

April 21, 2014

Via FedEx and Facsimile

Administrator Gina McCarthy
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator McCarthy:

Over forty years ago, the U.S. Environmental Protection Agency (EPA) recognized that airborne lead endangers human health and welfare when it began regulating lead emissions from automobile gasoline. Since that time, studies have confirmed that health effects occur at much lower levels than originally thought. Importantly, there is no safe exposure level for lead: even small, discrete doses can harm human health.

Despite abundant evidence of the impact of lead on human health, EPA has still not taken the initial step of finding endangerment to public health and welfare from the largest source of airborne lead in the country – aviation aircraft using leaded aviation gasoline. EPA does not need to gather any more data to make an endangerment finding for lead emissions from general aviation gasoline. Decades of scientific evidence support EPA finding endangerment, and millions of people are being needlessly exposed to airborne lead emissions while EPA delays its finding.

Enclosed is a Petition for Reconsideration submitted by Earthjustice and the Golden Gate University School of Law Environmental Law and Justice Clinic on behalf of Friends of the Earth, Physicians for Social Responsibility, and Oregon Aviation Watch requesting EPA reconsider its 2012 response to Friends of the Earth's 2006 Petition for Rulemaking and make an endangerment finding.

In addition, below please find a petition signed by approximately 25,465 Friends of the Earth members, activists, and supporters. Enclosed please also find a CD containing an electronic document listing the names and zip codes of those who signed the petition. The signatories ask that EPA recognize the existing science and find that lead emissions from general aviation aircraft endanger public health and welfare.

Respectfully submitted,



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Petition to U.S. Environmental Protection Agency Administrator Gina McCarthy for a Finding that Lead Emissions from General Aviation Aircraft Endanger the Public Health and Welfare

“It has been more than 16 years since the U.S. EPA required the complete phase-out of lead in automobile gasoline. Lead is a harmful and toxic chemical that causes a broad range of adverse health effects when absorbed by the body, with children being especially vulnerable.

There is no safe level of lead exposure!

Despite all of this evidence that lead is a major problem, general aviation planes continue to fly using leaded fuel. Aviation gasoline (“avgas”), used to power piston engine aircraft, is the single largest source of lead emissions in the United States.

EPA must find that lead emissions from general aviation aircraft endangers public health and welfare, and initiate a rulemaking to eliminate lead from general aviation immediately.”