

Press Release: National Coalition of Public Agencies Call for Swift Regulation of Leaded Aviation Fuel

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A national coalition of local governments called on the U.S. Environmental Protection Agency (“EPA”) to take long-overdue action to regulate lead emissions from aviation gasoline (“avgas”) and eliminate this major source of damaging lead air pollution.

Last week, the coalition submitted a public comment supporting the EPA’s proposed finding that leaded avgas causes or contributes to air pollution that endangers human health or welfare under Section 231 of the Clean Air Act. This “endangerment finding” is the first step in regulating the use of lead in aviation fuel. If it adopts the proposed endangerment finding, the EPA will be required to issue emission standards to control or eliminate the pollution. The coalition called on the EPA to proceed swiftly with finalizing the proposed endangerment finding and issue emission standards, banning lead emissions as early as 2025.

“We have known about the devastating effects of lead poisoning for decades,” said San Francisco City Attorney David Chiu. “I fully support the EPA taking the long-overdue step of confirming that leaded aviation fuel is harming public health and our environment.”

Lead exposure can cause severe and permanent human health impacts, with particularly severe impacts to children who may suffer irreversible cognitive and developmental harm from exposures. Fifty years after the EPA began eliminating lead from automobile gasoline, leaded avgas is the last remaining leaded transportation fuel. Leaded avgas is used by up to 220,000 piston-engine aircraft operating out of about 20,000 general aviation airports nationwide. Lead emissions from piston-engine aircraft account for 70% of total airborne lead pollution in the United States. Nationwide, an estimated 4 million people live within 500 meters of the 20,000 airports used by 170,000 piston-engine aircraft that continue to use leaded aviation fuel. About 600 schools (K-12) are located in that same close range. Approximately 16 million people – including 3 million children – live within a kilometer of such facilities.

Studies have directly linked the use of leaded avgas to elevated blood lead levels. In August 2021, a study of Reid-Hillview Airport in Santa Clara County, California found that children living and going to school near the airport had elevated blood lead levels on par with those experienced at the height of the Flint, Michigan water crisis. The burden of this lead air pollution is not evenly distributed: the highest emitting airports are disproportionately located in communities of color, making the continued use of leaded avgas a matter of environmental injustice.

The Federal Aviation Administration has already approved the use of several unleaded aviation fuels, including a fully unleaded, high-octane fuel usable by the entire piston-engine fleet. Prompted by the Reid-Hillview study’s alarming findings, County of Santa Clara transitioned its airports to the exclusive sale of unleaded avgas in January 2022. “The County has demonstrated that the transition to unleaded avgas can begin now with no impact on safety or general aviation

operations,” said James R. Williams, County Counsel for County of Santa Clara. “We have the technology to eliminate the threat of leaded avgas – every day of delay irreversibly

harms children in communities across the nation. The EPA must adopt rules that require the aviation industry to make this transition swiftly.”

The coalition emphasized that nationwide regulation of avgas by the EPA is urgently needed to meet this nationwide problem. “We regularly hear from residents about air pollution from aviation and its dangerous impact on our community and specifically children’s health,” said Boulder County Commissioner Ashley Stolzmann. “Leaded aviation gas is a major source of air pollution in Boulder County and in communities across the United States. We applaud this move by the EPA and ask that they move quickly to regulate and ultimately phase out the use of leaded gas in aviation.”

Without such regulation, local agencies that own airports face barriers in eliminating lead exposures from their airports. Agencies that do not own or operate airports have few if any tools available to them to address leaded avgas exposures, even when airport operations principally impact their constituents. For example, studies commissioned by the Town of Middleton, Wisconsin found that piston-engine aircraft overflights from an airport in a neighboring municipality is contributing to lead contamination of the air and drinking water in Middleton. The finding “is a necessary first-step in order to provide communities like ours with a very important tool to protect the community from this significant, ongoing public health hazard, and the particularly damaging health effects to children,” said Town Chair Cynthia Richson.

Health organizations agree that there is no known safe level of lead in a child’s blood, and exposure to even a small amount of lead has a negative effect on cognitive ability and IQ, particularly in developing children, who absorb lead more efficiently than older children and adults.

Additional information on the leaded avgas rulemaking is available on the EPA’s website. The public comment was submitted by County of Santa Clara, CA; Bay Area Air Quality Management District; City of Oakland, CA; City and County of San Francisco, CA; City of Santa Monica, CA; Boulder County, CO; City of South Bend, IN; City of Northampton, MA; Washtenaw County Prosecutor’s Office, MI; County of Travis, TX; and Town of Middleton, WI. The public comment was supported by declarations by Dr. Bruce Lanphear, a leading expert on health impacts of lead exposure, and Derek Ouyang, Research Manager for the Stanford Regulation, Evaluation, and Governance Lab whose declaration documents the socioeconomic disparities in avgas exposure.