

**1. Contractor's Formal Request:**

Status ...

- a. Include on Contractor Letterhead with contractor's signature
- b. Include specific contract numbers(s) applicable
- c. Describe where contractor capabilities do not meet contractual requirements (e.g. where are the shortfalls?)
  - i. Specific requirement(s) requested to be waived
  - ii. Specific detail why the requirements cannot be met, should not be met, or how the contractor will provide the same level of protection via alternate means. If providing protection via alternate means, provide specific detail on what the alternate means are and any resulting risk(s) (including, but not limited to, detailed inventory of equipment, training and policies that will be substituted for the requirements, etc.)
  - iii. If requesting to waive the minimum ARFF requirements (NAS 3306 Paras 5.3.5. and 5.3.6.), the contractor must logically establish what "reasonable fire suppression capability" is for determination (e.g. an all-volunteer fire department with an average response time of 20 minutes is not reasonable)
- d. Include the specific dates of the waiver (beginning to end - or - beginning and "for duration of contract")
  - i. Provide specific date and time the contractor will be in compliance
  - ii. Details and goals to measure progress (i.e. PO's for equipment, hiring plans for personnel, training plans, etc.)
  - iii. If the contractor does not plan on becoming compliant, then they must state the fact and provide justification
- e. Include the aircraft information:
  - i. Type and number of aircraft
  - ii. Fuselage length and fuselage width of each type aircraft
  - iii. State if the aircraft are UAS or manned
  - iv. Include aircraft fuel information:
    - 1. Fuel status of aircraft that are hangared (e.g. fueled, un-fueled, de-fueled)
    - 2. Type of fuel (Jet A, JP-5, JP-8, AVGAS, Diesel, etc.)
  - v. Location of aircraft during times requested waiver would be in effect (hangared and flight-line)
- f. State the NFPA category of the largest aircraft on-site (as determined by NAS 3306 table 5.1)

- g. Include specific information about ARFF and/or other firefighting capabilities:
  - i. Contractor owned or third party agreement (if third party, include MOA)
  - ii. Specific ARFF and/or other firefighting assets (number of vehicles, AFFF capacity of vehicles, type of vehicles, secondary agent type/capacity, etc.)
  - iii. Number of ARFF certified personnel (total and per shift)
  - iv. Number of other firefighting personnel (include certification level [e.g. Firefighter 1, 2, volunteer, etc.]
  - v. Type of turnout gear (e.g. proximity, structure, etc. and manufacture date)

Proximity Gear Expiration Date

Structure Gear Expiration Date

- vi. Response time and distance information
- vii. When full complement is available and when reduced level is available (e.g. hours of operation)
- viii. Method of notification (i.e. automatic [electronic], telephone, etc.)

- h. State if commercial and government aircraft are in close proximity to one another. If so, address:
  - i. Number and types of aircraft that are in close proximity to one another
  - ii. Fuel status of all, including commercial, aircraft in hangars (risk is applicable to all aircraft in same hangar)
  - iii. Any other specific risk within close proximity to aircraft (e.g. hazardous operations performed, etc.)

- i. Include hangar information:
  - i. What Group (as determined by NFPA 409) is the hangar (e.g. Group I, II, III, IV)?
  - ii. What is the type of hangar construction (wood, metal, fabric, etc.)?
  - iii. Age of the hangar (include date constructed and date of last major renovation, if applicable)
  - iv. A fair assessment of the overall hangar condition (assessment must be confirmed by the APT)
  - v. Specific type of fire detection system(s) installed (e.g. IR/UV, rate of rise, fixed temperature, pre-action [specify both actions], etc.
  - vi. Specific type of fire suppression system(s) installed (e.g. deluge, AFFF, high expansion foam with overhead sprinklers, closed head water, water deluge, etc.)
  - vii. Status of fire detection systems (last full inspection date and results)
  - viii. Status of fire protection systems (include last full inspection date and results)
  - ix. How are the systems monitored and the fire department notified if a system detects a fire or activate (e.g. automatic, 24/7, central station, proprietary, etc.)

j. Which type of contract is the contractor operating under?

If "other" please provide specifics

- i. Provide ACO correspondence documentation

- ii. If requesting to waive minimum ARFF requirements (NAS 3306 Paras. 5.3.5. and 5.3.6. [rev 2]), then explain the contractor's definition of "reasonable fire suppression capability", how the contractor came to that determination, and the actions being taken to mitigate the risk.

Please provide specifics

- a. Address the Maximum Credible Event (MCE) that could occur and identify the risk(s) (no matter the remote possibility, include specific information)
- b. Compare the risk(s) as being compliant versus the condition if the waiver request is approved
  - i. Example 1 - Three aircraft are left on flight-line and ARFF waived during periods of no operations. Aircraft are fueled. Battery shorts and aircraft catches fire. The fire is not detected until it has significantly grown. The closest fire response is 15 minutes away, only structure assets with limited foam capability. Compare on-site ARFF assets that can respond within three minutes versus this scenario.
  - ii. Example 2 - All aircraft are in a NAS 409 compliant hangar that is consistently monitored with an automatic fire department response time of 10 minutes. An electrical fire in the hangar starts. The hangar fire suppression system activates and continues to discharge until the fire department responds to shut-off the system. Compare 10 minutes of flow versus three minutes.
- c. Include a detailed risk analysis that identifies the risk that will be present if the waiver request is approved as compared to being compliant with the requirements
  - i. Example 1 - Compare four aircraft are on the flight-line and fire response assets that are 12 minutes away with structure fire vehicles, and no ARFF certified fire fighters, responding with limited ARFF capability versus an ARFF fire vehicle three minutes away with two ARFF certified fire fighters.
  - ii. Example 2 - All aircraft that will be in a foam protected hangar and ARFF is not within a three minute response. The hangar alarm is consistently monitored and the fire department is automatically notified. Compare structure response assets that are located five to seven minutes way versus ARFF assets that can respond within three minutes.