



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

October 10, 2018

The Honorable Elaine Chao
Secretary, United States Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Mr. Dan Elwell
Acting Administrator
Federal Aviation Administration
800 Independence Avenue SW
Washington, D.C. 20591

Dear Secretary Chao and Acting Administrator Elwell:

Aqueous Film Forming Foam

The Michigan PFAS Action Response Team (MPART) tasked the Michigan Department of Transportation (MDOT) with assisting in the State's response to the emerging human health concerns related to perfluoroalkyl and polyfluoroalkyl substances or PFAS. PFAS are a group of chemicals used globally for a variety of industrial and commercial purposes, including the Aqueous Film Forming Foam (AFFF) required to be present, tested, and dispersed at most Part 139 Certificated airports in Michigan and across the country.

Recently, as a result of the State's proactive approach to limiting the health impacts of PFAS use, many airports in Michigan raised concerns regarding the dispersal of AFFF for Part 139 compliance inspections and testing due to the potential environmental concerns. Given both the Congressional action required in the recent FAA reauthorization and the existence of alternatives to the current practice of dispensing the foam on to the ground, we respectfully request FAA expeditiously provide an alternative and environmentally conscious method of compliance with the foam testing requirements to ensure the health and safety of not only Michigan, but all U.S. residents.

We are willing to offer the collective support and technical expertise of the entire MPART team. I have designated MDOT Aeronautics Administrator Mike Trout to lead this effort. If you have any questions, he can be reached at 517-335-9568 or by email at troutm1@michigan.gov.

Sincerely,

Mark Van Port Fleet, P.E.
Senior Chief Deputy Director

cc: Mike Trout

bcc: Ms. Rebecca McPherson, Great Lakes Regional Administrator
Mr. Kevin Willis, Federal Aviation Administration Director