

Mooney Aircraft Pilots Association

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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:

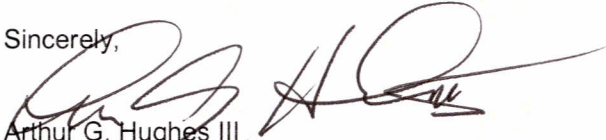
I represent a group of 5,000 individuals who own an FAA certified general aviation aircraft with high compression piston engines that must operate on 100 octane avgas. They use their aircraft for both business and personal use. It is a serious personal investment and an essential tool for efficient travel. I am concerned that a date may be set by the EPA to require reduced lead emissions that is premature and could render the use of piston powered planes non flyable or unsafe without major modifications. I oppose 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.

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.

I 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,


Arthur G. Hughes III
Executive Director
Mooney Aircraft Pilots Association

Cc: AOPA