

August 24, 2021

Sent via Email

Administrator Michael Regan
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Regan.Michael@epa.gov

Dear Administrator Regan:

The undersigned organizations and individuals submit this letter in support of the petition submitted on August 24, 2021, by Earthjustice, on behalf 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 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 August 24, 2021 petition, make a long-overdue endangerment finding for leaded avgas, and begin the process of regulating this source of harmful lead emissions. Doing so is an important step in fulfilling the Biden-Harris Administration’s commitments to protect children’s health and promote environmental justice.

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.”).

Sincerely,

Organizational Signatories:

Rev Edward Pinkney
Benton Harbor Community Water Council

Lisa Arkin
Beyond Toxics

Jose Barrera
California League of United Latin
American Citizens (LULAC)

Robina Suwol
California Safe Schools

Sandy Flores
Capitol Park Goss Dobern NA

Kristie Trousdale
Children's Environmental
Health Network

Citizens for Airpark Safety
Citizens for Airpark Safety - Montgomery
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Rebecca Overmyer-Velázquez
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Missouri Coalition for the
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Natural Resources Defense Council

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Individual Signatories:

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Poet, Song Writer, Music Creator,
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cc: Steve Dickson, Administrator, Federal Aviation Administration

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