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THE *Voice*

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NAAA ASKS EPA TO MORE ACCURATELY MODEL TODAY'S MODERN AERIAL APPLICATIONS IN AERIAL PESTICIDE APPLICATION RISK ASSESSMENTS



On Monday NAAA submitted a letter to the EPA's Office of Pesticide Programs requesting the agency reevaluate how they conduct modeling to calculate drift estimates for aerial applications of pesticides when they conduct risk assessments as part of the pesticide registration and re-registration process.

All current risk assessments are conducted by the EPA using the Tier 1 model in AgDRIFT. This model uses many inaccurate assumptions about how modern aerial applications are conducted that results in significant overestimates of drift. These include variables such as the application uses a radial powered aircraft, a smaller than commonly used droplet size, a swath displacement shorter than industry standards, a slight inversion during the application, wind speed measured at a height appropriate for ground applications instead of aerial applications, an application to bare ground instead of a standing crop, and the assumption that a second application would occur with a wind speed and direction identical to the first application.

NAAA has established a good working relationship with EPA and has commented on numerous risk assessments and proposed interim decisions. It has also met with key professional staff of EPA-OPP over the past number of years on this very topic which EPA been open to hearing. Many of NAAA's comments have focused on the inaccuracies of the Tier 1 AgDRIFT model which results in an over estimation of drift from aerial applications. These over estimations can then result in risk assessments that find potential hazardous risks to the environment, and human health which in turn can lead to stricter label requirements in order to mitigate the risks. NAAA feels the Tier 3 AgDRIFT model with more realistic assumptions should be used to estimate more realistic estimates of drift and thus more realistic risk assessments.

NAAA suggested the EPA use the more detailed Tier 3 model in AgDRIFT because it allows for many of the variables from the Tier 1 model to be changed to improve the model's accuracy at estimating drift from aerial applications. NAAA recommended specific assumptions and settings to be used in the Tier 3 model. To start, NAAA suggested a turbine powered aircraft be used instead of one with a radial engine. NAAA suggested the wind speed be increased from 10 to 15 mph to reflect real world spraying conditions and the fact that many labels currently allow spraying in wind speeds up 15 mph.

NAAA suggested boom length be set at 75% of the wingspan and boom drop set at 1.3 feet lower than the current Tier 1 level to reflect the boom positioning commonly seen on agricultural aircraft today. Instead of a fine droplet size, NAAA suggested using a medium droplet size which is easily created by many of the commonly used nozzles on agricultural aircraft today. A swath displacement of half a swath displacement was suggested instead of only a 1/3 of a swath displacement on the downwind field edge. Settings for the atmospheric stability component of the model were recommended to accurately model applications not occurring during an inversion, as all labels already prohibit applications when an inversion is present. NAAA recommended a more appropriate height for measuring wind speed and direction such as at the location of where a a smoker or Aircraft Integrated Meteorological Measurement System (AIMMS) would measure the conditions and to run the Tier 3 model assuming the presence of a crop instead of bare ground. Bare ground aerial applications are not nearly as common as aerial applications to a standing crop and the bare ground setting in AgDRIFT results in a much higher drift estimate.

THE NATA VOICE

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EPA PROVIDES GUIDANCE ON RESPIRATOR SHORTAGES DURING COVID-19 SHORTAGE

Last week the EPA issued temporary guidance on how pesticide handlers should deal with the current shortage of respirators. This shortage is the result of the increased demand for respirators from health care workers caused by the COVID-19 pandemic. In addition to a shortage of respirators, fit testing services have also been affected by stay-at-home orders. The full guidance memorandum can be viewed [here](#). It outlines four options for compliance that the EPA has deemed satisfactory for the duration of the pandemic.

The options for FIFRA compliance are the following:

- Use a NIOSH approved respirator that meets or exceeds the level of protection of the respirator required by the pesticide label.
- Use an alternative pesticide that fits the intended use but does not require a respirator.
- Hire a commercial applicator that has the required respirators for the product to be applied and has fit testing capability.
- If possible, delay the use of using the pesticide until additional compliance options become available.

If all of these compliance options are exhausted, the EPA provided these options:

- Extend the use or reuse disposable N95 filter facepiece respirators.
- Use filter facepiece respirators that are beyond their recommended service life.
- Use filter facepiece respirators that have been certified in other countries or jurisdictions.

In terms of completion of respirator fit testing, the EPA provided the option of delaying the fit test. Following these options will allow pesticide handlers to conduct their work in the safest manner possible if COVID-19 respirator related shortages affect their ability to find respirators.



Save *the* Date

December 7-10, 2020

Savannah, Ga.



Join us for the 2020 Ag Aviation Expo in Savannah, GA, Dec. 7-10, featuring the premiere trade show for agricultural aviation, great networking opportunities and a great lineup of speakers and events! It doesn't matter if you're a veteran operator, a fledging ag pilot, or an allied supplier to the ag aviation industry, you won't find a better venue than NAAA's Ag Aviation Expo to help you achieve your professional goals and business objectives.

Highlights include:

- Kickoff Breakfast Monday morning and NAAA General Session on Tuesday morning
- Educational & Training Sessions, including the NAAREF Safety Session on Thursday afternoon
- The popular NAAA Trade Show featuring 150+ companies
- Live & Silent Auction
- Networking - plenty of receptions, time between sessions and evenings to network
- Support Committee Programming for spouses and support staff
- Sessions for new or low time ag pilots: Compass Rose & "Ask The Expert" Speed Mentoring Sessions throughout the Ag Aviation Expo

NEBRASKA HAS DEEP LINDBERGH ROOTS

By Penny Rafferty Hamilton, Ph.D.

The May 20-21 anniversary of the historic Charles Lindbergh solo, transatlantic Spirit of St. Louis flight serves as a reminder of Nebraska's role. On April 1, 1922, 20-year-old Charles Lindbergh rolled into Lincoln on his motorcycle. Having just dropped out of the University of Wisconsin, he wanted to learn how to fly at the Ray and Ethel Page Flying School.



His life-changing flight with Otto Timm, Chief Engineer of Lincoln Standard Aircraft Company, in their "Tourabout" biplane began Lindbergh's historic journey. As Lindbergh gazed over the patchwork of farmland and the "city" of Lincoln, he knew he was destined to fly. Ira Biffle actually taught Lindbergh how to fly. Lindbergh even began working at the Lincoln Standard Aircraft Company manufacturing plant.

In addition to the aircraft manufacturing and flying school, Page Aerial Pageants, aka air shows, provided extra aviation exposure for Lindbergh. He later became a crew member and aerial performer during barnstorming.

In Lincoln, he learned the extremely valuable skill of parachuting. For years, Lindbergh had been tormented by nightmares of falling from a great height. Parachuting, he was certain, would allow him to face down that fear. For instruction, he went to Lt. Charles Hardin, who, along with his wife Kathryn, designed and demonstrated parachutes. Hardin, a World War I parachute instructor, had been at Fort Omaha ballooning school.

Kathryn Hardin was an aerial circus performer. Working with her husband, she helped demonstrate parachutes. On his very first attempt, Lindbergh barely, but successfully, pulled off a "double-jump." This stunt involved wearing two parachutes, attached to each other. After the first chute opened it was cut off, allowing the jumper to free-fall. Then, the second chute would burst open just before the jumper slammed into the ground. The Hardins taught Lindbergh all the finer points of parachuting, including how to land in almost any wind condition and avoid injury. It was a skill that would serve Lindbergh well throughout his life as an aviator.

In April 1923, Lindbergh was not able to solo in Lincoln because he did not have enough money to insure the plane. Also, since the plane was literally sold before he could fulfill his dream, he went to Americus, Georgia. Lindbergh purchased his first plane – a World War I surplus Curtiss JN-4D, or "Jenny," for \$500 or about \$7,500 today. The fact that he had never flown a Jenny before, or soloed in any plane, for that matter, didn't dent his confidence.

During those early years, Lindbergh, known as "Daredevil Lindbergh," barnstormed. Several Nebraska towns enjoyed his performances, including McCook. He teamed up with Humboldt native flier, Errold Bahn, and Harold "Shorty" Lynch, aerial performing all over Kansas, Nebraska and Colorado. Barnstormers would fly over rural towns and drop leaflets down upon the locals announcing when the next air exhibition would take place. Daredevil stunts were promised, as were five-dollar plane rides, which is like \$65 today.

After the 1927 historic Spirit of St. Louis New York to Paris flight, for a short time the Lincoln airport was called "Lindbergh Field." Lincoln airport flying school ads boasted "Learn to fly where Lindbergh learned!" As we celebrate this world changing flight, let's remember that Nebraska has deep aviation roots and a proud aeronautical history.

Penny Rafferty Hamilton, Ph.D., is the author of "America's Amazing Airports." She learned to fly at Beatrice Municipal-BIE.

GENERAL AVIATION APPRECIATION MONTH

By David Morris

On May 11, Nebraska Governor Pete Ricketts proclaimed May 2020 as Nebraska General Aviation Appreciation Month. This proclamation helps shine a light on general aviation and reminds us all that general aviation is not just a form of transportation, but supports the commercial wellbeing of communities throughout the nation.

In Nebraska, general aviation has an economic output in excess of \$1 billion annually, supports in excess of 7,000 jobs and represents 2.4% of Nebraska's Gross Domestic Product (GDP). As indicated by this proclamation, our nation's aviation infrastructure represents an important public benefit, and Congressional oversight should be in place to ensure that it remains a public system and serves communities of all sizes.

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MY 'SHORT-LIVED' ATTEMPT AT BECOMING AN AIR TRAFFIC CONTROLLER

By Kim Stevens

In early August of 1981, my quest to earn a commercial pilot's license was put in a holding pattern for a brief time, which led me to contemplate becoming an air traffic controller (ATC). I was working on my commercial rating with 200 hours logged, flying out of Eppley Airfield in Omaha. Back then, general aviation still operated on the west side of the airport, south of the airline terminal.

Although I don't recall the details, my logbook indicates that my short hiatus was between August 3rd and August 8th. You may recall that on August 3rd of that year, 13,000 air traffic controllers walked out after contract talks with the Federal Aviation Administration (FAA) collapsed. Some 7,000 flights across the country were canceled on that day at the peak of the summer travel season.

The Professional Air Traffic Controllers Organization (PATCO) was a US trade union that operated from 1968 until its decertification in 1981, following what was considered an illegal strike that was broken by the Reagan Administration. On August 5th, the President fired more than 11,000 of the PATCO controllers.

The sweeping mass firing of federal employees slowed commercial air travel, but it did not cripple the system as the strikers had forecast. Some 3,000 supervisors joined 2,000 non-striking controllers and 900 military controllers in manning the commercial airport towers. Before long, about 80 percent of flights were operating normally, with air freight remaining virtually unaffected.

What followed for me was a lot of buzz around the airport about the need to hire new controllers. That was when I started second-guessing my career choice of flying for a living and considered ATC. When an announcement was made that there would be a test given in Omaha, I quickly signed-up. I don't think I truly considered what it would be like to be a controller and if I'd even like being in a dark room or the cab of a tower, rather than in the cockpit flying the wild blue yonder. As fate would have it, it didn't matter.

When the day arrived to take the test, I showed up at a downtown Omaha office with around 20 others. We listened intently as the instructor went through the final details of the test – emphasizing that there was a strict time limit to complete the task.

As I flew through the test, I realized that the questions were straightforward, common sense stuff and I gained more confidence by the minute. I finished up with time to spare, noting with growing pride that everyone else was still at it. Just as I was dreaming of a life in the tower and patting myself on the back, I noticed that the other test-takers were working on the back of their test booklets. I looked down at mine and realized to my horror that there were a dozen questions on the back cover – I never turned over the last page.

I quickly started to answer the remaining questions when the instructor hollered out, "times up." Needless to say, my dream of becoming a controller came to an abrupt end – which, looking back, and knowing what I know now, was probably a good thing. I have a tremendous respect and appreciation for what controllers do, and often wonder if I had the right stuff or if I would have washed out trying to excel in those confines.

I did, however, muster a little restored pride. I did well on the test – scoring in the 90s. However, the cutoff to be considered for the job was a couple of points higher than I obtained.

I did go on to earn my commercial license with an instrument ticket and remember fondly those days of performing touch-and-goes in a C-150 along-side of Convair 580s, 727s and other big-iron aircraft on the parallel runway. I can still hear the calm, reassuring and authoritative voices making sure this low-time pilot did what he was trained to do – fly the airplane and operate safely in the airport environment. Cool times indeed.

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