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To: [Public Record](#)
Subject: *NEW SUBMISSION* Submit Comments - Commissioners' Public Comment Sessions
Date: Monday, April 8, 2024 9:30:41 AM

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Submit Comments - Commissioners' Public Comment Sessions

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Read-Only Content

Name

John Kennedy

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Waldorf, MD 20601

Phone

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FOMA2w5@gmail.com

Comment

I submitted a comment earlier. I wanted to reiterate my support for this zoning cahnge and submit additional information I provided to the economic developmeent team supporting this initiative. Thank you to the Commissioners for finally making this Aviation Business Zone a reality.

Upload File(s)

[Lead Emissions - MDE monitoring \(1\).pdf](#)
[Letter to Commissioners of Charles County.docx](#)

Thank you,
Charles County, MD

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Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

September 13, 2021

Montgomery County Council
Stella B. Werner Office Building
100 Maryland Avenue
Rockville, Maryland 20850

Dear Councilmembers:

Thank you for your recent letter requesting lead monitoring equipment for the Montgomery County Airpark to assess ambient lead concentrations and the impact on surrounding neighborhood communities.

In 2017, with the EPA's approval, the Department discontinued the one remaining lead monitoring site in Maryland due to levels consistently below the analytical method's detection limit. The Department no longer has the capability to conduct lead monitoring. A list of potential contractors is enclosed if the Council would like to hire a private company to purchase equipment or to perform lead monitoring at the Airpark. The Department would be happy to assist in review of any proposals if the Council wishes to proceed with such an action. I have also provided additional background information on this issue below, that may be useful to the Council as this issue is further discussed.

When the National Ambient Air Quality Standard (NAAQS) for lead was last revised in 2008, the Environmental Protection Agency (EPA) substantially strengthened this standard by an order of magnitude, revising the level downward from 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), to 0.15 $\mu\text{g}/\text{m}^3$. The EPA also required that state air quality agencies measure the maximum lead concentration at each airport source that emits 1.0 ton or more per year based on either the most recent National Emission Inventory (NEI) or other scientifically justifiable methods and data (such as improved emissions factors or site-specific data) taking into account logistics and the potential for population exposure. There were no airports in Maryland that exceeded this threshold. The most recent NEI reported emissions for the Montgomery County Airpark was 0.125 tons/year for 2017.

In addition to the above, the EPA required that some state air quality agencies conduct a one-year lead monitoring study at fifteen airports that had estimated lead emissions between 0.5 and 1.0 ton per year in an effort to better understand how these emissions affect the air at and near airports. Airports for this one-year monitoring study were selected based on factors such as the level of piston-engine aircraft activity and the predominant use of one runway due to wind patterns, to help evaluate airport characteristics that could lead to ambient lead concentrations that approach or exceed the lead NAAQS. **There was no airport in Maryland that made the list.** Upon completion of the one-year study, only two airports exceeded the lead NAAQS with measured levels at 0.33 ug/m³ and 0.17 ug/m³, and monitoring continued at those locations.

In February 2020, the EPA issued a technical update on two reports regarding the impacts of lead emissions from piston-engine aircraft on air quality near U.S. airports. The following is an excerpt from this document:

*"EPA's modeling and monitoring data indicate that lead concentrations at and near airports are typically well below the National Ambient Air Quality Standard for lead (lead NAAQS). Among the more active airports in the United States, there are a few where lead concentrations may be above the lead NAAQS, in very close proximity to where aircraft conduct pre-flight engine checks. **For the vast majority of airports, these small areas with lead concentrations potentially above the air standard are within the fence line of the airport and not accessible to the public, in all but a few instances. Lead levels dissipate quickly with distance from piston-engine aircraft exhaust. Thus, within 50 meters of the high concentration area, lead levels were uniformly below the lead air standard.**"*

The reports summarized in the technical update document can be found here:

[https://www.epa.gov/regulations-emissions-vehicles-and-engines/epas-data-and-analysis-pistonengine-aircraft-emissions.](https://www.epa.gov/regulations-emissions-vehicles-and-engines/epas-data-and-analysis-pistonengine-aircraft-emissions)

Should you have any questions or require further information, please contact David Krask, Manager of the Air Monitoring Program, at 410-537-3756 or by email at david.krask@maryland.gov.

Sincerely,



George S. (Tad) Aburn, Jr., Director
Air and Radiation Administration

Enclosure: Listing of Consultants and Industrial Hygiene Firms



MONTGOMERY COUNTY COUNCIL

August 20, 2021

David J. Krask, Program Manager
Maryland Department of the Environment
ARA/Air Monitoring Program
1800 Washington Blvd.
Baltimore, Md. 21230-1720

Dear Mr. Krask:

On June 23, 2021, the Montgomery County Revenue Authority (MCRA) held a virtual public meeting regarding the Montgomery County Airpark, a public-use airport owned and operated by the MCRA located in Gaithersburg, Maryland. During the meeting, residents expressed concern regarding lead exposure from aircraft emissions over neighborhoods adjacent to the Airpark.

Operations at the Montgomery County Airpark include fixed base operator services as well as flight instruction and maintenance services. The Airpark is surrounded by densely settled residential communities as well as a large service/industrial park.

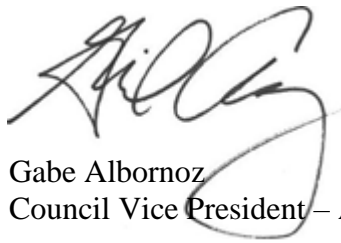
In response to community concerns, we would like to request lead monitoring equipment to assess the ambient lead concentrations at the Airpark location as well as the impact on the surrounding neighborhood communities. Should additional information be needed for this request, please contact Kristin Tribble at 240-777-7947.

Your assistance is very much appreciated.

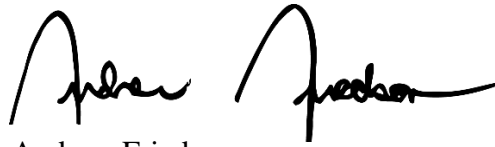
Sincerely,

Craig Rice
Councilmember - District 2

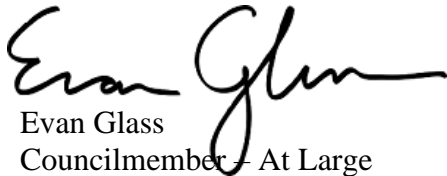
Tom Hucker
Council President - District 5



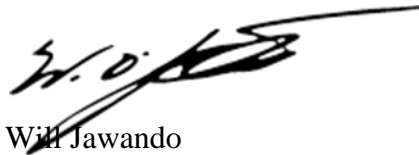
Gabe Albornoz
Council Vice President – At Large



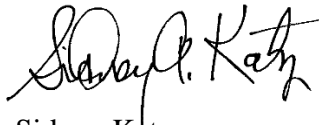
Andrew Friedson
Councilmember – District 1



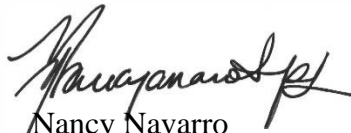
Evan Glass
Councilmember – At Large



Will Jawando
Councilmember – At Large



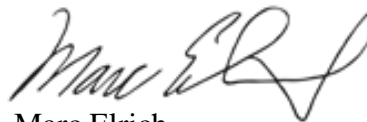
Sidney Katz
Councilmember – District 3



Nancy Navarro
Councilmember – District 4



Hans Riemer
Councilmember – At Large



Marc Elrich
County Executive

cc: Montgomery County Revenue Authority
Montgomery County Department of Environmental Protection

Commissioners of Charles County

200 Baltimore Street LaPlata, MD 20646

Re: Aviation Business Park ZTA 23-176/ZMA 23-02

I fully support the Aviation Business Park proposed under ZTA 23-176/ZMA 23-02...

I have been a pilot at Maryland Airport for nearly 30 years. I earned my instrument rating there from FAA examiner Larry DeAngelis in 1992. Maryland has long been a place for friendship, learning to fly, and a waypoint to adventure. I introduced all of my children to flying at Maryland and enjoyed many breakfast flights to Easton, Cambridge, and other destinations.

Establishing the Aviation Business Park promises great potential because of Maryland Airport's location. The airport is well positioned as a reliever airport for business travel to the National Capitol Region, located 10 miles from National Harbor, Maryland and 13 miles from the National Mall. The airport can become a reliever for busy Ronald Reagan National Airport and a destination for visitors to DC and National Harbor.

General aviation is a \$247 billion industry that accounts for more than 1.2 million jobs in America. Currently, there are more than 200,000 aircraft in the GA fleet, compared to fewer than 6,000 among the airlines. This country is served by more than 5,000 public-use airports, supporting a tremendous number of jobs, compared to fewer than 500 airports served by the airlines. In addition, many of these GA aircraft and airports are important staging sites for emergency rescue and disaster relief, and proved invaluable in the nation's fight against COVID.

Developing the airport offers direct employment for pilots, ground crew, and support personnel for Flight School and Air Taxi services. Direct employment could come from flight instructors, aircraft mechanics, schedulers and office staff. Additional revenue would be generated from a maintenance and repair facility serving transient aircraft and aircraft owners in Maryland and Virginia. Other technical skills would be needed for avionics certification, repair and installation, not to mention other revenue from hangar rentals and fuel sales as the airport thrives. Other beneficiaries of the Aviation Business Park would be training and education for new pilots, air taxi, light cargo, medical services (air ambulance, medical materials), and so on. Moreover, developing the airport as a Maintenance and Repair Facility would offer direct employment for mechanics but also apprenticeship opportunities for young people pursuing careers and for pilots performing their own maintenance in pursuit of a FAA Airframe and Powerplant certification.

Opportunities for indirect employment growth abound. Developing Maryland Airport as a flight school, air taxi, and MRO facility would create demand for restaurants, lodging, car rental, and other personal mobility solutions. In turn, the additional activity would enhance the Bryans Road area and the Indian Head Highway corridor with temporary construction and renovation jobs and new permanent employment opportunities.

Partnering with Maryland Airport to expand education opportunities in Southern Maryland would improve employment opportunities for Southern Maryland youth. Establishing an A&P apprenticeship with the at the College of Southern Maryland (CSM) School of Professional and Technical Studies to service and maintain aircraft would feed into the school's associate degree program and build a pipeline into the Aviation Management and Professional Pilot programs at University of Maryland Eastern Shore Maryland Airport and the maintenance, repair and operations facility could become the CSM aviation campus or a training laboratory for practical skill development. CSM students in business and hospitality curricula could leverage the airport as a model for entrepreneurship and hospitality programs. CSM might also offer the ground school curriculum for private and commercial pilot certificates.

Building on this base, Maryland Airport and Charles County could have a disproportional Impacts throughout Maryland and beyond. A recent study forecasts more than 320,000 aviation jobs in the United States. [2022, "Pilot and Technician Outlook 2022–2041", *The Boeing Corporation, Chicago, IL*] Mechanic and other skilled professional certificate training would feed employers at National Airport, BWI, Dulles; smaller airports like Montgomery County, College Park, Tipton, and Lee Airports; St. Mary's County Regional; and contractor and Government aviation opportunities at Joint Base Andrews and NAS Patuxent River.

At the public hearing on September 18, 2023, I heard a number of speakers express concern about lead contamination from exhaust fumes from aircraft. The majority of aircraft in the current general aviation fleet were designed to operate with fuel formulated to prevent damaging engine detonation that can result in a sudden engine failure. For decades, a lead-based additive has been the solution to get the high octane needed to prevent detonation. Finding a suitable substitute that doesn't contain lead has been challenging. However, in recent years there has been progress and the industry is committed to finding an alternative. Even though avgas represents one-third of 1 percent of all gasoline sales in the United States, the aviation industry is fully behind a smart and safe transition to an unleaded future.

But the concern that fumes from aircraft engines are causing toxic level of lead for persons on the ground is hogwash. Having spent more than 500 hours inches away from the exhaust of leaded fuel airplanes, I can personally attest to the safety of properly combusted aviation fuel. This is substantiated by a report from the Maryland Department of the Environment (attached). For several years, MDE monitored lead contamination at Montgomery County Airpark. In 2017, with the EPA's approval, the Department discontinued the one remaining lead monitoring site in Maryland due to levels consistently below the analytical method's detection limit. According to the MDE, when the National Ambient Air Quality Standard (NAAQS) for lead was revised in 2008, the Environmental Protection Agency (EPA) substantially strengthened this standard by an order of magnitude, revising the level downward from 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), to 0.15 $\mu\text{g}/\text{m}^3$. The EPA also required that state air quality agencies measure the maximum lead concentration at each airport source that emits 1.0 ton or more per year based on either the most recent National Emission Inventory (NEI) or other scientifically justifiable methods and data (such as improved emissions factors or site-specific data) taking into account logistics and the potential for population exposure. There were no airports in Maryland that exceeded this threshold. Moreover, In February 2020, the EPA issued a technical update on two reports regarding the impacts of lead emissions from piston-engine aircraft on air quality near U.S. airports. The following is an excerpt from this document:

"EPA's modeling and monitoring data indicate that lead concentrations at and near airports are typically well below the National Ambient Air Quality Standard for lead (lead NAAQS). Among the more active airports in the United States, there are a few where lead concentrations may be above the lead NAAQS, in very close proximity to where aircraft conduct pre-flight engine checks. For the vast majority of airports, these small areas with lead concentrations potentially above the air standard are within the fence line of the airport and not accessible to the public, in all but a few instances. Lead levels dissipate quickly with distance from piston-engine aircraft exhaust. Thus, within 50 meters of the high concentration area, lead levels were uniformly below the lead air standard."

There is no danger to the citizens of Charles County from lead emitted by aviation fuel burning light aircraft.

Furthermore, whatever limited risk there may be will soon be gone forever. Some aircraft can already use the available 94-octane unleaded fuel from Swift Fuels and in some cases, unleaded automotive fuel of certain octane levels and without ethanol. However, it is the pilot's and aircraft owner's responsibility to know if their aircraft has been approved for these unleaded fuels (and, if so, have purchased the appropriate supplemental type certificate [STC]) and where they may be able to buy it. The industry is working on a smart transition toward an unleaded solution that will work for the entire GA fleet.

In September 2022, the FAA approved STCs for General Aviation Modifications Inc.'s 100-octane unleaded fuel (G100UL) to be used in every general aviation spark-ignition engine and every airframe powered by those engines. The move was hailed by the industry as a major step in the transition to an unleaded GA future. In 2021, the FAA approved STCs GAMI's for covering a smaller number of Cessna 172 engines and airframes, and then expanded the approved model lists (AML) to include essentially all lower-compression engine and airframe combinations. Though that was seen as an encouraging step forward in the yearslong path to supply unleaded aviation fuel to the piston aircraft fleet, the STCs did not include aircraft needing the higher-octane fuel that accounts for 60 to 70 percent of avgas consumption. This latest announcement by the FAA addressed the needs of those higher-compression engines.

I urge the commissioners to approve this zoning initiative and continue efforts to develop this important segment of the county for the economic benefit of all of the citizens of Charles County.

Yours truly,

John Kennedy
5100 Monticello Court
Waldorf, MD 20601
(301) 705 8599