

January 9, 2023

Re: Comments on Docket No. EPA-HQ-OAR-2022-0389

Dear U.S Environmental Protection Agency:

The undersigned individuals and organizations appreciate the opportunity to comment on Docket No. EPA-HQ-OAR-2022-0389.

The City of Middleton, Wisconsin, approved the expansion of Middleton Municipal Airport, also known as Morey Airport. The airport already has significant air traffic of small aircraft in a heavily residential area. This small aircraft primarily uses leaded aviation gas, also known as Avgas. The expansion will increase air traffic and the use of Avgas in this airport, increasing Lead contamination of the air in the surrounding area. We ask the agency to consider the following:

- Morey Airport produces 32% of airborne lead emissions in Dane County. Dane County has the second-highest airborne lead emissions of all 72 counties in Wisconsin (WI DNR).
- Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The Lead effects most likely to be encountered in current populations are neurological effects in children. Infants and young children are especially sensitive to lead exposures, which may contribute to behavioral problems, learning deficits and lowered IQ. <sup>1</sup>
- According to [Miranda et al.](#)<sup>2</sup>, Early childhood blood lead levels as low as 2 µg/dL can have significant impacts on academic performance -In response to this body of research, the CDC has stated that there is no safe level for blood lead in children ([CDC 2005](#)).<sup>3</sup>
- Children highly frequent the area surrounding the Middleton Municipal Airport with a population of 4000 to 5000 children spending significant time in the area; within two miles of the Middleton Municipal Airport (C29), there are three pre-schools; Primrose School of Middleton, Little Red, and Clubhouse for kids, two elementary schools; Sauk Trail and Northside Elementary, the Middleton High School and Kromrey Middle school

and several kids' sports venues, such as Keva Sports Center, Middleton Gymnastics, Airport Soccer fields, and parks.

The use of Leaded aviation fuel in Middleton Municipal Airport contaminates the air with Lead, a neurotoxic substance, threatening the health and well-being of Middleton residents, especially our children. Therefore, we respectfully ask the EPA to declare the use of leaded aviation gas a danger to the health and welfare of the public.

Thank you for considering these comments,

Respectfully submitted,

*Cristina Carvajal / [wiecolatinos@gmail.com](mailto:wiecolatinos@gmail.com)  
Executive Director  
Wisconsin EcoLatinos*

-added signatures-

1. <https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution>
2. A Geospatial Analysis of the Effects of Aviation Gasoline on Childhood Blood Lead Levels  
[Marie Lynn Miranda](#), [Rebecca Anthopolos](#), and [Douglas Hastings](#)
3. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3230438/#r5>