

DISTRICT OFFICE:
8436 WEST THIRD STREET
SUITE 600
LOS ANGELES, CA 90048-4183
(323) 651-1040
(818) 878-7400
(310) 652-3095

Congress of the United States
House of Representatives
Washington, DC 20515-0530

HENRY A. WAXMAN
30TH DISTRICT, CALIFORNIA

October 23, 2012

Mr. Michael P. Huerta
Acting Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Acting Administrator Huerta:

I am writing to urge the Federal Aviation Administration (FAA) to accelerate efforts to reduce lead emissions from general aviation by taking immediate steps to expand the use of currently available unleaded fuels, which can be used safely and cost-effectively by the vast majority of general aviation aircraft with piston engines.

For too long general aviation gasoline, also known as “AvGas,” has been exempt from the Environmental Protection Agency’s (EPA) rules that eliminated lead from automotive fuel to protect public health and the environment. Leaded fuel from general aviation now accounts for half of all lead air emissions in the United States.¹ The devastating health effects of lead are well documented. Lead is a potent neurotoxin that has especially debilitating effects on children, damaging the brain and nervous system and impairing development. According to the Centers for Disease Control, there is no identified level of lead exposure without harmful effects and the effects appear to be irreversible.

Lead emissions from general aviation are a particular concern at airports located in close proximity to residential areas. At Santa Monica Airport (SMO), a general aviation facility located in the congressional district I represent, the runway sits just 250 feet from neighboring homes. In 2010, a General Aviation Airport Air Monitoring Study by the South Coast Air Quality Management District recorded significantly elevated lead concentrations on the east end of the SMO tarmac where planes taxi and idle before take-off.² Frequent touch-and-go flights by piston aircraft can also result in pollution concentrations in areas surrounding an airport.

¹ See Environmental Protection Agency, *Advance Notice of Proposed Rulemaking on Lead Emissions From Piston-Engine Aircraft Using Leaded Aviation Gasoline*, 75 Fed. Reg. 22440 (April 28, 2010) (proposed rule).

² South Coast Air Quality Management District, *General Aviation Airport Air Monitoring Study* (August 2010).

The FAA's plans with regard to addressing the use of leaded fuel for general aviation are described in the Unleaded Avgas Transition Aviation Rulemaking Committee report released in February 2012. This report outlines steps to identify, test, and certify an unleaded "drop-in" replacement fuel by 2018, but it does not identify any efforts to reduce the use of leaded fuel before such a replacement fuel becomes available, even though, according to the report, it may be 11 years or more before the new fuel will be phased in.

This extended time-frame is simply too long, given the certain and serious harms to human health from lead exposure and the availability of alternatives to leaded fuels. Today, high octane unleaded fuels are already commercially available and can be used in the vast majority of piston engine aircraft. According to one recent study by the Aviation Fuel Club, an organization of sport aviators devoted to fuel issues, the FAA has approved Supplemental Type Certificates (STC) permitting the use of automotive gasoline, also known as "autogas" or "mogas," in over 80% of piston aircraft now in operation.³ The study also notes that autogas can be less expensive than leaded AvGas, and aircraft using autogas can burn half as much fuel per hour.

High octane unleaded auto and biodiesel fuels for piston engines have been safely and successfully used in Europe for many years, but adoption in the United States has been slow. Airports face significant barriers to offering fuel alternatives, which include lack of pilot education, uncertainty about liability coverage, and concerns about the supply of high octane unleaded fuels that are ethanol free.

While real, these barriers are not insurmountable, particularly if the FAA were to support the airports that are interested in expanding the use of unleaded fuel. Nor should such efforts take a decade or more before they produce environmental improvements, as appears to be likely for development of a replacement fuel.

It is essential for the FAA to develop and implement, in the near term, measures to facilitate the use of currently available unleaded fuel in general aviation. I urge you to engage airports, particularly those in densely populated areas, to resolve these obstacles and promote the broader use of available unleaded alternatives for piston aircraft. I look forward to hearing from you regarding the actions that you will take to pursue this goal.

Sincerely,



Henry A. Waxman
Member of Congress

³ Aviation Fuel Club, *New study shows lead-free autogas can power 80% of all piston aircraft* (July 12, 2012).