



U.S. Department
of Transportation

**Federal Aviation
Administration**

Office of the Administrator

800 Independence Ave., S.W.
Washington, D.C. 20591

December 18, 2018

Mr. Mark Van Port Fleet
Senior Chief Deputy Director
State of Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Van Port Fleet:

Thank you for your letter to Secretary of Transportation Elaine L. Chao and me expressing concern related to perfluoroalkyl and polyfluoroalkyl substances (PFAS) found in Aqueous Film Forming Foam (AFFF) used to extinguish aircraft fires. You requested that the Federal Aviation Administration (FAA) expeditiously provide an alternative and environmentally conscious method of compliance with the foam testing requirements.

The FAA takes this matter seriously. The FAA's Office of Airport Safety and Standards is in the final stages of producing a CertAlert that will address AFFF testing at Part 139 certificated airports. The CertAlert will ask aircraft rescue firefighting (ARFF) departments to work with their local or state environmental regulatory organizations to identify a suitable location/storage container for foam discharge from their ARFF vehicles. Testing ARFF vehicles is an integral part of maintaining readiness in case of an emergency. The FAA believes that this regulatory requirement is essential to public safety. However, we are currently exploring other methods of testing foam-proportioning systems.

The FAA's William J. Hughes Technical Center located in Atlantic City, New Jersey, is researching commercially available internal foam testing systems to determine reliability and whether it is possible to conduct testing with reduced environmental impacts. If approved, the system can be tested without dispensing any foam.

In addition, construction will soon begin on a new ARFF Research Center for testing on this and other ARFF technologies. One of the goals of these projects is to identify alternative firefighting foams that are environmentally friendly and fluorine-free and can provide the same level of safety protection to the flying public.

We greatly appreciate your offer of assistance of the Michigan PFAS Action Response Team as we move forward.

Sincerely,

A handwritten signature in black ink, appearing to read "DK Elwell". The signature is written in a cursive, slightly slanted style.

Daniel K. Elwell
Acting Administrator

cc: Mike Trout, MDOT Aeronautics
Executive Administrator