

## **EPA ISSUES ANPRM ON LEAD IN AVGAS**

April 26, 2010

### ***What's at Issue***

The U.S. Environmental Protection Agency (EPA) has released a pre-publication version of an Advanced Notice of Proposed Rulemaking (ANPRM) on lead in aviation gasoline (avgas).

### ***Why It's Important***

The ANPRM is a response to a petition from the environmental group Friends of the Earth and signals the agency's intent to investigate lead emissions from general aviation aircraft further under the regulatory processes of the Clean Air Act. This ANPRM is a first step in a process that may eventually lead to regulations concerning the uses of lead as an additive in avgas.

### ***Major Provisions***

The ANPRM is a statement of the information the EPA has collected on lead use in avgas and the harmful effects of exposure to lead. The ANPRM contains the following sections:

- **Background**  
The EPA provides background on the use of lead in avgas, the FOE petition, and the regulation of lead in other industry sectors and also provides a review of the statutory authority for this process.
- **Health and Welfare Effects of Lead**  
This section provides an overview of the health effects of lead exposure, including information on the exposure pathways, effects and concerns with lead in the blood stream and a discussion on the differences in effects between the general population and at-risk groups such as children.
- **Lead Emissions from Piston Engine Aircraft**  
This section provides information on the EPA's efforts to create a national lead emission inventory along with a summary of the studies relating to the specifics of lead emissions from aircraft
- **Lead Concentrations in the Vicinity of Airports**  
The EPA provides an overview of research into the nature of lead emissions at airports. Also, the agency reviews the physical and chemical properties of lead emissions from aircraft.
- **Exposure to Lead from Piston-Engine Aircraft and Potential for Impacts**  
This section of the ANPRM reviews the population groups and areas subject to and likely to be impacted by lead emissions from aircraft, including the population residing near airports, schools located in the vicinity of airports, agricultural activities, pilots and aquatic organisms.

**OVER...**

## **(Major Provisions Continued)**

- **Additional Information Available for the NPRM to Evaluate the Potential for Public Health and Welfare Impacts and Considerations Regarding Engine Emission Standards**

The final section of the ANPRM details the additional information that the agency expects to obtain during the continued rulemaking process, including the results of lead monitoring at airports required by the National Ambient Air Quality Standards.

The ANPRM acknowledged that a joint effort will be critical in the likely case that the agency pursues regulating lead emissions from aircraft under the Clean Air Act. The EPA continued, “Given the potentially large number of affected aircraft and the potential complexities involved, a program affecting in-use aircraft engines would need careful consideration by both EPA and FAA and the two agencies would need to work together in considering any potential program affecting the in-use fleet.”

### ***NATA Position***

The issuance of this ANPRM is a key opportunity for the general aviation (GA) community to provide comment regarding this possible new environmental standard and into the development of a plan for identifying, evaluating, and ultimately transitioning to an unleaded fuel. This is particularly important given the technical complexity and safety implications of removing lead from aviation gasoline since there is not a high-octane replacement unleaded avgas available today that meets the requirements of the entire GA fleet. NATA in partnership with other industry stakeholders will continue to work with the EPA and the FAA on establishing a realistic standard to reduce lead emissions from GA aircraft along a transition timeline that balances environmental benefit with aviation safety, technical feasibility and economic impact upon the GA industry.

### ***Status***

The ANPRM provides a 60-day comment period for industry and the public once it is published in the *Federal Register*.

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