

Supporting Statement A
Federal Aviation Administration
Information Collection to provide for the amount of Aqueous Film Forming Foam (AFFF)
located at Part 139 airports.

OMB 2120-XXX

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The FAA Reauthorization Act of 2024, Sec. 762 requires the FAA to provide a progress report on the national transition plan related to a fluorine free firefighting foam, every 180 days on the transition from fluorine-free firefighting foam until transition is complete.

This Act requires that the FAA provide progress reports on the status of Part 139 airports transition to fluorine-free firefighting foam no later than 180 days after the date of enactment of this Act, and every 180 days thereafter until the progress report termination date. These progress reports on the development and implementation of a national transition plan related to a fluorine-free firefighting foam that meets the performance standards referenced in Chapter 3 – *Agent Compatibility, Substitutions, and Performance Requirements* of Advisory Circular 150/5210.6E – *Aircraft Fire Extinguishing Agents for Airports (AC 150/5210.62)* issued on November 27, 2023, shall be submitted to the appropriate committees of Congress. These reports will also contain a comprehensive list of the amount of aqueous filmforming firefighting foam at each part 139 airport has of the date of the submission of the progress report, including the amount of such firefighting foam held in firefighting equipment and the number of gallons regularly kept in reserve at each such airports. In order to provide congress an accurate accounting to AFFF, the FAA must contact all 518 airports to ascertain the amount at each airport.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The FAA will use the collected information to meet the requirements identified under the FAA Reauthorization Act of 2024, Sec. 762.

Please address the following items specifically:

1. Whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit.

- a. Response is mandatory
2. Describe the entities who must respond (e.g., class 1 railroads, operators of natural gas transmission lines, etc.).
 - a. All Part 139 certificated airports.
3. Whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure.
 - a. This collection is reporting. Respondents are permitted to choose the methodology to report information and can design their own recordkeeping system. As airports vary in size, operations and complexities, the FAA has determined this method of information collection allows airport operators greater flexibility and convenience to comply with reporting and recordkeeping requirements. 100% of the information may be submitted electronically.
4. Indicate collection frequency (e.g., bi-annual, annual, monthly, weekly, as needed).
 - a. One time collection.
5. Describe the information that would be reported, maintained in records, or disclosed (e.g., information about a hazardous materials incident including location, type of hazardous material, extent of consequences, etc.).
 - a. The reports will contain a comprehensive list of the amount of aqueous filmforming firefighting foam at each part 139 airport as of the date of the submission of the progress report, including the amount of such firefighting foam held in firefighting equipment and the number of gallons regularly kept in reserve at each such airports.
6. Describe who would receive the information – DOT, first responders, the general public, etc.
 - a. The FAA Office of Airports (ARP) and the appropriate Congressional committees identified in the FAA Reauthorization Act of 2024, Sec. 762.
7. Succinctly describe the purpose of the collection.

- a. The collection involves S.4319 - *A bill to provide for progress reports on the national transition plan related to a fluorine-free firefighting foam* that requires that the FAA provide progress reports on the status of Part 139 airports transition to fluorine-free firefighting foam no later than 180 days after the date of enactment of this Act, and every 180 days thereafter until the progress report termination date. Within this report, a comprehensive list of the amount of AFFF at each part 139 airport as of the date of the submission of the progress report, including the amount of such firefighting foam held in firefighting equipment and the number of gallons regularly kept in reserve at each such airport. These progress reports on the development and implementation of a national transition plan related to a fluorine-free firefighting foam that meets the performance standards referenced in Chapter 3 – Agent Compatibility, Substitutions, and Performance Requirements of Advisory Circular 150/5210.6E – Aircraft Fire Extinguishing Agents for Airports (AC 150/5210.62) issued on November 27, 2023 shall be submitted to the appropriate committees of Congress.

8. If a revision, succinctly describe the revision in the Abstract and in question 15 of the Justification document.

- a. N/A

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Explain the basis for the decision for adopting this means of collection. Also describe any consideration you have given or are giving to the use of improved information technology to reduce the burden on the public. You must address the following:

- a. Is the electronic submission of responses possible
 - i. Yes
- b. If a form is involved, is it available for public printing off the Internet* If so, please include the URL.

- i. No. There is no government form available for public printing. As airports vary in size, operations and complexities, the FAA has determined this method of information collection allows airport operators greater flexibility and convenience to comply with reporting and recordkeeping requirements.
- c. Will the results of the information collection be made available to the public over the Internet?
 - i. No. Information is only being collected to meet the requirements of the FAA Reauthorization Act of 2024, Sec 762.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This is the first, and only, effort on the part of the FAA too collect the information on the required transition part 139 airports to a fluorine-free firefighting foam in accordance with the FAA Reauthorization Act of 2024, Sec 762.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Respondents are permitted to choose the methodology to report information. As airports vary in size, operations and complexities, the FAA has determined this method of information collection allows airport operators greater flexibility and convenience to comply with reporting and recordkeeping requirements. 100% of the information may be submitted electronically.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The FAA will not be able to meet the newly established congressionally mandated requirement to provide Congress with reports on the progress each Part 139 airport is making to attain the requirements of the FAA Aircraft Firefighting Foam Transition Plan issued on May 8, 2023.

There is no alternative method to ascertain the amount of agent that each airport has in reserve beyond reaching out to all 518 airports.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

N/A

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on December 13, 2024 (89 FR 101090) solicited public comment. Two comments were received.

- One requested we expand the questions being asked of the airport (planned date to transition, planned completion date, etc). These questions are outside of the congressionally mandated scope we were given.
- The second request was to limit the amount of AFFF to what is owned by the airport and not tenants. This is within the congressional mandate and mirrors the planned request to the airport.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

There were no payments or gifts provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

There were no assurances of confidentiality given to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

This process should take approximately 3 hours to assess and document the amount of AFFF in the ARFF vehicles and how much is in storage. This will be an onetime request.

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	518	518	n/a
# of Responses per respondent	1	1	n/a
Time per Response*	3 hrs	1 hr	n/a
Total # of responses	518	518	n/a
Total burden (hours)	1554	518	n/a

**Reporting is an average of the*

- Class A/B (1 person * 1 hr): 1*
- Class C-E(2 people * 1 hr each): 4*
- 5 hrs divided by 2= 2.5 and rounded up to 3 per PRA instructions*

a.

Estimated total reporting cost burden:

Formula used: Calculation: hourly wage * 2¹ * burden hours

Estimated total reporting burden hours

1,554

¹ Wages are multiplied by 2 to account for benefits and other overhead costs such as rent, utilities, and office equipment. U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

Airfield operations specialist ²	\$25 * 2 * 1,554	\$77,700
Estimated total annual reporting cost burden		\$77,700

b. Estimated total recordkeeping cost burden:

Estimated total recordkeeping burden hours		518
Fire Chief ³	\$44 * 2 * 518	\$45,584
Estimated total recordkeeping cost burden		\$45,584

c. Total Burden cost to the respondent: \$123, 284.00

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

Total estimated cost for the respondents is presented in question #12 above.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The burden for collecting and analyzing data is borne primarily by Airport Certification Safety Inspectors (ACSI). The average pay grade for an ACSI is GS 13, Step 5. The 2024 OPM General Schedule reports the hourly rate for a GS 13, Step 5 is \$48.07 (rounded to \$41).⁴

Summary	Review
# of Respondents	518
# of Responses per respondent	1
Time per Review	1 hr
Total # of responses	518

² See [Airfield Operations Specialists \(bls.gov\)](https://www.bls.gov/occupations/specialists/) for Occupation 53-2022, May 2020. Rounded.

³ See [First-Line Supervisors of Firefighting and Prevention Workers \(bls.gov\)](https://www.bls.gov/occupations/specialists/) for Occupation 33-1021, May 2023. Rounded

⁴ See https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/GS_h.aspx.

Total burden (hours)	518

Formula used: Calculation: hourly wage * 2⁵ * burden hours

Estimated total recordkeeping cost burden:

Estimated total review burden hours		518
ACSI	\$48 * 2 * 518	\$44,548
Estimated total review cost burden		\$44,548

Total burden cost to government: \$44,548.00

15. Explain the reasons for any program changes or adjustments.

This is a new collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Information collected is not intended for publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The FAA is not requesting approval to not display the expiration date.

⁵ Wages are multiplied by 2 to account for benefits and other overhead costs such as rent, utilities, and office equipment. U.S. Department of Health and Human Services, Guidelines for Regulatory Impact Analysis, Table 4.2, Constructing Default Estimates of the Value of Time, 2016. See https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

**18. Explain each exception to the topics of the certification statement identified in
“Certification for Paperwork Reduction Act Submissions.”**

No exceptions are requested.