

[REDACTED]

From: [REDACTED]
Sent: 11 October 2021 11:47
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: FYI:US aviation authority opens door to PFAS-free firefighting foams

Dear [REDACTED]

Thank you for forwarding this. Indeed, the FAA and Mil-spec will have to be adapted to allow a use of fluorine-free foams in the US. Fortunately in the EU the aviation sector is generally not following these and several airports have already switched to alternatives.

Best regards,

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: 11 October 2021 09:18
To: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
[REDACTED] <[REDACTED]>
Subject: FYI:US aviation authority opens door to PFAS-free firefighting foams

Dear [REDACTED] [REDACTED] [REDACTED]
Just in case, you have not seen this message.

[REDACTED]

US aviation authority opens door to **PFAS**-free firefighting foams

05 October 2021

NGOs urge more aggressive action as military-based standards delay shift away from compounds

The US Federal Aviation Administration (FAA) has dropped its requirement that airport firefighting foams contain per- and polyfluoroalkyl substances (PFASs), but environmental entities say the agency must modify performance metrics to enable the adoption of PFAS-free substitutes.

In a 4 October alert to airports, the agency said it will now permit non-fluorinated options if they meet current performance standards. With the announcement, the FAA hit the deadline Congress set in the [2018 FAA Reauthorization Act](#) to allow fluorine-free foams (F3).

The guidance follows weeks of [uncertainty](#) regarding whether the agency would meet the cut-off because so far only PFAS-containing aqueous film-forming foams (AFFF) have met existing performance requirements.

These criteria are equivalent to a military specification (Mil-Spec) mandating, among other things, that a 28-square-foot gasoline fire be extinguished within 30 seconds. While the agency said it is sticking to this Mil-Spec, it "expects that the US Navy will provide a specification for a fluorine-free agent by 31 January 2023, and this specification will subsequently be adopted by the FAA".

However, environmental organisations said the Mil-Spec impedes the removal of PFAS-containing foams, and called on the agency to immediately switch to criteria supporting F3 use.

Agency work

The FAA recommended that airports seek its approval for any F3 that might fulfil the Mil-Spec. The agency told Chemical Watch it aims to curb fluorinated foam applications by encouraging them "only in an actual emergency".

The agency "continues to partner with the Department of Defense (DOD) in efforts to find a firefighting foam that ensures the protection of the flying public with no impact on human health or the environment", it said. AFFF is "very effective" for its

intended purpose of countering fuel fires, so the FAA has been studying "fluorine-free firefighting foams to find a replacement with equivalent firefighting performance that eventually can be used at airports".

The agency is assessing "new innovative foam formulations provided under research agreements with foam manufacturers", it added.

"Interim research has already identified safety concerns with candidate fluorine-free products that must be fully evaluated, mitigated and/or improved before FAA can adopt an alternative foam," the agency said. These issues include:

- longer fire suppression time compared with AFFF;
- inability to keep extinguished fires out; and
- potential incompatibility with gear, other firefighting agents and aircraft rescue training and firefighting schemes.

In an August 24 letter to the agency's Research, Engineering, and Development Advisory Committee (REDAC), Administrator Steve Dickson noted that the "FAA will likely need additional time to adequately coordinate all of the results and complementary research with DOD."

Environmental groups press for more

Liz Hitchcock, director of Safer Chemicals Healthy Families (SCHF), described the FAA communication as "classic DC doublespeak" because it "lays out no clear path" to obtain approval for non-fluorinated options. "In essence, PFAS firefighting foams are still required at America's airports," she said.

According to Melanie Benesh, legislative attorney for the Environmental Working Group (EWG), "by continuing to tie performance requirements to the Mil-Spec, the FAA is functionally blocking airports from adopting safer PFAS-free alternatives, which directly undermines the intent of the 2018 FAA Reauthorization Act."

Airport fires are not comparable to those on military bases, aircraft carriers, ships and submarines, she said.

Ms Benesh told Chemical Watch that the agency should transition to metrics meant for airports, such as the International Civil Aviation Organization (ICAO) standards for class B firefighting foams. Many airports worldwide have applied ICAO criteria to implement non-fluorinated foams and successfully handle emergencies, including London Heathrow, Paris-Charles De Gaulle and Dubai, she said.

"It's time for the FAA to stop stalling and move quickly to protect drinking water, firefighter health and all of us from these dangerous chemicals," Ms Benesh said.

FURTHER INFORMATION

- **FAA alert**
- **FAA letter**
- **EWG release**
- **SCHF release**



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