



US EPA
Margo Oge, Director
Office of Transportation and Air Quality
1200 Pennsylvania Ave
Room No. 6520A
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Washington DC 20004



July 22, 2010

Re: EPA-HQ-OAR-2007-0294 Advance Notice of Proposed Rulemaking on Lead Emissions from Piston-Engine Aircraft Using Leaded Aviation Gasoline



The Aircraft Owners and Pilots Association (AOPA), the Experimental Aircraft Association (EAA), the General Aviation Manufacturers Association (GAMA), the National Air Transportation Association (NATA), the National Business Aviation Association (NBAA), together represent general aviation aircraft owners, operators, and manufacturers. This stakeholder group is working with the Environmental Protection Agency (EPA) and the Federal Aviation Administration (FAA) to establish a realistic standard to reduce lead emissions from general aviation aircraft along a transition plan that balances environmental benefit with aviation safety, technical feasibility and economic impact upon the general aviation industry. With this letter, these associations are requesting clarification on issues that have arisen within our industry and are causing confusion surrounding EPA's Advance Notice of Proposed Rulemaking on Lead Emissions from Piston-Engine Aircraft Using Leaded Aviation Gasoline.



Perception of EPA Deadline to Eliminate Leaded Avgas

The perception that there is defined deadline for the elimination of lead in aviation gasoline is causing a level of panic amongst various sectors within our industry. The resulting uncertainties are having serious economic consequences as both current and potential aircraft owners are delaying making decisions about aircraft acquisitions, engine overhauls and repairs. Many of the decisions being delayed could have consequential safety ramifications. These delays are based on a strong and growing perception within our community that the EPA has determined that it will undertake actions to ban leaded aviation gasoline by 2017 and that steps are under way to do so. Trying to manage these perceptions and fears within the industry is diverting resources from efforts to work toward the actual goal of an unleaded future for general aviation.



Question 1: Has the EPA established a date or timeframe by which the general aviation industry will no longer be able to use leaded avgas?

Potential Impact on Aviation Safety

There is a concern that current and future EPA actions will be taken that could potentially jeopardize the safety of the operation of piston aircraft. General aviation engines and aircraft have been designed, built and certified for operation using high octane fuel. Current engine performance and certification standards provide us with a high level of safety that is considered in all of our day-to-day flying activities. A change to the fuel we utilize and the performance it affords could have significant safety ramifications on our industry.

Question 2: Will the EPA coordinate closely with FAA and industry stakeholders in the development of an unleaded avgas solution that ensures safety before taking any actions that may have potential impact on the general aviation industry?

Actions Leading to the Grounding of Aircraft

There is a strong and growing perception that EPA actions will lead to the grounding of portions of the existing fleet that require high octane avgas. In many instances, these aircraft serve vital roles in support of commerce such as transporting passengers and supplies to remote regions.

Question 3: Will the EPA take into consideration the impact that potential changes to aviation gasoline will have on the general aviation community and the U.S. economy? In particular, consideration of the potential grounding of segments of the U.S. general aviation fleet of commercial, historic and recreational aircraft?

Conclusion

It is important to the general aviation industry that we have these issues clarified in order to minimize the near-term impacts of EPA's recent actions and to facilitate industry activities to remove lead from aviation gasoline in a coordinated and effective industry-wide manner. We appreciate your consideration of this important matter and look forward to working with you and your staff on this critical issue.

Sincerely,



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Vice President, Regulatory Affairs
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Walter Desrosier
Vice President, Engineering & Maintenance
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