
FIRE DEPARTMENT SERVICE ANNOUNCEMENT

Bulletin #40, FAA Fail, October 15, 2021

Congress had directed the Federal Aviation Administration (FAA) to transition firefighting foam from Aqueous Film Forming Foam (AFFF) to fluorine-free foams through the National Defense Authorization Act (NDAA) of 2018. FAA missed this deadline on October 5, 2021.¹ The fluorine requirement for AFFF was deleted in 2019.² Testing criteria for AFFF has not changed yet but is now being tweaked.

There are two aspects of AFFF:

1. The MilSpec which is the Military Specification criteria strictly set for the production of firefighting foam for the US military.³
2. And, "The MILSPEC is a performance standard – many tests to demonstrate compliance with performance requirements".⁴

The FAA now "encourages certificate holders that have identified a different foam that meets the performance standard to seek approval for such from the FAA."⁵ FAA urges "U.S. airports to limit the use of firefighting foam with the chemical PFAS due to the environmental and public health risks as it evaluates possible alternatives."⁶ During the past year, several airports requesting exemptions to AFFF have been ignored by the FAA.

"The FAA Administrator Steve Dickson noted in an August letter that the FAA's alternative firefighting agent research project had been impacted by disruptions caused by the COVID-19 pandemic."⁷ However, the pandemic has not impacted many other international airports and corporate facilities that have already made the transition successfully to fluorine-free firefighting foams as noted in previous Foam Exposure Committee bulletins.

In testimony to the Washington State Congress in 2020 (<https://www.ewg.org/news-insights/news/its-time-switch-pfas-free-firefighting-foams>), Fire Chief Randy Krause, Seattle-Tacoma International Airport, mentioned AFFF as over designed for the airport environment.

The Foam Exposure Committee would encourage the FAA to fulfill its duties as directed by Congress. In the meantime, fire departments should try to avoid using AFFF from an airport or military facility on mutual aid incidents due to the environmental and health issues associated with fluorinated firefighting foams.

1 SaferChemicals, FAA must end the use of polluting PFAS firefighting foam, October 5, 2021, Liz Hitchcock, <https://saferchemicals.org/2021/10/05/faa-must-end-the-use-of-polluting-pfas-firefighting-foam/>

2 SERDP / ESTCP, AFFF Alternatives: Art of the Possible, 15 Nov 2019, p. 9, <https://www.serdp-estcp.org/News-and-Events/Conferences-Workshops/Past-WP-Workshops/AFFF-Alternatives-Summit-2019> EverySpec, http://everyspec.com/MIL-SPECS/MIL-SPECS-MIL-F/MIL-F-24385F_38698/, accessed 10 Oct 2021

3 SERDP / ESTCP, AFFF Alternatives: Art of the Possible, 15 Nov 2019, p. 30, <https://www.serdp-estcp.org/News-and-Events/Conferences-Workshops/Past-WP-Workshops/AFFF-Alternatives-Summit-2019>

5 Federal Aviation Administration, National Part 139 Cert Alert, 10/4/2021, Part 139 Extinguishing Agent Requirements, https://www.faa.gov/airports/airport_safety/certalerts/media/part-139-cert-alert-21-05-Extinguishing-Agent-Requirements.pdf

6 U.S. urges airports to avoid using firefighting foam with fluorine, David Shepardson, Oct 4, 2021, <https://www.reuters.com/business/environment/us-urges-airports-avoid-using-firefighting-foam-with-fluorine-2021-10-04/>

7 *ibid.*

Foam Exposure Committee

Contact: Rick Nickeson

rick@rnick.com

C. 781-775-2092

Vicki Quint

codepfas@gmail.com

C. 262-794-7226

The Foam Exposure Committee Mission Statement -

To reduce firefighter / first responder exposures to perfluorinated chemicals used in firefighting foams in order to protect their health and lives. We will recommend a list of firefighting products for fire departments based upon testing, which we believe have no intentionally added fluorine. First responders should have immediate access to safer fluorine-free firefighting foams.



Kevin Ferrara
William Hutchins
Dion LeMieux
Rick Nickeson
Vicki Quint
Richard Rockford