

August 25, 2010

BOARD OF DIRECTORS

Co-Presidents

G. Vinson Hellwig
Michigan
Larry Greene
Sacramento, CA

Co-Vice Presidents

David Shaw
New York
Lynne A. Liddington
Knoxville, TN

Co-Treasurers

Mary Uhl
New Mexico
Merlyn Hough
Springfield, OR

Past Co-Presidents

Colleen Cripps
Nevada
Arturo J. Blanco
Houston, TX

Directors

Rick Brunetti
Kansas
Joyce E. Epps
Pennsylvania
Andrew Ginsburg
Oregon
Anne Gobin
Connecticut
Cheryl Heying
Utah
James Hodina
Cedar Rapids, IA
Cindy Kemper
Johnson County, KS
John S. Lyons
Kentucky
Richard Stedman
Monterey, CA

Executive Director

S. William Becker

EPA Docket Center (Air Docket)
Docket ID No. EPA-HQ-OAR-2007-0294
U.S. Environmental Protection Agency
EPA West Building
1301 Constitution Avenue, NW
Room: 3334, Mail Code: 2822T
Washington, DC

To Whom It May Concern:

We write to you on behalf of the National Association of Clean Air Agencies (NACAA) to provide the association's perspectives on the U.S. Environmental Protection Agency's (EPA's) Advance Notice of Proposed Rulemaking (ANPR) on *Lead Emissions from Piston-Engine Aircraft Using Leaded Aviation Gasoline* as published in the *Federal Register* on April 28, 2010 (75 FR 22440). NACAA is the association of air pollution control agencies in 52 states and territories and over 165 metropolitan areas across the country.

NACAA welcomes this ANPR, which begins the official process for responding to a petition from Friends of the Earth for EPA to make a finding of endangerment to health and welfare that will lead to EPA proposing a lead emissions standard for general aviation aircraft. Our association supports the agency's efforts to seek feedback on currently available data for evaluating lead emissions, ambient concentrations and potential exposure to lead from the continued use of leaded aviation gasoline in piston-engine-powered aircraft and, further, to take comments on additional information being collected by EPA to inform any future action. Moreover, we look forward to EPA's subsequent efforts to move ahead with a positive finding of endangerment and to work with the Federal Aviation Administration (FAA) to put in place effective regulatory limits on lead emissions from general aviation aircraft.

Nearly half of the national lead emissions inventory is the result of leaded aviation gas used in piston-engine aircraft that frequent nearly 20,000 public and private general aviation airports throughout the U.S. The results of ambient air monitoring suggest that lead concentrations on or near such airports are elevated and, in some cases, may approach the health-based National Ambient Air Quality Standard (NAAQS) for lead. As proximity to the airport increases, so may lead exposure. Affected populations include not only the approximately 2 million people who live within 1 kilometer of one of these airports and 3 million children who attend one of the 8,000 schools located within 1 kilometer of one of these airports, but also more than 600,000 pilots and over 145 million passengers.

The serious adverse health effects of exposure to lead are well documented and now known to occur at much lower levels of lead in blood than previously recognized. In October 2008, EPA put in place a new, more rigorous health-based lead NAAQS, lowering the standard from 1,500 nanograms per cubic meter (ng/m³), as established in 1978, to 150 ng/m³.

Exposure to low levels of lead at an early age is linked to IQ loss and detrimental effects on learning, memory and behavior. Adults, too, can experience the adverse impacts of lead exposure. Moreover, alkyl-lead – the type added to aviation gasoline to reduce knock in combustion engines – is a priority persistent, bioaccumulative and toxic pollutant. Alkyl-lead compounds are distributed through the body to soft tissues, especially the kidneys, liver, brain and muscles, and can lead to alkyl-lead poisoning. Among the initial symptoms of such poisoning are anorexia, nausea and vomiting, fatigue, weakness, insomnia, mood shifts (e.g., aggression or depression) and memory impairment. Acute alkyl-lead poisoning can lead to mania, delirium, fever, convulsions, coma and, in some cases, death.

Finally, as a persistent pollutant that has been emitted by general aviation aircraft for many decades, and will continue to be emitted unless well regulated, lead emissions accumulate, rather than dissipate, year upon year causing dangerous cumulative exposure and further heightening our concern.

Accordingly, NACAA commends EPA for releasing this ANPR and urges the agency to proceed without delay to work in collaboration with FAA to propose and finalize a positive endangerment finding that includes federal standards to limit lead emissions from general aviation. We look forward to working with you and supporting you in this effort.

Sincerely,



Nancy L. Seidman
Massachusetts
Co-Chair, NACAA Mobile Sources
and Fuels Committee



Barry R. Wallerstein
Los Angeles, CA
Co-Chair, NACAA Mobile Sources
and Fuels Committee