



FAA Releases CertAlert on Part 139 Extinguishing Agent Requirements

October 4, 2021

With a congressional deadline for the Federal Aviation Administration (FAA) to approve a PFAS-free alternative to aqueous film forming foam (AFFF) having arrived today, the agency this afternoon released a [Part 139 CertAlert](#) outlining three avenues that a Part 139 certificated airport can pursue to gain FAA review of a PFAS-free firefighting foam for use at its airport in lieu of AFFF that contains PFAS and is currently required to be used by FAA. Importantly, FAA has made clear that the agency will evaluate any potential fluorine-free foam submitted by an airport against existing performance standards defined in the military specification.

Approval by the agency of any foam submitted pursuant to this CertAlert faces incredibly high hurdles and concerns have been raised that this document creates an unrealistic expectation that airports could obtain such approval. Despite several years of concerted efforts by FAA and the Department of Defense (DOD) to identify an alternative, fluorine-free foam that meets these existing performance specifications – and millions of dollars spent – the federal government has been unable to identify such a foam and has failed to meet the October 2021 deadline set by Congress. If FAA and DOD have been unable to approve a suitable alternative after three years of research and with their significant resources, an airport is extremely unlikely to achieve that objective on its own.

AAAE continues to press FAA and DOD to identify and approve an alternative foam as soon as possible, and we are also urging clear and realistic transition planning supported by much needed federal resources to airports.

Research for AFFF Alternatives. As part of the 2018 FAA reauthorization bill, Congress directed FAA to allow airports to use non-fluorinated chemicals in firefighting foam within three years, or by October 4, 2021. To comply with the mandate, FAA built an aircraft rescue and firefighting (ARFF) testing facility, which was completed in 2019, to test both commercially available and in-development firefighting foams. As of this month, FAA has conducted over 400 tests on 15 commercially available, and prototype, fluorine-free firefighting foam products.

In the CertAlert, FAA identified several of the safety concerns with the fluorine-free products that they have tested at the ARFF research facility. The safety concerns include (a) notable increase in extinguishment time; (b) issues with fire reigniting (failure to maintain fire suppression); and (c) possible incompatibility with other firefighting agents, existing equipment, and aircraft rescue training and firefighting strategies that exist today. These issues, among others, are the primary reasons why FAA has yet to identify and approve a suitable alternative.

FAA Guidance on Foam Use. The CertAlert also discussed two recommendations from FAA regarding the use of firefighting foam at airports. First, FAA reiterated its policy that the agency does not require the discharge of foam except during an actual emergency involving a fuel fire. However, airports must have an input-based foam proportioning testing system and must be able to show that it works in an acceptable manner for each vehicle required for its ARFF index. In the document, FAA “strongly encourages” airports to acquire these systems, which are [eligible for funding](#) under the Airport Improvement Program. Second, FAA encouraged airports to follow state and local requirements, if applicable, for containment and clean-up of firefighting foam discharged on the airport.

What’s Next? FAA and DOD are continuing to conduct research and testing on fluorine-free firefighting foams for use by both the military and Part 139 certificated airports. FAA indicated that they expect the U.S. Navy to develop and release a specification for a fluorine-free agent by January 31, 2023, and this specification will be adopted by FAA when available. In the meantime, AAAE continues to press FAA and DOD to identify and approve an alternative foam as soon as possible, and we are also urging clear and realistic transition planning supported by much needed federal resources to airports.



[Justin Barkowski](#), Vice President
[Janet Bennett](#), Director
[Jeremy Valcich](#), Director

AAAE | 601 Madison Street, Suite 400, Alexandria, VA 22314

Sent by justin.barkowski@aaae.org