



The **TWIN CESSNA** *Flyer*™

Supporting Twin Cessna Owners Worldwide since 1988

www.twinessna.org

August 1, 2010

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

ATTENTION: 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 Twin Cessna Flyer aircraft owners group. Our organization represents over 1,000 of the 6,500 owners of piston-powered twin engine Cessna aircraft. We are very concerned about the EPA's plans to reduce lead emissions from 100 octane avgas. Over half of our members use their aircraft for business purposes. Many are fully dedicated to air charter and air ambulance activities which serve the rural parts of our nation. If lead were removed from avgas before a suitable replacement was found, it would not only be devastating to the aircraft owners themselves but to the communities they serve. For those of us who use our aircraft personally, the elimination of 100LL prematurely would render our airplanes almost worthless.

Our organization opposes any rulemaking on lead emissions for piston engine aircraft at this time or in the near future until the following critical steps are accomplished first:

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.

The Twin Cessna Flyer
P.O. Box 12453
Charlotte, NC 28220
Tel. 704.910.1790 eFax 801.515.8354
editor@twinessna.org

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 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 acceptable.

The Twin Cessna Flyer owners organization strongly disagrees 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,



Robert D. Thomason, President
The Twin Cessna Flyer