



EPA Docket Center (Air Docket)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW, Mail Code 6102T
Washington, DC 20460

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

August 25, 2010

Good day:

Over 9600 members of the American Bonanza Society (ABS), the vast majority of who operate airplanes with engines requiring 100 octane fuel for safe operation, are concerned the Environmental Protection Agency may set a deadline for elimination of leaded aviation fuels before a suitable alternative is developed and distributed, which may create an interruption in fuels availability.

Our Beechcraft airplanes and similar types built by other manufacturers are frequently used in business as well as personal transportation. Vital services such as on-demand human organ and blood transportation are flown almost exclusively in this class of airplane. Thousands of small businesses and hundreds of thousands of jobs exist in aircraft manufacturing and support, jobs that would go away overnight if no fuel existed to replace 100LL. Already aircraft sales and support providers warn that owners are not buying airplanes or paying for upgrades as they have historically, in part because they are unwilling to make major investments in products and services until they have great confidence in future aviation fuel availability.

ABS encourages EPA to continue its investigation to determine whether there is an adverse effect on public health, and if so, to quantify that impact as part of a plan to minimize health risks. While this is under way, however, ABS implores EPA to provide time for work on the other side of the equation, identification of a suitable alternative that permits continued operation of tens of thousands of airplanes with engines requiring 100 octane-equivalent fuel to safely develop rated power.

ABS and other aircraft owners groups are actively encouraging FAA to work with entrepreneurs and industry to expedite testing and certification of unleaded aviation fuels and other technologies that permit safe, full-power operation. Only FAA, however, can set this timetable. If EPA were to set a deadline for eliminating leaded aviation gasoline without consideration for FAA's timeline, we would have great potential for a catastrophic impact to business, to jobs, to life-saving on-demand services, and to significant personal investments.

The American Bonanza Society ardently requests EPA not set a deadline for the elimination of 100LL aviation gasoline until FAA has selected one or more means of achieving 100 octane-equivalent operation, and industry is delivering the product to market in sufficient quantity that availability is not an issue.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Thomas P. Turner", with a long horizontal line extending to the right.

Thomas P. Turner
Interim Executive Director