



# Federal Aviation Administration

## National Part 139 CertAlert

**\*\*Advisory\*\*Cautionary\*\*Non-Directive\*\*Advisory\*\*Cautionary\*\*Non-Directive\*\*Advisory\*\*Cautionary\*\*Non-Directive\*\***

**Date:** 5/8/2024 **24-05**

**To:** **Airport Operators, FAA Airport Certification Safety Inspectors (ACSI), Aircraft Rescue Firefighting Departments**

**Subject:** **Department of Defense's (DoD's) Memorandum on Rinsing Aircraft Rescue Firefighting (ARFF) Vehicles Transitioning from Aqueous Film Forming Foam (AFFF) to Fluorine-Free Foam (F3)**

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### 1. Purpose.

This CertAlert provides information on rinsing ARFF vehicles transitioning from AFFF to F3.

### 2. Cancellation.

This CertAlert cancels CertAlert 24-04, *Information on best practices for cleaning Aircraft Rescue Firefighting (ARFF) Vehicles Transitioning from Aqueous Film Forming Foam (AFFF) to Fluorine-Free Foam (F3)*, dated March 18, 2024.

### 3. Information.

The DoD has done extensive research on effective and efficient methods for rinsing ARFF vehicles transitioning to F3. This CertAlert shares the DoD's March 5, 2024, memorandum, *Guidance for the Change Out from Aqueous Film Forming Foam in Mobile Firefighting Systems* (attached), which sets forth the steps DoD will take to ensure that AFFF is removed from mobile systems before new F3 foams are used. This memorandum is shared with airport operators for information only. It does not impose legal requirements.

Operators with mobile systems that previously used AFFF and will now use a new F3 agent may want to consider taking the following actions before changing from AFFF to F3:

- Completely drain the system of AFFF.
- Conduct a single water rinse of the entire system from the AFFF tank through all components and piping, to all discharge nozzles, including external equipment (e.g., hoses, nozzles, fittings) that previously contained AFFF.
- Empty rinsate from the system and reconfigure it for the selected fluorine-free alternative agent in accordance with the agent manufacturer's recommendations.
- Ensure appropriate spill prevention measures and containment are incorporated into the process to minimize any releases or impacts.

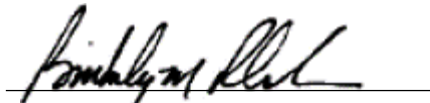
#### 4. Additional Information

Airport operators should coordinate with their governing environmental agencies and dispose of the rinsate and AFFF in accordance with their respective environmental laws. As a reminder, when transitioning between firefighting foams, airport operators must maintain their required ARFF index to comply with 14 Code of Federal Regulations part 139.

Transitioning vehicles will need to be temporarily taken out of service; therefore, airport operators may need to borrow or rent an ARFF vehicle to maintain index requirements while those vehicles are out of service.

For further information on transitioning to F3, see the FAA Fluorine-Free Foam (F3) Transition for Aircraft Firefighting webpage, which includes the FAA's Aircraft Firefighting Foam Transition Plan, F3 Transition Webinar recordings, and the F3 Transition Training Handout:

[https://www.faa.gov/airports/airport\\_safety/aircraft\\_rescue\\_fire\\_fighting/f3\\_transition](https://www.faa.gov/airports/airport_safety/aircraft_rescue_fire_fighting/f3_transition).



Birkely Rhodes, Manager  
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5/8/2024

Date



## ASSISTANT SECRETARY OF DEFENSE

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ENERGY, INSTALLATIONS,  
AND ENVIRONMENT

March 5, 2024

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (INSTALLATIONS,  
ENERGY AND ENVIRONMENT)  
ASSISTANT SECRETARY OF THE NAVY (ENERGY,  
INSTALLATIONS AND ENVIRONMENT)  
ASSISTANT SECRETARY OF THE AIR FORCE  
(INSTALLATIONS, ENVIRONMENT AND ENERGY)  
DIRECTOR, NATIONAL GUARD BUREAU (JOINT STAFF, J8)  
DIRECTOR, DEFENSE LOGISTICS AGENCY (LOGISTICS  
OPERATIONS)

SUBJECT: Guidance for the Change Out from Aqueous Film Forming Foam in Mobile  
Firefighting Systems

In accordance with the requirements in Section 322 of the Fiscal Year 2020 National Defense Authorization Act (NDAA), the Department of Defense (DoD) must discontinue land-based use of Aqueous Film Forming Foam (AFFF) containing per- and polyfluoroalkyl substances starting September 30, 2024 (with the possibility of two 1-year extensions). DoD is committed to replacing AFFF firefighting systems with fluorine-free alternatives in accordance with requirements in the NDAA. As DoD transitions from AFFF to fluorine-free alternatives, it will remove AFFF from mobile assets including tanks, hoses, and components. This memorandum provides guidance to the DoD Components on the minimum removal and rinsing requirements to ensure that AFFF is removed from mobile systems.

For mobile systems that previously utilized AFFF and will be reused with the new fluorine-free fighting agents, the DoD Components will:

- Completely drain the system of AFFF.
- Conduct a single water rinse of the entire system from the AFFF tank through all components and piping to all discharge nozzles, including external equipment (e.g., hoses, nozzles, fittings) that previously contained AFFF.
- Empty rinsate from the system and reconfigure it for the selected fluorine-free alternative agent in accordance with the agent manufacturer's recommendations.
- Ensure appropriate spill prevention measures and containment are incorporated into the process to minimize any releases or impacts.

For locations within the United States, DoD Components will dispose of AFFF, rinsate, and other AFFF-impacted materials in accordance with the Assistant Secretary of Defense (Energy, Installations, and Environment) Memorandum, *Interim Guidance on Destruction or Disposal of Materials Containing Per- and Polyfluoroalkyl Substances in the United States*, dated July 11, 2023, and the Assistant Secretary of Defense (Energy, Installations, and Environment) Memorandum, *Guidance on Incineration of Materials Containing Per- and*

*Polyfluoroalkyl Substances*, dated July 14, 2023. For overseas locations, DoD Components will dispose of AFFF, rinsate, and other AFFF-impacted materials in accordance with local Final Governing Standards or Overseas Environmental Baseline Guidance Documents.

The point of contact for this guidance is Ms. Cristina Harvey, OASD(EI&E), at 703-571-9067 or [marcia.c.harvey2.civ@mail.mil](mailto:marcia.c.harvey2.civ@mail.mil).

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