

Request for DCTA Letter of Support for Petition to the EPA regarding Leaded Aviation Gas

Consideration and possible approval of a DCTA letter of support for the EarthJustice Petition to the EPA, including the Town of Middleton as co-petitioner, for a regulatory lead endangerment finding for leaded aviation gas authorizing the EPA to work with the FAA to transition to unleaded aviation gas.

Background Information

Even though lead in automobile gas was banned in the 1970s, *leaded* aviation gas is still used in general aviation piston-driven aircraft. Morey Airport aircraft produce 32% of airborne lead emissions or 217.25 pounds annually (2017), and Dane County has the second highest airborne aircraft lead emissions of all 72 counties in Wisconsin. There are over five-hundred airports in Wisconsin and small airports can emit more airborne lead emissions than larger airports. For example, the busiest airport in Wisconsin, Milwaukee's General Mitchell International Airport, had 34% *less* aircraft airborne lead emissions than Morey Airport. (Sources: EPA and Wisconsin DNR; See <https://echo.epa.gov/air-pollutant-report?fid=110037971772>)

There is no safe level of lead in humans, especially in children where even low levels of lead exposure can cause a reduction in IQ among other adverse health effects. Preventing exposure to lead is key. (See <https://www.dhs.wisconsin.gov/lead/health-effects.htm>). Lead exposure is cumulative, and breathing airborne lead is one of the most dangerous ways to be exposed. (See Town of Middleton Town Board 2/17/21 Minutes, Item 4, presentation by pediatrician Beth Neary, M.D., <https://middleton.civicweb.net/Portal/MeetingInformation.aspx?Org=Cal&Id=298>). Unlike lead in automobile gas, once inhaled, piston-engine aviation airborne lead cannot be expelled by the lungs due to its smaller particle size. (See <https://pubmed.ncbi.nlm.nih.gov/33100835/>).

Unleaded 94 Swift Fuels for piston-aircraft has been produced and sold nationwide since 2015 as a "drop-in ready" unleaded aviation gas for 66% of U.S. piston-engine aircraft. (See <https://www.swiftfuelsavgas.com/faq>). In a 9/13/16, statement, Swift Fuels advised it sells UL94 at 40 U.S. airports in 11 states, *mostly in the Midwest, and the largest concentration is in Wisconsin*. (See <https://www.swiftfuelsavgas.com/news/swift-fuels-ul94-put-to-the-test-aopa/>)

In 2021, Swift Fuels expanded its current California distribution of UL94, and as of 1/1/22, county owned Reid-Hillview Airport will sell only unleaded aviation gas. "For some county regulators concerned for their community's health, this announcement could not have come

soon enough, as the National Academies of Science recently released its latest study that indicates: “Small gasoline-powered aircraft are the single largest emitter of lead in the United States, as other major emission sources such as automobile gasoline have been previously addressed. A highly toxic substance that can result in an array of negative health effects in humans, lead, is added to aviation gasoline to meet the performance and safety requirements of a sizable portion of the country’s gasoline-powered aircraft. When emitted from aircraft exhaust, lead can be inhaled by people living near and working at airports.”

(https://www.einnews.com/pr_news/547494368/swift-fuels-expands-unleaded-avgas-distribution-across-california-and-celebrates-6th-anniversary-selling-ul94-nationwide; <https://countyairports.sccgov.org/sites/g/files/exjcpb686/files/newsletter/2021%2012-06%20SCAN.pdf>)

In addition, at EAA AirVenture in July 2021 the General Aviation Modifications Inc. (GAMI) announced a new 100-octane *unleaded* aviation gas, and as of October 2021, the FAA has approved hundreds more piston-engine aircraft (approximately 611 engines) for use of unleaded aviation gas. (See <https://www.aopa.org/news-and-media/all-news/2021/october/pilot/alternative-fuels-unleaded>; <https://www.aopa.org/news-and-media/all-news/2021/october/28/faa-approves-hundreds-more-engines-to-use-unleaded-avgas>).

On 10/12/21, the Town of Middleton became a co-petitioner to the EarthJustice Petition filed with the EPA for a Regulatory Lead Endangerment Finding for EPA authorization to work with the FAA to safely transition from leaded to *unleaded* aviation gas for all piston-engine aircraft as soon as reasonably possible. As of 10/12/21, there are 57 organizations and 146 medical professionals, professors, advocates, and other individuals who have submitted a letter in support of this Petition to the EPA, and the number of supporters continues to grow.

A letter of support for the Petition to the EPA from the Dane County Towns Association would be in the best interests of the health, safety, and welfare of all town residents in Dane County as well as in the interests of public health for residents of the State of Wisconsin and elsewhere.

For additional information please see also the Town of Middleton website Morey Airport Updates at: <https://town.middleton.wi.us/>