

8TH AIR FORCE HISTORICAL SOCIETY - OREGON CHAPTER



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February 2, 2017

The Honorable Caddy McKeown, Chair, & Members
House Committee on Transportation Policy
State Capitol, 900 Court St.
Salem, OR 97301

RE: HB 2109

Dear Chair McKeown & Committee Members:

We are the Oregon Chapter of the United States 8th Air Force Historical Society. We are a registered 501(c)(3) nonprofit organization of veterans who served in the 8th Army Air Corps during World War II and other members committed to preserving and honoring the legacy of these heroes. **We are very concerned about HB 2109 and its potential impact on our activities and on General Aviation in Oregon.**

One of our key programs is our decades-long tradition of bringing WW II aircraft tours to Oregon. We work with multiple foundations that keep these aircraft flying. Our goal is two-fold: first, to provide the public with an "up close and personal" history education experience and second, to give our veterans the chance to see and once again fly in the types of aircraft in which they served. Their history is not being taught in public schools. We know of no better way to preserve it than through these tours. These men and women literally helped save the world.

Our vintage aircraft engines require 100 octane low lead (100 LL) fuel. They cannot operate on automotive or other unleaded fuel without significant risk of engine failure. They cannot operate on jet fuel. **The paragraph below is from a 2013 U.S. EPA Fact Sheet:**

Why keep using leaded fuel?

"First and foremost, the use of leaded fuels is an operational safety issue, because without the additive TEL, the octane levels would be too low for some engines, and use of a lower octane fuel than required could lead to engine failure. As a result, the additive TEL has not been banned from avgas. Aircraft manufacturers, the petroleum industry, and the FAA have worked for over a decade to find alternative fuels that meet the octane requirements of the piston engine aircraft fleet without the additive TEL. However, no operationally safe, suitable replacement for leaded fuel has yet been found to meet the needs of all of the piston engine aircraft fleet."

Besides our WW II aircraft tours through Oregon, which emit only about 23 pounds of lead each year total, most piston-driven aircraft involved in medical transport, search and rescue, forestland & species monitoring and firefighting, among other functions, burn 100 LL fuel. **We work with fixed base operators around the state on our aircraft tours. They tell us that banning 100 LL prior to there being available a certified alternative that will safely work in all types of aircraft piston engines would decimate general aviation in Oregon.**

We recognize that leaded avgas is likely to eventually go away. We are aware of EPA's Unleaded Avgas Transition Plan and the EPA/FAA Piston Aviation Fuels Initiative. **However, we ask that you consider the following when debating HB 2109:**

- EPA has not yet issued an Endangerment Finding for leaded aviation fuel (avgas) and has not yet proposed a ban on leaded avgas.
- EPA has denied multiple lawsuits by environmental groups to regulate leaded avgas.
- EPA set a goal in 2012 – but not a requirement – of finding and certifying a safe, suitable alternative fuel by 2018 and is currently, with FAA support, evaluating two unleaded fuel alternatives under the Piston Aviation Fuels Initiative (PAFI). A July, 2016 PAFI report describes this as “the first step in a long process.”
- PAFI's goal is to have an alternative certified by 2018 – however there is no guarantee this goal will be reached. Some estimates are that it could take a decade after certification for the long-term trials, production, marketing and distribution issues to be evaluated and resolved.
- The two alternatives are very different chemically than 100LL. Long-term impact on aviation engine reliability and performance will take time to evaluate.
- PAFI will not result in approval for specific classic engine/frame combinations. To our knowledge, large displacement, high performance, supercharged radial engines such as those powering our vintage aircraft are not going to be part of the test engine population.
- Per *Aviation Week*: “The approvals may be available in 2019, but whether or not the market will support the production and distribution of the fuels is unknown at this time.”
- Considering the minuscule lead emissions from our vintage aircraft tours in Oregon, at the very least we would request an exception for those aircraft.

Given the foregoing, we recommend that this issue be considered a federal matter, the same as was the case for automotive fuels. Oregon would then be subject to the federal directive as would other states.

Alternatively, if the Legislature decides to move forward on HB 2109, its implementation should be contingent on the widespread availability of a proven safe and reliable substitute for 100 LL certified for use in all piston aircraft engine types.

Thank you for your consideration. We will be closely following the bill in the 2017 session.

Respectfully,

Bert Campbell

President

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JJR