

October 12, 2021

Sent via Email

Administrator Michael Regan
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
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Dear Administrator Regan:

The undersigned 57 organizations and 146 medical professionals, professors, advocates, and other individuals submit this letter in support of the October 12, 2021 updated petition, originally submitted on August 24, 2021, of Alaska Community Action on Toxics, Center for Environmental Health, Friends of the Earth, Montgomery-Gibbs Environmental Coalition, and Oregon Aviation Watch, and by the County of Santa Clara, California and the Town of Middleton, Wisconsin, petitioning the U.S. Environmental Protection Agency (“EPA”) to make an endangerment finding under section 231 of the Clean Air Act that leaded aviation gasoline (“avgas”) contributes to air pollution that harms public health and welfare.¹

Emissions from leaded avgas, used by many piston-engine aircraft, make up over 70% of the lead that is released domestically into the atmosphere. These lead emissions put the millions of people, including hundreds of thousands of young children, that live near general aviation airports at an increased risk of harm from lead. Indeed, multiple studies have shown that children who live near general aviation airports where lead is used have blood lead levels that are significantly higher than children who do not. This is particularly troubling because there is no safe level of lead, and childhood exposures to lead can lead to a host of adverse health effects, including interference with brain development. Leaded avgas emissions also exacerbate environmental injustice: most of the fifty general aviation airports with the highest lead emissions are located in communities of color, and children of color are already disproportionately burdened by chemical exposures, including by exposures to lead.

Even though EPA has known for years that the use of leaded avgas by piston-engine aircraft increases the blood lead levels of children who live near general aviation airports, increasing their risk of learning disabilities and neurodevelopmental disorders, EPA has thus far declined to regulate this largest remaining source of lead in the air. The undersigned organizations and individuals ask EPA to grant the petition, make a long-overdue endangerment finding for leaded avgas, and begin the process of regulating this source of harmful lead

¹ 42 U.S.C. § 7571(a)(2) (“The Administrator [of the EPA] shall . . . issue proposed emission standards applicable to the emission of any air pollutant from any class or classes of aircraft engines which in his judgment causes, or contributes to, air pollution which may reasonably be anticipated to endanger public health or welfare.”).

emissions. Doing so is an important step in fulfilling the Biden-Harris Administration's commitments to protect children's health and promote environmental justice.

Sincerely,

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