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February 10, 2010

Margo T. Oge
Director
Office of Transportation and Air Quality
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Margo:

We write to you on behalf of the National Association of Clean Air Agencies (NACAA) regarding an issue that has long been of concern to us and on which we urge action by the U.S. Environmental Protection Agency (EPA): lead emissions from general aviation aircraft.

It is our understanding that, in response to a petition for EPA to make a finding of endangerment to health and welfare and then propose a lead emissions standard for general aviation aircraft, the agency will soon release an Advance Notice of Proposed Rulemaking (ANPR) presenting the currently available data upon which next steps could be based. We look forward to the publication of that ANPR and support your subsequent efforts to move forward 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.

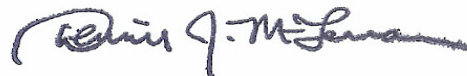
As a persistent pollutant that has been emitted by general aviation aircraft for many decades, and will continue to be emitted unless well regulated, lead emissions accumulate, rather than dissipate, year upon year causing dangerous cumulative exposure and further heightening our concern.

Accordingly, NACAA urges that EPA proceed without delay to release its ANPR and then 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
Committee



Dennis J. McLerran
(Seattle, WA)
Co-Chair
NACAA Mobile Sources and Fuels
Committee

cc: Carl E. Burleson
Director, Office of Environment and Energy
Federal Aviation Administration