levels

Department	Staff Positions
Administration	Executive Director Business manager
Maintenance	3 full-time 2 part-time
Aircraft Rescue & Fire Fighting (ARFF)	3 full-time 6 part-time
Airport parking	1 full-time 3 part-time

Source: Airport Staff

There is extensive cross utilization of staff among departments. Only trained ARFF personnel provide ARFF services, but the ARFF personnel assist other departments, as available and needed.

General Impacts

Of the four federal regulatory areas reviewed in this case study, GTR management considers FAA requirements to be the most significant. Such requirements strain the staff at small airports such as GTR. For example, GTR's Airport Emergency Plan (AEP) grew from 30 to 180 pages. GTR does not retain a fire chief who could prepare the AEP; ARFF staffing is limited to operational fire-fighters. The Executive Director prepared the AEP. GTR generally does not have the financial resources to pay consultants, unless the consultant's work is included in a grant funded project. Preparation of documents such as an AEP is considered an administrative or operational cost, and is not eligible for grants.

Costs associated with FAA programs have been increasing. GTR management noted the increase in local matching share requirement recently approved by Congress, and the new benefit-cost-analysis (BCA) requirements for airports participating in the FAA contract tower program. Another impending impact is the requirement to provide data to support the FAA's Geospatial Information System (GIS) and electronic airport layout plan (E-ALP). The costs of complying with the GIS requirements may be reimbursed by an AIP grant, but this additional cost means less grant dollars available for actual project implementation.

GTR management is also concerned that safety management system (SMS) requirements, once adopted by the FAA, will be beyond the capacity of existing staff to handle while performing their other responsibilities. Airport staff may need to be added to comply.

FAA/DOT Requirements

Vehicle Operations on the Airfield – In 2002, the FAA issued AC 150/5210-20, *Ground Vehicle Operations on Airports*. In 2008, the FAA issued Change 1 to the AC. The AC addresses, among other things, vehicle access control, vehicle marking, and driver training.

GTR spent $500 to develop a new driver training curriculum and spends $100 annually on recurring driver training expenses. The airport will continue to incur driver training expenses because the FAA requires annual training. The airport's access controls met the new standards.

Compared to the other airports participating in the survey, GTR reported the minimum expenditures for both initial and recurring driver training costs. Average initial costs $20,450, and average recurring costs are $10,038. GTR is also one of the few airports that reported being in compliance with new requirements for vehicle access controls. Eighty-eight percent of surveyed airports reported modifying vehicle access policies or procedures, and 73 percent reported modifying enforcement and control practices.

Part 139 Requirements – In 2004, the FAA amended 14 CFR Part 139 governing Airport Operating Certificates. The primary purpose of the amendment was to include airports with scheduled service from aircraft with 10 to 30 seats in the certification requirement. However, the amendment included modification to the certificate classification systems and new requirements for existing certificate holders.

GTR held a Part 139 certificate in 2004. GTR's largest expense to comply with the Part 139 amendments was the cost of installing a perimeter fence. Previously, the airport was surrounded by barbed wire fencing. GTR had to install an eight-foot tall wildlife fence topped by two feet of barbed wire, with access-controlled gates. The fence was constructed to comply with new perimeter security requirements added to Part 139 airports after the terrorist attacks of September 11, 2001 (9/11 attacks). The cost for this project was $200,000. The FAA paid $195,000, and GTR funded the remaining $5,000 with revenue from Passenger Facility Charges (PFCs). GTR incurs $1,000 per year in recurring costs for the fence.

GTR's experience does not align fully with the experience of other airports as reflected in the survey results. Based on the survey, acquisition of ARFF facilities or equipment was the largest expense category for existing Part 139 airports. GTR's initial cost for installing the fence was 47 percent of the average cost of fencing projects reported in the survey ($426,840). GTR's recurring compliance costs represent the minimum reported in the survey. The industry average is $6,667.

GTR also reported spending $1,000 to update the Airport Certification Manual. The Part 139 amendment required all existing certificate holders to update their manuals. GTR's costs were approximately 50 percent of the average cost reported in the survey ($2,002).

In 2006 and 2009, the FAA issued updates to AC 150/5210-17, *Programs for Training of Aircraft Rescue and Firefighting Personnel*. GTR reported initial costs of $3,000 for the acquisition of the required training curriculum. The airport incurs recurring costs of $1,000 for annual training requirements. All costs are paid for with airport funds. GTR's initial costs are close to the average cost reported in the survey ($2,947). However, GTR's recurring costs are only 33 percent of the average reported in the survey ($3,097).

Part 139 also requires certificated airports to maintain AEPs. In 2010, FAA issued Change 1 to AC 150/5200-31C, *Airport Emergency Plan*. As noted, because of limited airport staffing, the Executive Director prepared the AEP to comply with the new standards, spending approximately $2,000 worth of staff time for initial cost and $500 per year in recurring costs for maintaining the AEP. Costs were funded entirely by the airport. GTR's initial and recurring costs are substantially below the average cost reported in the survey: $7,368 for initial cost and $1,033 per year for recurring costs.

DBE Requirements – In 2000 and 2003, the Department of Transportation amended 49 CFR Part 26, which governs participation by disadvantaged business enterprises (DBEs) in DOT funded projects. In 2005, the Department of Transportation amended 49 CFR Part 23, which governs participation by DBEs

in airport concessions. The amendments to Part 26 did not have an impact on GTR, but GTR spent $2,000 initially to comply with the changes to Part 23 and spends the same amount annually. The compliance costs are treated by the FAA as an AIP administrative cost recoverable through AIP project grants. GTR has used $1,500 in grant funds to cover the added costs, with the balance financed by PFCs.

GTR's initial $2,000 expenditure is approximately 40 percent of the average reported in the survey ($5,025). The recurring expenditure of $2,000 per year is closer to the average reported in the survey ($2,533)

Airfield Layout, Design and Standards – During the study period, FAA issued approximately 43 regulatory or compliance documents relating to airfield layout, design, equipment, facilities and operations. For small airports, potentially costly requirements include new requirements for runway protection zones (RPZ), runway safety areas (RSA) and signage and marking. GTR is one of the 85 percent survey respondents that reported no effect from the RPZ and RSA requirements because its existing configuration met the new standards.

GTR did modify its airfield signs to meet the new requirements. Initial installation costs were $50,000. The FAA provided a $49,500 grant for the project, and GTR used PFCs to cover the local matching requirement. GTR's costs were 69 percent of the average initial installation costs reported in the survey ($72,317).

PFC Requirements – During the study period, FAA adopted new requirements for documentation for PFC approvals. PFC Update 50-06, issued in 2006, requires public agencies to provide additional supporting cost detail for projects with more than $10 million in PFC funding. GTR was not affected by PFC Update 50-06, along with 63 percent of the airports that responded "to the survey.

GTR was affected by PFC Update 59-09, issued in 2009, requiring FAA staff to include additional information and analysis in the PFC documentation. GTR estimates a $500 cost for providing the additional information required by FAA staff to comply with this guidance, the minimum reported in the survey. The average cost reported in the survey is $6,332.

Consulting and Engineering Services – In 2005, the FAA issued AC 150/5100-14D, *Architectural, Engineering and Planning Consultant Services for Airport Grant Projects*, establishing new requirements for consultant selection on AIP-funded projects. GTR reports an incremental cost of $1,000 per project to comply with the new requirements. This amount is the estimated cost of obtaining independent cost estimates to compare to the consultant's proposed fee. This cost, however, is eligible for AIP funding. GTR's estimated cost is equal to the minimum cost reported in the survey, with the average cost calculated at $267,167.

In 2007 and 2008 the FAA issued a series of ACs on the use of GIS data in airport planning documents and other documentation. Like many small airports, GTR relied on engineering and surveying firms to comply with the requirements. The GIS work was done in connection with a runway extension and equipment installation project. GTR initially estimated the cost of compiling the GIS data at $15,000. The FAA provided $14,000 in grant funds; GTR used PFCs to finance the remaining $1,000. This figure actually understates total costs, due in part to FAA's requirement to repeat aerial survey work. GTR management indicated that total costs could end up being between $30,000 and $35,000. Among other things, aerial survey work was redone to capture data when trees had lost their leaves. Even accounting for the additional work and associated costs, GTR's expenditures would be only 20 percent of the average cost reported in the survey ($176,000).

Environmental Requirements

The case study focused on GTR's survey responses for the following areas:

- Planning and development – environmental site assessments and NEPA-related documents
- Water resources – spill prevention, control and countermeasure (SPCC) and national pollution Discharge Elimination system (NPDES) permits

Planning and Development – GTR reported spending $45,000 for an environmental assessment (EA) to support a runway extension project. Because the project involved land acquisition, environmental site assessments (ESAs) were conducted for three separate parcels at a total additional cost of $20,000 ($6,667 per ESA, on average). GTR's costs for EA preparation are consistent with the average cost reported in the survey ($50,000). GTR's total cost for the ESAs is likewise consistent with the average reported in the survey (also $20,000). On a per parcel basis, however, GTR's expenditure is approximately 33 percent of the average reported in the survey.

Before issuing a finding of no significant impact (FONSI), the FAA required GTR to update its noise exposure map (NEM) noise contours, based on new requirements for maintaining current noise exposure maps for Part 150 noise compatibility programs. The additional noise analysis cost $11,000. The additional analysis had only a modest impact on the overall schedule for the NEPA process – adding three weeks. GTR received an AIP grant of $10,500 for the noise analysis. Mississippi provided $250, and GTR financed the remaining $250 with PFCs. The cost of GTR's noise analysis was only $1,000 more than the minimum reported in the survey for comparable analyses completed to qualify for Part 150 funding, and only 14 percent of the survey sample average ($74,175).

Water Resources: SPPC Requirements – GTR's approach to meeting the requirement for a spill prevention control and countermeasure (SPCC) plan is a joint SPCC plan with its FBO, RAS, Inc. Airports for the most part do not include tenant operations in their SPCC plans due to the potential liability and associated costs the airport may assume for compliance-related issues (e.g. plan implementation, inspections, recordkeeping, spill reporting, etc.). In this case, however, the FBO is responsible for most of the compliance related activities associated with the aviation fuel tanks.

The initial SPCC plan was completed in 2004. In 2009, the installation of new tanks and infrastructure and changes to the SPCC regulations triggered an update to the plan. The cost of the update, prepared by a consultant, was $5,000. This figure is 64 percent of the average cost for preparation of SPCC documentation reported in the survey ($7,800). However, the survey results may include a combination of initial SPCC plans and SPCC plan updates

As with most airport storage of aviation fuel is the primary focus of the SPCC. The fuel is stored in double-walled above ground storage tanks and a mobile refueler. The stationary tanks are enclosed within a containment area.

The SPCC also includes tanks operated by the airport, i.e. gasoline, diesel and backup generator tanks.

The airport does not currently provide spill prevention training to its employees. GTR is in the majority of airports in this respect. Only six out of 22 airports (27 percent) that reported preparing SPCC documentation reported providing specialized training.

Water Resources: National PDES – Mississippi regulates storm water runoff from construction sites, and requires the preparation of construction storm water pollution prevention plans (SWPPPs). Also, a Notice of Intent (NOI) must be submitted for individual projects. GTR hired a consultant to prepare a general

construction SWPPP at a cost of $2,000. This amount is 59 percent of the average cost of $3,417 reported in the survey. NOIs are usually submitted by the contractor, with the cost included in the overall contract price. GTR's experience is that the incremental cost is usually low and typically less than $500 per NOI or project.

Implementation of a construction SWPPP includes controls to minimize impacts to storm water discharges. GTR reported that contractors are generally responsible for installing controls, inspections and monitoring.

Security Requirements

The case study focused on four areas:

- Cost of security equipment and facilities
- TSA reimbursement for facilities, equipment or space
- Additional employee or other operating costs
- Passenger and baggage screening requirements

Security Equipment and Facilities – GTR installed a new card access system and CCTV at a cost of $150,000. The project was completed to comply with requirements under Part 139, with the FAA providing grant funding for 90 percent of the project cost. Mississippi provided half of the local matching share (5 percent), and GTR funded the balance with PFCs. GTR reported a separate CCTV upgrade project that was also funded with AIP grants at the same federal share. The upgrade project was not required by FAA. TSA did not offer financial assistance for either project because neither was required by TSA. GTR's expenditure was 33 percent of the average cost of full physical access control systems reported in the survey ($449,647) and was 64 percent of the average cost of stand-alone CCTV systems ($234,617).

TSA Reimbursement for Facilities, Equipment or Space – The TSA reimburses GTR for office space and employee break rooms. GTR provides screening and baggage screening space at no cost to TSA. Checked baggage screening is done at a vacant ticket counter position. Based on current rental rates, GTR forgoes $34,000 per year in rental revenue on the baggage screening space and $15,600 per year on the passenger screening space, for a total estimated annual lost revenue of $49,600. The estimated annual rental revenue loss from providing TSA space at no cost represents 4.5% of GTR's annual operating budget of approximately $1.1 million.

Additional Employees or Operating Costs – GTR is not affected by the change in badging requirements adopted after 9/11, but GTR was unable to estimate the cost savings associated with this status.

TSA security checkpoints are typically staffed from 45 minutes before a scheduled flight departure until after departure. TSA staff members work full-time at GTR and perform other duties when screening facilities are not open. The requirement for GTR to provide armed law enforcement officer (LEO) support for the screening process is becoming more costly for the Airport, because TSA's contribution through the LEO support program is declining. GTR management is examining whether it would be more cost effective to provide LEO support through less expensive alternatives permitted by TSA, even if those alternatives do not receive TSA funding.

Passenger and Baggage Screening Requirements – GTR undertook a voluntary project to move the passenger screening checkpoint and expand its footprint. AIP grants funded 95 percent of the $1.8 million cost, with the remaining five percent equally divided between PFCs and state funds. GTR

successfully negotiated with TSA to avoid a TSA charge to accomplish the relocation. The relationship with local TSA officials has been cooperative and constructive.

GTR does not have customs or immigration inspection facilities.

Occupational Safety and Health Requirements

GTR is not substantially affected by occupational safety and health requirements. As a local governmental entity, GTR is not directly under the jurisdiction of the Occupational Safety and Health Administration (OSHA). GTR management advised that GTR follows OSHA requirements as a voluntary action. GTR contractors, which are regulated by OSHA, do not separate the costs of OSHA compliance from other costs in their bids or in their billing.

Findings and Key Considerations

As a small airport, GTR has limited resources to meet federal requirements. Staff is limited, and it sometimes falls to the Executive Director to prepare reports, plans or other documentation. When a requirement is related to a particular project, especially one that is grant eligible, GTR has been able to rely on contractors or consultants to meet the requirement and include the compliance costs in the overall project costs. GTR has on limited occasions relied on consultants to meet compliance responsibilities even without financial assistance.

Even when grant funds are used, GTR often relies on state funds to pay one-half of the local match. The recently-implemented increase in the local matching requirement, together with the anticipated new federal requirements such as SMS, causes GTR's management to be concerned about GTR's ability to afford future compliance costs.

Table C**-5** summarizes the regulatory compliance costs reported by YKM. As noted previously, GTR relied on airport staff to meet many requirements during the course of their normal duties. Therefore, the figures in the table may understate the true impact to the airport. In addition, only limited questions were asked about recurring security costs and environmental costs. As a governmental entity, GTR does not fall under the direct jurisdiction of the OSHA. To the extent that OSHA requirements apply to construction projects on the airport, compliance costs would be borne by the contractors completing the project and would be incorporated into bid prices.

Table C-5. Summary of Regulatory Cost Impacts to GTR

	Initial Costs	Recurring Costs
FAA/DOT Requirements	$469,600	$5,700
Environmental Requirements	$101,600	$400
Security Requirements	$250,000	
OSHA Requirements	$842	
Total Costs	$822,042	$6,100
Federal Funds Received	$666,500	$1,500
State Funds Received	$17,750	$0

Federal compliance costs have fallen less heavily on GTR than on other small airports. Out of 23 requirements for which GTR was able to determine or estimate a cost, GTR's costs were below the average reported in the survey on 17 occasions, and approximately average on six occasions, In no instance did GTR's costs exceed the average cost by a significant amount.

APPENDIX C-2

Regulatory Compliance Costs and the Impact on Yakima Air Terminal/McAllister Field – A Case Study

Introduction

This case study is intended to provide more detailed data and analysis of the impact of Federal regulatory requirements on Yakima Air Terminal/McAllister Field (YKM). A description of the Airport and its operations is provided followed by a general discussion of the regulatory impacts faced by YKM. An analysis of YKM's experience with compliance in each of the four regulatory areas addressed in the study then follows. As part of the analysis, YKM's expenditures will be compared to the results of the industry surveys, using the interquartile mean as a measure of the industry average. The final section of the case study presents summary findings and considerations.

Airport Characteristics

YKM is a non-hub primary airport located in Yakima, WA. It is owned and operated under a Joint Operations Agreement (JOA – 1982) by the City/County of Yakima. **Table C-6** provides data on operations and traffic at YKM. At its current level of enplanements, YKM qualifies for the minimum annual passenger apportionment of $1 million under the Airport Improvement Program (AIP). Additional AIP funding received by the Airport is discretionary.

Table C-6. YKM Operations and Activity

Passenger Enplanements	53,832
Commercial Operations	7,237
General Aviation Operations	18,154
Scheduled Air Service	3 daily round-trips to SEA Alaska/Horizon Air Bombardier Q-400 3 flights daily in each direction EAT-YKM-PDX SeaPort Airlines Cessna Caravan 208B

SOURCE: FAA data and airport staff

YKM has two runways – a primary runway (9/27) and a crosswind runway (4/22). The FAA has advised the Airport that based on recent studies of wind coverage, the cross-wind runway no longer meets the criteria for federal support. **Table C-7** provides data on airfield and terminal facilities at YKM.

Table C-7. YKM Airfield and Terminal Facilities

Runway 9/27	7604 ft. x 150 ft. grooved asphalt
Runway 4/22	3825 ft. x 150 ft. porous friction course
Taxiways	Full length parallel to RW 9/27 Full length parallel to RW 4/22 North/south taxiway converted from Runway 18/36 Multiple connector taxiways
Aprons	3.9 million sq. ft. total Terminal apron – concrete Balance of aprons – asphalt
Acreage	825
Perimeter fencing, gates	16,000 lin. ft.; 8ft. chain link, buried to prevent access by coyotes and burrowing animals Interior barbed wire fence for livestock grazing 65 vehicle gates; 25 pedestrian gates SIDA gates and terminal area gates computer controlled Remaining public access gates controlled with 4 digit key pads Restricted access gates (Airport personnel and emergency response, lock and key)
Terminal: ticket counters	2 counters Alaska Air/Horizon – 80 linear ft. SeaPort – 40 linear ft.
Gates and hold rooms	5 ground load gates and hold rooms
Public space	22,958 sq. ft. in ticket lobby and pre-screening, 7,880 sq. ft. vacant space on terminal 2nd floor 8,000 sq. ft. beyond screening (including gates)
Checked baggage	2 secure baggage drop doors
Security Screening	Passenger screening – 1 lane Checked baggage – 1 ETD

SOURCE: Airport staff, Unison calculations

YKM has a single full service fixed-base operator (FBO) and limited services/amenities. Information regarding services and amenities available to aircraft operators and passengers is provided in **Table C-8**.

Table C-8. YKM Services and Amenities for Aircraft Operators and Passengers

Full Service FBOs	McCormick Air Center
Specialized Aviation Service Operations (SASO)	McAllister Museum of Aviation – 100 LL avgas sales; self-service pump
Aviation fuel - FBO	Jet A Fuel and 100 LL avgas Mobile fuel trucks and pumps
Terminal Retail Concessions	Vending machines pre and post-security Coffee shop space vacant
Terminal Operating Hours	4:30 am-7:00 pm 9:00 pm-midnight
Car Rental	Two companies on Airport One company off Airport

Source: Airport Staff

Table C-9 summarizes the organization and staffing levels of the Airport.

Table C-9. YKM Departments and Staffing Levels

Department	Staff Positions
Administration	4 full-time
Operations and maintenance	5 full-time 1 part-time
ARFF	1 full-time (Index A)

Source: Airport Staff

General Observations

As a small airport, YKM struggles to meet federal requirements in the time specified by the FAA. With limited staff and equipment, it can be difficult to meet certain requirements in house, such as the new marking requirements adopted by the FAA. If the compliance costs cannot be included in a grant funded project, it may be difficult to fund a contractor or consultant to do the work needed to meet the requirement. Most requirements for plans, manuals or other administrative issues are accomplished by staff as part of their regular duties with no separate accounting for costs.

A costly requirement for YKM is providing Law Enforcement Officer (LEO) support for TSA screening activities. Even with the financial assistance offered through the TSA's LEO reimbursement

program, YKM relies on off duty officers, rather than reimburse the City or County for staffing the Airport during operating hours. Airport management anticipates that TSA's contribution will continue to decline, adding to the costs YKM must cover.

YKM has contract air traffic control services provided by SERCO and does not have to participate in the cost sharing of these services.

FAA/DOT Requirements

Snow and Ice NOTAMS – In 2000, the FAA issued a cert. alert modifying the acceptable procedures for issuing NOTAMS on snow conditions and friction measurements. YKM reported spending $6,000 for updating the NOTAMS twice. YKM is attempting to use PFCs to cover the cost of the modifications by including them in the PFC funding application for the friction testing equipment being acquired to comply with the FAA requirement. YKM is among the 64 percent of airports in the survey that reported modifying their procedures in response to the cert. alert. YKM's costs were the highest reported in the survey. The average cost reported was $1,000.

Vehicle Operations on the Airfield – In 2002, the FAA issued AC 150/5210-20, *Ground Vehicle Operations on Airports*. In 2008, the FAA issued Change 1 to the AC. The AC addresses, among other things, vehicle access control, vehicle marking, and driver training.

In its survey response, YKM indicated modifying its driver training curriculum to comply with vehicle access requirements at no cost. YKM's prior curriculum was a generic airport training curriculum. To comply with the FAA requirements, the new curriculum is specific to YKM and includes separate sections for aircraft movement and non-movement areas. YKM reported no cost because the modifications were made by airport staff as a part of normal duties. YKM was not able to estimate the staff time used to complete the modification. According to the survey, the average initial cost of meeting the new driver training requirements is $6,400, with recurring costs of $3,040 to comply with annual recurrent driver training requirements.

For YKM, the driver training requirements are an example of the difficulty of quantifying the cost of a new requirement when compliance is accomplished by airport staff during the normal course of business.

Part 139 Requirements – In 2004, the FAA amended 14 CFR Part 139 governing Airport Operating Certificates. The primary purpose of the amendment was to include airports with scheduled service from aircraft with 10-30 seats in the certification requirement. However, the amendment included modification to the certificate classification systems and new requirements for existing certificate holders.

YKM held a Part 139 certificate in 2004. YKM's largest expense to comply with the Part 139 amendments was the cost of installing perimeter fence. YKM had to install a fence along the south side of the Airport, which had been unfenced. The cost for this project was $428,429. The FAA paid $385,244, and YKM paid $42,805 financed with PFCs. YKM's cost is close to the average cost of $426,840 reported in the survey.

YKM revised its Airport Certification Manual (ACM) twice in 2004. Current management assumes that one of these updates was to meet the requirement of the Part 139 amendment. The work was done in house with no record of time spent. The updates predated the tenure of current management.

In 2006 and 2009, the FAA issued updates to AC 150/5210-17, *Programs for Training of Aircraft Rescue and Firefighting Personnel*. YKM was one of only 13 percent of responding airports that were not required to modify their training procedures in response to the new requirements.

Part 139 also requires certificated airports to maintain Airport Emergency Plans (AEPs). In 2010, FAA issued Change 1 to AC 150/5200-31C, *Airport Emergency Plan*. YKM updated its AEP in response to the new AC. The updates were completed by airport staff. YKM also used staff to update its snow and ice control plan in response to FAA requirements. Estimates of the value of staff time could not be made.

DBE Requirements – In 2000 and 2003, the Department of Transportation amended 49 CFR Part 26, which governs participation by Disadvantaged Business Enterprises (DBEs) in DOT funded projects. In 2005, the Department of Transportation amended 49 CFR Part 23, which governs participation by DBEs in airport concessions. The amendments to Part 26 affected YKM, but current airport staff was unable to determine the nature of the impact or estimate its cost. YKM is in the majority of survey respondents (56 percent) that reported an impact from the amendments to Part 26.

Airfield Layout, Design and Standards – During the study period, FAA issued approximately 43 regulatory or compliance documents relating to airfield layout, design, equipment, facilities and operations. For small airports, potentially costly requirements included new requirements for runway protection zones (RPZ), runway safety areas (RSA) and signage and markings. YKM completed a substantial project to comply with the RPZ and RSA standards. The project involved the approach end of runway 9/27. It included a road relocation, construction of a bridge over a stream, and relocation of power lines and telephone poles. The cost of the project was $3.04 million. The FAA provided $2.87 million in AIP funds, and YKM financed the balance ($171,000) with PFCs. YKM's costs were in the 75th percentile of airports responding to the survey question on RPZ projects; the costs were slightly more than double the average costs of $1.49 million.

YKM also modified its airfield signs to meet the new requirements. Initial installation costs were $4,624. The FAA provided a $4,393 grant for the project, and YKM used PFCs to cover the local matching requirement ($231). The costs reported by YKM are well below the 25th percentile of costs reported in the survey ($20,000).

PFC Requirements – During the study period, FAA adopted new procedures for submission of PFC applications by non-hub airports. The procedures were required by statute and were intended to reduce the cost to non-hub airports of submitting PFC requests. YKM reported submitting a PFC application under the new procedures. It did not report any cost savings, because the application was prepared by airport staff as part of their normal duties. YKM's experience contrasts with results reported in the survey responses. Five airports reported cost savings averaging $2,000.

Consulting and Engineering Services – In 2005, the FAA issued AC 150/5100-14D, *Architectural, Engineering and Planning Consultant Services for Airport Grant Projects*, establishing new requirements for consultant selection on AIP-funded projects. Since that time, YKM has gone through the process. However, YKM management could not estimate the cost impact of the new requirements, because the impact would have been on airport staff.

In 2007 and 2008, the FAA issued a series of ACs on the use of GIS data in airport planning documents and other documentation. To date, YKM has not been required to develop GIS data for the FAA. At some point in the future, based on current FAA policies, YKM will need to generate the data. Based on the survey results, YKM could face initial costs ranging from $1,000 to $658,000, with average costs of $176,000.

Environmental Requirements

The case study for YKM showed impacts to YKM from environmental requirements in the following key areas:

- Planning and development – Wildlife Management
- Water resources – Spill prevention, control and countermeasure

Planning and Development – FAA AC 150/5200-36, *Qualifications for Wildlife Biologist Conducting Wildlife Hazard Assessments and Training Curriculums for Airport Personnel Involved in Controlling Wildlife Hazards on Airports* (June 28, 2006) describes the qualifications for wildlife biologists who conduct Wildlife Hazard Assessment (WHA)s for Part 139-certified airports. The AC also establishes the minimum wildlife hazard management training curriculum for airport personnel involved in implementing an FAA-approved Wildlife Hazard Management Plan. YKM is required to maintain a wildlife hazard management plan; therefore, YKM is required to provide annual staff training on wildlife hazard mitigation.

Typically airports hire a qualified wildlife biologist to perform a WHA as part of WHMP development. YKM's plan was developed in-house by airport staff during the normal course of duties and with the help of USDA personnel from Seattle, WA. Costs for the plan were not provided.

The AC requires a minimum of eight hours for both initial and recurrent training. YKM indicated that even prior to the 2006 AC issuance, staff attended wildlife hazard training classes lasting up to eight hours annually.

Site-specific concerns related to YKM's WHMP include management of pocket gophers, which are prevalent in the area. Airport staff indicated these burrowing animals produce mounded areas on the airfield that damage Airport pavement surfaces and impact safety areas. As a result, YKM staff need to address pocket gophers on an ongoing basis but do not have the staffing resources to do so. Future issues and costs related to mitigating pavement integrity and safety areas may need to be addressed.

Water Resource Requirements – The majority of aviation fuel handled at YKM is by mobile refueler or via self-serve aircraft fueling stations. The FBO is responsible for mobile refueler operations and any potential small spills that may occur. Spills above 15 gallons are handled by the Yakima Fire Department. YKM's Airport Emergency Plan (AEP) includes information on spill response procedures and specifies when a response from the Yakima Fire Department is necessary.

YKM's reported costs associated with spill prevention include providing tenants with response equipment and performing periodic inspections. In general, YKM's costs fall well below those reported in the survey. The reported costs are modest as only $400 was reported for replacement of materials in spill response kits. Many other small airports also provide their tenants with spill response equipment to minimize the potential airport liability from spills occurring on airport property. The average cost of specialized equipment to prevent or mitigate spills reported as part of the survey was $5,750. Inspections, up to 3 hours per month, are also performed by the Assistant Airport Manager as part of normal job duties. The inspections include leak detection, proper operation of equipment, and records reviews. Previously, the inspections were performed by the City of Yakima.

Spill response training is conducted as part of the annual table-top training for YKM's AEP. The full table-top training lasts 4-5 hours. Specific training on spill response may require an additional 4 hours for airport personnel. Based on Bureau of Labor Statistics standard hourly wage rates, estimated training

costs would be $1,000 assuming five airport employees participate in the training. The average training costs reported as part of the survey was $1,603.

YKM has made several attempts to establish the Airport under a NPDES Industrial Storm Water General Permit. This effort is ongoing, and the filing for the permit will be accomplished under a soon-to-be funded FAA CIP grant. The estimated cost for accumulating the data and submission of the data under an application is $15,000. This will lead to the writing and implementation of a SPCC plan. YKM's projected costs are almost double the average costs reported in the survey results ($7,800).

Security Requirements

The case study focused on four areas:

- Cost of security equipment and facilities
- TSA reimbursement for facilities, equipment or space
- Additional employee or other operating costs
- Passenger and baggage screening requirements

Security Equipment and Facilities – YKM installed a new access control system with card readers following the tragic events of 9/11. The cost of the system was $248,803. Previously security had been provided by key lock doors. The system included two computer systems. YKM's costs were 55 percent of the average cost of $449,647 reported in the survey.

TSA Reimbursement for Facilities, Equipment or Space – The TSA reimburses YKM for office space, employee break rooms and passenger checkpoint space. YKM provides baggage screening space at no cost to TSA. YKM was unable to estimate the revenue loss associated with the free baggage screening space. It is unusual for an airport to be compensated for the use of passenger checkpoint screening space by TSA.

Additional Employees or Operating Costs – YKM incurs recurring costs for materials and staffing for issuance and reissuance of ID badges. However, these costs are recovered in the badging fee.

TSA security checkpoints are typically staffed in three-hour blocks around scheduled flight arrivals. TSA staff members remain at the Airport and perform other duties when screening facilities are not open. The Airport continues to provide armed law enforcement officer (LEO) support through participation in TSA's law enforcement reimbursement program, even though TSA funding for the program is decreasing.

Following the events of 9/11, TSA requires airports to tow unaccompanied vehicles parked in front of or near the terminals. When this requirement was first introduced, towing was done by airport staff as part of their normal duties. Currently, YKM contracts for towing services on an as needed basis for each vehicle tagged.

Passenger and Baggage Screening Requirements – YKM undertook a project to relocate the passenger screening checkpoint to provide space for TSA offices. Prior to TSA's creation no office space was provided to support screening functions. The project cost $126,653 and was funded by TSA. The cost of YKM's project was 27 percent of the average cost of $460,649 reported in the survey for passenger screening checkpoint projects.

YKM has not modified its baggage screening facilities, placing it in the minority of survey respondents. Only 22 percent of responding airports reported they did not modify baggage screening facilities.

YKM does not have customs and immigration inspection facilities.

Occupational Safety and Health Requirements

YKM is not substantially affected by occupational safety and health requirements. As a local governmental entity, YKM is not directly under the jurisdiction of the Occupational Safety and Health Administration (OSHA). YKM is subject to state regulation, which is passed through by the local government.

YKM spends approximately $826 per year on personal protective equipment (PPE) for its employees. The PPE consists primarily of gloves for maintenance workers and specialized gloves for employees servicing electrical equipment.

YKM contractors, which are regulated by OSHA, do not separate the costs of OSHA compliance from other costs in their bids or in their billing.

Findings and Key Considerations

As a small airport, YKM has limited resources to meet federal requirements. Staff is limited, and financial resources to pay consultants and contractors are constrained.

YKM's largest single compliance expenditure was the project to upgrade its perimeter fence, which received grant funding. When grant funds are available for projects to meet federal requirements, YKM has relied on PFCs to fund the local match.

Table C**-10** summarizes the regulatory compliance costs reported by YKM. As noted previously, YKM relied on airport staff to meet many requirements during the course of their normal duties. Therefore, the figures in the table may understate the true cost impact on the Airport. In addition, only limited questions were asked about recurring security costs and environmental costs. As a governmental entity, YKM does not fall under the direct jurisdiction of the OSHA. To the extent that OSHA requirements apply to construction projects on the Airport, compliance costs would be borne by the contractors completing the project and would be incorporated into bid prices.

Table C-10. Summary of Regulatory Cost Impacts to YKM

	Initial Costs	Recurring Costs
FAA/DOT Requirements	$3,655,633	$350
Environmental Requirements	$631,454	$13,200
Security Requirements	$375,056	
OSHA Requirements	$842	
Total Costs	$4,662,985	$13,550
Federal Funds Received	$3,384,149	$0
State Funds Received	$0	$0

Compared with other airports, the overall reported impact to YKM is about average. Out of the six requirements for which YKM was able to determine cost impacts, YKM's costs were above average in three instances and below average in three. For many of the compliance activities completed in-house, however, YKM was unable to determine compliance costs.

APPENDIX C-3

Regulatory Compliance Costs and the Impact on Stewart International Airport – A Case Study

Introduction

This case study is intended to provide more detailed data and analysis of the impact of Federal regulatory requirements on Stewart International Airport (SWF). A description of the Airport and its operations is provided, followed by a general discussion of the regulatory impacts faced by SWF. An analysis of SWF's experience with compliance in the four regulatory areas addressed in the study then follows. As part of the analysis, SWF's expenditures are compared to the results of the industry surveys, using the interquartile mean as a measure of the industry average. The final section of the case study presents summary findings and considerations.

Airport Characteristics

SWF is a non-hub primary airport located in Newburgh, NY. The Airport is owned by the State of New York. It is currently operated by the Port Authority of New York and New Jersey (PANYNJ, or Port Authority) under a long-term lease. Day-to-day management and operations are provided by AFCO AvPORTS Management LLC (AvPORTS), under contract to the PANYNJ.

SWF has been owned by the State of New York throughout the study period. However, operational control has varied during this time. Until March 31, 2000, the State of New York operated the Airport via an airport management company, Lockheed Air Terminal. On April 1, 2000 National Express, LTD, a United Kingdom corporation, took over operations under a 99-year lease approved by the FAA under the federal Airport Privatization Pilot Program. On October 31, 2007, National Express sold its leasehold to the PANYNJ. AvPORTS assumed responsibility for day-to-day operations and management on November 1, 2007.

Table C-11 provides data on operations and traffic at SWF. At its current level of enplanements, SWF qualified for $1.8 million in annual passenger apportionment funds for FY 2012 under the Airport Improvement Program (AIP). Additional AIP funding received by the Airport is discretionary.

Table C-11. SWF Operations and Activity

Passenger Enplanements	201,684
Commercial Operations	12,440
General Aviation Operations	28,494
Scheduled Air Service	4 daily round-trips to PHL US Airways Express DH-400; CRJ-200 2 daily round trips to ATL (to be discontinued) Delta Connection CRJ-700 3 daily round trips to DTW Delta Connection CRJ-700 aircraft 1 daily RT to FLL JetBlue EMB-190 2 daily RT to MCO JetBlue EMB-190

SOURCE: FAA data and airport staff

SWF has two runways – a primary runway (9/27) and a crosswind runway (16/34). **Table E-12** provides data on airfield and terminal facilities at SWF.

Table C-12. SWF Airfield and Terminal Facilities

Runway 9/27	11,817 ft. x 150 ft. grooved asphalt
Runway 16/34	6,004 ft. x 150 ft. grooved asphalt
Taxiways	Full length parallel to RW 9/27 (TW A) Taxiway access to ends of RW 16/34 and to the middle (incl. TW A) Multiple connector taxiways
Aprons	Concrete: 961,870 sf. Asphalt: 158,000 sf.
Acreage	2,100
Perimeter fencing, gates	6.4 miles – 8 ft chain-link w/3 strands barbed wire per FAA specification 4 vehicle gates, 1 electrified for general vehicle access; 3 construction access Gate guard at construction entry gate
Terminal: ticket counters	22 counters, 36 check-in stations 150 lf.
Gates and hold rooms	7 gates with loading bridges 1 ground load gates and hold room
Public space	19,550 sf. in ticket lobby and pre-screening, 23,375 sq. ft. beyond screening
Checked baggage	2 carousels
Security Screening	Passenger screening – 1 checkpoint; 1 screening lane Checked baggage – 2 in-line EDS

SOURCE: Airport staff, Unison calculations

SWF has two full-service fixed-base operators (FBOs) and a range of services/amenities. Information regarding services and amenities available to aircraft operators and passengers is provided in **Table C-13**.

Table C-13. SWF Services and Amenities for Aircraft Operators and Passengers

Full Service FBOs	Richmor Aviation, Atlantic Aviation
Specialized Aviation Service Operations (SASO)	Cessna Citation Center, Aircraft repair, overhaul
Aviation fuel	Jet A Fuel and 100 LL avgas provided by both FBOs All fuel dispensed by mobile fuel trucks
Terminal Retail Concessions	2 fast food concessions and 1 news/retail concession pre-security 1 fast food concession and 1 news/retail concession post security
Terminal Operating Hours	4:30 am-7:00 pm 9:00 pm-midnight
Car Rental	Six companies on Airport None off Airport

Source: Airport Staff

Table C-14 summarizes the organization and staffing levels of the Airport. Airport staff at SWF consists of 11 PANYNJ staff members and three PANYNJ consultants, 66 AvPORTS full-time employees, and 32 AvPORTS temporary employees.

Table C-14. SWF Departments and Staffing Levels

Department	Staff Positions
Executive Management	2 PANYNJ; 5 AvPORTS
Business Services	1 PANYNJ; 6 AvPORTS
Engineering & Environmental	4 PANYNJ Staff; 3 PANYNJ consultants; 2 AvPORTS
Plant Structures, Operations & Maintenance	3 PANYNJ; 43 AvPORTS full-time; 32 AvPORTS temps.
Properties & Business Development (including parking services)	1 PANYNJ; 10 AvPORTS

Source: Airport Staff

General Observations

Due to its changing organizational structure and control throughout the Study Period, SWF provides a unique perspective. While being operated by the State, SWF experienced a lack of focus and expertise on the requirements of operating an airport. NEC brought management with the requisite expertise, but its focus was on bottom line profitability. During this period, SWF sought to achieve compliance with new and existing requirements while minimizing the level of effort and resources applied. Currently, as part of the PANYNJ's system of airports, SWF sometimes benefits from the staff and resources the PANYNJ makes available to all of its airports. However, the PANYNJ is also under pressure to control costs. It is easier to justify an expansion of staff to implement a program that generates new revenue than one that is undertaken strictly for compliance purposes. Therefore, the PANYNJ as a whole, and SWF in particular, are under pressure to meet new compliance requirements within existing staffing levels.

As a large organization, the PANYNJ has a decision process that is more involved and lengthier than is typical for an airport with a local governing body. However, SWF benefits from having access to resources that would not otherwise be available to a small airport.

FAA/DOT Requirements

Vehicle Operations on the Airfield – In 2002, the FAA issued AC 150/5210-20, *Ground Vehicle Operations on Airports*. In 2008, the FAA issued Change 1 to the AC. The AC addresses, among other things, vehicle access control, vehicle marking, and driver training.

In its survey response, SWF reported spending $500,000 to upgrade its vehicle access controls and $100,000 in recurring costs. The initial expenditures were for computerized access control gates and surveillance cameras. The Airport's existing access controls were in compliance with FAA requirements. The upgrades were undertaken voluntarily by SWF. The recurring costs are incurred for the staffing to conduct vehicle surveillance at airfield perimeter gates.

SWF's initial costs are 24 times higher than the survey sample average cost of $20,450. Its recurring costs (annual incremental costs due to the requirement) are almost 10 times higher than the survey sample average of $10,038.

SWF also modified its driver training program in response to the AC. SWF acquired an interactive video training system produced by the American Association of Airport Executives that is customized for SWF. The $110,000 in initial costs reported by SWF represents the initial acquisition cost of the system. Subscription renewal and updating of the system account for the $5,000 in SWF's recurring costs.

SWF's initial costs for driver training are approximately 17 times the survey sample average cost of $6,479. The recurring costs are 1.6 times the survey sample average of $3,040.

Part 139 Requirements – In 2004, the FAA amended 14 CFR Part 139 governing Airport Operating Certificates. The primary purpose of the amendment was to require airports with scheduled service from aircraft with 10-30 seats to obtain a certificate. However, the amendment included modification to the certificate classification system and new requirements for existing certificate holders.

SWF held a Part 139 certificate in 2004. SWF incurred no significant expenses in complying with the Part 139 amendments. No revisions to ARFF policy, procedures, equipment or facilities were required. Likewise no modifications to SWF's perimeter fencing or its snow and ice control plan were undertaken. The revisions to the SWF's Airport Certification Manuel were completed by airport staff as part of normal duties.

SWF's experience is consistent with the majority of survey participants with respect to the modified requirements for ARFF and fencing. Only 29 percent of responding airports reported expenditures to comply with ARFF requirements; thirty-one percent reported modifications to perimeter fencing. However, 58 percent of responding airports reported revisions to their snow and ice control plans, placing SWF in the minority.

In 2006 and 2009, the FAA issued updates to AC 150/5210-17, *Programs for Training of Aircraft Rescue and Firefighting Personnel*. SWF was one of only 13 percent of responding airports that were not required to modify their training procedures in response to the new requirements.

Part 139 also requires certificated airports to maintain Airport Emergency Plans (AEPs). In 2010, FAA issued Change 1 to AC 150/5200-31C, *Airport Emergency Plan*. SWF spent initially $25,900 to revise its AEP in response to the new AC. It spends $1,200 in recurring costs for annual updates to the AEP required by the FAA.

SWF's initial expenditure is almost six times the survey sample average cost of $4,364 and the second highest expenditure reported. The Airport's recurring costs are approximately 38 percent higher than the survey sample average.

DBE Requirements – In 2000 and 2003, the Department of Transportation amended 49 CFR Part 26, which governs participation by Disadvantaged Business Enterprises (DBEs) in DOT funded projects. In 2005, the Department of Transportation amended 49 CFR Part 23, which governs participation by DBEs in airport concessions. The amendments to neither of the regulations affected SWM. For Part 26, SWF is in the minority of survey respondents (48 percent) that did not report an impact. However, for Part 23, SWF is in the majority of survey respondents (56 percent) that did not report an impact.

Airfield Layout, Design and Standards – During the study period, FAA issued approximately 43 regulatory or compliance documents relating to airfield layout, design, equipment, facilities and operations. For small airports, potentially costly requirements included new requirements for runway protection zones (RPZ), runway safety areas (RSA) and signage and markings. SWF completed a substantial project to increase the size of the RSAs at both ends of runway 16/34 to the minimum required by FAA. The project included elimination or relocation of perimeter roads, fence relocation, grading and earthwork. The cost of the project was $3.5 million. The FAA provided $1.8 million in AIP discretionary funds, and SWF financed the balance ($1.7 million). The share of funds provided (50 percent) was well below the standard Federal share (90 or 95 percent, depending on the year the grant was issued). According to SWF management, the FAA could not afford to provide any more AIP discretionary funds for the project. SWF's cost was close to the sample survey average of $3.7 million.

SWF did not modify its airfield signs to meet the new requirements. It is in the minority of airports responding to the survey. Seventy-nine percent of responding airports undertook an airfield sign project to comply with the new FAA requirements.

PFC Requirements – During the study period, FAA adopted two requirements for additional documentation in support of PFC applications (PFC Update 50-06 and PFC Update 59-09). Since the purchase of the SWF lease by the Port Authority, administration of SWF's PFC program has been provided by central Port Authority staff. The PFC program is one example of the benefit to SWF of being part of a system of airports.

Consulting and Engineering Services – In 2005, the FAA issued AC 150/5100-14D, *Architectural, Engineering and Planning Consultant Services for Airport Grant Projects*, establishing new requirements for consultant selection on AIP-funded projects. Currently the PANYNJ provides engineering and

planning services for SWF, or administers the consultant selection process. This is another example of the benefit to SWF of being part of a system of airports.

Environmental Requirements

SWF also benefits from its affiliation with the PANYNJ in complying with environmental requirements. Environmental documents required under the National Environmental Policy Act (NEPA) are currently prepared by PANYNJ staff. PANYNJ engineers also conduct inspections and monitoring required under SWF's National Pollutant Discharge Elimination System (NPDES) construction permits.

SWF reported impacts from environmental requirements in the following key areas:

- Planning and development – Environmental Site Assessments, Wildlife management
- Water resources – Spill prevention, control and countermeasure (SPCC), Storm water, Aircraft and airfield deicer collection and treatment
- Waste Management

Planning and Development, Environmental Site Assessments – SWF reported a cost of $40,000 for conducting an environmental site assessment (ESA). The high cost was the result of fuel spills at the airport. The ESA included monitoring of existing wells in the vicinity of the airport and drilling new monitoring wells. The monitoring requirement is scheduled to terminate in 2012. The FBO is responsible for periodic monitoring; SWF is responsible for monitoring associated with specific spills.

SWF's ESA cost is approximately twice the survey sample average cost of $20,000.

Planning and Development, Wildlife Management – FAA AC 150/5200-36, *Qualifications for Wildlife Biologist Conducting Wildlife Hazard Assessments and Training Curriculums for Airport Personnel Involved in Controlling Wildlife Hazards on Airports* (June 28, 2006) describes the qualifications for wildlife biologists who conduct Wildlife Hazard Assessment (WHAs) for Part 139-certified airports. The AC also establishes the minimum wildlife hazard management training curriculum for airport personnel involved in implementing an FAA-approved Wildlife Hazard Management Plan (WHMP). SWF is required to maintain a wildlife hazard management plan; therefore, SWF is required to provide annual staff training on wildlife hazard mitigation.

SWF contracted out the development of the WHA and WHMP, which is typical of small airports. SWF relies on a U.S. Department of Agriculture wildlife biologist located at the airport on a contract basis to implement the plan.

The AC requires a minimum of eight hours for both initial and recurrent training. The on-site USDA wildlife biologist conducts the training. All personnel working on SWF's airfield are subject to the annual training requirement. SWF estimates that 45-50 people attend the training class each year. One impact of the change in FAA requirements on wildlife hazard training was to increase the number of airport employees who are subject to mandatory training.

SWF also conducted a threatened and endangered species survey at a cost of $10,000. SWF's cost is 32 percent of the survey sample average cost of $31,667.

Water Resource Requirements, SPCC – The majority of aviation fuel handled at SWF is delivered by mobile refueler. The FBOs are responsible for mobile refueler operations. SWF contracted out the

preparation of a SPCC plan in 2000, at a cost of $3,500. The SPCC plan covers the entire airport, with separate sections for FBOs who are responsible for aviation fuel storage and the Airport, which is responsible for the storage of other fuel and oil. In addition, SWF holds a major oil storage facility (MOSF) permit issued by the State of New York.

Annual training is provided to fueling operators. The training lasts approximately eight hours, and it is provided by PANYNJ staff. Previously, the training was provided by contractors.

SWF reported cost for preparation of the SPPC is just 44 percent of the survey sample average cost of $7,800. SWF did not estimate the cost of training.

Water Resource Requirements, Storm Water – SWF reported preparing a storm water pollution prevention plan (SWPP plan) and a construction storm water pollution prevention plan (CSWPP Plan), with costs of $5,500 and $2,500 respectively. SWF was not required to undertake control, mitigation or remediation measures in connection with either plan.

The cost of the SWPP Plan was 59 percent of the survey sample average cost of $9,375. SWF's reported cost of $5,500 was the median value of the survey sample. The cost of the CSWPP Plan was 73 percent of the survey sample average cost of $3,417. SWF's experience with control, mitigation or remediation measures is consistent with the majority of airports responding to the survey. Only 13 percent of airports preparing a SWPP plan reported control, mitigation or remediation measures. Only nine percent of airports preparing a CSWPP Plan reported any of these measures.

Water Resource Requirements, Deicer Fluid Collection and Treatment – SWF reported costs of $350,000 for equipment and facilities for collection and treatment of aircraft deicing fluid. SWF's cost is 18 percent of the average cost reported in the survey. SWF also reported costs of $225,000 for equipment and facilities for collection and treatment of airfield pavement deicing fluid. SWF was the only respondent reporting expenses of this type.

Security Requirements

The case study focused on four areas:

- Cost of security equipment and facilities
- TSA reimbursement for facilities, equipment or space
- Additional employee or other operating costs
- Passenger and baggage screening requirements

Security Equipment and Facilities – SWF has installed a new access control system, a closed circuit television (CCTV) system, a credentialing and biometric system, and breach control system since the 9/11 tragedy. SWF was unable to estimate the costs of the systems, but it reported receiving FAA funding for vehicles used for perimeter security, biometric equipment and CCTV cameras. SWF management maintains regular communication with the Transportation Security Administration (TSA) regarding compliance with security requirements. According to SWF management these communications frequently result in additional security expenditures.

TSA Reimbursement for Facilities, Equipment or Space – The TSA reimburses SWF for office space and employee break rooms. SWF provides passenger checkpoint space and baggage screening space at no cost to TSA. SWF does not participate in TSA's electric utility cost sharing program. SWF estimated the lost revenue from providing the free screening space to be $193,750.

Additional Employees or Operating Costs – SWF incurs recurring costs for providing guards at the airfield gates. The cost to man the general access gate, which is open year-round, is approximately $100,000 per year. Construction gates are manned during periods of construction with an average of 3-5 months per gate per year.

SWF has not incurred any out-of-pocket costs to provide law enforcement officer (LEO) presence at screening checkpoints. The State has provided LEO staffing in exchange for space at SWF. The PANYNJ is constructing a crime lab for the State in exchange for continued LEO staffing at Port Authority airports. While no cash outlay is involved, SWF and the Port Authority incur opportunity costs by providing space to the State.

Passenger and Baggage Screening Requirements – In 2004, SWF undertook a terminal renovation project that included construction of a second passenger screening lane. The full cost of the terminal renovation was $4 million, and the FAA provided an AIP grant. SWF was unable to estimate the cost associated with adding the screening lane. TSA has since added a full body scanner to one of the screening lanes and currently operates only one lane.

TSA undertook a project to improve SWF's checked baggage screening equipment. TSA added roller tables to SWF's existing out-bound baggage belt system. Existing facilities were sufficient to accommodate this addition. SWF incurred no costs for the modification.

SWF has customs and immigration inspection services. It spent $450,000 to construct "temporary" inspection facilities on a voluntary basis. Construction of permanent facilities is underway. SWF's expenditures were 1.2 times the survey sample average cost ($375,000).

Occupational Safety and Health Requirements

SWF is subject to state regulation for occupational safety and health as a part of the PANYNJ. AvPORTS and its employees, however, are directly under the jurisdiction of the Occupational Safety and Health Administration (OSHA), because of AvPORTS' status as a private entity.

The value of SWF staff time spent on occupational safety and health training is approximately $12,000 per year, which is 31 percent higher than the survey sample average cost of $9,138.

SWF contractors, which are regulated by OSHA, do not separate the costs of OSHA compliance from other costs in their bids or in their billing.

Findings and Key Considerations

Of the airports included in the case study, SWF is unique in being part of a larger airport system and in relying on a private entity to provide day-to-day operational and management services. SWF benefits from its affiliation with the PANYNJ. For example, the PANYNJ has assumed responsibility for NEPA compliance, and it provides resident engineers to SWF. Nevertheless, SWF faces financial constraints typical of small airports. The PANYNJ generally considers revenue generating potential as part of its decision on expenditures of funds. The Airport is competing for resources with the other airports in the PANYNJ's system. At times SWF must satisfy new compliance requirements with existing resources.

SWF management considers security requirements to have a continuing impact. However, SWF's largest single compliance expenditure was the project to upgrade its RSAs, at $3.5 million. SWF received AIP funding for this project, but at a reduced federal share of 50 percent.

Table C**-15** summarizes the regulatory compliance costs reported by SWF. After the Port Authority acquired SWF's lease, some compliance requirements were satisfied by Port Authority staff. Also, SWF incurred costs for modifying passenger screening checkpoints as part of a larger terminal renovation project, but SWF management could not isolate the costs of security enhancements. In addition, only limited questions were asked about recurring security costs and environmental costs. As a governmental entity, SWF does not fall under the direct jurisdiction of the OSHA. AvPORTS is required to comply with OSHA with respect to its employees, but AvPORTS was not requested to supply OSHA compliance cost data. Further, to the extent that OSHA requirements apply to construction projects on the Airport, compliance costs would be borne by the contractors completing the project and would be incorporated into bid prices.

Table C-15. Summary of Regulatory Cost Impacts to SWF

	Initial Costs	Recurring Costs
FAA/DOT Requirements	$4,161,047	$107,400
Environmental Requirements	$1,042,000	$500
Security Requirements*	$450,000	
OSHA Requirements		$12,000
Total Costs	$5,653,047	$119,900
Federal Funds Received	$3,384,149	$0
State Funds Received	$0	$0

* Cost of Customs and Immigration facilities. Additional security costs were incurred, but costs are unknown

The overall cost of Federal requirements has fallen more heavily on SWF than on other small airports. Out of the 14 requirements for which SWF and other airports reported costs, SWF's costs were above average in nine instances and below average in five. The cost of environmental requirements on SWF has not been as great. All five of the requirements for which SWF's costs are below average are in the environmental area.

APPENDIX C-4

Regulatory Compliance Costs and the Impact on Santa Barbara Municipal Airport – A Case Study

Introduction

This case study is intended to provide more detailed data and analysis of the impact of Federal regulatory requirements on Santa Barbara Municipal Airport (SBA). A description of the Airport and its operations is provided followed by a general discussion of the regulatory impacts faced by SBA. An analysis of SBA's experience with compliance in each of the four regulatory areas addressed in the study then follows. As part of the analysis, SBA's expenditures will be compared to the results of the industry surveys, using the interquartile mean as a measure of the industry average. The final section of the case study presents summary findings and considerations.

Airport Characteristics

SBA is a small hub primary airport located in Santa Barbara, CA. The Airport is owned and operated by the City of Santa Barbara.

Table C-16 provides data on operations and traffic at SBA. At its current level of enplanements, SBA qualifies for $2.7 million in annual passenger apportionment funds for FY 2012 under the Airport Improvement Program (AIP). Additional AIP funding received by the Airport is discretionary.

Table C-16. SBA Operations and Activity

Passenger Enplanements	382,894
Air Carrier Operations	4,198
Air Taxi Operations	25,618
General Aviation Operations	80,805
Scheduled Air Service	4 daily RT to DEN 3 RT – United Express CRJ-200 1 RT – Frontier EMB-90 12 daily RT to LAX 8 RT – United Express EMB-120 4 RT – American Eagle ERD aircraft 10 daily RT to SFO United Express EMB-120 5 daily RT to PHX USAirways CRJ aircraft 1 daily RT to PDX Alaska-SkyWest CRJ-700 1 daily RT to SEA Alaska-SkyWest CRJ-700

SOURCE: FAA data, airport staff, air carrier schedule information

SBA has three runways – a primary runway (7/25) and two closely spaced parallel crosswind runways (15L/33R and 15R/33L). **Table C-17** provides data on airfield and terminal facilities at SBA.

Table C-17. SBA Airfield and Terminal Facilities

Runway 7/25	6,052 ft. x 150 ft. grooved asphalt
Runway 15R/33L	4,183 ft. x 100 ft. asphalt
Runway 15L/33R	4,178ft. x 75 ft. asphalt
Taxiways	Full length and partial parallel to RW 7/25 Full length parallel to RW 15L/33R Partial parallel to RW 15R/33L Multiple connector taxiways
Aprons	5.6 million S.F. total pavement (incl. runways, taxiways) 25,800 S.Y. air carrier apron 201,375 S.Y. other apron
Acreage	948 (includes approximately 400 acres of wetland preserve)
Perimeter fencing, gates	42,210 L.F. total, with a combination of the following: • 6 ft. wood fence • 4 ft. chain link fence • 6 ft. chain link fence • 8 ft. chain link with "double lean" barbed wire 54 gates (33vehicle and 21 pedestrian) Proximity cards for access control at all gates
Terminal: ticket counters	5 counters 127 L.F.
Gates and hold rooms	4 gates with loading bridge capability (only 3 gates currently operational) 1 ground load gate 2 hold rooms serve the five gates
Public space	4,082 S.F. in ticket lobby and pre-screening, 7,324 S.F. in hold rooms; 4,753 S.F. public circulation space beyond screening
Checked baggage	4 secure bag drops
Security Screening	Passenger screening – 1 checkpoint; 3 screening lanes Baggage screening – 2 EDS fed by baggage conveyor belts 5 ETDs

SOURCE: Airport staff

SBA has two full service fixed-base operators (FBOs) and a range of services/amenities. Information regarding services and amenities available to aircraft operators and passengers is provided in **Table C-18**.

Table C-18. SBA Services and Amenities for Aircraft Operators and Passengers

Full Service FBOs	Signature Flight Support, Atlantic Aviation
Specialized Aviation Service Operations (SASO)	Coastal Aircraft and Accurate Aviation (each providing aircraft maintenance) Accurate Aviation also provides aircraft tie-down space MAG aviation – aviation fuel sales 3 flight schools
Aviation fuel	Jet A and 100 LL avgas provided by both FBOs. Tanks owned by FBO's; tanks will revert to airport at end of ground leases MAG Aviation provides 100 LL avgas through self-service pump FBO's dispense fuel by mobile refueler
Terminal Retail Concessions	1 gourmet coffee stand pre-security 1 gourmet coffee stand, 1 restaurant and 1 news/retail concession post-security
Terminal Operating Hours	4:30 A.M.-12:00 A.M. (or last arrival)
Car Rental	7 companies on Airport property 1 off Airport property

Source: Airport Staff

SBA has a full time staff of 53, and 15-20 part-time hourly staff. Full time staff includes the Airport Patrol Division, which provides law enforcement officer (LEO) support to TSA. Aircraft rescue and fire-fighting personnel (ARFF) are supplied by the City of Santa Barbara under contract. **Table C-19** summarizes the organization and staffing levels of the Airport.

Table C-19. SBA Departments and Staffing Levels

Department	Staff Positions
Airport Director	3
Administration/Property Management	5.5
Airport Operations (Operations, Maintenance, Security and ARFF)	42 full-time airport staff 15-20 part-time staff ARFF staff (3 per shift) under contract
Capital Support	2.5 airport staff 2 contractors

Source: Airport Staff

General Observations

SBA benefits from leasing commercial-industrial property, which accounts for 40 percent of its operating revenue and helps cover the costs of compliance with regulatory requirements. SBA is similar to the other small-hub airport included in the case studies – Huntsville International Airport (HSV).

With 53 full time staff (excluding ARFF staff) and 15-20 part-time staff, SBA has more internal resources to implement new compliance requirements compared to other non-hub airports included in these case studies. Even so, SBA indicated that staff resources were not always suitable or had the expertise to meet regulatory changes. For example, SBA added the part-time staff specifically to comply with TSA requirements for monitoring exit lanes and terminal curb-side.

SBA management considers new security requirements to have had the greatest impact on the Airport, because of the added staffing needed to meet TSA requirements. However, SBA also reported significant wetland mitigation costs on a recurring basis, as discussed below.

FAA/DOT Requirements

Vehicle Operations on the Airfield – In 2002, the FAA issued AC 150/5210-20, *Ground Vehicle Operations on Airports*. In 2008, the FAA issued Change 1 to the AC. The AC addresses, among other things, vehicle access control and driver training.

SBA reported spending $1,000 to comply with vehicle access requirements associated with the AC and changed its policies to prohibit operation of vehicles by the public on the AOA. Particularly, the $1,000 expense was for publicizing the new policy. No modification to gates or access controls was undertaken.

SBA's reported initial costs are four percent of the average cost of $22,227 reported in the survey. SBA reported no recurring costs associated with vehicle access. This contrasts with the average cost of $11,144 for recurring costs reported in the survey.

SBA did not modify its driver training program in response to the AC. SBA is part of a small minority (eight percent) of airports that did not make modifications; 92 percent of survey respondents reported the need for driver training program modifications.

Part 139 Requirements – In 2004, the FAA amended 14 CFR Part 139 governing Airport Operating Certificates. The primary purpose of the amendment was to require airports with scheduled service from aircraft with 10-30 seats to obtain a certificate. However, the amendment included modification to the certificate classification system and new requirements for existing certificate holders.

SBA held a Part 139 certificate in 2004. SBA incurred no significant expenses in complying with the Part 139 amendments. No revisions to ARFF policy, procedures, equipment or facilities were required. Likewise no modifications to SBA's perimeter fencing or its snow and ice control plan were undertaken. The revisions to the SBA's Airport Certification Manual were not significant and SBA incurred minimal costs.

SBA's experience is consistent with the majority of survey participants with respect to the modified requirements for ARFF and fencing. Only 29 percent of responding airports reported expenditures to comply with ARFF requirements; thirty one percent reported modifications to perimeter fencing. Although 58 percent of responding airports reported revisions to their snow and ice control plans, SBA does not have a snow and ice control plan due to its location and climatic conditions.

In 2006 and 2009, the FAA issued updates to AC 150/5210-17, *Programs for Training of Aircraft Rescue and Firefighting Personnel*. SBA was one of only 13 percent of responding airports that were not required to modify their training procedures in response to the new requirements.

Part 139 also requires certificated airports to maintain Airport Emergency Plans (AEPs). In 2010, FAA issued Change 1 to AC 150/5200-31C, *Airport Emergency Plan*. SBA staff modified its AEP in the normal course of other required duties. As a result, SBA management was unable to estimate the cost of the modifications.

An average cost of $4,490 for initial AEP modification was reported in the survey. The average recurring cost for annual updates reported in the survey is $867.

DBE Requirements – In 2000 and 2003, the Department of Transportation amended 49 CFR Part 26, which governs participation by Disadvantaged Business Enterprises (DBEs) in DOT funded projects. In 2005, the Department of Transportation amended 49 CFR Part 23, which governs participation by DBEs in airport concessions. SBA reported being affected by the amendments to both regulations. However, because the DBE programs are administered by airport staff, costs to implement the amendments were not quantified. The average initial and recurring cost of the amendments to the regulation governing DBE participation in DOT funded contracts reported in the survey was $11,000. The average initial cost for compliance with the changes to concession DBE regulation reported in the survey was $7,620, and the average recurring cost was $2,900.

Airfield Layout, Design and Standards – During the study period, FAA issued approximately 43 regulatory or compliance documents relating to airfield layout, design, equipment, facilities and operations. For small airports, potentially costly requirements included new requirements for runway protection zones (RPZ), runway safety areas (RSA) and signage and markings. SBA completed a substantial project to bring two of its RSAs into compliance with FAA standards. The project included acquisition of development rights and easements, relocation of two creeks, airfield access roads, utilities and navigational aids and major earthwork. The cost of the project was $34 million. The FAA provided $32.3 million in AIP funds, and SBA financed the remaining balance ($1.7 million). The federal share provided by the FAA (95 percent) was equal to the standard statutory share.

SBA's costs are the highest reported by any survey respondent and are more than nine times the average cost of $3.7 million reported in the survey.

SBA has multiple fencing types surrounding the Airport. Neither FAA nor TSA has directed the Airport to accomplish fencing upgrades as stand-alone projects. Instead, the Airport has a continuing program to upgrade its perimeter fencing, in connection with other development projects. SBA has not tracked the cost of the fencing elements separately. SBA also assigns to airport tenants the responsibility for fencing upgrades as part of any significant development on their leased property.

SBA did not modify its airfield signs to meet the new requirements and is in the minority of airports responding to the survey reporting signage modifications. Seventy-nine percent of responding airports undertook airfield signage projects to comply with the new FAA requirements.

PFC Requirements – During the study period, FAA adopted two requirements for additional documentation in support of PFC applications (PFC Update 50-06 and PFC Update 59-09). SBA reported the new requirements did not add to the costs of preparing its PFC applications. An average cost of $17,167 was reported in the survey for compliance with PFC Update 50-06, and an average cost of $6,333 was reported for compliance with PFC Update 59-09.

Consulting and Engineering Services – In 2005, the FAA issued AC 150/5100-14D, *Architectural, Engineering and Planning Consultant Services for Airport Grant Projects*, establishing new requirements for consultant selection on AIP-funded projects. SBA reported the new requirements had an impact as SBA retained a consultant to provide a cost benefit analysis for a proposed planning grant that cost $8,100. The average cost impact reported in the survey for this AC is $157,500.

Environmental Requirements

SBA reported expenditures to comply with environmental impacts in the following key areas:

- Air Quality – Air emissions inventory
- Planning and Development – Environmental assessment and environmental impact statements; and wildlife management
- Sensitive Areas

Air Emissions Inventory – Although there were no regulatory changes during the study period that required SBA to perform an air emissions analysis, a greenhouse gas inventory and evaluation was conducted as part of the new terminal project at the request of Santa Barbara's city council. Particularly, council was concerned of the potential increase in carbon emissions from construction of the new terminal and associated operations of the airport. The inventory evaluated the entire airport, including airport operations and concluded that overall carbon emissions from the airport did not significantly change as a result of the project. The inventory and evaluation was conducted by a consultant at an estimated cost of less than $25,000.

Planning and Development – SBA incurred costs for both an environmental assessment (EA) and an environmental impact statement (EIS) under the National Environmental Policy Act (NEPA) during the study period. As part of these projects, SBA was also required to prepare negative declarations (NDs) and environmental impact reports (EIRs) under the California Environmental Quality Act (CEQA). Typically, documentation for EAs or EISs is prepared at the same time as documentation for EIRs. The requirements for EIRs are reported by SBA to be generally more stringent and costly than the requirements for NEPA documents.

SBA spent about $1,000,000 for a joint EIR/EIS to support the Aviation Facilities Plan, which included construction of a new airline terminal, runway relocation, creek relocation, taxiway extensions, and other airfield improvements and environmental mitigation. SBA paid for its portion of the EIS cost primarily with Passenger Facility Charge (PFC) funds. SBA also spent $9 million for extensive environmental mitigation that included clearing out invasive species, planting native plants, designing tidal circulation into wetland areas, and resorting upland habitats. This figure was included as part of the overall cost of $34 million reported for SBA's RSA improvements. Consequently, SBA received federal funding for 95 percent of the cost associated with its initial wetland/stream mitigation activities.

The Airport's cost for the EIR/EIS preparation is more than 23 times higher than the average cost of $42,500 for an EIS reported in the survey. SBA reported consultation with FAA and regulatory agencies specifically related to wetland/stream impacts contributed to the greatest portion of costs for NEPA analyses. For example, SBA was required to perform field studies to determine how potential changes in tidal circulation would impact wildlife hazardous to aviation. SBA identified this particular study took three years to complete. SBA's mitigation costs are the highest reported in the survey and 1,800 times higher than the average reported cost of $5,000.

SBA incurs substantial costs for continuing mitigation in the form of construction and maintaining replacement wetlands. The maintenance obligation generally lasts for seven years after creation of the replacement wetland. SBA's current maintenance efforts cost $325,000 per year. The maintenance obligation will expire in 2014. SBA management considers the wetland mitigation to be its most expensive environmental compliance requirement. SBA may be atypical in this case because of the large acreage of wetlands within the boundaries and vicinity of the airport.

In order to obtain approvals to construct or conduct work in wetland or tidal areas, SBA had to obtain Clean Water Act Section 404 permits from the Army Corps of Engineers, Section 401 Water Quality Certifications from the California Regional Water Quality Control Board, and approvals from the California Coastal Commission in compliance with the Federal Coastal Zone Management Act. One of the requirements for California Coastal Commission was issuance of a Lake or Streambed Alteration Agreement from the California Department of Fish and Game which requires special-studies and application fees totaling up to $150,000.

FAA AC 150/5200-36, *Qualifications for Wildlife Biologist Conducting Wildlife Hazard Assessments and Training Curriculums for Airport Personnel Involved in Controlling Wildlife Hazards on Airports* (June 28, 2006) describes the qualifications for wildlife biologists who conduct Wildlife Hazard Assessment (WHAs) for Part 139-certified airports. The AC also establishes the minimum wildlife hazard management training curriculum for airport personnel involved in implementing an FAA-approved Wildlife Hazard Management Plan (WHMP). SBA has a wildlife hazard management plan that was updated during the study period; therefore, SBA is required to provide annual staff training on wildlife hazard mitigation.

The change in curriculum requirements resulted in a change to the general wildlife training received by SBA staff. In particular, SBA now relies on a training course taught by a state-certified biologist in Orange County. SBA sends four to five employees to training each year. In addition to employee time, SBA incurs out of pocket costs for transportation and course fees.

Sensitive Areas – SBA has a comprehensive integrated pest management plan covering animals and plants to ensure non-toxic pesticides and herbicides are applied in areas accessible to the public. The plan was developed as a local initiative, not to comply with any federal requirements. Because the plan limits the use of certain herbicides and pesticides and extensive acreage outside of secured airport areas, the airport requires thousands of hours of manual labor to removing weeds and invasive plant species.

Security Requirements

The case study focused on four areas:

- Cost of security equipment and facilities
- TSA reimbursement for facilities, equipment or space
- Additional employee or other operating costs
- Passenger and baggage screening requirements

Security Equipment and Facilities – To comply with TSA requirements, SBA installed a closed circuit television (CCTV) system as part of the project to construct a new passenger terminal. The cost of the CCTV system was approximately $300,000.

SBA's cost is 28 percent higher than the average cost of $234,617 reported in the survey.

TSA Reimbursement for Facilities, Equipment or Space – The TSA reimburses SBA utilities and custodial services for the passenger screening checkpoint. TSA uses metrics based on design standards for electricity draw of the screening machines and standardized rates. TSA's payment includes some compensation for TSA employee parking.

SBA estimates that it loses $350,000 per year on the space it provides to TSA without charge.

Additional Employees or Operating Costs – SBA added seven full time staff at a combined cost of $1 million per year to handle increased security patrol and operational requirements. The part-time hourly employees also perform security functions. For example, the AOA access badging workload has tripled as a result of new security requirements. The Airport does collect a badging fee and charges for background checks.

Passenger and Baggage Screening Requirements – SBA recently completed construction of a new passenger terminal. SBA estimates that the baggage screening facilities in the new terminal cost $1.98 million, and the passenger screening checkpoints $1.99 million, The FAA provided AIP funds for construction of the baggage screening facilities, with local matching share funded by PFCs. TSA did not provide funding for either the passenger or baggage screening facilities.

SBA's baggage screening facility costs were more than two times higher than the average costs of $768,055 reported in the survey. The Airport's passenger screening checkpoint costs were more than 4 times higher than the average costs of $460,649 reported in the survey.

SBA does not have customs and immigration facilities.

Occupational Safety and Health Requirements

SBA is subject to regulation by the California Occupational Safety and Health Administration. (CALOSHA). CALOSHA's requirements are more stringent than federal OSHA requirements. Contractors operating in California, including those doing work at the Airport, are also regulated by CALOSHA.

SBA contractors do not separate the costs of CALOSHA compliance from other costs in bids or billing.

SBA staff spends approximately 195 hours each year in occupational safety and health training, with a time value of $5,200. SBA's occupational safety and health training costs are 57 percent of the average cost of $9,138 reported in the survey.

Findings and Key Considerations

As a small hub airport, SBA has a larger staff than the non-hub airports included in the case studies. However, SBA's status as a small hub also brings additional levels of activity and additional complexity compared to non-hub airports. Therefore federal compliance can put a strain on airport staff resources just as it does for non-hub airports. SBA needed to add seven full time staff and 15-20 hourly employees (part-time) just comply with new security requirements, for example.

The Airport's largest single reported expense was for RSA compliance. The project cost of $34 million is the largest reported cost impact in the survey. SBA management also considers wetland mitigation to be its most expensive environmental requirement as part of RSA improvements. Wetland mitigation for the Project cost approximately $9 million of the total project cost. Ongoing responsibilities and costs are also associated with maintaining the mitigation site, including periodic site work, preparing annual reports, and consulting with regulatory agencies.

This case study also identified that in some cases local or state requirements are more stringent and costly compared to federal requirements, or required in addition to federal requirements. For example, SBA was required to coordinate NEPA documentation for airport actions but was also required to meet the requirements of CEQA. Any additional analysis required to comply with CEQA must be funded entirely by the Airport. Also, local initiatives such as greenhouse gas evaluations and implementation of pesticide management practices are required to be performed at the airport's expense.

Table C-20 summarizes the regulatory compliance costs reported by SBA. As noted previously, many requirements included in the survey were satisfied using Airport staff during normal business hours, and therefore, SBA was unable to estimate the value of staff time spent on compliance. Nevertheless, the time spent by individual staff members on regulatory compliance is time these individuals cannot devote to other operational or administrative duties. As a result, the time spent on meeting regulatory compliance needs represents an overall "opportunity cost" to the airport. In addition, reported costs for environmental and OSHA requirements in some cases represent total costs incurred by the Airport, not the incremental costs of new requirements adopted during the study period.

Table C-20. Summary of Regulatory Cost Impacts to SBA

	Initial Costs	Recurring Costs
FAA/DOT Requirements*	$34,001,000	$0
Environmental Requirements*	$10,660,800	$325,000
Security Requirements	$3,978,000	$1,000,000
OSHA Requirements		$5,200
Total Costs	$39,539,800	$1,330,200
Federal Funds Received	$35,153,800	$0
State Funds Received	$0	$0

* Total Initial Cost of FAA DOT Requirements Includes $9 million environmental costs for wetland mitigation

Compared with the average costs of compliance requirements reported in the survey, it appears that SBA is less impacted than other small airports. SBA reported below average costs for eight requirements and two requirements with above average costs. However, for many of the items that were below average, SBA reported no costs because compliance was accomplished using airport staff. In fact, SBA incurred the highest cost reported for RSA compliance projects and also reported substantial initial and recurring expenses for wetland mitigation.

APPENDIX C-5

Regulatory Compliance Costs and the Impact on Huntsville International Airport – A Case Study

Introduction

This case study is intended to provide more detailed data and analysis of the impact of Federal regulatory requirements on Huntsville International Airport – Carl T. Jones Field (HSV). A description of the Airport and its operations is provided followed by a general discussion of the regulatory impacts faced by HSV. An analysis of HSV's experience with compliance in each of the four regulatory areas addressed in the study then follows. As part of the analysis, HSV's expenditures are compared to the results of the industry surveys, using the interquartile mean as a measure of the industry average. The final section of the case study presents summary findings and considerations.

Airport Characteristics

HSV is a small hub primary airport located in Huntsville, AL. The Airport is owned and operated by the Huntsville-Madison County Airport Authority.

Table C-21 provides data on operations and traffic at HSV. At its current level of enplanements, HSV qualifies for $3.5 million in annual passenger apportionment funds for FY 2012 under the Airport Improvement Program (AIP). Additional AIP funding received by the Airport is discretionary.

Table C-21. HSV Operations and Activity

Passenger Enplanements	606,127
Commercial Aircraft Operations	32,716
General Aviation Operations	23,153
Scheduled Air Service	9 daily RT to ATL 3 RT – Delta Connection (CRJ) 6 RT – Delta (DC-9, MD-80) 1 daily RT to DTW Delta Connection (CRJ) 4 daily RT to CLT US Airways Express (CRJ) 4 daily RT to DCA US Airways Express (CRJ) 3 daily RT to ORD 2 RT – American Eagle (ERJ) 1 RT – United Express (ERJ) 3 daily RT to DFW 1 RT – American Eagle (ERJ) 2 RT American (MD-80) 2 daily RT to DEN United Express (ERJ) 3 daily RT to IAH United Express (ERJ) 2 daily RT to IAD United Express (ERJ)

SOURCE: FAA data, airport staff, and air carrier schedule information

HSV has two parallel runways (18L/36R and 18R/36L). **Table C-22** provides data on airfield and terminal facilities at HSV.

Table C-22. HSV Airfield and Terminal Facilities

Runway 18L/36R	10,006 ft. x 150 ft. grooved asphalt
Runway 15R/33L	12,600 ft. x 150 ft. grooved asphalt
Taxiways	Full length parallel to each runway Multiple connector taxiways
Aprons	Air Carrier 1550 ft. x 900 ft. Air Cargo 2900 ft. x 550 ft. General Aviation 1300 ft. x 650 ft.
Acreage	7,178 acres
Perimeter fencing, gates	14 miles of 6 ft. chain link fence 32 access gates, 10 proximity card swipe
Terminal: ticket counters	6 terminal ticket counters, 32 ticketing positions
Gates and hold rooms	14 gates, 10 passenger hold areas, 12 loading bridges
Public space	***Pre-screening:*** Queuing for Screening: 1,758 sq. ft. Security Screening: 4,287 sq. ft. Public Waiting: 7,234 sq. ft. Baggage Claim: 39,148 sq. ft. Terminal Lobby: 9,750 sq. ft. Retail: 1,572 sq. ft. ***Post-screening:*** Screening: 1,175 sq. ft. Hold Rooms: 26,000 sq. ft. Retail: 1,150 sq. ft.
Checked baggage	Three baggage carousels
Security Screening	Passenger screening – 3 lanes (footprint for 4) Checked baggage – 3 EDS; 8 ETDs

SOURCE: Airport staff

HSV has a single full service fixed-base operator (FBO) and a range of services/amenities. Information regarding services and amenities available to aircraft operators and passengers is provided in **Table C-23**

Table C-23. HSV Services and Amenities for Aircraft Operators and Passengers

Full Service FBOs	Signature Flight Support
Specialized Aviation Service Operations (SASO)	Fitzgerald Flight Academy (Flight Instruction), C-Cubed Avionics, Skyline Aviation (Aircraft Maintenance), Signature Flight Support (Aircraft Charters)
Aviation fuel	Jet A Fuel and 100 LL avgas provided by Signature All fuel is dispensed by mobile fuel trucks Fuel is stored in tanks owned by Airport Authority Any other fuel providers: None
Terminal Retail Concessions	Pre-Security: one news and gift; one restaurant; hotel Post-Security: one news and gift; food court with three vendors
Terminal Operating Hours	24 hours
Car Rental	5 on airport 1off airport

Source: Airport staff

Table **C-24** summarizes the organization and staffing of the Airport. HSV has a full time staff of 104, with no part-time hourly staff.

Table C-24. HSV Departments and Staffing Levels

Department	Staff Positions
Administration	15
Facilities	22
Operations	29
Capital Improvements	4
Public Safety	20
Marketing	3
JetPlex Industrial Park	1
International Intermodal Center	10

Source: Airport Staff

General Observations

HSV benefits from leasing commercial-industrial property and operating a multimodal freight transportation facility, which account for 18.7 percent of its operating revenue. This revenue helps HSV cover the costs of compliance with regulatory requirements. HSV is similar to the other small-hub airport included in the case studies – Santa Barbara Municipal Airport (SBA) in this respect.

HSV has spent substantial sums on security requirements. HSV had to redesign and rebuild a portion of the terminal to accommodate meeters and greeters after security rules were changed to limit access to the gates by ticketed passengers. The total cost of the project was $23 million, due to the extensive work required. HSV's public safety budget has also increased substantially, as discussed below – from $1,416,167 per year before 9/11 to $2,301,420 currently. HSV added 3 Public Safety Officers to deal with federal security requirements. In addition to operational costs of new security requirement, TSA is increasing the number of inspections, reviews and audits, which in turn requires HSV staff to spend more time on administrative matters related to security.

FAA/DOT Requirements

Vehicle Operations on the Airfield – In 2002, the FAA issued AC 150/5210-20, *Ground Vehicle Operations on Airports*. In 2008, the FAA issued Change 1 to the AC. The AC addresses, among other things, vehicle access control, vehicle inspection and driver training.

HSV reports initial expenses of $40,000 to comply with vehicle access requirements, and average recurring costs of $20,000. Ninety-five percent of HSV's initial costs were funded with an AIP grant, and HSV funded the balance with PFCs. HSV's recurring costs include staffing, software subscriptions and upgrades.

HSV's initial costs are 80 percent higher than the average cost of $22,227 reported in the survey. HSV's recurring costs are 79 percent higher than the average cost of $11,144 reported in the survey.

HSV reported one-time (initial) costs of $57,000 to comply with new requirements for vehicle inspection. HSV reported recurring costs associated with vehicle inspection compliance to average $3,000 annually. HSV's initial costs are over 12 times higher than the survey sample average cost of $4,517. Its recurring costs are 19 percent of the survey sample average of $16,200

HSV reported initial costs of $40,000 to modify its driver training curriculum to meet new FAA requirements. FAA provided $36,000 (90 percent) toward the cost of this project in an AIP grant. HSV funded the balance with PFCs. HSV's costs were more than six times higher than the average cost of $6,459 reported in the survey.

Part 139 Requirements – In 2004, the FAA amended 14 CFR Part 139 governing Airport Operating Certificates. The primary purpose of the amendment was to require airports with scheduled service from aircraft with 10-30 seats to obtain a certificate. However, the amendment included modification to the certificate classification system and new requirements for existing certificate holders.

HSV held a Part 139 certificate in 2004. HSV incurred limited expenses in complying with the Part 139 amendments. No revisions to ARFF policy, procedures, equipment or facilities were required. No modifications to HSV's perimeter fencing or its snow and ice control plan were undertaken. The revisions to the HSV's Airport Certification Manual cost approximately $5,000. For HSV, the most costly requirement was the change in the pavement deicing agent adopted by the FAA. HSV currently spends $30,000 on average per year on pavement deicing compounds. Before the change, it spent on average $20,000 per year.

HSV's experience is consistent with the majority of survey participants with respect to the modified requirements for ARFF and fencing. Only 29 percent of responding airports reported expenditures to comply with ARFF requirements; thirty one percent reported modifications to perimeter fencing. HSV's cost to modify its certification manual was almost two times higher than the average cost of $2,602 reported in the survey. Because HSV included the cost of deicing materials in its estimate of incremental recurring cost of complying with the new requirements for snow and ice control plans, its results are not comparable with the survey results.

In 2006 and 2009, the FAA issued updates to AC 150/5210-17, *Programs for Training of Aircraft Rescue and Firefighting Personnel*. HSV reported initial costs of $12,000 to comply with the new training requirements. HSV also reported that the time required for training doubled from two days to four days. HSV's initial costs are 3 ½ times higher than the average cost of $3,383 reported in the survey.

Part 139 also requires certificated airports to maintain Airport Emergency Plans (AEPs). In 2010, FAA issued Change 1 to AC 150/5200-31C, *Airport Emergency Plan*. HSV modified its AEP at an initial cost of $6,000. HSV reported recurring costs associated with updates to the AEP to average $1,000 annually.

HSV's costs for the initial AEP modification are 34 percent higher than the survey sample average cost of $4,490. Its recurring costs are 15 percent higher than the survey sample average of $867.

DBE Requirements – In 2000 and 2003, the Department of Transportation amended 49 CFR Part 26, which governs participation by Disadvantaged Business Enterprises (DBEs) in DOT funded projects (DBE project participation). In 2005, the Department of Transportation amended 49 CFR Part 23, which governs participation by DBEs in airport concessions. HSV reported initial costs of $26,367 and recurring costs of $7,210 for compliance with DOT's new airport concession DBE requirements. Initial and recurring costs for compliance with the new DBE project participation requirements were $19,183 and $16,305 respectively.

HSV's initial and recurring costs were almost three times higher and more than double, respectively, than the survey sample average costs of $7,620 and $2,900 for compliance with the new concession DBE requirements. The Airport's costs for complying with the new DBE project participation requirements were almost two times higher, and almost 1 ½ times higher, respectively, than the survey sample averages of $11,000 for both initial and recurring costs of compliance. HSV's costs were the highest reported for recurring costs of compliance with the changes to both rules. Its initial cost of compliance with the new DBE project participation requirements was also the highest reported. Further HSV reported only internal costs, not costs for outside attorneys or consultants. Whether other airports included costs of outside attorneys or consultants is unknown. If they did, and HSV's outside costs were added, the disparity would be even more.

Airfield Layout, Design and Standards – During the study period, FAA issued approximately 43 regulatory or compliance documents relating to airfield layout, design, equipment, facilities and operations. For small airports, potentially costly requirements included new requirements for runway protection zones (RPZ), runway safety areas (RSA) and signage and markings. HSV did not modify either RPZs or RSAs. In the case of RPZs, HSV is in the majority, with only 13 percent of responding airports reporting RPZ modifications to comply with the new FAA standards. In the case of RSA's HSV is in the minority. 61 percent of responding airports reported executing RSA projects to meet the new standards.

HSV did revise its airfield signage and markings, however. The initial cost of the project was $347,102. HSV received an AIP grant for 95 percent of the project cost ($329,747). It financed the balance with PFCs.

HSV's cost is more than three times higher than the average cost of $90,003 reported in the survey.

PFC Requirements – During the study period, FAA adopted two requirements for additional documentation in support of PFC applications (PFC Update 50-06 and PFC Update 59-09). HSV did not report incurring any costs to comply with the new requirements. HSV is in the majority of airports for both requirements. Only 27% of airports reported incurring costs to comply with PFC Update 50-06. Thirty-four percent reported incurring costs to comply with PFC Update 59-09.

Consulting and Engineering Services – In 2005, the FAA issued AC 150/5100-14D, *Architectural, Engineering and Planning Consultant Services for Airport Grant Projects*, establishing new requirements for consultant selection on AIP-funded projects. Since 2005 HSV has completed seven consultant selections resulting in an additional estimated cost of $105,000 or $15,000 per selection. HSV's costs are approximately 10 percent of the average cost of $157,500 reported in the survey.

Environmental Requirements

HSV reported the following expenditures to comply with environmentally-related compliance criteria:

- Planning and development – Environmental Assessment; Environmental Site Assessments

- Water Resources – Spill Prevention Control and Countermeasure Plan (includes above-ground storage tanks, refuelers,)

During the study period, impacts were minimal in the following key areas:

- Waste Management
- Water resource management – Pesticide and herbicide application

Planning and Development, Environmental Assessment – HSV conducted an environmental assessment (EA) under the National Environmental Policy Act (NEPA) in support of a runway extension during the study period.

HSV spent approximately $61,211.00 for the EA. The review included an archeological and cultural assessment of an old barn on the affected property and a threatened and endangered species review of a rare wild potato plant. Neither study produced results requiring mitigation or preventing the project. The threatened and endangered species study added six months to the preparation and processing time of the EA. In contrast, HSV undertook wetland mitigation required through the NEPA process. The cost to HSV was $180,000. The costs of the EA and mitigation were financed with a combination of AIP discretionary funds, PFCs and state funds.

HSV's cost of the EA is close to the survey sample average cost of $59,602. HSV's mitigation costs are almost twice the survey sample average of $92,500.

Planning and Development, Environmental Site Assessments – HSV conducted multiple environmental site assessments (ESAs) for land acquired during the study period. The average cost of the ESAs was $11,500. HSV is spending $20,000 for an ongoing cleanup from an underground storage tank leak on one of the parcels.

HSV's cost per ESA is 69 percent of the survey sample average cost of $16,750. The mitigation cost of $20,000 is equal to the survey sample average.

Water Resource Management, Spill Prevention, Control and Countermeasure Plan – HSV maintains a spill prevention, control and countermeasure plan (SPCC Plan). HSV was required to update the plan twice in the last four years – once to include a new emergency generator in the plan and once to update emergency contact information. The required SPCC annual training includes approximately 75 employees. HSV estimates it expends $9,000 in labor costs to fulfill the annual training requirements. HSV's training costs are the highest reported in the survey, and they are 4.7 times higher than the survey sample average of $1,902.

Water Resource Management, Above-Ground Storage Tanks, Mobile Refuelers – The Airport owns the aircraft fuel tanks at HSV. Airport management stated this arrangement simplified compliance issues and eliminated compliance issues related to spills. HSV also required tenants to give up use of skid tanks to reduce risk and costs of spills. Although this policy is relatively novel, HSV's proactive approach is an option for small airports to consider to minimize potential compliance costs related to tenant spills.

HSV staff spends approximately five hours per month on inspection of tanks and pumps, at an annual cost of $12,000

HSV was required to construct spill containment for its mobile refueler parking area. The construction costs were $209,485.00.

The survey did not include specific questions about the costs of mandatory inspections. HSV's cost for the mobile refueler spill containment is more than four times higher than the survey sample average cost of $50,000.

Other Agency Permits – wildlife management – HSV spent $95,000 for a wildlife hazard assessment. It does not have an approved wildlife hazard management plan and spends $1,000 per year in recurring costs on wildlife hazard management. The survey did not include specific questions on the cost of FAA requirements for wildlife hazard plans and assessments.

Security Requirements

The case study focused on four areas:

- Cost of security equipment and facilities
- TSA reimbursement for facilities, equipment or space
- Additional employee or other operating costs
- Passenger and baggage screening requirements

Security Equipment and Facilities – HSV installed a physical access control system at a cost of $4.3 million. Recurring costs for operating the system are $250,000. HSV received an AIP grant for the initial installation in the amount of $4,085,000 (95 percent). The Airport used PFCs to pay for its local five percent share ($215,000).

HSV's initial costs were the highest reported in the survey and are almost eight times higher than the average cost of $538,137 reported in the survey.

TSA Reimbursement for Facilities, Equipment or Space – TSA pays for office space and break rooms at HSV. TSA employees pay directly for automobile parking. HSV receives no reimbursement for screening space.

HSV estimates it loses $325,946 annually on the space it provides to TSA without charge.

Additional Employees or Operating Costs – HSV's public safety budget increased from $1,416,167 prior to 9/11 to $2,301,420 today. HSV attributes most of the cost increase to compliance with TSA requirements. TSA has provided compensation under the law enforcement officer (LEO) Support Program, but it has advised HSV that payments will not increase. HSV noted it went for six months without receiving LEO Support Program payments.

HSV employees also spend a substantial amount of time supporting TSA investigations, evaluations and audits. The frequency and intensity of these reviews is increasing. HSV employees are involved in the examination phase of these reviews and must also devote time to responding to the findings and conclusions in the reports generated by the reviews. HSV management considers the support for TSA reviews to be the most significant recurring security compliance cost incurred by the Airport.

Passenger and Baggage Screening Requirements – As a result in the change in rules that limits access to the gate concourse of the passenger terminal to ticketed passengers, HSV spent $23 million to reconfigure the passenger screening check-point. The cost was so high because HSV had to add public waiting space for meeters and greeters. Before the rule change, meeters and greeters could proceed through the passenger checkpoint by showing proper identification and submitting to the screening protocol. There

was ample space for meeters and greeters in the gate area. Once meeters and greeters were prohibited from passing through the screening check-point, there was not adequate waiting space for meeters and greeters prior to entering the checkpoint. The project also added space for two additional screening lanes; this resulted in three operational screening lanes and space for a fourth. The project was funded by FAA Entitlement ($16,596,499), PFC ($1,096,850) and HMCAA ($5,433,401) for a total of $23,126,750.

HSV's costs were the highest reported in the survey and were 36 times higher than the average reported cost of $637,377

HSV is currently negotiating with TSA on the installation of an automated in-line checked baggage screening system. HSV estimates the cost of the project would be $14 million. To date HSV and TSA have been unable to agree on how initial installation costs and operating and maintenance costs will be allocated between the Airport and TSA

HSV does not have customs and immigration facilities in the terminal.

Occupational Safety and Health Requirements

HSV has a voluntary occupational safety and health program. HSV did not report adding staff dedicated to occupational safety and health compliance. HSV's response is consistent with a substantial majority of the Phase 1 survey responses. Only nine percent of airports reported adding dedicated staff.

HSV contractors do not separate the costs of occupational safety and health compliance from other costs in their bids or in their billing.

Other Compliance Requirements

In discussing the overall cost of federal requirements to small airports, HSV noted that changes in policies can lead to substantial costs for small airport. HSV offered as an example a recent audit of HSVs affirmative action programs and compliance with the Fair Labor Standards Act conducted by the U.S. Department of Labor (DOL). In response to the audit findings, HSV had to prepare a new affirmative action plan and to reclassify some employee positions from salaried to hourly positions eligible for overtime. HSV's affirmative action program and its position classifications were based on recommendations of expert consultants and had been in place for many years without objection from the DOL.

Findings and Key Considerations

As a small hub airport, HSV has a larger staff than the non-hub airports included in the case studies. Its staff is also larger than Santa Barbara International Airport, the other small hub case study airport. However, HSV's status also brings additional levels of activity and additional complexity. Therefore federal compliance can put a strain on airport staff resources just as it does for non-hub airports.

HSV has been constrained in adding staff to meet federal requirements. The one exception is in the Department of Public Safety, where budgets grew by 62.5 percent to comply with new operational security requirements introduced after 9/11. HSV has not been able to add staff to handle the additional administrative work-load associated with TSA requirements and operations at the Airport.

HSV benefits from owning a successful industrial park and successful multimodal cargo transportation center, like the other small hub airport (Santa Barbara Municipal) included in the case

studies. However, most small airports do not have a comparable revenue stream independent of airport operations.

HSV management considers compliance with security requirements to be its most costly continuing (recurring) requirement. Security facilities and equipment also represented HSV's most costly capital development requirements.

Table C-**25** summarizes the regulatory compliance costs reported by HSV. As noted previously, many requirements included in the survey were satisfied using Airport staff during normal business hours. For many requirements, HSV was able to estimate the amount of staff time spent and assign a cost to the time. Even in cases where HSV could not develop an estimate, the time spent by individual staff members on regulatory compliance is time that these individuals cannot devote to other operational or administrative duties. The time spent on compliance matters thus represents an opportunity cost to the airport.

Table C-25. Summary of Regulatory Cost Impacts to HSV

	Initial Costs	Recurring Costs
FAA/DOT Requirements	$571,358	$164,514
Environmental Requirements	$484,265	$21,000
Security Requirements	$27,300,000	$885,253
OSHA Requirements		
Total Costs	$28,355,623	$1,070,767
Federal Funds Received[1]	$21,314,036	$0
State Funds Received[1]	$12,060	$0

[1] Federal and state funds received for environmental projects estimated by Unison

Compared with the average costs of compliance requirements reported in the survey, it appears that HSV is more impacted by federal requirements than other small airports. Eleven out of 17 of HSV's costs that could be compared are above the survey sample average costs. For two security items, HSV reported the highest costs in the survey. HSV also had the highest DBE compliance costs.