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United States  
Department of  
Agriculture

Forest  
Service

Washington  
Office

14th & Independence SW  
P.O. Box 96090  
Washington, DC 20090-6090

Reply to: 5700

Date: March 24, 1993

Subject: C-130A Issue - Draft Memo

To: Ben Campbell  
Deputy Director, OAS

Ben, as discussed, we do not think that the first paragraph of the memo serves a purpose. C-119 airtanker accidents were caused by flight outside the established performance envelope, not by inadequate inspection or maintenance. Also, there is no relationship to suspension of C-119 airtankers and initiation of the C-130 acquisition program. Transition to C-130's and P-3's are the result of our desire to improve the reliability and performance of the contract person.

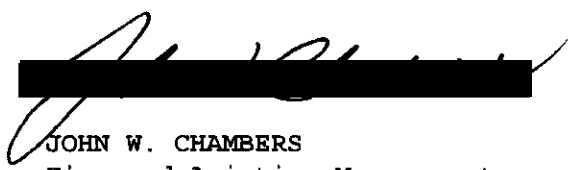
It would be desirable to point out in the second paragraph that OAS pre-award evaluation and conclusions were based upon evaluation of a single aircraft and operator, not under contract with the Forest Service. (As discussed, Forest Service inspectors have found no reason for concern after inspecting numerous C-130A airtankers under contract to the Forest Service.)

It would also be helpful to indicate that the Forest Service is in full agreement with planned FAA actions regarding C-130A inspection and maintenance standards, and intends to require full compliance with these standards once issued. At that point, both the FS and the OAS will have like policies regarding these aircraft.

Clarification of the term "DOI wildfires" would also be helpful to the folks in the trenches. Does this mean any wildfire on DOI administered lands regardless of protection responsibility?

We don't see any inordinate risk of tort claim costs to the Government when using C-130A airtankers per FAA certification. We do however think that the risk of claims and potential costs are considerable should we not utilize available, FAA approved, C-130A airtankers under contract for wildfire suppression.

In closing, we regret this difference, Ben; hopefully we can prevent them from reaching this point in the future.



JOHN W. CHAMBERS  
Fire and Aviation Management  
USDA Forest Service

Enclosure



**DRAFT**

3/31/93

UNITED STATES DEPARTMENT OF THE INTERIOR  
WASHINGTON, D.C. 20240

In Reply Refer To:  
9400 (RP-120)

Instruction Memorandum No. 93-

To: State (or Regional) Directors  
From: Director (or Commissioner)  
Subject: Use of C-130A Airtankers

The attached memorandum from the Director, Office of Aircraft Services (OAS), requires us to take actions to minimize the use of U.S. Forest Service contracted C-130A airtankers during the 1993 fire season on Department of the Interior lands which are being protected by a DOI agency.

The Director, OAS, strongly preferred a complete restriction on the use of C-130A aircraft on DOI lands; however, recognizing the total interagency nature of fire operations and the intermingled land ownership patterns, he conceded to the "minimized use" policy. Therefore, the following policies will be adhered to during the upcoming fire season.

1. C-130A's will not be mobilized from one geographic area to another geographic area for any going or anticipated fires on DOI lands which are protected by a DOI agency.
2. State Directors will instruct their field offices to develop local procedures to insure that the use of C-130A's on DOI lands being protected by a DOI agency is minimized. Local, written plans to minimize this use should be collected, evaluated and maintained by each

State Office.

In closing, we would like to apologize for this obvious breakdown in interagency coordination that has resulted in this awkward operational situation. We are pursuing an improved coordination process which will prevent this type of gridlock in the future. If you have any questions concerning this issue, please contact . . . .

1 - Attachment ( p)

1 - Memo dated / / ( p)



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, D.C. 20240

MAY 10 1993

## Memorandum

To: Director, Bureau of Land Management  
Director, Fish and Wildlife Service  
Director, National Park Service  
Assistant Commissioner, Indian Affairs

From: Director, Program Services *Burt R. H. [Signature]*

Subject: Use of C-130A Airtankers

The Department of the Interior understands that the U.S. Forest Service has activated early a contract for a C-130A airtanker based at Hemmett Valley, California. That contract was due for activation on May 18.

The Department of the Interior and the U.S. Forest Service have cooperative agreements making airtankers under contract to one agency available to the other. The contract process provides for inspection of aircraft to ensure the vendor's ability to comply with the specifications of the contract. During a contract pre-award evaluation in 1991, Office of Aircraft Services inspectors concluded that essential inspection and maintenance services critical to sustaining the aircraft in an airworthiness condition under normal operating conditions were not being accomplished.

On May 6, 1993, representatives from the Office of Aircraft Services, the Department of the Interior fire program, and the Department's Solicitor's Office met with representatives of the Department of Justice to review the issues involved in this matter. As a result of that meeting, another meeting is scheduled for May 14, 1993, with the above parties and the Federal Aviation Administration and the U.S. Forest Service.

The Department of the Interior believes that the risks associated with the use of the current fleet of C-130A aircraft are too great to allow their use in association with Department of the Interior wildfire suppression activities, notwithstanding the Federal Aviation Administration's issuance of airworthiness certificates.

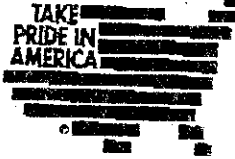
Thus, until further notice, use of C-130A airtankers on fires on Department of the Interior lands being managed by a Department of the Interior agency is prohibited. No employee of the Department of the Interior nor its bureaus shall dispatch any C-130A airtankers, regardless of the location of the fire or the agency managing the fire.

cc: Office of Aircraft Services  
Division of General Law  
Bureau Fire Directors  
National Interagency Coordination Center



# United States Department of the Interior


OFFICE OF THE SECRETARY  
Washington, D.C. 20240



MAY 28 1993

## Memorandum

To: Director, Bureau of Land Management  
Director, Fish and Wildlife Service  
Director, National Park Service  
Assistant Commissioner, Indian Affairs

From: Director, Program Services 

Subject: Use of C-130A Airtankers - REVISION TO POLICY

On May 10, 1993, I issued a memorandum prohibiting the use of C-130A airtankers on fires on Department of the Interior lands being managed by a Department of the Interior agency. In addition the memorandum prohibited employees of the Department of the Interior and its bureaus from dispatching any C-130A airtankers, regardless of the location of the fire or the agency managing the fire. The basis for those prohibitions was documented in the May 10 memorandum.

Since that time the Department has met with the Federal Aviation Administration (FAA), the U.S. Forest Service, and the Department of Justice to further explain its concerns and to obtain additional information regarding the process for evaluating aircraft safety and airworthiness.

On May 28, 1993, Mr. William J. White, Deputy Director, Flight Standards Services, FAA, wrote to me acknowledging the concerns that the Department of the Interior has raised regarding the inspection and maintenance program of the C-130A airtankers and setting forth an expedited process for evaluating those concerns. That process will include an evaluation of the military inspection and maintenance program for the C-130As, establishment of guidance for approving inspection programs, and formulation of recommendations to the Aircraft Certification Service regarding issuance of any necessary airworthiness directives, designation of life-limited parts, and revisions to the C-130A type certification data sheets. Additionally, the FAA will review existing approved inspection programs and recommend revisions that may be necessary.

The FAA reiterated that the C-130As are certificated in the restricted category, and that their airworthiness certification will remain in effect as long as

maintenance and alterations are properly performed by the operators as set forth in the Federal Aviation Regulations.

Thus, effective immediately, the prohibitions on the use and dispatch of C-130A aircraft issued May 10, 1993, are withdrawn.

Attachment

Letter dated May 28, 1993, from William J. White, Deputy Director, Flight Standards Service, Federal Aviation Administration

cc: Office of Aircraft Services  
Bureau Fire Directors  
National Interagency Coordination Center  
Division of General Law  
Acting Director, Fire and Aviation, U.S. Forest Service  
William J. White, FAA  
National Transportation Safety Board

**DRAFT COPY**



United States Department of the Interior

OFFICE OF THE SECRETARY

In reply refer to:

OFFICE OF AIRCRAFT SERVICES

3905 VISTA AVENUE  
P.O. BOX 15428  
BOISE, IDAHO 83715-5428

April 1, 1993

MEMORANDUM

TO: DIRECTOR, BLM  
DIRECTOR, FWS  
DIRECTOR, NPS  
COMMISSIONER, BIA

FROM: DIRECTOR, OFFICE OF AIRCRAFT SERVICES, PAS

SUBJECT: USE OF C-130A AIRTANKERS

The Department of the Interior (DOI) and the U.S. Forest Service (USFS) have cooperative agreements making airtankers under contract to one agency available to the other. The contract process provides for inspection of aircraft to ensure the vendor's ability to comply with the specifications of the contract. During a contract pre-award evaluation in 1991, Office of Aircraft Services (OAS) inspectors concluded that essential inspection and maintenance services critical to sustaining the aircraft in an airworthiness condition under normal operating conditions were not being accomplished.

The United States Air Force C-130A maintenance program is designed to assure that latent defects are discovered and corrected before malfunctioning or serious trouble results. This system includes Programmed Depot Maintenance (PDM) inspection and service on a scheduled 42-months calendar year cycle.<sup>1</sup> In part, the PDM includes core inspection requirements that are designed to direct the attention of maintenance personnel to components and areas (or zones) where defects are suspected to exist due to usage under normal operating conditions. Core PDM inspection requirements are defined as those inspection items essential to ensure safe aircraft operations irrespective of the flight environment in which the aircraft is operating. It is the collective judgment of this office and the U.S. Air Force C-130A engineering authority that the fact the aircraft were transferred out of a "military system" into the "civilian system" and issued a restricted category Type Certificate, Airworthiness Certificate, and an FAA-approved inspection program does not negate the requirement for the inspection and maintenance of selected components previously serviced in PDM.

The Federal Aviation Administration (FAA) is in the process of developing several measures to ensure the C-130A aircraft are operated and maintained in a safe manner. Actions being considered and under review by the FAA include:

- ◆ Issue Type Certificate Data Sheets (TCDS) that clearly define that U.S. Air Force Technical Orders (T.O.) are applicable for civil certification.

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<sup>1</sup>Table 1-2, USAF T.O 00-25-4, Depot Maintenance of Aerospace Vehicles and Training Equipment

- ◆ Maintain close internal FAA coordination on certification and inspection program approval of surplus military aircraft.
- ◆ Issue an Advisory Circular specific to C-130A inspection program approval requirements.
- ◆ Establish an Air Force/FAA liaison relationship for C-130A airworthiness. Liaison is necessary to establish a "core" list of T.O.'s of the Programmed Depot Maintenance (PDM) inspection items. This list is dynamic as a result of the experience gained by the U.S. Air Force with a particular type of aircraft.
- ◆ Issue a bulletin to FAA Field Offices on approval of C-130A inspection programs to ensure that the minimum of "core" items are incorporated.
- ◆ Issue Airworthiness Directives specific to the C-130A as appropriate.

The USFS has awarded FY 93 airtanker contracts that include C-130A aircraft. In order to minimize the tort liability risk associated with the use of the current fleet of C-130A aircraft, the following Department of the Interior (DOI) policy is promulgated and forwarded for the information of all concerned.

Pending issuance of revised FAA C-130A certification, airworthiness, and/or inspection program standards; DOI managers, supervisors and employees shall:

(select one)

- not dispatch or use C-130A airtankers on DOI wildfires.<sup>2</sup>
- not use C-130A airtankers on DOI wildfires. However, the fire program manager having decision-making authority may use C-130A airtankers on DOI wildfires<sup>2</sup> providing a determination is made that a life-threatening emergency exists (as defined in 350 DM 1.4Q(1)).<sup>3</sup>
- minimize the use of C-130A airtankers on DOI wildfires.<sup>2</sup>
- assess the risk of C-130A equipment failure as opposed to the potential loss of resources and life should access to full interagency mobilization be restricted. A decision should be made accordingly.

This policy will be amended as necessary when C-130A airtankers are brought on-line in accordance with revised FAA criteria. Program managers will be advised accordingly.

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<sup>2</sup>DOI wildfires are defined as \_\_\_\_\_

<sup>3</sup>Life-Threatening Emergency - A situation or occurrence of a serious nature, developing suddenly and unexpectedly and demanding immediate action to prevent loss of life.



**BRIEFING MEMORANDUM**  
**FLIGHT STANDARDS NATIONAL FIELD OFFICE**

**SUBJECT:** C-130A Inspection Working Group

During the week of June 14, the Flight Standards National Field Office AFS-500, sponsored the C-130A inspection working group. The working group was convened to provide recommendations in accordance with the action items outlined in the FAA Action Plan for addressing "Issues Raised Concerning C-130A Airworthiness."

The working group consisted of the Principal Maintenance Inspectors (PMI) responsible for each of the four operators that may be providing aircraft to the Department of Interior or the USDA Forest Service. The Technical Advisor was a C-130A experienced aviation safety inspector from the ATL-FSDO. In addition, representatives from AFS-300 and the Aircraft Certification Service were be in attendance.

Recommendations were provided concerning the standards to be used for evaluating inspection programs submitted for approval under FAR 91.409(f)(4),(g), for large and turbine powered multiengine surplus military airplanes, certificated in the restricted category.

Using the recommended standards, the working group evaluated four of the existing inspection programs approved for use with C-130A aircraft. The results of the program evaluation, as well as the standards used to perform the evaluation, are under review by the FAA Flight Standards Service.

In addition, the working group reviewed USAF Time Compliance Technical Orders for the C-130A aircraft and T56-A9 engine, Lockheed L-382 Airworthiness Directives and life limited parts. Recommendations were made concerning what Airworthiness Directives and life limited parts should be designated for the C-130A aircraft, and/or engines. The recommendations are currently under review by the FAA Aircraft Certification Service.

Phase two of the FAA Action Plan is under way. The PMI's will be conducting facility inspections on each of the four operators that may be providing aircraft to the Department of Interior or the U.S. Forest Service. The PMI's will assess the impact of implementing the working groups recommendations and provide a report to AFS-510.

Prepared By: E. Freeman  
AFS-512D