

Gulfstream Aerospace Corporation G-IV
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**NATIONAL TRANSPORTATION SAFETY BOARD
WASHINGTON, D.C.**

ATTACHMENT 6

DoD/FAA Agreement on Inspection of DoD Firefighters at Joint Use
Airfields

8- Pages



DOD
POLICY BOARD
ON FEDERAL AVIATION

OFFICE OF THE SECRETARY OF DEFENSE
1480 DEFENSE PENTAGON
WASHINGTON DC 20301-1480

MEMORANDUM FOR (SEE ATTACHED)

3 April 2012

FROM: Executive Director, DoD Policy Board on Federal Aviation

SUBJECT: DoD/FAA Agreement on Inspection of DoD Firefighters at Joint Use Airfields

The DoD and the Federal Aviation Administration's (FAA) have reached agreement on procedures to be used at joint use airports where Aircraft Rescue and Firefighting (ARFF) services are provided by the DoD and the civilian partner at the airport is certificated under 14 CFR part 139. If you are an addressee on this memo your airfield has a civil operator that operates under 14 CFR part 139, the military provides the ARFF coverage, and the civil operator takes credit for that coverage to meet their part 139 ARFF requirements. Please review this letter and the attached procedures to ensure you understand and can implement them.

These procedures came about because DoD policy and federal statute do not permit the FAA to inspect DoD controlled airfields or military ARFF facilities, equipment, and records at airports where the DoD provides ARFF services for civilian part 139 airport operators. Airport operators holding a FAA Airport Operating Certificate under part 139, however, must comply with each section of part 139. Although the military unit provides the ARFF coverage, the civil airport operator is responsible for ensuring compliance with part 139 ARFF requirements. To help ensure that civil airport operators have the information needed to show the FAA that they meet these part 139 ARFF requirements, DoD and FAA officials have developed a process to assure the civil airport operators that the military ARFF services provided meet or exceed DoD and the National Fire Protection Association standards. During the development of these procedures, the DoD provided the FAA with its ARFF standards, training, and inspection procedures for review. The FAA determined that those standards and procedures are equivalent to the ARFF requirements in 14 CFR part 139. With this understanding, the DoD and FAA have developed a protocol for civil airport operators at joint use airports to use to demonstrate they meet their 14 CFR part 139 safety inspection requirements where the military provides ARFF services.

Under this protocol, airport operators receive documentation from DoD ARFF providers every January. In addition to the annual documentation, civil airport operators will also request that their DoD ARFF providers update this documentation prior to the civil operators' annual FAA part 139 safety inspection. The civil airport operator must provide the completed documentation to the FAA Airport Certification Inspector during the annual part 139 inspection to demonstrate compliance with the ARFF requirements. This protocol does not preempt any current procedures or agreements you as the DoD ARFF provider have with the civil airport operator.

DISTRIBUTION:

377 ABW	375 ARW
104 FW	106 FW
101 ARW	142 FW
177 ARW	151 ARW
110 FW	173 FW
158 FW	144 AW
439 OG	161 ARW
437 AW	168 AW
21 OG	802 CES/802 OSS
130 AW	452 AMW
153 AW	164 ARW
132 FW	446 AW
147 FW	145 AW
119 FW	118 AW
447 AW	134 AW
188 FW	AF/A30-B
120 FW	NGB/A7
914 AW/107 FW	SAF/GCN
166 AW	AFRC/A7
449 AW	AFCEA/CEXF
451 AW	DAMO-AV-A
448 AW	HQ USMC/APX-25
179 AW	SAF/TEI
187 AW	HQ FAA/AAS-1
157 AW	
165 AW	
178 FW	
183 FW	
80 TW	
139 AW	
185 ARW	
46 TW	
910 RW	
436 AW	
106 RW	
109 AW	
167 AW	
911 AW	
442 AW	
177 FW	
934 AW	
180 FW	

Airport Rescue and Fire Fighting (ARFF) Services Supplied by the Department of Defense (DoD) and Civil Airport Operators

1. **Introduction:** Certificated airport operators must comply with all aspects of 14 CFR, Part 139. This document provides the procedures for Federal Aviation Administration (FAA) inspectors to determine whether a Part 139 civil airport operator is meeting Part 139 ARFF requirements at an airport where ARFF services are provided by the DoD.

2. **DoD/FAA Agreement:** The FAA determined that DoD ARFF standards are equivalent to or exceed Part 139 requirements. The DoD will provide the civil airport operator (certificate holder) a package of standard documents that validate the DoD meets its ARFF requirements.

3. **FAA Inspections:** The civil airport operator will give FAA inspectors the completed documentation provided by the DoD. This documentation will include the items required to satisfy the ARFF portion of Part 139. Inspectors will review the standard package for completeness and work with the civil airport operator to resolve any issues or questions.

3.1. FAA inspectors will coordinate with the civil airport operator, not the DoD. The civil airport operator will interface with their ARFF provider. All communications regarding DoD ARFF services are between the DoD provider and the civil airport operator.

3.1.2. No direct communication occurs between the DoD provider and FAA inspectors. FAA inspectors will not inspect DoD vehicles, equipment, or facilities and will not conduct timed response drills.

4. **Due Diligence:** The civil airport operator must provide evidence that they meet Part 139 regulatory standards. In order for the civil airport operator to demonstrate that the airport meets Part 139 ARFF requirements, the DoD Fire Chief will send a memorandum (Appendix A) to the civil airport operator showing that the DoD fire department meets DoD standards that affect the ARFF services provided to the civil airport. The local DoD Fire Chief will provide this memorandum to the civil airport operator in January of each calendar year and as requested by the civil airport operator prior to their annual FAA Part 139 inspection. The memo will include the following elements:

4.1. **Introductory Paragraph:** An introductory paragraph stating that the local fire department meets DoD ARFF requirements.

4.2. Include the following documentation as attachments to the memorandum:

4.2.1. **Civil Airport ARFF Operations Checklist.** An example is provided at Appendix A, Attachment 1.

4.2.2. **External Inspection.** The date of the last major external inspection (Major Command (MAJCOM) staff, Inspector General or Center for Public Safety Excellence).

The frequency of external inspections may vary but is normally conducted at three to five year intervals.

EXPLANATION: Each DoD ARFF facility is inspected by external organizations to validate compliance with standards. Inspection can be by a MAJCOM staff, the Inspector General or another official external source. Accreditation by the Center for Public Safety Excellence also serves as proof of compliance with standards.

The memo will identify the external organization conducting the inspection and the date. If the external inspection results in ARFF related discrepancies, the DoD Fire Chief will inform the civil airport operator and explain how the discrepancies were resolved. DoD will not provide the actual inspection documents since they are for Official Use Only.

4.2.3. ARFF Vehicle Report. Provide ARFF vehicle information using the format at Appendix A, Attachment 2.

EXPLANATION: This report is provided by the DoD Fire Chief to the civil airport operator in January of each year. The report may list all assigned ARFF vehicles or only those required to satisfy Part 139 requirements. The civil airport operator determines the appropriate action necessary when a vehicle's status changes. The DoD Fire Chief and the airport operator develop procedures for the DoD Fire Chief to inform the civil airport operator when an ARFF vehicle is not available.

DoD ARFF vehicles may incorporate ultra high pressure (UHP) fire fighting technology. UHP increases the effectiveness of AFFF agent by a factor of 3.5. For vehicles less than 1500 gallons capacity, FAA inspectors will use the equivalent capacity determined by multiplying the actual gallons times 3.5. The equivalent capacity of turrets is also determined by multiplying the actual discharge capacity times 3.5. These vehicles meet DoD standards.

EXAMPLE: A 500 gallon UHP ARFF vehicle with a 60 GPM turret has an effective capacity of a 1750 ARFF vehicle and a 227 GPM turret using conventional pressures.

4.2.4. DoD ARFF Training Summary. Provide a summary of training dates for the subjects listed at Appendix A, Attachment 3. The report may be electronically produced from automated systems or manually prepared using the spreadsheet similar to what is shown in Appendix A, Attachment 3.

EXPLANATION: The DoD Fire Chief will provide summary of training dates for firefighters. The number of firefighters in the report will be limited to the number required for the airport index regardless of the actual number of firefighters that routinely respond to civil aircraft emergencies. DoD firefighters are transitory due to frequent rotation and deployments; therefore, inspectors should expect to see different firefighter names and information from year to year.

FAA Inspectors will accept the DoD ARFF Training Summary provided to the civil airport operator to document that DoD firefighters satisfied DoD training standards. This attachment shows the full name of the firefighter, the areas of required training related to ARFF and the last date the training was completed. FAA inspectors will ensure the dates for the listed training are within the last 12 calendar months (training due in a month can be conducted anytime during the month). Due to the transient nature of DoD firefighters, FAA inspectors will not request 24 months of training data.

In the last column of Training Summary, indicate whether the listed firefighters are required to meet the civil airport's Index. To determine the Index requirement, multiply the number of vehicles in the ARFF Vehicle report times 2.65 (round up). When an individual has not completed all the required training within 12 consecutive months, list another individual that has completed the training and select "no" for this column. The goal is to always provide enough trained personnel on the list to satisfy the Part 139 requirements.

5. **Resolving Deficiencies:** If training discrepancies exist, the FAA inspector will ask the civil airport operator for a detailed training report on the subject and/or individual, when a discrepancy is identified. All requests for additional information will be made through the civil airport operator. The DoD will respond to the request by the civil airport operator in a timely manner not to exceed 8 normal business hours.

6. **Unresolved Deficiencies:** If discrepancies result in non-compliance with Part 139, the FAA inspector will take appropriate action against the civil airport operator to address the non-compliance in accordance with the FAA Compliance and Enforcement Order and the Airport Certification Handbook.

APPENDIX A

Official Memorandum with:

Attachment 1 - Civil Airport ARFF Operations Checklist

Attachment 2 - Example ARFF Vehicle Report

Attachment 3 - DoD ARFF Training Summary

Official Letterhead

(INSERT DATE)

MEMORANDUM FOR (INSERT NAME OF CIVIL AIRPORT MANAGER)

FROM: (INSERT OFFICE SYMBOL OF NEXT LEVEL ABOVE FIRE CHIEF)

SUBJECT: Certification of Department of Defense (DoD) Aircraft Rescue and Fire Fighting (ARFF) Capability

1. This memorandum is provided to document that the (INSERT NAME OF AFB FIRE DEPARTMENT) meets requirements for all ARFF in accordance with DoDI 6055.06, *Fire & Emergency Services Program*.
2. The following documentation is provided to substantiate ARFF training and vehicle response capability:

- a. Completed Civil Airport ARFF Operations Checklist (Attachment 1):

DATE: _____

- b. Date and overall rating of last external inspection:

DATE: _____

INSPECTING AGENCY: _____

EXPLAIN THE CORRECTIVE ACTIONS TAKEN FOR ANY IDENTIFIED DEFICIENCIES THAT AFFECT ARFF CAPABILITY AVAILABLE TO RESPOND TO CIVIL AIRCRAFT EMERGENCIES: _____

Note: Inspection reports are for official use only; a copy or the report cannot be provided.

- c. ARFF Vehicle Report (Attachment 2).
- d. DoD ARFF Training Summary for DoD firefighters assigned to Civil ARFF duties (Attachment 3).
- e. Average response time to aircraft emergencies for the previous 90 days.

For the period _____ to _____ the average response time to ARFF emergencies was _____ and compliant with DoD requirements.

3. I certify the (INSERT NAME OF DoD FIRE DEPARTMENT) meets all DoD ARFF requirements. If you have any questions, please contact Chief (FIRE CHIEF'S NAME) at (INSERT COMMERCIAL TELEPHONE NUMBER).

Fire Chief's Supervisor Signature Block

Attachments:

1. Civil Airport ARFF Operations Checklist
2. ARFF Vehicle Report
3. DoD ARFF Training Summary

DOD ARFF Vehicle Information

Airport:

Gal Sign	Model Year	Manufacturer	Model (Type)	Vehicle Status	Water Capacity	AFFF Capacity	AFFF Concentration %	Dry Chemical Type	Dry Chemical Capacity	Maximum Primary Turret Discharge Rate
Cash 9	2006	Pierce	P-23	In Service	4300	500	3	Potassium-Based	500	1200 GPM
Cash 10	1985	Oscokosh	P-19	In Service	1000	130	3	Potassium-Based	500	1000 GPM
Banker 7	1991	International	W/D	In Service	5000	0	0			750 GPM
	1993		Tri/Foam	In Service	0	1000	0	Potassium-Based	0	

Summary:

Number of Vehicles: 3 Vehicle(s)
 Total Water Capacity: 9300 Gallons
 Total AFFF Capacity: 1630 Gallons
 Total Dry Chemical Capacity: 1000 Pounds

INDEX REQTS

INDEX A
 - 1 vehicle with 500 lbs sodium based dry chemical/Halon 1211/clean agent; or 450 lbs of potassium based dry chemical and 100 gal AFFF

INDEX B
 - 1 vehicle with 500 pounds of sodium based dry chemical/chemical/Halon 1211/clean agent and 1500 gals AFFF; or
 - 2 vehicles: 1 vehicle with 500 lbs sodium based dry chemical/Halon 1211/clean agent; or 450 lbs of potassium based dry chemical and 100 gal AFFF; and 1 vehicles with 1500 gals AFFF

INDEX C
 - 3 vehicles: 1 vehicle with 500 lbs sodium based dry chemical/Halon 1211/clean agent; or 450 lbs of potassium based dry chemical and 100 gal AFFF and 2 vehicles with 3000 gals of AFFF (in all 3 vehicles combined)
 - 2 vehicles: 1 vehicle with 500 lbs sodium based dry chemical/Halon 1211/clean agent; or 450 lbs of potassium based dry chemical and 100 gal AFFF and 1 vehicle with 3000 gals of AFFF (in both vehicles combined)

INDEX D
 - 3 vehicles: 1 vehicle with 500 lbs sodium based dry chemical/Halon 1211/clean agent; or 450 lbs of potassium based dry chemical and 100 gal AFFF and 2 vehicles with 4000 gals of AFFF (in all 3 vehicles combined)

INDEX E
 - 3 vehicles: 1 vehicle with 500 lbs sodium based dry chemical/Halon 1211/clean agent; or 450 lbs of potassium based dry chemical and 100 gal AFFF and 2 vehicles with a total of 6000 gals of AFFF (in all 3 vehicles combined)