



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

January 12, 2022

THE ADMINISTRATOR

Ms. Deborah A. Sivas
Ms. Stephanie L. Safdi
Ms. Ada Statler
Environmental Law Clinic
Mills Legal Clinic at Stanford Law School
559 Nathan Abbott Way
Stanford, California 94305

Dear Meses. Sivas, Safdi and Statler:

By letter dated August 24, 2021, and updated October 12, 2021, Alaska Community Action on Toxics, Center for Environmental Health, Friends of the Earth, Montgomery-Gibbs Environmental Coalition, Oregon Aviation Watch, the county of Santa Clara and the town of Middleton petitioned the U.S. Environmental Protection Agency to make an endangerment finding under section 231 of the Clean Air Act that leaded aviation gasoline contributes to air pollution that harms public health and welfare.

Protecting children's health and reducing lead exposure are two of the EPA's top priorities. As described in detail in our 2012 response to the 2006 petition from Friends of the Earth requesting EPA action regarding aircraft lead emissions, the EPA has actively engaged in the investigation of whether lead emissions from piston-engine aircraft cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Our investigation included necessary data collection and analysis to provide nationwide estimates of the contribution of aircraft lead emissions to lead air pollution concentrations as well as an analysis of the impacted population. The EPA has completed these analyses and their subsequent peer review.

The EPA now intends to develop a proposal under CAA section 231(a)(2)(A) regarding whether lead emissions from piston-engine aircraft cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. For convenience, we refer to this action collectively as the "endangerment finding."

We plan to issue a proposed endangerment finding in 2022. The EPA will undertake a full public notice and comment process for the proposed finding. After evaluating comments on the proposal, we plan to issue any final endangerment finding in 2023.

I appreciate your interest in this issue and welcome the opportunity to work with you and other stakeholders in addressing lead emissions from piston-engine general aviation aircraft. If you have additional questions or information to provide to the EPA, please contact Marion Hoyer at (734) 214-4513 or hoyer.marion@epa.gov.

Sincerely yours,


Michael S. Regan