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July 20, 2010

U.S. Environmental Protection Agency
Mail Code: 6102T
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

RE: EPA-HQ-OAR-2007-0294; Advance Notice of Proposed Rulemaking on Lead Emissions from Piston-Engine Aircraft Using Leaded Aviation Gasoline

I am writing in response to your Advance Notice of Proposed Rulemaking (ANPR) on Lead Emissions from Piston-Engine Aircraft. With Alaska being the largest state in the union, covering over 365 million acres, eighty-two percent of our communities are not accessible by road and rely on air transport for life sustaining goods and services. Aviation is a basic mode of transportation and the small general aviation aircraft is the equivalent of the mini-van for a family in Bush Alaska. When someone needs to go to the hospital in rural Alaska, they typically must travel by piston driven aircraft. Over 95% of Alaskan aircraft are piston-engine aircraft that burn leaded aviation fuel. Without these aircraft and their ability to access these rural and oftentimes remote communities, thousands of Alaskans could face extraordinarily negative socio-economic problems.

My greatest concern with this ANPR is that at this point, there is no suitable alternative for leaded aviation gasoline currently available. The introduction of unleaded or ethanol based fuels into piston-engine aircraft could have potentially life-threatening safety consequences. While the ANPR states that lead from aviation gasoline has been identified as a "potential source of contamination for local communities", the ANPR does not provide any new scientific data that confirms that those who live in close proximity to airports with piston-engine aircraft activity have a higher propensity for increased lead blood levels. While the removal of lead from automobile gasoline, paint and other commonly used materials has been scientifically verified to have lowered the risk of elevated lead levels in humans, the ramifications to the aviation industry of enacting a dramatic policy to prohibit the use of leaded aviation fuel without supporting scientific data is troublesome and the impacts on the communities of Alaska could be disastrous.

By imposing unachievable standards before a viable, cost effective fuel alternative can be manufactured, this ANPR could jeopardize the safety of pilots and disrupt the livelihoods of those communities that they serve. Along with the safety and economic impacts to Alaskan communities from this ANPR, I would encourage the EPA to remain mindful of the economic impacts that could be felt by the piston-engine aviation fleet as new fuel standards could lead to costly engine modifications and replacements. Without a consensus amongst key representatives from the aviation community who manufacture, operate, service and support piston-engine

aircraft, along with the FAA, I would caution the EPA from enacting a broad policy change regarding leaded aviation gasoline that is based on non-scientifically supported information.

I would strongly urge the EPA to refrain from making any changes to regulations regarding leaded aviation gasoline until a proper substitute can be developed, tested and certified. The EPA should also ensure that some part of the testing phase is conducted in Alaska, specifically during the harsh winter months. I would also recommend that the EPA extend the deadline for this APRN for as long as needed to allow the aviation industry and its stakeholders to have adequate time to fully investigate and collect information in response to the questions the EPA raised in the APRN. Lastly, I would call the EPA's attention to the \$2 million that was included in the President's FY2011 budget request for aviation gasoline research. I would encourage the EPA to take this as a signal of progress and to allow the research and scientific data collection to occur at a steady and controlled pace without the imposition of artificial deadlines.

Sincerely,



Lisa Murkowski
United States Senator