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# EAGLE Stakeholder Q&A on the Environmental Protection Agency's (EPA) Endangerment Finding on Lead Emissions Decision

This document is a product of the Eliminate Aviation Gasoline Lead Emissions (EAGLE) initiative and does not necessarily represent the views or policies of any U.S. governmental organization or agency.

**What is the EPA Endangerment Finding?**

The EPA issued a determination that lead emissions from aircraft engines can cause or contribute to air pollution that may reasonably be anticipated to endanger public health and welfare. For official EPA statements on this finding, please refer to the EPA's website "Regulations for Lead Emissions from Aircraft."[1]

With the final finding, the EPA is now subject to a duty under the Clean Air Act to propose and issue regulatory standards for lead emissions from certain aircraft engines. Under its own authorities, the FAA now has the authority and obligation to develop standards that address the composition or chemical or physical properties of an aircraft fuel or fuel additive to control or eliminate aircraft lead emissions. In other words, this action begins a multi-year regulatory process that EAGLE expects will conclude with the eventual elimination of lead from aviation gasoline. The EPA is not proposing aircraft engine lead emission standards with this action.

By law, under the Clean Air Act the EPA and FAA must consult with each other on these rulemaking requirements so they are developed in a manner that does not adversely impact aviation safety.

**What does the EPA Endangerment Finding not do?**

The EPA endangerment finding does not ban 100 low lead (100LL) fuel from use at the nation's airports. It also does not mean that airports should stop offering 100LL, as it would adversely impact safety and hinder commerce. This action does not cause aircraft to be grounded or become prohibited from using 100LL.

To the contrary, 100LL is needed throughout the safe transition period, until we achieve full use of unleaded fuels.

**Why did the EPA release an Endangerment Finding?**

The EPA has been studying emissions of lead from aircraft operating on leaded fuel, and the contribution of these emissions to lead air pollution, for many years. In response to petitioners to the EPA, the Agency announced in January 2022 that it was developing a proposal under the Clean Air Act regarding the "endangerment finding." On October 7, 2022, the EPA announced its proposed determination, which then underwent public notice and comment. After evaluating comments on the proposal, the EPA is now announcing its final determination.

[1] https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-lead-emissions-aircraft

**How will the EPA Endangerment Finding impact general aviation?**
It shouldn't, as the general aviation industry has been collaboratively working toward the EAGLE goal to remove lead from aviation fuel in a safe and smart way by 2030 or sooner. As part of the safe and smart transition to unleaded fuel, airports and local communities should maintain a supply of 100LL at our nation's airports for those aircraft that need it to fly safely.

**Will the EPA Endangerment Finding force pilots and airports to take any measures?**
Not at this point. The EPA's endangerment finding does not ban 100 low lead (100LL) fuel from use at the nation's airports. As part of the safe and smart transition to unleaded fuel, airports and local communities should maintain a supply of 100LL at our nation's airports for those aircraft that need it to fly safely.

It also does not mean that airports should stop offering 100LL, as it would adversely impact safety and hinder commerce. This action does not cause aircraft to be grounded or become prohibited from using 100LL.

**Will the EPA Endangerment Finding prevent 100LL from being used?**
No, the EPA's endangerment finding does not ban 100 low lead (100LL) fuel from use at the nation's airports. As part of the safe and smart transition to unleaded fuel, airports and local communities should maintain a supply of 100LL at our nation's airports for those aircraft that need it to fly safely.

**What should pilots and the general public know about the EPA Endangerment Finding?**
It's important for pilots and other constituents to know that the EPA's endangerment finding does not ban 100 low lead (100LL) fuel from use at the nation's airports. It also does not mean that airports should stop offering 100LL, as it would adversely impact safety and hinder commerce. This action does not cause aircraft to be grounded or become prohibited from using 100LL.

To the contrary: 100LL is needed throughout the safe transition period until we achieve full use of unleaded fuels.

The general aviation industry, along with the FAA, has been working hard toward the goal of removing all lead from avgas by 2030 or sooner, and good progress is being made.

**What progress is being made to find an unleaded fuel that can be used by all GA pilots across the country?**
Good progress is being made toward the goal of removing all lead from avgas by 2030 or sooner. The general aviation industry, along with the FAA, have been working hard toward this goal.

Currently, there are four high octane fuels in the testing, approval and commercialization process. These include fuels developed by GAMI, Swift, Afton/Phillips 66 and LyondellBassell/VP Racing.

**Why is there lead in avgas, especially since it was eliminated from automobile fuel years ago?**
In many piston engines, lead in avgas prevents damaging detonation that can result in a sudden engine failure. For general aviation aircraft that need 100-octane fuel to prevent detonation, the only current

option is 100LL. The industry fully supports a smart transition toward a 100 unleaded (UL) solution that will work for the entire general aviation fleet, and good progress is being made.

**Does 100LL really pose a risk to those living near airports?**
While levels of airborne lead in the United States have declined 99 percent since 1980, there is still more work to be done to lower risks of lead exposure to communities adjacent to general aviation airports. Accordingly, the general aviation industry and the FAA are working hard to eliminate all lead in aviation fuel as soon and safely as possible.

**Should I refrain from buying an aircraft that requires 100LL due to the time it takes to get to an unleaded fuel?**
That is a personal decision of the prospective buyer; however, the general aviation industry and the FAA are working hard to eliminate all lead in aviation fuel as soon and safely as possible.

**GAMI's G100UL is already approved; why can't I buy it?**
G100UL received Supplemental Type Certificate approval from the FAA, and GAMI is currently working to commercialize the fuel and bring it to the nation's general aviation airports. EAGLE fully supports GAMI's efforts, as well as the efforts of all fuel companies currently in the process of developing safe, unleaded aviation gasoline formulations.

**Will groups try to use the EPA Endangerment Finding to close airports?**
During the safe and smart transition to unleaded fuel, airports are expected to face continued challenges from local activists looking to close or significantly reduce operations. That is why it is important to remain factual about what the endangerment finding means (and doesn't mean) for the aviation community, the dedicated industry/government collaborative commitment and progress toward eliminating lead in all aviation fuel.