

U.S. Department of Transportation Federal Aviation Administration

InFO

Information for Operators

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Flight Standards Service Washington, DC

http://www.faa.gov/other_visit/aviation_industry/airline_operators/airline_safety/info

An InFO contains valuable information for operators that should help them meet certain administrative, regulatory, or operational requirements with relatively low urgency or impact on safety.

Subject: Automotive Detailing Companies Working on Aircraft

Purpose: This InFO discusses rules and regulations concerning maintenance, preventative maintenance and washing of aircraft.

Background: The Federal Aviation Administration (FAA) has received reports of operators using automotive detailing companies to wash aircraft without ensuring compliance with other procedures required by Title 14 of the Code of Federal Regulations (14 CFR). Examples of these procedures include aircraft preparation tasks, post-wash inspections/lubrication, and documentation. Information and recommended procedures can be found in manufacturers' published manuals and in the current edition of Advisory Circular (AC) 43-4, Corrosion Control for Aircraft.

Discussion: Washing aircraft is one part of the manufacturer's recommended procedures and/or an operator/owner's corrosion prevention and control program. This activity often requires preparatory and follow-on actions that are defined as maintenance or preventive maintenance under 14 CFR. As a result, 14 CFR requirements apply to:

- The use of certificated or trained and authorized personnel when performing maintenance, preventive maintenance, and alterations;
- Performing required inspections associated with washing of an aircraft; and
- The documentation of these activities in accordance with 14 CFR.

The FAA has stated that the physical act of washing an aircraft, by itself, is usually neither maintenance nor preventive maintenance, as defined in 14 CFR. (Reference FAA, Office of Aerospace Medicine and Flight Standards Service, 14 CFR Part 120, Guidance Alert, dated 8/15/2006.) However, a manufacturer's recommendations and a complete corrosion prevention and control program usually include sequential steps that are considered maintenance or preventive maintenance. These steps may be required either before, after, or as a result of other maintenance or inspection program tasks—including the act of washing the aircraft. Examples of such tasks could be:

- Aircraft wash preparation, such as covering static ports
- Post-wash inspections
- Lubrication
- Preservation

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- Replacement of defective environmental gaskets and sealant materials
- Other post-wash procedures and maintenance checks

Since these tasks are maintenance or preventive maintenance, performance and documentation requirements of 14 CFR apply. This means:

- Appropriately authorized or certificated personnel must perform/supervise the work;
- Documentation must be in accordance with 14 CFR; and
- Aircraft return-to-service procedures must be followed.

NOTE: The FAA acknowledges that operators have placed significant importance on aircraft appearance, and may engage in supplemental efforts to obtain aircraft cleanliness goals. Nevertheless, operators need to be aware that in some cases, these supplemental efforts may trigger a requirement for follow-on maintenance or preventive maintenance, such as inspections or re-application of lubricants, as well as the associated documentation. In all cases, operators, per 14 CFR, must ensure aircraft used for operations meet all applicable airworthiness requirements.

Recommended Action: Aircraft owners and operators should review their aircraft washing procedures and corrosion prevention and control program requirements to ensure they meet the performance and documentation requirements of 14 CFR.

Contact: Questions or comments regarding this InFO should be directed to the Aircraft Maintenance Division, AFS-300, at (202) 267-1675.

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