

## Pedersen, Alex

---

**From:** Hoyer, Marion <hoyer.marion@epa.gov>  
**Sent:** Friday, October 7, 2022 7:01 AM  
**To:** aircraft.lead  
**Subject:** EPA Proposes Endangerment Finding for Lead Emissions from Aircraft Engines that Operate on Leaded Fuel

**CAUTION: External Email**

On Friday, October 7<sup>th</sup>, EPA announced the proposed determination that lead emissions from aircraft operating on leaded fuel cause or contribute to air pollution that may reasonably be anticipated to endanger public health and welfare.

The proposal and fact sheet for this action are on EPA's website:

<https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-lead-emissions-aircraft>

This action will undergo public notice and comment and after consideration of comments, the EPA plans to issue any final endangerment determination in 2023.

EPA's consideration of the endangerment finding is a first step toward application of EPA's and FAA's statutory authorities to address lead pollution from aircraft. The proposed finding, if finalized, would not apply new requirements to entities other than EPA and FAA. EPA is not at this time proposing aircraft engine lead emission standards.

If EPA makes a final determination that aircraft engine emissions of lead cause or contribute to lead air pollution that may reasonably be anticipated to endanger public health or welfare, EPA would subsequently propose regulatory standards for lead emissions from aircraft engines. Such a final determination would also trigger the FAA's statutory mandate to prescribe standards for the composition or chemical or physical properties of an aircraft fuel or fuel additive to control or eliminate aircraft lead emissions.

The FAA has two integrated initiatives focused on safely transitioning the fleet of piston-engine aircraft to an unleaded future: the Piston Aviation Fuels Initiative (PAFI) and the FAA-industry partnership to Eliminate Aviation Gasoline Lead Emissions (EAGLE). For information about these initiatives, go to <https://www.faa.gov/about/initiatives/avgas>. In addition, the FAA has approved the safe use of an unleaded fuel that can be used in a large number of piston-engine aircraft, along with other unleaded fuels for specific aircraft.



SEATTLE CITY COUNCIL | DISTRICT 4

## COUNCILMEMBER ALEX PEDERSEN

September 8, 2022

Casey Sixkiller  
Regional Administrator  
Environmental Protection Agency – Region 10  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

**Re: Follow-up Request for EPA Study and Endangerment Finding Regarding Leaded Aviation Gas in Seattle (including Lake Union area)**

Dear Administrator Sixkiller:

Thank you for your thoughtful response, dated May 18, 2022, to my letter to your office, dated May 3, 2022, regarding my concerns about leaded aviation fuel in Seattle. I also want to thank you and the Region 10 office for your work to collaborate with the Puget Sound Clean Air Agency (PSCAA) to investigate this issue locally and to provide data points that acknowledge the harmful realities of leaded aviation fuel. **The purpose of this follow-up letter is to make sure impacts to Lake Union and surrounding areas are also studied.**

In my May 3, 2022 letter, I stated:

*"[...] it's important to note that the landing zone for Seattle's seaplanes and lead pollution in and around Seattle's Lake Union have yet to be studied. Twenty-five schools fall within 1.5 miles of Lake Union and many families with children enjoy summer activities in and around the lake, potentially being exposed to toxic lead pollutants from aircraft that use lead-based fuel. EPA's support for studies of lead pollution from aviation gas in this area is needed and Lake Union aviation zones should be included in future studies."*

While your May 18, 2022 letter elaborated on your collaboration with PSCAA on a Community Scale Air-Toxics study in South Seattle, your letter did not mention any potential or future studies around Lake Union, another domain for seaplanes that use leaded aviation fuel.

I believe we mutually recognize the importance of monitoring particulate matter that causes harm to humans and the environment, and I want to emphasize the concern for the health and wellbeing of our children who attend school and play in areas that are underneath and around the take-off/landing zones for seaplanes in Lake Union. As you had mentioned, such studies can help inform us of steps the City and local agencies can take to mitigate harm in the short-term as the EPA finalizes its endangerment finding. Because the levels of lead-based impacts from seaplanes are unknown in the Lake Union area, a study and/or monitoring site are needed.

I urge you to please work with PSCAA to initiate an air sampling study and monitoring station around Lake Union. If not with PSCAA, I urge you to partner with an academic institution, such as the University of

Washington's School of Public Health, to conduct a study surrounding Lake Union. As a result, we would have the appropriate information – with your aid – to determine mitigation techniques to reduce risk. If there is anything that the City can do to help establish the study, please let my office know.

Please contact my office at 206-684-8804 or email [Alex.Pedersen@seattle.gov](mailto:Alex.Pedersen@seattle.gov) with any questions about this request. Thank you.

Regards,

A handwritten signature in blue ink that reads "Alex Pedersen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

**Alex Pedersen**

City Councilmember and Chair of the Transportation & Seattle Public Utilities Committee

<https://www.seattle.gov/council/pedersen>

cc:

Lisa Rivera Smith, Seattle School Board District 2 Director

Gabby Lacson, Legislative Aide to Councilmember Pedersen



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

OFFICE OF THE REGIONAL  
ADMINISTRATOR

May 18, 2022

The Honorable Alex Pedersen  
City Councilmember and Chair of the Transportation & Seattle Public Utilities Committee  
P.O. Box 34025  
Seattle, Washington 98124-4025

Dear Mr. Pedersen:

Thank you for your May 3, 2022, letter to Michael S. Regan, Administrator for the U.S. Environmental Protection Agency. We appreciate you taking the time to write to us about leaded aviation gasoline in Seattle and concerns regarding potential effects of leaded aviation gasoline emissions in South Seattle communities. The Administrator has asked that I respond on his behalf.

Protecting children's health and reducing lead exposure are two of the EPA's top priorities. The EPA's work on an Endangerment Finding for leaded aviation gasoline includes a thorough evaluation of a large body of scientific information about the impact of avgas-based lead emissions on air quality at and near airports. This includes a thorough assessment of the air quality impact of lead emissions from piston-engine aircraft operating on leaded fuel, including an evaluation of potentially exposed populations. Due to the highly complex nature of this work, the process is lengthy. As you noted in your letter, the EPA plans to issue a proposed avgas endangerment finding in 2022. The EPA will then undertake a full public notice and comment process for the proposed endangerment finding. Because we anticipate many comments on the proposal which we will carefully consider, the EPA has not established an exact timeframe to issue any final endangerment finding, though our current estimate for doing so is 2023.

Regarding your request for a local lead study, the Puget Sound Clean Air Agency is conducting an EPA-Funded Community-Scale Air Toxics study that includes monitoring of metals in coarse particulate matter (PM10) in South Seattle. Though the scope of the study does not include any direct testing of blood lead levels or other biomarkers; the results will be assessed according to their potential cancer risk. The study is currently in the data collection phase including a full year of PM10 (including lead) monitoring at a near-road site in the Chinatown International District and monitoring at the Seattle Duwamish site located on East Marginal Way and South Alaska Street. Additionally, PM10 metals are monitored at the Beacon Hill National Core site as it is part of the National Air Toxics Trends Station network. Puget Sound Clean Air Agency is also conducting shorter-term PM10 metals monitoring for 3-6 months at three sites in Georgetown and two in South Park. These sites were selected with guidance from the affected communities. One of the Georgetown sites is located at the Georgetown Steam Plant Museum, next to the King County Airport. This PSCAA study draws upon both earlier PSCAA studies on lead as well as results from a recent US Forest Service study that looked at levels of metals accumulated on moss.

The EPA will continue to coordinate with PSCAA as these studies progress and will use results to determine appropriate next steps, such as further study and possible specific actions to reduce risk in the short term.

Again, thank you for contacting the EPA. If you have any questions on lead emissions from piston-engine general aviation aircraft, please feel free to contact me or have your staff contact Dr. Karl Pepple, who is our Transportation Lead for the EPA, Region 10. You can reach Karl at (206) 553-1778 or [pepple.karl@epa.gov](mailto:pepple.karl@epa.gov). For further information about planned PSCAA studies, please contact Mr. Erik Saganic, Technical Analysis Manager, at the PSCAA, at (206) 689-4003 or at [eriks@psccleanair.gov](mailto:eriks@psccleanair.gov).

Sincerely,

CASEY  
SIXKILLER

Digitally signed by  
CASEY SIXKILLER  
Date: 2022.05.18  
15:29:51 -0700

Casey Sixkiller  
Regional Administrator



SEATTLE CITY COUNCIL | DISTRICT 4

# COUNCILMEMBER ALEX PEDERSEN

May 3, 2022

Michael S. Regan  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Michelle Pirzadeh  
Acting Regional Administrator, Region 10  
Environmental Protection Agency  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

## Re: Request for EPA Study and Endangerment Finding Regarding Leaded Aviation Gas in Seattle

Dear Administrator Regan and Administrator Pirzadeh:

Thank you for the work you and your staff do in addressing environmental matters and keeping people safe.

As the chair of the Seattle City Council Transportation Committee, I am writing to make two requests of the Environmental Protection Agency: (1) expedite the process leading to an “endangerment finding” for aviation fuel that contains the harmful element of lead and (2) establish a study of lead pollution in Seattle, Washington.

It is my understanding that approximately 70 percent of lead emissions in the United States are from piston-engine (general aviation) aircraft.<sup>1</sup> In January 2015, in response to an April 2014 petition,<sup>2</sup> the EPA indicated an intent “to issue a final endangerment finding in 2018.” That deadline was not met. It is my recollection that Administrator Regan, in response to a renewed and expanded October 2021 petition, issued a commitment<sup>3</sup> on January 12, 2022, with “plan[s] to issue a proposed endangerment finding in 2022,” and “a final endangerment finding in 2023.” It is difficult for me to understand why it would take almost ten years for the EPA to respond to what appears to be a clear public health risk. I am writing in support of the petitioners<sup>4</sup> and request that the EPA progress toward elimination of lead pollution by issuing an endangerment finding at the earliest possible date.

As the largest city and urban area in the northwestern United States, Seattle, King County, and the surrounding Puget Sound region include the economic engines of the Port of Seattle, a growing international airport, and a valuable center of our nation’s technology industry. The Puget Sound region also consists of a very diverse community. However, we understand that King County International Airport (South Seattle) and Lake Union facilities (just north of downtown Seattle) are currently serving aircraft that still use leaded aviation gas. As indicated in the 2014 and 2021 petitions, this raises concerns about public health.

Lead pollution is also a serious environmental inequity problem. The South Seattle neighborhoods of Beacon Hill, South Park, and Georgetown, which populate the region around the King County Airport, are

---

<sup>1</sup> <https://news.sccgov.org/newsroom/reid-hillview-airport-airborne-lead-study>

<sup>2</sup> <https://www.epa.gov/sites/default/files/2016-09/documents/avgas-petition-reconsider-04-21-14.pdf>

<sup>3</sup> <https://www.epa.gov/system/files/documents/2022-01/ltr-response-aircraft-lead-petitions-aug-oct-2022-01-12.pdf>

<sup>4</sup> <https://www.epa.gov/regulations-emissions-vehicles-and-engines/petitions-and-epa-response-memorandums-related-lead>

predominantly People of Color. Unfortunately, South Seattle continues to be a disproportionate recipient of air pollution and other adverse effects of emissions and climate change.<sup>5</sup> A recent study of areas surrounding King County Airport shows that lead pollution is present all around the airport.<sup>6</sup> This finding, paired with the work conducted at San Jose's Reid-Hillview Airport on lead pollution,<sup>7</sup> creates concern with lead exposure among our communities and children, especially historically marginalized constituents.

Our recommendation after discussing this issue with local scientists, community advocates, and government leaders, is to urge you to (1) proceed without delay to publish the endangerment finding and (2) undertake (or otherwise provide technical and financial support for) a study of lead pollution impacts in the Seattle area. We appreciate your stated commitment to producing an endangerment finding in response to the cited petitions and look forward to the results. Regarding the need for a study, it's important to note that the landing zone for Seattle's seaplanes and lead pollution in and around Seattle's Lake Union have yet to be studied. Twenty-five schools fall within 1.5 miles of Lake Union and many families with children enjoy summer activities in and around the lake, potentially being exposed to toxic lead pollutants from aircraft that use lead-based fuel. EPA's support for studies of lead pollution from aviation gas in this area is needed and Lake Union aviation zones should be included in future studies.

Federal oversight and regulatory action from the EPA are essential to eliminate harmful lead pollution from small aircraft in Seattle and the rest of the nation, especially in the most vulnerable communities that reside next to the King County Airport. Furthermore, once the endangerment finding is published, the EPA must promptly collaborate with stakeholders, including the Federal Aviation Administration, to phase out leaded aviation fuel.

Environmental justice advocates and their coalitions are eager to see results that protect our communities and children.

Please contact my office at 206-684-8804 or email [Alex.Pedersen@seattle.gov](mailto:Alex.Pedersen@seattle.gov) with any questions about this request. Thank you.

Regards,



**Alex Pedersen**

City Councilmember and Chair of the Transportation & Seattle Public Utilities Committee

<https://www.seattle.gov/council/pedersen>

cc:

Lisa Rivera Smith, Seattle School Board District 2 Director

King County Councilmember Jeanne Kohl-Welles

King County Councilmember Girmay Zahilay

King County Councilmember Dave Upthegrove

<sup>5</sup> <https://www.seattletimes.com/seattle-news/environment/new-maps-show-strong-correlation-between-redlined-places-in-seattle-and-worse-air-quality/>

<sup>6</sup> <https://doi.org/10.1016/j.scitotenv.2022.153801>

<sup>7</sup> <https://news.sccgov.org/sites/g/files/exjcpb956/files/documents/RHV-Airborne-Lead-Study-Report.pdf>

Krishna Viswanathan, Director of the Air and Radiation Division, EPA Region 10  
Kathy Taylor, Air Quality Program Manager at Washington State Department of Ecology  
Kendee Yamaguchi, Deputy Mayor of External Affairs at Mayor Bruce Harrell's Office  
Jessyn Farrell, Director of the Office of Sustainability and Environment, City of Seattle  
Gael Tarleton, Director of Seattle Office of Intergovernmental Relations  
Arlyn Purcell, Director of Aviation Environment and Sustainability, Port of Seattle  
Shirlee Tan, Manager – Toxicology at Seattle-King County Public Health  
Cynthia Wang, Interim Executive Director of Puget Sound Clean Air Agency  
Maria Batayola, Beacon Hill Council Chair & Environmental Justice Coordinator at El Centro de la Raza  
Velma Veloria, King County International Airport Community Coalition  
Gabby Lacson, Legislative Aide to Councilmember Pedersen