

Board of Health

for Madison and Dane County

2300 South Park Street, Room 2010
Madison, WI 53713

publichealthmdc.com/board

DATE: May 29, 2025

TO: David Bryce, MD, Member, Town of Middleton Board

SUBJECT: Response to Town of Middleton regarding leaded aviation fuel

Dear Dr. Bryce,

The Board of Health for Madison and Dance County (BoH) and personnel of Public Health Madison & Dane County (PHMDC) have reviewed reports of your telephone communications of early April, including:

- A question as to whether BoH and PHMDC had reviewed the USGS Scientific Investigations Report 2024-5113 ("Report");
- Asking for the BoH to provide a statement that the Middleton Municipal Airport (also known as Morey Field) should switch to unleaded fuel; and
- If the BoH would consider reiterating its position on the matter of leaded aviation fuel use at Middleton Municipal Airport in light of the USGS report

Personnel from the BoH and PHMDC attended (by Zoom) the Middleton Town Board meeting where preliminary results of the Report were presented and have reviewed the final version of the Report in detail. In partial response to these questions, we'd ask that you review prior communications, including our December 2022 report, "[Assessing Childhood Lead Poisoning Risk from Middleton Municipal Airport](#)," as well as our [letter to Chair Richson](#) dated January 27, 2023 (note that the date was mis-entered as "2021" in the record).

The Board stands by the last paragraph of the letter and has made no change in its position regarding the desirability of the eventual elimination of leaded aviation gas. Neither the BoH nor PHMDC has authority to regulate airport functions nor aviation fuel. We are encouraged by the [Environmental Protection Agency's Endangerment Finding](#) dated October 20, 2023 and the subsequent "duty to propose and promulgate emission standards...pursuant to...the Clean Air Act," and "...the FAA['s] ..statutory mandate to prescribe standards...to control or eliminate aircraft emissions which the EPA has found endanger public health or welfare..."

Regarding the isotopic ratios of the very low levels of lead in two wells: it's important to note that the Report does not allow a conclusion as to the origin of the lead and makes no definitive statement about origin. For one thing, levels and ratios were similar in the upgradient and Highland Circle wells. In addition, Mr. Stuntebeck noted in response to emailed questions dated January 6, 2025 from BoH member Dr. Gene Musser regarding the specificity of lead isotopic ratios, "there is a lot of overlap between isotopic ratios of lead used in Avgas 100 and older auto gas, and there's actually a lot of overlap with paint and other sources as well." "We

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thought isotopes were really going to help us pin down sources, but this proved very difficult to do.” Sean Scott, a chemist who performed the isotopic studies at the Wisconsin State Lab of Hygiene, commented via email to BoH member Dr. Musser on January 12, 2023, that the isotopic [composition of older automobile gas](#) is similar to the Avgas in use at Morey Airport—and acknowledged, “However, I would not say there is a unique isotopic composition for any type of gasoline.”

The BoH and PHMDC continue to monitor the situation regarding the Morey Airport and leaded Avgas and, in particular, regionally measured childhood lead levels and will make further recommendations should they become warranted.

Sincerely,

Board of Health for Madison and Dane County

Dr. Jerry Halverson, Chair
Dr. Gene Musser (1st Vice Chair)
Leslie Seltzer (2nd Vice Chair)
Lisa Jackson
Ceri Jenkins
Jessi Kendall