

Aviation Gasoline/Clean Air Act: Friends of the Earth Report Addressing Lead



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The environmental group Friends of the Earth ("FOE") issued a September 2016 report addressing aviation gasoline ("AVGAS") titled *Myth & Realities of Leaded Aviation Fuel* ("Report").

The FOE *Report* is the latest in a series of actions the organization has undertaken to press for the removal of lead from AVGAS.

AVGAS is used in smaller planes and the fuel contains lead.

FOE submitted a Petition for Rulemaking to the U.S. Environmental Protection Agency ("EPA") in 2006 asking that the agency find that lead emissions from general aviation aircraft endangered public health and welfare pursuant to provisions of the Clean Air Act. The organization also requested that EPA issue a proposed emission standard for lead for general aviation aircraft.

The petition was subsequently denied by EPA. The agency responded that more studies were necessary before it could issue an endangerment finding. Work on the issue would not be completed until 2017.

The conditions required for a Clean Air Act endangerment are a finding that lead emissions from aircraft fueled by leaded air gas contribute to air pollution and such pollution is reasonably anticipated to endanger the public health or welfare. FOE has argued that these conditions have been previously substantiated by EPA. As a result, the organization argues that EPA has a mandatory obligation under the Clean Air Act to make an endangerment finding.

FOE cites in the *Report* the phase-out of lead in automobile fuels approximately 20 years ago as an argument for transitioning to lead-free AVGAS. The organization notes in the *Report* in part:

... Approximately 50 percent of lead emissions in the United States are from piston-engine aircraft. From 1970 to 2007, general aviation aircraft emitted about 34,000 tons of lead into the atmosphere. Twenty thousand airport facilities across the U.S. operate using leaded fuel and an estimated 16 million people live within 1 kilometer of the 20,000 airports where leaded AVGAS is used.

The FOE *Report* argues for an expedited transition to unleaded general aviation fuel.

[A copy of the Report can be downloaded here.](#)