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Ms. Kathryn Sargeant
Director, Health Effects
Benefits and Toxics Center
U.S. EPA Office of Transportation and Air Quality
2000 Traverwood Drive
Ann Arbor, MI 48105

Ms. Sargeant:

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 416,000 pilots. AOPA's mission is to effectively serve the interests of its members as aircraft owners and pilots to establish, maintain, and articulate positions of leadership in promoting the economy, safety, utility, and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.

AOPA is aware that the Environmental Protection Agency (EPA) will be sponsoring an environmental study in the vicinity of the Santa Monica, California airport as discussed in a public meeting on January 26, 2008. It is our understanding that this study will focus on ambient air and ground lead levels near and around the airport.

General aviation aircraft rely on a leaded fuel to ensure the safety of the pilots, passengers, and aircraft. AOPA has been working with the aviation industry to identify a safe unleaded alternate fuel for the industry and will continue these efforts. AOPA appreciates the EPA's participation in aviation industry meetings and looks forward to working with the EPA on this important aviation safety issue.

A previous study conducted at the Santa Monica airport in 2005 showed that the level of lead in the ambient air was below the national ambient air quality standards (NAAQS) for lead. AOPA understands that the EPA plans to use the data collected during the 2009 study to refine an existing air quality model and hopes that the EPA's work plan fully explains all the currently planned uses for the study data.

AOPA is requesting a complete copy of the EPA's work plan as it relates to this study and, if not included in the work plan, the intended use of the study results.

Sincerely,

Leisha Bell
Manager, Regulatory Affairs