

Commander Owners Group



August 29, 2010

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

Ref: **DOCKET ID No. EPA-HQ-OAR-2007-0294**
Federal Register Volume 75, No 81, April 28, 2010, Page 22440-22468

Dear Administrator,

I am the President of the Commander Owners Group which has over 300 members and indirectly represents more than 1,200 owners of the Commander single-engine aircraft worldwide. These aircraft are used for business and personal use and represent a significant investment to their owners. Our aircraft operate on 100 octane gasoline and our members are very concerned that action might be taken to set a date for the elimination of the current 100 octane fuel when there is not yet any replacement available. Accordingly, our members oppose any rulemaking on lead emissions at this time or the near future until the following steps are taken:

1. The process for approval of any new fuel is clearly defined by the FAA and the authority of the EPA and FAA are clarified. Stakeholders in fuel development need to know what they have to do for approval.
2. A viable 100 octane alternative aviation fuel is developed and fully tested. There is no viable 100 octane alternative at this time. A viable 100 octane alternative must provide the same engine performance and margin of safety in high compression engines at a comparable price in all flight conditions as 100LL. It must be mixable with current 100LL and handling and burning must not be any more toxic than current 100LL. Complete testing must involve fleet tests on a variety of high compression piston aircraft in real world conditions with adequate duration to allow significant time on the engines and teardowns to inspect and analyze internal parts.
3. A realistic timeline supported by industry that provides any necessary infrastructure changes for refining, transportation and storage is developed.
4. A realistic transition period supported by suppliers, users, and retailers is defined to allow for using both current and new 100 octane that minimizes impacts to users and retailers.

Because of the widespread use of high compression engines in general aviation, not having a viable 100 octane fuel replacement available by some prematurely determined date for new

lead emissions will have catastrophic financial effects to the businesses and industries involved with, and relying upon, these aircraft. There would also be a significant negative financial impact to owners. Grounding these aircraft or modifying the engines because a viable 100 octane replacement is not available is not realistic or acceptable.

We strongly disagree with any rulemaking on lead emissions for piston engine aircraft until a viable 100 octane alternative exists, and achievable timelines for making infrastructure changes and the transition are agreed upon by all stakeholders

Sincerely,

A handwritten signature in cursive script, appearing to read "Glenn S. Mores".

Glenn S. Mores
President
Commander Owners Group