




Bulletin #80, October 1, 2023
FAA Delivery Systems

| ARFF ¹ | Delivery System | Foam tank size | Finished Foam – 3 % |
|---|-----------------|-----------------------|---------------------|
|  | ARFF Class 1 | 100 gallons | |
| | ARFF Class 2 | 300 gallons | |
| | ARFF Class 3 | 500 gallons | 16,667 |
| | ARFF Class 4 | 1,500 gallons | 50,000 |
| | ARFF Class 5 | 3,000 – 4,000 gallons | 100,000 – 133,333 |

The IAFF announced in September 2018, that: “Airport fire departments will soon be free to select fluorine-free foams that don’t contain toxic PFAS chemicals.”²

Five years later, the FAA has finally issued a new Cert 139 on firefighting foam (No. 23-07, 9/13/2023).³ One product has been listed thus far on the QPL.

According to the current Cert 139, dual agent use will continue at airports. PFAS water contamination will continue in communities as long as AFFF is used.

The Department of Defense stated: “Section 322 prohibits DoD procurement of fluorinated aqueous film-forming foam (AFFF) containing in excess of one part per billion of perfluoroalkyl and polyfluoroalkyl substances (PFAS) after October 1, 2023, ***unless an exemption applies.***”⁴ [emphasis added]

US fire departments have no such regulations requiring the use of AFFF.

1 <https://www.oshkoshairport.com/arff-vehicle-reference-guide>

2 IAFF Testifies on Toxic Fire Fighting Foam at Senate Subcommittee Hearings, September 28, 2018, <https://www.iaff.org/news/iaff-testifies-on-toxic-fire-fighting-foam-at-senate-subcommittee-hearing/>

3 FAA, https://www.faa.gov/airports/airport_safety/certalerts/part_139_certalert_23_01, accessed September 25, 2023

4 The Federal Register, Defense Federal Acquisition Regulation Supplement: Replacement of Fluorinated Aqueous Film Forming Foam (DFARS Case 2020-D011), 9/29/2023, <https://www.federalregister.gov/documents/2023/09/29/2023-20800/defense-federal-acquisition-regulation-supplement-replacement-of-fluorinated-aqueous-film-forming>