

October 18, 2021

Steve Dickson
Administrator
Federal Aviation Administration
800 Independence Avenue SW
Washington DC 20591

Cc: Birke Rhodes, Manager, Airport Safety and Operations Division
Marc Tonnacliff, Senior Aircraft Firefighting Specialist

Dear Administrator Dickson:

We, the undersigned 53 local, state, and national organizations, are writing to express our serious concerns regarding the FAA's failure to meet the October 4, 2021 deadline of Sec 332 of the Federal Aviation Administration (FAA) Reauthorization Act of 2018 (PL: 115-254) to allow airports to use firefighting foams that do not contain per -and polyfluoroalkyl substances (PFAS).

PFAS are dangerous chemicals linked to a range of serious health impacts including kidney and testicular cancer, liver damage, immune suppression, and effects on lipid metabolism. Their widespread use in firefighting foam required at airports and by the military continues to contribute to a growing crisis of contamination of people, breast milk, drinking water and wildlife. Congress directed the FAA in 2018 to do its part in this crisis by preventing further contamination and ending its requirement that airports use this type of foam.

In an alert sent to airports on October 5, FAA announced that the firefighting foam standard that applies to airports no longer requires the use of fluorinated chemicals (i.e., PFAS). However, it failed to change the requirement for airports to meet the military standard, which is based on how fluorinated foams perform. The "[Cert Alert](#)" said that airports can seek approval for PFAS-free foams—but lays out no clear path for them to achieve this approval. This was not what Congress intended when it directed the FAA to allow the use of PFAS-free foams by October 4, 2021.

This lack of progress is particularly unacceptable given that [airports around the world are successfully using PFAS-free foams](#), including London Heathrow, Gatwick, Stansted and City, Manchester, Paris Charles De Gaulle, Paris Orly, Lyon, Helsinki, Lisbon, Dubai, Brussels, Copenhagen, Oslo, Stockholm, Stuttgart, Dortmund, Sydney, Melbourne, and Brisbane.

States have stepped in due to the lack of federal action and have enacted bans. Nine states including Washington, Illinois, New York, and California, have enacted laws that prohibit the sale or use of PFAS foams.

Dozens of organizations representing millions of people, including communities whose drinking water has been contaminated by PFAS firefighting foams, [wrote to the FAA in March 2019](#) requesting a specific plan and timeline for how the agency would meet the requirement to allow the use of PFAS-free foams at airports. The agency never provided a specific plan or timeline, but instead stated a building was being constructed to test foams. Now, three years later, the FAA is passing the responsibility to airports to propose PFAS-free alternatives for possible Agency approval without a clear path forward.

The urgency of this situation continues to grow, while the FAA refuses to adopt standards used by airports around the world. Accidental spills of PFAS foam at Bradley International Airport in Connecticut and Stewart International Airport in New York highlight the risks that PFAS foams pose for local communities due to inaction by the FAA.

While PFAS contamination and exposure continues, there are foams on the market today that can be used for aviation and have an environmental certification by an independent third-party. GreenScreen Certified has certified a [dozen PFAS-free foams](#), including two for aviation. They are not only fluorine-free, [but are also free of other organohalogens, siloxanes and other hazardous chemicals](#). Any foam used at airports or required by the FAA in the future should be required to meet this third-party certification to avoid regrettable substitutes.

We request that the FAA:

- Immediately allow civilian airports to use fluorine-free foam, meeting a performance standard, such as ICAO B, used by other countries; and
- Require foams used by airports receive third-party certification from GreenScreen Certified.

Thank you for your consideration of this urgent matter.

Sincerely,

Louis Allen MD, MPH, FAAP
Manager
able-differently

Pamela Miller
Executive Director
Alaska Community Action on Toxics

Kelly McLaughlin
Member
Alaska PFAS Action Coalition

Nancy Buermeyer
Senior Policy Strategist
Breast Cancer Prevention Partners

Robina Suwol
Executive Director
California Safe Schools

Kathryn Alcantar
Policy Director
Center for Environmental Health

Bobbi Wilding
Executive Director
Clean and Healthy New York

Emily Donovan
Co-Founder
Clean Cape Fear

Lynn Thorp
National Campaigns Director
Clean Water Action

Shaina Kasper
Water Program Director
Community Action Works

Brian Ronholm
Director, Food Policy
Consumer Reports

Patrick MacRoy
Deputy Director
Defend Our Health

Christine Santillana
Legislative Counsel
Earthjustice

Rebecca Meuninck
Deputy Director
Ecology Center

Melanie Benesh
Legislative Attorney
Environmental Working Group

Stel Bailey
Executive Director
Fight For Zero, Inc

Rebecca Fedewa
Executive Director
Flint River Watershed Coalition

Liz Kirkwood
Executive Director
For Love of Water (FLOW)

Jill M Ryan
Executive Director
Freshwater Future

Anthony Spaniola and Sandy Wynn-Stelt
Co-chairs
Great Lakes PFAS Action Network

Arlene Blum
Executive Director
Green Science Policy Institute

Sue Phelan
Director
GreenCAPE

Kelly McLaughlin
Chair
Gustavus PFAS Action Coalition

Deanna White
Director
Healthy Legacy Coalition

Madeleine Foote
Deputy Legislative Director
League of Conservation Voters

Tracy Gregoire
Healthy Children Project Director
Learning Disabilities Association of America

Gregg French
President
Learning Disabilities Association of Connecticut

Carolyn P. Kingsley
State Affiliate
Learning Disabilities Association of Georgia

Beverly H. Johns
President
Learning Disabilities Association of Illinois

Amy L Barto
President and Healthy Children Project
Coordinator
Learning Disabilities Association of Michigan

Anne Fogel
Secretary
Learning Disabilities Association of South Carolina

Pamela Smith
Learning Disabilities Association of Texas

Gaylia Tanner
Corresponding Secretary
Learning Disabilities Association of Utah

Diane Sixel
President
Learning Disabilities Association of Wisconsin

Laurene Allen
Director
Merrimack Citizens for Clean Water

Charlotte Jameson
Chief Policy Officer
Michigan Environmental Council

Pat Elder
Director
Military Poisons

Kathleen A. Curtis, LPN
Founder
Moms for a Nontoxic New York

Daniel Rosenberg
Director of Federal Toxics Policy
Natural Resources Defense Council (NRDC)

Jennifer Rawlison
Steering Committee Member
Newburgh Clean Water Project

Sylvia Orduño
Organizer
People's Water Board Coalition

Liz Hitchcock
Director
Safer Chemicals Healthy Families

Sarah Doll
Executive Director
Safer States

Sonya Lunder
Senior Toxics Policy Advisor
Sierra Club

Andrea Amico
Co-founder
Testing for Pease

Laurie Valeriano
Executive Director
Toxic-Free Future

Emily Rogers
Zero Out Toxics Advocate
U.S. PIRG

Anita Desikan
Research Analyst
Union of Concerned Scientists

Lauren Hierl
Executive Director
Vermont Conservation Voters

Cheryl M. Cail
Vice Chief
Waccamaw Indian People and SC Idle No More, SCIAC

Melissa Mays
Founder
Water You Fighting For?

Bill Wood
Executive Director
West Michigan Environmental Action Council

Diane Cotter
Founder
Your Turnout Gear and PFOA