### AGENDA

**Standards Council Meeting**  
Via Teams Video Conferencing  
April 14-15, 2021

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Attachment</th>
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<tbody>
<tr>
<td>21-4-1</td>
<td>Report of the Committee Membership Task Group (J. Quiter, Chair). No Attachment</td>
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<tr>
<td>21-4-1-a</td>
<td>Consideration of Non-Reappointments. No Attachment</td>
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<tr>
<td>21-4-1-b</td>
<td>Act on pending applications for Committee Members. No Attachment</td>
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<tr>
<td>21-4-1-c</td>
<td>Request for classification reconsideration. No Attachment</td>
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<tr>
<td>21-4-1-d</td>
<td>Report back to Council in accordance with Decision No. 20-6 (20-12-21). No Attachment</td>
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<tr>
<td>21-4-2</td>
<td>Report of the Awards Task Group (J. Golinveaux, Chair). No Attachment</td>
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<tr>
<td>21-4-3</td>
<td>Update from P&amp;P Chair. No Attachment</td>
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<td>21-4-4</td>
<td>Report of the December 2020 Minutes. No Attachment</td>
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<td>21-4-5</td>
<td>Review of the process of Standards Council decision making by Suzanne Gallagher, Deputy General Counsel. No attachment.</td>
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**TENTATIVE INTERIM AMENDMENTS (TIAs)**

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>Attachment</th>
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<tbody>
<tr>
<td>21-4-6</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise section 10.5.1.6.2 and add new associated Annex material of the 2020 edition of NFPA 2, <em>Hydrogen Technologies Code</em> (TIA No. 1542).</td>
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<tr>
<td>21-4-6-a</td>
<td>Text of proposed TIA No. 1542. See Attachment 21-4-6-a</td>
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<tr>
<td>21-4-6-b</td>
<td>Ballot results of TIA No. 1542. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 29 voting members/26 agree on technical merit/0 disagree/0 abstained/3 ballots not returned/26 agree on emergency nature/0 disagree/0 abstained/3 ballots not returned. See Attachment 21-4-6-b</td>
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<tr>
<td>21-4-6-c</td>
<td>No comments were received.</td>
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<tr>
<td>21-4-7</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise Annex A.7.2.2 item (5) of the proposed 2022 edition of NFPA 10, <em>Standard for Portable Fire Extinguishers</em> (TIA No. 1557).</td>
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<tr>
<td>21-4-7-a</td>
<td>Text of proposed TIA No. 1557. See Attachment 21-4-7-a</td>
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<tr>
<td>21-4-7-b</td>
<td>Ballot results of TIA No. 1557. <strong>FAILED</strong> ballot - passed ballot on technical merit but failed ballot on emergency nature – 31 voting members/22 agree on technical merit/6 disagree/0 abstained/3 ballots not returned/19 agree on emergency nature/9 disagree/0 abstained/3 ballots not returned. See Attachment 21-4-7-b</td>
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<tr>
<td>21-4-7-c</td>
<td>One comment was received. See Attachment 21-4-7-c</td>
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<tr>
<td>21-4-8</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise section 4.7.1.6 of the 2018 edition of NFPA 12, <em>Standard on Carbon Dioxide Extinguishing Systems</em> (TIA No. 1543).</td>
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<tr>
<td>21-4-8-a</td>
<td>Text of proposed TIA No. 1543. See Attachment 21-4-8-a</td>
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<tr>
<td><strong>21-4-8-b</strong></td>
<td>Ballot results of TIA No. 1543. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 34 voting members/26 agree on technical merit/0 disagree/1 abstained/7 ballots not returned/26 agree on emergency nature/0 disagree/1 abstained/7 ballots not returned. See Attachment 21-4-8-b</td>
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<tr>
<td><strong>21-4-9</strong></td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise section 20.5.3.1.3 of the proposed 2022 edition of NFPA 13, <em>Standard for the Installation of Sprinkler Systems</em> (TIA No. 1560).</td>
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<tr>
<td><strong>21-4-9-a</strong></td>
<td>Text of proposed TIA No. 1560. See Attachment 21-4-9-a</td>
<td></td>
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<tr>
<td><strong>21-4-9-b</strong></td>
<td>Ballot results of TIA No. 1560. <strong>FAILED</strong> ballot on both technical merit and emergency nature – 36 voting members/22 agree on technical merit/12 disagree/0 abstained/2 ballots not returned/18 agree on emergency nature/16 disagree/0 abstained/2 ballots not returned. <strong>PASSED CC</strong> ballot on correlation but <strong>FAILED</strong> ballot on emergency nature – 22 voting members/19 agree on correlation/2 disagree/0 abstained/1 ballots not returned/7 agree on emergency nature/14 disagree/0 abstained/1 ballots not returned. See Attachment 21-4-9-b</td>
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<tr>
<td><strong>21-4-9-c</strong></td>
<td>No comments were received.</td>
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<tr>
<td><strong>21-4-10</strong></td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to add new Annex material A.14.3.2 to the 2019 edition of NFPA 72, <em>Fire Alarm Signaling Code</em> (TIA No. 1548).</td>
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<tr>
<td><strong>21-4-10-a</strong></td>
<td>Text of proposed TIA No. 1548. See Attachment 21-4-10-a</td>
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<tr>
<td><strong>21-4-10-b</strong></td>
<td>Ballot results of TIA No. 1548. <strong>FAILED</strong> ballot on both technical merit and emergency nature – 28 voting members/16 agree on technical merit/8 disagree/1 abstained/3 ballots not returned/16 agree on emergency nature/8 disagree/1 abstained/3 ballots not returned. <strong>PASSED CC</strong> ballot on both correlation and emergency nature – 19 voting members/17 agree on correlation/0 disagree/1 abstained/1 ballots not returned/14 agree on emergency nature/3 disagree/1 abstained/1 ballots not returned. <strong>REBALLOT FINAL RESULTS</strong> of TIA No. 1548. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 28 voting members/16 agree on technical merit/5 disagree/0 abstained/7 ballots not returned/16 agree on emergency nature/5 disagree/0 abstained/7 ballots not returned. See Attachment 21-4-10-b</td>
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<tr>
<td><strong>21-4-10-c</strong></td>
<td>Four comments were received. See Attachment 21-4-10-c</td>
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<td><strong>21-4-11</strong></td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to add new section 26.2.10 to the 2019 edition and proposed 2022 editions of NFPA 72, <em>Fire Alarm Signaling Code</em> (TIA No. 1549).</td>
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<tr>
<td><strong>21-4-11-a</strong></td>
<td>Text of proposed TIA No. 1549. See Attachment 21-4-11-a</td>
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<tr>
<td><strong>21-4-11-b</strong></td>
<td>Ballot results of TIA No. 1549. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 26 voting members/24 agree on technical merit/0 disagree/0 abstained/2 ballots not returned/24 agree on emergency nature/0 disagree/0 abstained/2 ballots not returned. <strong>PASSED CC</strong> ballot on both correlation and emergency nature – 19 voting members/17 agree on correlation/0 disagree/0 abstained/2 ballots not returned/17 agree on emergency nature/0 disagree/0 abstained/2 ballots not returned. See Attachment 21-4-11-b</td>
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<td>21-4-11-c</td>
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<td><strong>Two comments were received.</strong></td>
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<td><strong>See Attachment 21-4-11-c</strong></td>
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<tr>
<td>21-4-12</td>
<td><strong>NFPA 92</strong></td>
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<td><strong>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise Annex A.5.11 Example 4 of the 2021 edition of NFPA 92, <em>Standard for Smoke Control Systems</em> (TIA No. 1547).</strong></td>
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<tr>
<td>21-4-12-a</td>
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<tr>
<td><strong>Text of proposed TIA No. 1547.</strong></td>
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<tr>
<td><strong>See Attachment 21-4-12-a</strong></td>
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<tr>
<td>21-4-12-b</td>
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<td><strong>Ballot results of TIA No. 1547. PASSED ballot on both technical merit and emergency nature – 31 voting members/25 agree on technical merit/0 disagree/2 abstained/4 ballots not returned/26 agree on emergency nature/0 disagree/1 abstained/4 ballots not returned.</strong></td>
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<td><strong>See Attachment 21-4-12-b</strong></td>
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<td>21-4-12-c</td>
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<td><strong>No comments were received.</strong></td>
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<td>21-4-13</td>
<td><strong>NFPA 99</strong></td>
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<td><strong>Act on the issuance of proposed Tentative Interim Amendment (TIA) to add new item (13) to section 6.1.3 and revise Section 6.1.4 of the 2021 edition of NFPA 99, <em>Health Care Facilities Code</em> (TIA No. 1522).</strong></td>
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<td>21-4-13-a</td>
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<tr>
<td><strong>Text of proposed TIA No. 1522.</strong></td>
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<td><strong>See Attachment 21-4-13-a</strong></td>
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<td>21-4-13-b</td>
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<td><strong>Ballot results of TIA No. 1522. PASSED ballot on both technical merit and emergency nature – 33 members/25 agree on technical merit/2 disagree/0 abstained/6 ballots not returned/24 agree on emergency nature/3 disagree/0 abstained/6 ballots not returned. PASSED CC ballot on both correlation and emergency nature – 18 voting members/14 agree on correlation/0 disagree/0 abstained/4 ballots not returned/14 agree on emergency nature/0 disagree/0 abstained/4 ballots not returned.</strong></td>
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<td><strong>See Attachment 21-4-13-b</strong></td>
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<tr>
<td>21-4-13-c</td>
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<tr>
<td><strong>No comments were received.</strong></td>
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<tr>
<td>21-4-14</td>
<td><strong>NFPA 101</strong></td>
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<tr>
<td>21-4-14-a</td>
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<tr>
<td><strong>Text of proposed TIA No. 1559.</strong></td>
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<tr>
<td><strong>See Attachment 21-4-14-a</strong></td>
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<tr>
<td>21-4-14-b</td>
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<td><strong>Ballot results of TIA No. 1559. PASSED ballot on both technical merit and emergency nature – 25 voting members/21 agree on technical merit/2 disagree/0 abstained/2 ballots not returned/22 agree on emergency nature/1 disagree/0 abstained/2 ballots not returned. PASSED CC ballot on both correlation and emergency nature – 12 voting members/10 agree on correlation/0 disagree/0 abstained/2 ballots not returned/10 agree on emergency nature/0 disagree/0 abstained/2 ballots not returned.</strong></td>
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<tr>
<td><strong>See Attachment 21-4-14-b</strong></td>
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<tr>
<td>21-4-14-c</td>
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<tr>
<td><strong>One comment was received.</strong></td>
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<td><strong>See Attachment 21-4-14-c</strong></td>
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<td>21-4-15</td>
<td><strong>NFPA 407</strong></td>
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<td><strong>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise Sections 5.1.12, 6.1.3.12.2.7, 6.1.3.12.2.8, 6.1.3.12.2.9 and Table C.1 of the 2017 edition and proposed 2022 editions of NFPA 407, <em>Standard for Aircraft Fuel Servicing</em> (TIA No. 1558).</strong></td>
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<tr>
<td>21-4-15-a</td>
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<tr>
<td><strong>Text of proposed TIA No. 1558.</strong></td>
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<tr>
<td><strong>See Attachment 21-4-15-a</strong></td>
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<tr>
<td>21-4-15-b</td>
<td>Ballot results of TIA No. 1558. <strong>FAILED</strong> ballot on both technical merit and emergency nature – 29 voting members/15 agree on technical merit/10 disagree/0 abstained/4 ballots not returned/15 agree on emergency nature/10 disagree/0 abstained/4 ballots not returned. See Attachment 21-4-15-b</td>
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<tr>
<td>21-4-15-c</td>
<td>One hundred sixty (160) comments were received. One hundred fifty-eight (158) comments support the TIA, two (2) comments do not support the TIA. See Attachment 21-4-15-c</td>
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<tr>
<td>21-4-15-d</td>
<td>Consider the appeal of Steve Berry, National Air Transportation Assoc., to overturn the ballot results of TIA No. 1558 and issue the TIA. See Attachment 21-4-15-d</td>
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<tr>
<td>21-4-16</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise section 3.3.3, and associated Annex material of the 2021 edition of NFPA 499, <em>Recommended Practice for the Classification of Combustible Dusts and of Hazardous (Classified) Locations for Electrical Installations in Chemical Process Areas</em>, (TIA No. 1546).</td>
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<tr>
<td>21-4-16-a</td>
<td>Text of proposed TIA No. 1546. See Attachment 21-4-16-a</td>
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<tr>
<td>21-4-16-b</td>
<td>Ballot results of TIA No. 1546. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 20 voting members/15 agree on technical merit/0 disagree/1 abstained/4 ballots not returned/16 agree on emergency nature/0 disagree/0 abstained/4 ballots not returned. See Attachment 21-4-16-b</td>
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<tr>
<td>21-4-16-c</td>
<td>No comments were received.</td>
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<tr>
<td>21-4-17</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to add new references to sections 2.2, 2.3.1, 2.4, revise section 11.2.5 and add a new section 11.2.6 to the 2021 edition of NFPA 909, <em>Code for the Protection of Cultural Resource Properties – Museums, Libraries, and Places of Worship</em>, (TIA No. 1544).</td>
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<tr>
<td>21-4-17-a</td>
<td>Text of proposed TIA No. 1544. See Attachment 21-4-17-a</td>
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<tr>
<td>21-4-17-b</td>
<td>Ballot results of TIA No. 1544. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 30 voting members/22 agree on technical merit/4 disagree/0 abstained/4 ballots not returned/20 agree on emergency nature/5 disagree/1 abstained/4 ballots not returned. See Attachment 21-4-17-b</td>
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<tr>
<td>21-4-17-c</td>
<td>No comments were received.</td>
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<tr>
<td>21-4-18-a</td>
<td>Text of proposed TIA No. 1552. See Attachment 21-4-18-a</td>
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<tr>
<td>21-4-18-b</td>
<td>Ballot results of TIA No. 1552 <strong>FAILED</strong> ballot on both technical merit and emergency nature – 36 voting members/9 agree on technical merit/21 disagree/2 abstained/2 ballots not returned/8 agree on emergency nature/24 disagree/2 abstained/2 ballots not returned. See Attachment 21-4-18-b</td>
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<tr>
<td>21-4-18-c</td>
<td>Forty-four comments were received. See Attachment 21-4-18-c</td>
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<tr>
<td>21-4-18-d</td>
<td>Consider the appeal of Ryan McGill, IAFF Local 2068, to overturn the ballot results of TIA No. 1552 and issue the TIA. See Attachment 21-4-18-d</td>
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<td>21-4-19</td>
<td>NFPA 1977</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to delete and replace Figure 6.1.14.6(a) with existing figure from the 2016 edition of NFPA 1977, Standard for Protective Clothing and Equipment for Wildland Fire Fighting, (TIA No. 1562).</td>
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<tr>
<td>21-4-19-a</td>
<td></td>
<td>Text of proposed TIA No. 1562. See Attachment 21-4-19-a</td>
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<tr>
<td>21-4-19-b</td>
<td></td>
<td>Ballot results of TIA No. 1562. PASSED ballot on both technical merit and emergency nature – 23 voting members/17 agree on technical merit/0 disagree/0 abstained/6 ballots not returned/17 agree on emergency nature/0 disagree/0 abstained/6 ballots not returned. PASSED CC ballot on both correlation and emergency nature – 27 voting members/20 agree on correlation/0 disagree/0 abstained/7 ballots not returned/20 agree on emergency nature/0 disagree/0 abstained/7 ballots not returned. See Attachment 21-4-19-b</td>
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<tr>
<td>21-4-19-c</td>
<td></td>
<td>No comments were received.</td>
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<tr>
<td>21-4-20</td>
<td>NFPA 1986</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise sections 8.2.5.5, 8.2.5.7, 8.2.5.8, 8.23.5.4 through 8.23.5.6 and 8.23.5.7(new) of the 2017 edition of NFPA 1986, Standard on Respiratory Protection equipment for Tactical and Technical Operations, (TIA No. 1545).</td>
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<tr>
<td>21-4-20-a</td>
<td></td>
<td>Text of proposed TIA No. 1545. See Attachment 21-4-20-a</td>
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<tr>
<td>21-4-20-b</td>
<td></td>
<td>Ballot results of TIA No. 1545. PASSED ballot on both technical merit and emergency nature – 24 voting members/17 agree on technical merit/2 disagree/2 abstained/3 ballots not returned/17 agree on emergency nature/2 disagree/2 abstained/3 ballots not returned. PASSED CC ballot on correlation but FAILED ballot on emergency nature – 27 voting members/17 agree on correlation/5 disagree/1 abstained/4 ballots not returned/15 agree on emergency nature/6 disagree/2 abstained/4 ballots not returned. See Attachment 21-4-20-b</td>
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<tr>
<td>21-4-20-c</td>
<td></td>
<td>Nine comments were received. See Attachment 21-4-20-c</td>
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<tr>
<td>21-4-20-d</td>
<td>APPEAL</td>
<td>Consider the appeal of Clint Mayhue, Avon Protection Systems, to overturn the ballot results of TIA No. 1545 and issue the TIA. See Attachment 21-4-20-d</td>
</tr>
<tr>
<td>21-4-20-d-1</td>
<td>APPEAL</td>
<td>Consider the appeal of John Morris, 3M, to uphold the ballot results of TIA No. 1545 and not issue the TIA. See Attachment 21-4-20-d-1</td>
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**REVISION CYCLES**

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<tr>
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<tr>
<td>NFPA 418</td>
<td>2021</td>
<td>PI Closing: January 5, 2022</td>
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See Attachment 21-4-21

**NEW PROJECTS**

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<tr>
<th>Date</th>
<th>Action</th>
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<tr>
<td>21-4-22</td>
<td></td>
<td>Consider the request of Christopher Wagner, AmeriGas Propane, to develop a standard to address Mobile Food Establishments/Mobile Cooking Operations. Seventeen (17) comments</td>
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were received on the proposed project. Sixteen (16) comments support the development of the project, one (1) does not support the project. See Attachment 21-4-22

**21-4-23** Consider the request of Brian Lucas, City and County of Denver, CO, to develop a standard to address fire protection of cannabis growing and processing facilities. Eighty-one (81) comments were received. Seventy (70) comments support development of the project, six (6) comments do not support the development of the project, five (5) provided commentary and twenty-six (26) indicated Technical Committee interest. See Attachment 21-4-23

**21-4-24** Consider the request of the Technical Committee on Hazardous Waste to approve the preliminary draft of NFPA 401, *Recommended Practice for the Prevention of Fires and Uncontrolled Chemical Reactions Associated with the Handling of Hazardous Waste*. If approved, the Technical Committee also requests the Standard to be entered into its initial revision cycle, with a Public Input closing date of January 5, 2022. See Attachment 21-4-24

**REPORTS BACK TO COUNCIL**

**21-4-25** At the December 2020 Council meeting, the Council reviewed the request of Megan Hayes on behalf of NEMA regarding the terms of listed versus certified. After review of all information before it, the issue was directed to staff for review and instructions to report back to the Council during the April 2021 meeting. No Attachment

**21-4-26** In accordance with prior actions and direction of Council, the following standards have completed their current revision cycles and are therefore transferred to the Technical Committee on Emergency Responders Occupational Health:
- NFPA 1581, *Standard on Fire Department Infection Control Program*
- NFPA 1582, *Standard on Comprehensive Occupational Medical Program for Fire Departments*
- NFPA 1583 *Standard on Health-Related Fitness Programs for Fire Department Members*
- NFPA 1584, *Standard on the Rehabilitation process for Members During Emergency Operations and Training Exercises*

Draft development of NFPA 1585, *Standard on Contamination Control*, continues by the Technical Committee on Emergency Responders Occupational Health and will be presented to Council for entry into its initial public revision cycle at a later date. No Attachment

**21-4-27** Review and consider the request to remove NFPA 1081 from new consolidated document NFPA 1010. See Attachment 21-4-27

**GENERAL ITEMS**

**21-4-28** Consider the location/method and dates for the upcoming Council meetings in 2021:

- August 24-26, 2021
- Location/Method TBD

- December 7-8, 2021
- Location/Method TBD

**21-4-29** Update from the Council Secretary. No Attachment

Standard for Aircraft Fuel Servicing

TIA Log No.: 1558
Reference: Section 5.1.12, 6.1.3.12.2.7, 6.1.3.12.2.8, 6.1.3.12.2.9 and Table C.1
Comment Closing Date: March 17, 2021
Submitter: Steve Berry, NATA General Aviation Fuel Handling Subcommittee
www.nfpa.org/407

Wording for the 2017 Edition:
1. Delete Section 5.1.12 as follows:
   5.1.12 Aircraft Fuel Servicing Vehicle Loading and Unloading Racks.
   5.1.12.1 The loading rack shall be equipped with an automatic shutdown system that stops the tank loading operation when the fuel servicing vehicle tank is full.
   5.1.12.2 All fuel servicing tank vehicle primary shutdown systems shall be compatible with the system utilized at the loading rack.
   5.1.12.3 The automatic secondary shutoff control shall not be used for normal filling control.
   5.1.12.4 New and existing loading systems shall comply with 5.1.12.1 through 5.1.12.3 within 5 years of the effective date of this edition.

2. Revise Sections 6.1.3.12.2.7, 6.1.3.12.2.8 and 6.1.3.12.2.9 to read as follows:
   6.1.3.12.2.7 The cargo tank vehicle shall be equipped with an automatic primary shutdown system that stops the tank loading operation when the tank is full unless an automatic shutdown is provided on the loading rack in accordance with 5.1.12.
   6.1.3.12.2.8 The cargo tank vehicle shall be equipped with an automatic secondary shutdown system that stops the tank loading operation when the tank is full.
   6.1.3.12.2.9 The automatic secondary shutoff control shall not be used for normal filling control.

Wording for the Proposed 2022 Edition:
1. Delete Section 5.1.12 and associated Annex material for A.5.12.4 as follows:
   5.1.12 Aircraft Fuel Servicing Vehicle Loading and Unloading Racks.
   5.1.12.1 The loading rack shall be equipped with an automatic shutdown system that stops the tank loading operation when the fuel servicing vehicle tank is full.
   5.1.12.2 All fuel servicing tank vehicle primary shutdown systems shall be compatible with the system utilized at the loading rack.
   5.1.12.3 The automatic secondary shutoff control shall not be used for normal filling control.
   5.1.12.4* New and existing loading systems shall comply with 5.1.12.1 through 5.1.12.3 by June 2, 2021.
   A.5.1.12.4 This date is consistent with the 5-year phase-in for overfill prevention systems as required in the 2017 edition of NFPA 407.

2. Revise Sections 6.1.3.12.2.7, 6.1.3.12.2.8 and 6.1.3.12.2.9 to read as follows:
   6.1.3.12.2.7 The cargo tank vehicle shall be equipped with an automatic primary shutdown system that stops the tank loading operation when the tank is full unless an automatic shutdown is provided on the loading rack in accordance with 5.1.12.
6.1.3.12.2.8 The cargo tank vehicle shall be equipped with an automatic secondary shutdown system that stops the tank loading operation when the tank is full.
6.1.3.12.2.9 The automatic secondary shutoff control shall not be used for normal filling control.

3. Revise entries for 5.1.12.3 and 6.1.3.12.2.7 of Table C.1 to read as follows:
   5.1.12.3 The automatic secondary shutoff control shall not be used for normal filling control.

   6.1.3.12.2.7 The cargo tank vehicle shall be equipped with an automatic primary shutdown system that stops the tank loading operation when the tank is full, unless an automatic shutdown is provided on the loading rack in accordance with 5.1.12.

Substantiation: No statistical data or studies have been performed showing that the requirements in section 5.1.12 and related requirements in section 6.1.3.12.2 are necessary or justified. The aviation refueling industry has been safely performing bottom loading operations of mobile refueling vehicles for decades without the use of automatic shutoffs at loading racks. The NFPA 407 already includes requirements that ensure this is the case. All mobile refuelers are required to be equipped with high-level shut off devices that close the internal valve of the refueling vehicle when full. The devices are tested before every loading operation to ensure they work. When operated properly under the existing requirements defined in the NFPA 407, the only means for spills to occur is through intentional non-compliance and gross negligence on behalf of the operator by defeating the dead-man control device and leaving the loading area unattended. Automatic shutoff devices at loading racks can also be bypassed and defeated allowing negligent operators to leave loading operations unattended. The requirements of 5.1.12 were made not only without verifiable data to justify them but will not solve the problem of spills caused by negligence and intentional non-compliance.

Emergency Nature: The standard contains an error or an omission that was overlooked during the regular revision process. The proposed TIA intends to correct a circumstance in which the revised NFPA Standard has resulted in an adverse impact on a product or method that was inadvertently overlooked in the total revision process or was without adequate technical (safety) justification for the action.

Thousands of general aviation (GA) airports will be affected by the requirements of 5.1.12 and related sections in 6.1.3.12.2. Prior to the July 2020 release of draft FAA AC 5230-4C on Aircraft Fuel Storage, Handling, Training, and Delivery the GA industry was unaware of the impact these requirements would have on them and unfortunately this was after the public comment periods for the 407 revision process had closed. The new AC 5230-4C makes compliance with the most recent edition NFPA 407 MANDATORY for all airports that receive federal funding under the Airport Improvement and Passenger Facility Charge programs. This means the scope of enforcement for the most recent revision of the 407 is far greater than just Part 139 airports and will have a profound financial impact on nearly every GA airport in the United States. Many of which are small, county run operations and small businesses who simply cannot afford the unnecessary cost of compliance with sections 5.1.12 and related 6.1.3.12.2.
MEMORANDUM

TO: Technical Committee on Aircraft Fuel Servicing

FROM: Yiu Lee, Committee Administrator

DATE: March 18, 2021

SUBJECT: NFPA 407 Proposed Tentative Interim Amendment (TIA) No. 1558 – Public Comment Review

The attached Public Comments are being submitted to the Technical Committee for review.

If you wish to change your vote, the change must be submitted through the NFPA online ballot system at the following link: NFPA Ballot Link. If you do not wish to change your vote, no response is necessary.

Please complete the ballot on or before March 25, 2021 by 11:59 pm ET.

While completing your ballot, please remember the following:

- A comment is required for both Question No. 1 and Question No. 2 for the online TIA ballot. Comments must accompany all Negative, Abstaining and Agree votes.

- If you vote “Agree” on Question 1, simply add “Agree” to the comment field and if you vote “Agree” on Question 2, insert the applicable letter(s) selections in the comment field which can be found in the Instructions box on the ballot site.

You must hit SUBMIT to SAVE your work. Note: the system session will time you out after 60 minutes; any work not submitted at that time will not be saved! You may return to finish or change your ballot at any time up to the closing date. Ballot comments exceeding 4,000 characters must be submitted in a Word document via email, to Yiu Lee at ylee@nfpa.org.

The return of ballots is required by the Regulations Governing the Development of NFPA Standards.

Attachment: Public Comments

Standard for Aircraft Fuel Servicing

TIA Log No.: 1558

Reference: Section 5.1.12, 6.1.3.12.2.7, 6.1.3.12.2.8, 6.1.3.12.2.9 and Table C.1

Comment Closing Date: March 17, 2021

Submitter: Steve Berry, NATA General Aviation Fuel Handling Subcommittee

www.nfpa.org/407

Wording for the 2017 Edition:

1. Delete Section 5.1.12 as follows:

5.1.12 Aircraft Fuel Servicing Vehicle Loading and Unloading Racks.

5.1.12.1 The loading rack shall be equipped with an automatic shutdown system that stops the tank loading operation when the fuel servicing vehicle tank is full.

5.1.12.2 All fuel servicing tank vehicle primary shutdown systems shall be compatible with the system utilized at the loading rack.

5.1.12.3 The automatic secondary shutoff control shall not be used for normal filling control.

5.1.12.4 New and existing loading systems shall comply with 5.1.12.1 through 5.1.12.3 within 5 years of the effective date of this edition.

2. Revise Sections 6.1.3.12.2.7, 6.1.3.12.2.8 and 6.1.3.12.2.9 to read as follows:

6.1.3.12.2.7 The cargo tank vehicle shall be equipped with an automatic primary shutdown system that stops the tank loading operation when the tank is full, unless an automatic shutdown is provided on the loading rack in accordance with 5.1.12.

6.1.3.12.2.8 The cargo tank vehicle shall be equipped with an automatic secondary shutdown system that stops the tank loading operation when the tank is full.

6.1.3.12.2.9 The automatic secondary shutoff control shall not be used for normal filling control.

Wording for the Proposed 2022 Edition:

1. Delete Section 5.1.12 and associated Annex material for A.5.12.4 as follows:

5.1.12 Aircraft Fuel Servicing Vehicle Loading and Unloading Racks.

5.1.12.1 The loading rack shall be equipped with an automatic shutdown system that stops the tank loading operation when the fuel servicing vehicle tank is full.

5.1.12.2 All fuel servicing tank vehicle primary shutdown systems shall be compatible with the system utilized at the loading rack.

5.1.12.3 The automatic secondary shutoff control shall not be used for normal filling control.

5.1.12.4* New and existing loading systems shall comply with 5.1.12.1 through 5.1.12.3 by June 2, 2021.

A.5.1.12.4 This date is consistent with the 5-year phase-in for overfill prevention systems as required in the 2017 edition of NFPA 407.

2. Revise Sections 6.1.3.12.2.7, 6.1.3.12.2.8 and 6.1.3.12.2.9 to read as follows:

6.1.3.12.2.7 The cargo tank vehicle shall be equipped with an automatic primary shutdown system that stops the tank loading operation when the tank is full, unless an automatic shutdown is provided on the loading rack in accordance with 5.1.12.
6.1.3.12.2.8 The cargo tank vehicle shall be equipped with an automatic secondary shutdown system that stops the tank loading operation when the tank is full.

6.1.3.12.2.9 The automatic secondary shutoff control shall not be used for normal filling control.

3. Revise entries for 5.1.12.3 and 6.1.3.12.2.7 of Table C.1 to read as follows:

5.1.12.3 The automatic secondary shutoff control shall not be used for normal filling control.

6.1.3.12.2.7 The cargo tank vehicle shall be equipped with an automatic primary shutdown system that stops the tank loading operation when the tank is full, unless an automatic shutdown is provided on the loading rack in accordance with 5.1.12.

**Substantiation:** No statistical data or studies have been performed showing that the requirements in section 5.1.12 and related requirements in section 6.1.3.12.2 are necessary or justified. The aviation refueling industry has been safely performing bottom loading operations of mobile refueling vehicles for decades without the use of automatic shutoffs at loading racks. The NFPA 407 already includes requirements that ensure this is the case. All mobile refuelers are required to be equipped with high-level shut off devices that close the internal valve of the refueler when full. The devices are tested before every loading operation to ensure they work. When operated properly under the existing requirements defined in the NFPA 407, the only means for spills to occur is through intentional non-compliance and gross negligence on behalf of the operator by defeating the dead-man control device and leaving the loading area unattended. Automatic shutoff devices at loading racks can also be bypassed and defeated allowing negligent operators to leave loading operations unattended. The requirements of 5.1.12 were made not only without verifiable data to justify them but will not solve the problem of spills caused by negligence and intentional non-compliance.

**Emergency Nature:** The standard contains an error or an omission that was overlooked during the regular revision process. The proposed TIA intends to correct a circumstance in which the revised NFPA Standard has resulted in an adverse impact on a product or method that was inadvertently overlooked in the total revision process or was without adequate technical (safety) justification for the action.

Thousands of general aviation (GA) airports will be affected by the requirements of 5.1.12 and related sections in 6.1.3.12.2. Prior to the July 2020 release of draft FAA AC 5230-4C on Aircraft Fuel Storage, Handling, Training, and Delivery the GA industry was unaware of the impact these requirements would have on them and unfortunately this was after the public comment periods for the 407 revision process had closed. The new AC 5230-4C makes compliance with the most recent edition NFPA 407 MANDATORY for all airports that receive federal funding under the Airport Improvement and Passenger Facility Charge programs. This means the scope of enforcement for the most recent revision of the 407 is far greater than just Part 139 airports and will have a profound financial impact on nearly every GA airport in the United States. Many of which are small, county run operations and small businesses who simply cannot afford the unnecessary cost of compliance with sections 5.1.12 and related 6.1.3.12.2.
Foran, Rosanne

From: Aviation Fire Safety Consultants,
Sent: Friday, February 12, 2021 8:07 PM
To: Shared TIAs; Cary Skinner
Subject: Comment on Proposed TIA 1558 on NFPA 407

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This TIA is the same as the last TIA NATA submitted. The last TIA was voted down by the committee, why would this one be ANY different? There is NO NEW INFORMATION OFFERED in the new TIA, other than the NATA refiling in the hope that the committee will back down and vote it in. This TIA is a nuisance TIA (repetitive, no new information, no new documentation) in an effort to delay a safety change that WAS AGREED UPON BY THE COMMITTEE 5 YEARS AGO. Since these sections have been in place 5 years, this is in NO WAY an emergency situation.

Thank you,
Fred Cnota

Sent from Mail for Windows 10
Foran, Rosanne

From: Cary Skinner
Sent: Friday, February 12, 2021 8:27 PM
To: Aviation Fire Safety Consultants,
Cc: Shared TIAs
Subject: Re: Comment on Proposed TIA 1558 on NFPA 407

Looks good to me.

On Fri, Feb 12, 2021, 19:06 Aviation Fire Safety Consultants, <fcnota@gmail.com> wrote:

This TIA is the same as the last TIA NATA submitted. The last TIA was voted down by the committee, why would this one be ANY different? There is NO NEW INFORMATION OFFERED in the new TIA, other than the NATA refiling in the hope that the committee will back down and vote it in. This TIA is a nuisance TIA (repetitive, no new information, no new documentation) in an effort to delay a safety change that WAS AGREED UPON BY THE COMMITTEE 5 YEARS AGO. Since these sections have been in place 5 years, this is in NO WAY an emergency situation.

Thank you,

Fred Cnota

Sent from Mail for Windows 10
From: Daniel Samms  
Sent: Thursday, February 11, 2021 11:47 AM  
To: Shared TIAs  
Subject: Comment on Proposed TIA 1558 on NFPA 407

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

My name is Daniel Samms, the Safety Coordinator for Bakersfield Jet Center. Founded in 1958, we are a small family-owned FBO, and have achieved Stage II IS-BAH compliance through adherence to industry-wide best practices and a willingness to promote safety as our primary focus. In the almost 33 years our fuel farm has been in place, we have never experienced an overfill due to the failure of a high-level shut off valve. We have developed procedures that verify the high-level shut off valve is operational during daily morning checks as well as at the beginning of each farming. We have found that these are more than adequate levels of protection against overfill. Reducing a high-level shut off valve to secondary and installing a primary electronic shut off is redundant, cost ineffective, and does not negate or even mitigate employee bypass or error, which, statistically speaking, has been found to be the overwhelming root cause of fuel spills.

We respectfully request that these mandates be removed in agreement with TIA 1558 for NFPA 407.

Thanks,

Daniel Samms  
Safety Coordinator  
Loyd’s Aviation
To whom it may concern:
I have been in the FBO industry since 1964, primarily in aircraft fueling and fuel handling. I have served as an LST, an FBO Line Manager, an FBO Operations Manager, an FBO General Manager, as well as a Regional Vice President for one of the largest FBO chains in the world. I am currently the VP of FBO Operations for a smaller but first class FBO chain. During this period and working with over 75 FBO’s I am aware of only one incident where a fuel spill occurred when a fuel shut off on fuel truck failed when the truck had reached capacity. Today 99.9% of aircraft refuel trucks are equipped with a shut off when the truck reaches capacity. Further all fuel farms have a dead man that must be held for the fuel to flow from the farm to the truck as well as from the truck to the aircraft. When fuel is delivered from the tank truck to the storage tanks the same process occurs and there is normally two individuals involved in the off loading. Additionally emergency shut off valves are located in a manner so that an individual can shut the facility down should the other two systems fail. To require FBO’s and Fuel vendors to add an additional shut off to tanks and piping not only is redundant but quite costly. The general flying public does not want to pay for the cost of adding these systems since it is no benefit to the end user so the FBO and fuel vendor will have to bear the cost. Again in todays world the FBO is required to have satisfactory fire extinguisher systems on and near any area where fuel is being transferred and each individual involved is trained on containment and fire suppression. Lastly I would imagine that this system would not prevent any fuel spills that are not already prevented by current devices.
I hope that the NFPA will re think and withdraw this change to NFPA 407.

Tom

HAWTHORNE
GLOBAL AVIATION SERVICES

Tom Auten | VP FBO Operations
3955 Faber Place Drive | N. Charleston, SC 29405
| www.hawthorne.aero
To whom it may concern,

Million Air Dallas has had a longstanding record of safety when considering fuel spills at the refueler loading rack. In our 36 years of operation at the Addison, Texas airport, with sales of 5M gallons per year (recent data), we have not had any recordable fuel spills when “bottom loading” a refueling truck. With this record, the automatic shutoffs already installed on our fuel trucks (pre-checked before any bottom loading is performed), and with the additional containment area provided at the reloading rack, the risk of a environmentally damaging fuel spill is at or near zero. For these reasons we fully support TIA 1558 to exempt ourselves from this new requirement.

We are proud to abide by NFPA 407 standards and we market that fact to our customers, however this additional requirement is unnecessary, burdensome, and does little if anything to enhance safety. Thank you for your consideration as we continue to work safely and in adherence to all other NFPA 407 standards.

Respectfully,

Jeff Zimmerman
Vice President / Director of FBO Services
Million Air Dallas
Foran, Rosanne

From: Travis McQueen
Sent: Friday, February 12, 2021 9:58 AM
To: Shared TIAs
Subject: KHNB - TIA 1558

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Good day,

The Huntingburg Regional Airport - KHNB - is owned and operated by the Dubois County Airport Authority.

We also own and operate the FBO, only due to the fact that in 2013, the private business model, could no longer be followed, as reflected nationally in the last 10-20 years, with loss of private FBO's.

Fuel volumes are down and businesses at our airport are just barely using any aircraft.

Please know that we stand in Support of TIA 1558.

We are a small GA airport, with a single runway, using a system that has yet to fail us, with one single truck using the system.

Understand that not all GA-FBO's are the same, however as the FAA segregated and separated GA airports in 2012 (ASSET Study), please consider some matrix, for compliance to any formal standard, rather than a bureaucrat/government approach of one-size-fits all.

Thank you,

Travis McQueen, Mgr.,
Huntingburg Regional Airport - KHNB
Huntingburg Airport Technology Park - HATP
Dubois County Airport Authority

www.huntingburgairport.com
Foran, Rosanne

From: Evan Warren
Sent: Friday, February 12, 2021 10:42 AM
To: Shared TIAs
Subject: Support for TIA1558

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CAUTION: Always use caution when opening attachments. Make sure you know the sender and are you expecting one.

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Please find the attached letter in strong support of TIA 1558.

Evan Warren
General Manager - Robinson Aviation

Address 50 Thompson Avenue East Haven, CT 06512
Website https://www.robinsonaviation.com/

---
To: NFPA
Re: TIA 1558

Date: 12FEB2021

Dear National Fire Protection Association,

I am writing to you on behalf of and in support of TIA 1558, and the need for the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval of TIA 1558.

Robinson Aviation has been in operation since 1989, using the current bottom-loading and existing high-level shutoff equipment and procedures with an impeccable safety record. We see no data or evidence that the existing procedures and equipment pose any need for new regulations that will cripple ours and many businesses with exorbitant implementation costs for newly regulated equipment. We view this regulation as burdensome to businesses already suffering during a period of historically low air travel, that have born the huge cost of operating uninterrupted during the pandemic, and cannot afford tens of thousands of dollars in retro-fit equipment. This is compounded by the physical loss of equipment during the retro-fit process, which will be time-consuming and will result in reduced sales during the retro-fit process, to an already-reduced operation.

I cannot state in more plain terms. We request and require the approval of TIA 1558 in order to stay in business.

Thank you for your time.

Sincerely,

Evan B. Warren
Operations Manager
Robinson Aviation, Inc.
Foran, Rosanne

From: Kelly Linn
Sent: Friday, February 12, 2021 10:46 AM
To: Shared TIAs
Cc: Kelly Linn
Subject: TIA 1558

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern,

I am writing you to share that AvBase San Jose LLC fully supports TIA 1558 and we encourage the NFPA Aircraft Fuel Servicing Committee to vote in favor of approval.

AvBase is a small private FBO with combined staff experience of 52 years. I personally have worked at FBOs for 30 years, starting at line-service operations, Supervisor, Operations Manager and now General Manager. While we are small, we take pride in keeping our facility and equipment in the best shape possible. We adhere to all daily, monthly, quarterly and annual inspections. We are constantly making sure all aspects of our equipment are working as designed. I am proud to say that over the 15 years I have been with AvBase, we have not had an issue with fuel spilling. I strongly believe this is due to the exceptional care we take of our equipment and facilities.

Please feel free to contact me should you have any questions. I look forward to speaking with you.

Thank you and have a great day.

-- Kelly Linn
AvBase San Jose LLC
Mineta San Jose International Airport - SJC
From: Damon Ward
Sent: Friday, February 12, 2021 10:47 AM
To: Shared TIAs
Subject: TIA 1558

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear NFPA Aircraft Fuel Servicing Technical Committee,

Please accept this email in support of TIA 1558 and I would respectfully request your favorable vote in support of this TIA.

I have been in the FBO industry for 25 years as an owner and manager of FBOs. Our industry has a long track record of safe and environmentally friendly operations with the current spill prevention equipment in use. These proven spill prevention systems include a high level overfill protection for trucks as they are bottom loaded as well as active control of the filling process with the use of the dead man switch by the fuel technician during truck loading. This requirement for automatic shutdown is very expensive and is a redundant system to the proven spill prevention systems that are successfully being used today. I personally rely on facts and data for the decision making process and I have seen no supporting information that automatic systems add any additional spill prevention barrier beyond the high level shut off and the dead man switch.

These comments are respectfully submitted for your consideration. My contact information is below should you need additional information or comment.

With kind regards,

Damon Ward

USTRINITY

5035 Warbird Dr. | Denton, TX 76207
From: David Parker
Sent: Friday, February 12, 2021 10:52 AM
To: Shared TIAs
Subject: TIA 1558

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

Packerland Aviation LLC dba Executive Air would like to state clearly that we support TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval. Executive Air is a small, privately owned FBO in Green Bay, Wisconsin. We have been operating our current fuel farm facility, with its existing high-level shut off system and operational procedures for bottom loading, safely and reliably since its install in 2000. If TIA 1558 is not approved, this will cause an undue burden on Executive Air and thousands of other operators.

The cost to Executive Air would be approximately $24,000.00. In the current situation with COVID, adding this cost to our operations in 2021 would be devastating to our company.

Please approve TIA 1558.

Sincerely,

David Parker | Executive Air
Administrative Director

www.executiveair.com
I write in support of TIA 1558 providing relief from sections 5.1.12 and 6.1.3.12.2.7 through 6.1.3.12.2.9 of the NFPA 407. We have bottom-loaded for years using the existing and wholly-sufficient procedures required by NFPA 407. We currently employ a high-level shut-off system and detailed bottom loading procedure that capture and minimize the risk associated with refueler loading.

Thank you for your consideration.

Regards,

Scott Hinton
Airport Manager
www.egairport.com
Foran, Rosanne

From: Philip Bissonnette
Sent: Friday, February 12, 2021 10:58 AM
To: Shared TIAs
Subject: TIA 1558

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I am in support of the proposed TIA 1558. Existing overfill protection has been in place, and has not failed at any point. We need to move away from continual expensive requirements cannot be justified by actual operational history. We are proposing a cure for a problem which does not exist. Please note my contact information below.

Thank you

Phil Bissonnette
General Manager
TAC Air- Spirit of St. Louis

18260 Edison Avenue
Chesterfield, Missouri 63005

DISCLAIMER AND NOTICE OF CONFIDENTIAL MATERIAL PLEASE READ. The information contained in this message is non-public, proprietary, confidential, and may be protected from disclosure under applicable law. This message is intended for the individual or entity to which it is addressed herein. If you are not the intended recipient, please do not read, copy, use or disclose this communication to others; please delete it (and any attachments) from your system. Also please notify the sender by replying to this message. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Neither TAC Energy, TAC Air, nor any of The Arnold Companies or any of their affiliated entities accepts any liability for any damage caused by any virus transmitted by this email or its attachments.
Foran, Rosanne

From: Rick Shepard  
Sent: Friday, February 12, 2021 11:09 AM  
To: Shared TIAs  
Subject: Support TIA 1558

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I own two FBO’s that would be impacted negatively and I fully support TIA 1558!

I would be severely impacted without the changes proposed as a small business trying to operate during a global pandemic.

Rick Shepard  
Vice President of Operations | Aircraft Sales Representative  
Skytech, Inc.

www.skytechinc.com

Celebrating 45 years of the Skytech Advantage!

Save a tree....don't print this unless absolutely necessary!

CONFIDENTIALITY NOTICE: This electronic message is intended to be viewed only by the individual or entity to whom it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any dissemination, distribution or copying of this communication is strictly prohibited without our prior permission. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, or if you have received this communication in error, please notify us immediately by return e-mail and delete the original message and any copies of it from your computer system.
Foran, Rosanne

From: Moran, Jay (SFS-JAX)
Sent: Friday, February 12, 2021 11:27 AM
To: Shared TIAs
Subject: Supporting TIA 1558

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

I support TIA 1558 and encourage NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

We currently have multiple safety measures in place, including high level monitoring and shut off. All tanks are in secondary containment and all fuel transferring takes place on a containment pad.

Jay Moran | General Manager JAX

Signature Flight Support JAX | 14700 Yonge Drive | Jacksonville FL 32218

This message may contain confidential and/or privileged information. If you are not the intended recipient or believe you have received this message in error, please notify us immediately by responding to the sender and then delete this message from your system.
Foran, Rosanne

From: Brian Decoudres
Sent: Friday, February 12, 2021 11:42 AM
To: Shared TIAs
Subject: TIA 1558

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

NFPA Team,

I would like to write to support NATA’s TIA 1558 removing requirement for Automatic Shutoff Systems at airports. At my facility I have 5 separate loading stations 2 for Avgas and 3 for Jet. The cost to upgrade these 5 systems plus the 5 fuel trucks would have a great impact on our operations and I feel with the procedures that we have in place are unnecessary.

We have high level shutoffs with prechecks on all of our fuel trucks and have dead man style controls for all the loading stations. Our procedures require that the operator test the high level precheck multiple times while topping off and if it does not engage to immediately stop and call a supervisor.

Please consider the impact that this additional requirement will have considering that this is already a safe operation at most location. Also the financial impact of this upgrade will be very difficult for may FBO’s already struggling to rebound in a very difficult time. Please vote to approve TIA 1558

Thank you,

Brian DeCoudres
General Manager
DuPage Flight Center

https://flightbridge.com/go/DuPage

ChICAGO LAND'S
DuPage Flight Center

Please consider providing us with your feedback.
https://www.getfeedback.com/r/12InvXQZ
Foran, Rosanne

From: Dan Dietz
Sent: Friday, February 12, 2021 11:42 AM
To: Shared TIAs
Subject: TIA 1558

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Greetings,
I am writing to provide my full support of TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical committee to vote in favor of approval.
We are a university owned, public use airport and have an excellent safety record in fuel operations. Our current high-level shutoff system has proven very reliable and is tested each time the trucks are filled.
Sincerely,
Dan

Dan Dietz C.M.
Foran, Rosanne

From: West, Robert (SFS-BTR)
Sent: Friday, February 12, 2021 11:56 AM
To: Shared TIAs
Subject: Support TIA 1558

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Signature Flight Support BTR supports TIA 1558 and we encourage the NFPA Committee to vote in favor of approval. We are the largest FBO operation in North America and our safety record is impeccable, along with an outstanding training system company wide.

Robert West
General Manager Signature Flight Support BTR

Robert West | General Manager
Signature Flight Support | KBTR
www.signatureflight.com/locations/btr

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Foran, Rosanne

From: Patrone, Nicole  
Sent: Friday, February 12, 2021 12:52 PM  
To: Shared TIAs  
Subject: Support for TIA 1558

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Good afternoon –

On behalf of Signature Flight Support – Trenton, NJ, we fully support proposed TIA 1558. We encourage the NFPA Aircraft Fuel Service Technical Committee to vote in favor of approval to remove the requirements to install automatic shutdown systems at airport loading racks that are also compatible with mobile refuelers.

As an FBO operation and fuel farm operator, we are requesting relief of this requirement as we continue our operations with the existing safe and reliable high-level shut off systems and operational procedures for bottom loading.

Please feel free to contact me at:
Signature Flight Support – TTN
Trenton Mercer Airport
18 W Piper Avenue
Trenton, NJ 08628

Thank you for your time and cooperation.

Nicole D. Patrone | General Manager- TTN
Trenton Mercer Airport, 18 W Piper Avenue
Trenton, NJ 08628

www.signatureflight.com

This message may contain confidential and/or privileged information. If you are not the intended recipient or believe you have received this message in error, please notify us immediately by responding to the sender and then delete this message from your system.
Foran, Rosanne

From: Steven Burdeaux
Sent: Friday, February 12, 2021 1:39 PM
To: Shared TIAs
Subject: Please Support TIA 1558

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Good Afternoon,

I’m writing to you in regards to the upcoming vote on TIA 1558, as it relates to the costly, overly vague, and unwarranted requirements to further alter our nation’s airport fueling systems, and asking that you please APPROVE TIA 1558.

There is a longstanding safety record at our nation’s airports, including our own, that has proven to be most effective in preventing safety issues with our fuel farms and mobile refuelers. Speaking on our individual operation - being owned and operated by the City of Minden, it would be an unnecessary and excessive financial burden, on our already tight budget, to have some sort of random untested system added to our fuel tanks and trucks. That is, as you know, in addition to the already required, and effective, overfill alarms and high level shut off features of our tanks and bottom-loaded trucks. We feel that it would add no additional safety to our operation. Instead, it would only add undue burden on the local taxpayers, during an already stressful national environment, to fund this additional equipment.

Please reach out to me here, or at , if you require any additional information on my opinion of this matter.

Thanks,

Steven Burdeaux, C.M., ACE
Airport Manager

http://www.mindenairport.net
Dear Sirs: As an aviation operator and fixed base operator on a public airport, **WE STRONGLY SUPPORT TIA 1558** and respectfully ask the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

If you would like to know more about our business, please see [www.phoenixair.com](http://www.phoenixair.com). In addition to our FBO, we also operate fuel facilities to support our fleet of +35 aircraft.

Thank you for your attention to this matter.

Randall H. Davis  
Senior V.P. & General Counsel  
Phoenix Air Group, Inc.

*A world-wide provider of specialized jet aircraft services to Government & Industry*

The Phoenix Building  
100 Phoenix Air Dr.  
Cartersville, GA 30120  
[www.phoenixair.com](http://www.phoenixair.com)
Foran, Rosanne

From: Kettle, Peter
Sent: Friday, February 12, 2021 3:02 PM
To: Shared TIAs
Cc: Silvar, Deborah
Subject: TIA 1558

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To whom it may concern.

Please be advised that we --- the Fitchburg Municipal Airport fully support TIA 1558 in it’s entirety and fully encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

We are a G.A. airport with both Jet A and 100LL fuel availability. We have two static tanks of 10,000 gallons capacity, one with Jet A and the other with 100 LL. We also have a Self Serve Facility supplying 100 LL fuel -- and the tank size is 6,000 gallons.

• We have been in operation since the early 1900’s with great reliability of our existing high-level shut off systems and operational procedures for bottom loading and do not see any requirement to change a good working system that has been in operation for many years.

Best,

Peter.
From: Chuck Studer  
Sent: Friday, February 12, 2021 3:37 PM  
To: Shared TIAs  
Subject: NFPA 407

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please consider this my request that you consider and enact the National Air Transportation Association’s Tentative Interim Amendment TIA 1558 to NFPA 407. This amendment would eliminate costly and unnecessary requirements that will be imposed on airport operators to modify fueling systems that are already installed and have been operated safely for many years.

The cost of these modifications will have a tremendous negative impact on small airports, many of which are already struggling due to revenue losses related to the pandemic. Add this to the fact that there is no evidence that NFPA’s proposed changes to 407 will accomplish anything to enhance safety.

Again, please consider NATA’s proposed TIA 1558.

Respectfully,

Chuck Studer  
Airport Manager  
Illinois Valley Regional Airport  
Peru, IL
Foran, Rosanne

From: Joe Crawford
Sent: Friday, February 12, 2021 3:49 PM
To: Shared TIAs
Subject: TIA1558

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I am writing in support of TIA1558 and the changes in mobile refueling and fuel farms at Fixed Based Operations across the country. I am a principal at Abilene Aero and Lubbock Aero, two Fixed Based Operators in operation in Texas over 50 years. We have a long-standing record of safety with refuelers and fuel farms. I cannot emphasize more the safety and reliability of our existing high-level shut off systems and our operational procedures for bottom loading. These new regulations of NFPA put undue burdens on our industry solving a problem which we feel is not a problem.

I encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval of TIA 1558.

Thanks

Joe Crawford
President
Abilene Aero – Lubbock Aero
2850 Airport Blvd.
Abilene TX 79602

Abileneaero.com
Lubbockaero.com

Providing Excellence In Aviation
To whom it may concern,

My name is Shanon Spears and I am the Operations Manager for Gulf Atlantic Airways, Inc, dba University Air Center located at the Gainesville Regional Airport in Gainesville, Florida. I am writing to say that University Air Center supports TIA 1558 emphatically. I have been in the aviation fuel business going on 29 years. I was in the US Navy stationed aboard the warship USS George Washington CVN 73 for 4 years where my job was fuel quality assurance for the V4 fuels division. After my time in the Navy I went to work for The Naples Airport Authority in Naples, Florida. After a short run as a lineman, I was promoted to Duty Officer and oversaw all operations that occurred on a daily basis. Naples has been noted as one of the busiest non commercial airports in the country. I received multiple loads of Jet fuel and Avgas on a daily basis. In my ten years with Naples not once did I see a high level shut off on a refueler fail, NOT ONCE! I have never seen a truck overflow due to malfunction of equipment.

After 10 years in Naples I relocated to North Central Florida. I started working for University Air Center, the only FBO located at the Gainesville Regional Airport. I have served as Operations Manager with responsibility for all fueling activities for going on 15 years. We operate four large refuelers, a self fueler, and a fuel farm. Here as well, I have still never seen a high level shut off fail on a refueler.

I have been in Aviation and fuels for most all of my life. I can tell you that if your looking for a reason as to why a fuel truck would over flow while being topped, the error or issue would be ONLY with the person topping the truck. I can say with 100% confidence that a truck or fuel farm that over flows is because the person topping the truck or moving fuel in the farm has in some way overridden and or bypassed the deadman device. NFPA 407 does nothing to address or prevent this human error and it places a completely unnecessary financial burden on FBO's and airports that are already struggling in an era of pandemic.

If NFPA 407 did anything to enhance safety of fueling operations we would support it fully. However it is nothing more than an unnecessary and overreaching bureaucratic power play.

Shanon Spears
University Air Center
Operations Manager
TO: NFPA Technical Committee  
RE: Support for TIA 2558

Gulf Atlantic Airways, Inc, dba University Air Center has been in business since 1981 and has been fully owned and operated by the Lukowski family since 1984. In the now 40 years of fueling operations we have had ZERO failures of our high level shut off systems and our operational procedures for bottom loading.

We operate four refuelers as well as a self-fueler and we refuel at the KGNV's fuel farm multiple times a day. In normal times the fuel farm would receive multiple ~8,000 gallon loads of fuel 6 days a week. Obviously fueling has slowed due to the pandemic, but we still pump fuel daily to both GA and Commercial customers.

NFPA 407 is unnecessary and it places a financial burden on FBO's and airports that does not enhance safety in any way. We fully support TIA 2558.

Debbie Frederick  
Chief Operating Officer
Foran, Rosanne

From: Stan Finch
Sent: Friday, February 12, 2021 4:43 PM
To: Shared TIAs
Subject: TIA 1558

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To Whom it May Concern:

I strongly support TIA 1558 and encourage the technical committee to hasten approval. We have operated an FBO since 1988 and have never experienced an issue with our existing high level shut off systems due to both the reliability of the system and our backup monitoring procedures. We have discussed this issue at length, internally, and we firmly believe there is no compromise to safety by continuing to operate with the single high level shut off system.

Please me know if you would like to discuss.

STANLEY FINCH
President

BERRY AVIATION

www.berryaviation.com
Foran, Rosanne

From: Mittleman, David A.
Sent: Friday, February 12, 2021 5:28 PM
To: Shared TIAs
Subject: Full Support of TIA 1558

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am in FULL support of TIA 1588 and strongly encourage the technical committee to approve the TIA.

I work for Avfuel and visit hundreds of FBO’s and corporate fuel farms each year.

Thanks,
David Mittleman
Regional Manager
Avfuel Corporation

www.avfuel.com
Foran, Rosanne

From: Kevin Edwards
Sent: Friday, February 12, 2021 6:12 PM
To: Shared TIA
Subject: Comment on Proposed TIA 1558 on NFPA 407

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I respectfully request the scope of NFPA 407 be changed to remove GA airports from this requirement. I manage the Nevada County Airport (GOO) in Grass Valley, CA. We are a small county airport that has little revenue and we have had trouble keeping up with our required improvements on the airport. Over the next 5 years, our current Airport Capital Improvement Program will require us to come up with our portion of the projects totaling $225,500 to keep our runways, taxiways, weather stations and lighting systems safe and current. The County is the fuel provider and we sell less than 200,000 gallons of fuel each year, which is far less than the part 139 airports pump in a day. We have local procedures in place to ensure we are operating our fuel systems in a safe manner to prevent any overfilling conditions. We cannot afford this unnecessary cost. I am begging you to remove GA airports from this requirement.

Respectfully,

Kevin M. Edwards
Airport Manager
13083 John Bauer Avenue
Grass Valley, CA 95945

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www.nevcorelief.org
We support TIA 1558 and encourage the committee to vote in favor of approval.

We have owned and operated a small FBO for 31 years.

Our fuelers are equipped with shut off systems and we have procedures for bottom loading. Further cost requirements from NFPA 407 would be financially prohibitive, especially during this time of business downturn due to the pandemic.

Thank you,

Avcraft, Inc.
Columbus, NE 68601
Foran, Rosanne

From: Roger Kelsay
Sent: Sunday, February 14, 2021 6:46 PM
To: Shared TIAs
Subject: Airport Refueler Proposal

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You people are out of control! Secondary overfill protection is like demanding two condoms.

Especially at economic times like this, to come up with these foolish ideas, is especially absurd.

Then, I should remember, all of you are government employees sucking on the teat. It is not your money you are spending!

Get the drift?

Sent from my iPhone

Roger B. Kelsay
President
Premier Jets and Affiliated Companies
From: David Kucko  
Sent: Monday, February 15, 2021 11:15 AM  
To: Shared TIAs  
Cc: Tom Auten; Kjell Lavoll  
Subject: Letter of support regarding TIA #1558 - NFPA 407  

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Dave

HAWTHORNE
GLOBAL AVIATION SERVICES

David Kucko | General Manager  
Hawthorne Global Aviation Services  
1723 McCollum Parkway | Kennesaw, GA 30144  
| www.hawthorne.aero

Building Customer Loyalty One Experience At A Time
February 15, 2021

RE: Support of TIA #1558 to upcoming NFPA 407

To whom it may Concern:

I would like to voice my support of TIA # 1558 that has been submitted by the NATA in regards to the upcoming release of the latest revision of NFPA 407.

As a General Manager of many Fixed Based Operations (FBO's) over the past 25 yrs. at airports throughout the country I have never seen any evidence of the problem of over fueling aviation fuel trucks while bottom loading at airport loading racks at any airports that I have had operations at. Currently this consists of over 15 different airports, both commercial and GA reliever airports, which I have operated fuel loading racks at. Historically on average at these airports we have loaded anywhere from 2 up to 15 trucks per day utilizing the current NFPA procedures that have been in place for years for aviation fuel loading racks. This has happened seven days per week / 365 days per year. So, conservatively on average I have been in charge of well over 63,000 truck loadings from aviation fuel farms in my career. In that time I have never had one fuel spill or over fueling event from any aviation bottom loading rack. In fact, in my career I have only heard of one instance where the safety procedures currently in place (i.e.: high – level shutoffs and NFPA approved well defined bottom loading procedures) have not prevented an over fueling situation and subsequent fuel spill while bottom loading.

The recommendation of requiring “scully” type systems on aviation fuel loading racks and refuelers will place an unwarranted expense and burden on the industry that does not have a history of any bottom loading over fuelings or fuel spills at airport loading racks. This is clearly an instance of trying to solve a perceived problem that does not exist. If I am in error of this fact I would like you to show me the examples where this is a problem as I can show at a minimum of 63,000 examples over my career personally where it is not an issue.

Thank you in advance for your consideration of this TIA # 1558 and please feel free to reach out to me should you require any further info.

Sincerely,

David M. Kucko
General Manager
Foran, Rosanne

From: Dave Emerson
Sent: Tuesday, February 16, 2021 7:58 AM
To: Shared TIAs
Subject: NFPA 407

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CAUTION: Always use caution when opening attachments. Make sure you know the sender and are you expecting one.

To Whom it May Concern,
Please find attached our comments regarding the new proposed regulation on fuel farms and refueling trucks.

Sincerely,
David A. Emerson
President
DAE Aviation Enterprises Corp
Emerson Aviation
61 Recycle Way
65 Aviation Drive
Gilford, NH 03249

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Re: Tentative Interim Amendment (TIA) proposing change to NFPA 407- Standard for Aircraft Fuel Servicing

2/15/2021

To Whom it May Concern,

With respect to the above and its possible integration to NFPA 407 Standards, DAE Aviation Enterprises Corp dba Emerson Aviation would like to comment as follows:

Emerson Aviation is a general aviation, Full service Based Operator (FBO) company based at the Laconia Municipal Airport in Gilford, NH. The implementation of TIA 1539 by the National Fire Protection Association would provide relief to Emerson Aviation and other small aviation businesses that are coping with downturns associated with the Covid19 pandemic.

Emerson Aviation currently has one Jet A loading rack supporting one (1) 12,000 gallon AST and one Avgas loading rack supporting one (1) 12,000 gallon AST. Our above ground fuel farm is thirty years old but has been upgraded over the years and is equipped with the Scully System, our 3,000 gallon Jet A and our 1,200 gallon Avgas trucks, both of which are also equipped with an automatic shut-off system.

The fuel farm is inspected each year and signed off by the respective Fire Departments as complying with the NFPA-407. Our line service staff is trained to conduct daily and monthly specific inspections to the strictest of industry standards. Furthermore, we have an annual fuel farm inspection and training with our supplier, Titan Aviation Fuels and our fuel farm maintenance contractor further strengthening our commitment to fuel and equipment quality control and safety.

We would fully support removing the retroactive nature of the current language in the NFPA and applying the revised standards to new fuel farm and fuel truck installations only. Implementing expensive new regulations at a time when businesses are coping with the challenges of a pandemic would have a very negative impact.

Respectfully,

David A. Emerson
President
DAE Aviation Enterprises Corp
Emerson Aviation
61 Recycle Way
Gilford NH 03249
From: Coley Means
Sent: Tuesday, February 16, 2021 10:04 AM
To: Shared TIAs
Subject: TIA 1558

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Ladies & Gentlemen,

I support TIA 1558 and encourage you to approve the TIA. I operate a small FBO at a GA airport. We have used high level shut off systems for ~20 years without incident. The 'new' 407 will place undue financial burden our business with no concurrent increase in safety or reliability.

We ask for your support on the TIA.

Thanks, Coley Means
Foran, Rosanne

From: Gatlinburg Pigeon Forge Airport
Sent: Tuesday, February 16, 2021 12:11 PM
To: Shared TIAs
Subject: NFPA 407

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To whom it may concern:

I understand that NATA’s previous proposal to edit the NFPA has been unsuccessful to date. Please consider their new proposal which relieve thousands of general aviation airports, FBOs, and fuel farm operators from the costly, and unnecessary requirements found in sections 5.1.12, and 6.1.3.12.2.7 through 6.1.3.12.2.9 of the NFPA 407 and allow for the continued safe and effective bottom loading operations they have been performing for years.

In my opinion, this will be detrimental to small GA airports who are already struggling due to the COVID pandemic. I believe requiring this expensive additions would force some airports to shut down fueling operations. Since fuel is the major revenue source for most GA airports, I foresee this requirement even forcing the airport to shut down completely. Unless you all can provide funding assistance for these requirements, please accept NATA’s new proposal.

Thank-you for your time and consideration.

Emily

Emily R. Haun
Manager
Gatlinburg Pigeon Forge Airport
134 Air Museum Way
Sevierville, TN 37862
Dear NFPA Technical Committee,

I support TIA 1558! I request that you APPROVE TIA 1558.

I work for Wells Aircraft, Inc. located at the Hutchinson Regional Airport (KHUT). I started working here with line service is 1998. Throughout the MANY years I have been directly involved in the use of fuel trucks, bulk storage tanks, and fire safety procedures. I have seen and approve of many previous changes in safety requirements over the years. Since we started using automatic shutdown systems to stop the flow of fuel when the truck is full and prevent fuel tank overflow, we have had ZERO incidents or system failures. They are reliable and they work!

Currently, we park our fuel trucks in a containment center when they are being filled. We use a computer accounting system to track fuel pumped into and out of the trucks and fuel tanks. This allows us to know how much fuel is expected to be transferred. After we squeeze the dead-man switch and begin the transfer of fuel, we engage the spring-loaded pre-check lever to observe the immediate stop of fuel flow. (If the system failed at this step, which we have not experienced, we would shut down the system immediately.) After the pre-check has proven functional, the pre-check lever is released, and the fuel resumes normal flow. We then continue to hold the dead-man switch while standing between the truck being filled and the tank being transferred from. We continue to monitor the fuel meter for comparison to the expected amount to be transferred. When the truck is full, the automatic shutdown system stops the flow of fuel. This occurs within about 15 gallons plus or minus the expected amount. (If the number of gallons exceeds the expected amount, we test the pre-check again, and then stop the transfer anyway to verify the amount. When this occurred once in the past, it was discovered that a fuel ticket had not been entered into the program. It was human error in accounting not equipment failure.)

The current system has proven reliable and trustworthy! I fear that changing or adding additional systems will complicate the procedure and increase opportunity for failure. It seems like additional cost without additional benefit. I encourage you to APPROVE Tentative Interim Amendment (TIA) 1558. Thank you for considering my view on this matter.

Sincerely,

Mike T. Winkler
Line Service Manager
Wells Aircraft, Inc.
800 N. Airport Rd
Hutchinson, KS 67501
From: Jim DeLong
Sent: Wednesday, February 17, 2021 12:31 PM
To: Foran, Rosanne
Subject: TIA No. 1558

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To Whom It May Concern,

The purpose of this email is to convey our support of TIA 1558 and to strongly encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

Bun Air Corporation is a full service Fixed Base Operator at the Bedford County Airport. We provide maintenance, pilot and line service to based and transient aircraft.

There have not been any fuel or other Hazmat related incidents in the 28 years that the Bedford County Airport has existed.

We utilize the Pneumercator LC1000 Alarm which provides both audible and visual warning alarms at the occurrence of high, low, or leak conditions, as well as automatic shut down of the fueling system. The system is tested monthly to ensure that it is functioning properly. In addition, we have two emergency shut-off systems. One is located at the fuel farm, and one is located in the FBO facility itself.

Our trained line service personnel accompany the fuel delivery person when off loading the fuel to the tanks to ensure the appropriate procedures and safety protocols are followed.

Please feel free to call me or stop by for a visit to discuss this further.

Sincerely,

Jim DeLong, President
Bun Air Corporation
697 Belden Road
Bedford, PA 15522
From: Jennifer DeLong  
Sent: Wednesday, February 17, 2021 12:58 PM  
To: Foran, Rosanne  
Subject: Support for TIA 1558

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To Whom It May Concern,

The purpose of this email is to convey the Bedford County Airport Authority's (BCAA) support of TIA 1558 and to strongly encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

BCAA is the landlord for a full service Fixed Base Operator at the Bedford County Airport named Bun Air Corporation, and the final authorizing entity for Bedford County Airport in Bedford, PA.

There have not been any fuel or other Hazmat related incidents in the 28 years that the Bedford County Airport has existed.

Bedford County Airport utilizes the Pneumercator LC1000 Alarm which provides both audible and visual warning alarms at the occurrence of high, low, or leak conditions, as well as automatic shut down of the fueling system. The system is tested monthly to ensure that it is functioning properly. In addition, Bun Air Corporation has two emergency shut-off systems. One is located at the fuel farm, and one is located in the FBO facility itself.

Bun Air Corporation's trained line service personnel accompany the fuel delivery person when off loading the fuel to the tanks to ensure the appropriate procedures and safety protocols are followed.

Please feel free to call me or stop by for a visit to discuss this further.

Sincerely,

Stephen A. George, Chairman  
Bedford County Airport Authority  
697 Belden Road  
Bedford, PA  15522
From: Brian Wolfel
Sent: Wednesday, February 17, 2021 10:14 AM
To: Shared TIAs
Subject: TIA 1558

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My name is Brian R. Wolfel, PE and am writing to you on behalf of GAI Consultants, Inc. as well as our aviation sponsors and clients in support of proposed TIA 1558. To require all existing load racks and mobile refuelers to be retrofitted with automatic shut off systems creates an unreasonable financial burden while doing little to reduce actual risk. The overfilling of mobile refuelers is not something that occurs with such frequency as to prompt the excessive and costly regulatory enforcement that the current language in section 5.1.12, and 6.1.3.12.2.7 through 6.1.3.12.2.9 of the NFPA 407 mandates. All at a time when our industry is already hurting from the impacts of this global pandemic. Safety standards and mechanical safeguards are already in place which prevent the overflow of mobile refuelers and we strongly encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor to approve TIA 1558.

Brian R. Wolfel, P.E.
Engineering Manager
203 W. Weber Avenue, DuBois, PA 15801-1859
Foran, Rosanne

From: Neil Doran  
Sent: Wednesday, February 17, 2021 11:10 AM  
To: Shared TIs  
Subject: RE: NFPA 407 2022 Edition - Comments on TIA 1558

RE: NFPA 407 2022 Edition - Comments on TIA 1558

To Whom It May Concern,

I am writing on behalf of our FBO to express our clear and adamant support for the NATA’s TIA 1558.

Our airport authority recently purchased the privately-owned fixed base operation on the field and went into the FBO business. We have continued to utilize the existing high-level shut off systems on our trucks and bulk fuel farm. We are confident in our current equipment and in our operational procedures. We see them as more than adequate to ensure safety and spill-prevention during bottom loading processes.

We strongly encourage the technical committee to approve the TIA. We see this regulation as largely unnecessary as respects the airport FBO fuel service industry. As many FBOs would have no choice but to pass on these additional compliance expenses to the flying public - this regulation would also be burdensome from a cost perspective* during a time when the costs of aircraft ownership, fuel, services, insurance and increased environmental regulations are producing more and more discouraging effects on general aviation activity.

Thank you for your attention.

*Compliance with these regulation could lead to a bill of $6,000-$10,000 per fuel farm loading rock, and $2,500-$3,500 per fuel truck with a looming deadline of June 2, 2021.

Neil R. Doran, CM, ACE
DIRECTOR OF AVIATION  
CHIEF OPERATING OFFICER  
AIRPORT MANAGER  
FBO MANAGER

EASTERN WV REGIONAL AIRPORT AUTHORITY  
MRB AVIATION FBO & PART 135 AIR CARRIER  
Eastern West Virginia Regional - Shepherd Field (KMRB)  
170 Aviation Way - Suite 105, Martinsburg, WV 25405

- www.FlyMRB.com - facebook.com/EWVRAA
Good Morning,

On Behalf of Executive Air Taxi Corporation I would like to strongly encourage you to approve TIA 1558.

Executive Air Taxi Corporation is a 24/7 FBO located in Bismarck N.D. Currently we have two JET A fuel trucks, one 100LL truck, and two loading racks at our fuel farm that will be affected by NFPA 407-2017 edition. We have been in the aviation industry for over 47 years, with zero overfill occurrences at our loading racks. Our annual traffic and gallon flow rate have taken a substantial hit since COVID 19 that no one could have predicted. We will be one of many of FBOs that are burdened with upgrades required by sections 5.1.12 and 6.1.3.12.2 in the NFPA 407-2017.

Our fuel farm was redesigned in 2015 with concrete curbing around the designated loading/unloading. This area has a sloped grade leading to a concrete holding basin capable of retaining a full delivery truck load for any spills that could potentially occur, in addition our fuel farm itself is within an EPA approved dyke system. All EATC employees have annual training on our EATC Spill Prevention Control and Countermeasure Plan engineered specifically for EATC that is approved by our local AHJ. Each flight line technician is trained in proper bottom loading operations and are well aware of the consequences of not following standard operating procedures. All overfill precheck systems are checked prior to any bottom loading operations. The idea of adding an additional primary shutdown system as stated in NFPA 407-2017 to an already existing overfill system becomes redundant.

I believe if overfill occurrences are becoming more frequent else where, it would more than likely be tied to gross negligence on behalf of the operator, or lack of proper training.

Thanks,

Nick Popelka
Flight Line Manager
Nick.Popelka@executive-air.com

Executive Air Taxi Corporation
PO BOX 2273
2301 University Drive
Bismarck, ND 58502
Foran, Rosanne

From: Keith Hafenbreidel
Sent: Wednesday, February 17, 2021 1:20 PM
To: Shared TIAs
Subject: Newly proposed TIA 1558

Importance: High

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Good morning,

I work for the Charlotte County Airport Authority as the FBO manager at the Punta Gorda Airport. We are located in southwest Florida between two hub airports in Ft. Myers and Tampa.

With the looming June 2, 2021 deadline just a few months away, NATA’s General Aviation Fuel Handling Subcommittee is continuing its efforts to seek relief for aviation businesses from requirements in NFPA 407-Standard for Aircraft Fuel Servicing to install automatic shutdown systems at airport loading racks that are also compatible with mobile refuelers.

The newly proposed TIA 1558 calls for complete removal of the requirements for automatic shutdown systems at airport loading racks that are also compatible with mobile refuelers (note: this TIA does not impact the longstanding requirement for high-level shutoff systems on mobile refuelers).

NATA continues to highlight the lack of data supporting the need for additional automatic shutdown systems at airport loading racks. Citing our industry’s safety record in bottom loading mobile refuelers for decades following the existing, well-defined requirements for high-level shutoffs and bottom loading operations in NFPA 407.

It is clearly evident that a reasonable degree of safety is already provided in that we have a safe and effective bottom loading operation at the Punta Gorda Airport. Our system has been performing for years with historical evidence showing that the equipment and procedures in place have a demonstrated history of reliability (i.e.: no spills).

- We have installed and maintain a Proteus® Tank Monitoring high-level shut off system.
- Each bulk storage tank also has a clock gauge inventory device to monitor fuel levels.

Our mobile refuelers are already equipped with functional high-level shut off systems and our staff is properly trained on safe bottom loading operations including the following:

- How to test the high-level system of the truck at the beginning of each bottom loading operation (using the “pre-check”).
- Never to bypass/fail the dead-man device or leave the bottom loading operation unattended.

I completely support the newly proposed TIA 1558 as it provides relief to thousands of general aviation airports, FBOs, and fuel farm operators from the costly, and unnecessary requirements found in sections 5.1.12, and 6.1.3.12.2.7 through 6.1.3.12.2.9 of the NFPA 407. Without the changes proposed in NATA’s TIA 1558, airports, FBOs, and other fuel farm operators across the country would be faced with an unnecessary bill of
$6,000-$10,000 per fuel farm loading rack, and $2,500-$3,500 per fuel truck with a commitment deadline of June 2, 2021.

Thank you,

Keith Hafenbreidel

Keith Hafenbreidel | FBO Manager

Punta Gorda Airport (PGD)
28000 A-1 Airport Road
Punta Gorda, FL 33982

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From: Andrea Martin  
Sent: Wednesday, February 17, 2021 7:27 PM  
To: Shared TIAs  
Subject: Support NEW Proposed TIA 1558

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I Support the new proposed TIA 1558 and urge the able authority to approve the TIA.

We are a small FBO at CNY Airport in southern Utah that has been in operation for over 20 years. During my six years of employment and to my knowledge over the history of Redtail Air we have not had any fuel spills due to our operational procedures for bottom loading. We dip our storage tanks every time we upload fuel into our trucks and we know the available capacity before we begin to upload fuel into our storage tanks. This has been our procedure for over six years and I have not had a fuel spill.

It would be very difficult for a small operation like ours to afford the changes to our Storage tanks and fuel trucks.

Please consider the approval of the New Proposed TIA 1558. Thank you for your consideration,
From: Mike Capron  
Sent: Wednesday, February 17, 2021 11:44 PM  
To: Shared TIAs  
Subject: Seeking relief for aviation businesses from requirements in NFPA 407  

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We are a very active FBO in central PA, we are seeking relief from the requirements in NFPA 407. We operate four fuel trucks and have two Jet-A and two 100LL storage tanks in our operation. If we are required to comply with NFPA 407 by the June deadline, we believe it will make our operation beyond the hope of any financial recovery especially considering the upset in operations due to Covid-19 over the last year and continuing.

We provide an essential service to Airline charter operations along with struggling general aviation and private business aircraft support. We do support TIA 1558 and encourage the technical committee to approve the TIA, while we do have an exceptional safety record along with all existing high-level shut off systems and operational procedures for bottom loading required on our fuel trucks and fuel storage units. We believe the added cost will place an excessive burden on our operation.

We do encourage the technical committee to approve the TIA.

Michael J. Capron  
Chief Pilot  
Director-FBO Operations  
Reading Jet Center Inc.
From: Small, David (CEI-Atlanta)
Sent: Thursday, February 18, 2021 5:07 PM
To: Shared TIAs
Subject: NFPA Part 407

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Public Comment to NFPA 407 Aircraft Fuel Servicing shutdown system

We are against additional automatic shutdown systems for fuel farms and truck that do not utilize public roads.

Our argument against this mandate is that there currently is no data that proves we need such an additional measure.
We currently have high-level cutoff switches for our filling process that have proven to be safe over the many years they
Have been required as well as our pre-check function which test this high-level shutoff switch.

But to unnecessarily burden the industry with an addition safety switch that is not needed for non-public road use vehicle or
refuelers is a waste of people’s money and resources. Once you have data that shows the need then maybe you may have a point.
Let’s stop wasting people’s time and money on useless legislation.

David Small
Director of Flight Coordination & Administration | Cox Enterprises
To Whom It May Concern:

I am writing to show my support for proposed TIA 1558. As a small business in South Dakota the impact of the costs to comply with NFPA 407’s retroactive requirements would significantly impact our ability to serve our customers.

Westjet has been in business for over 70 years and during those 70 years we have had countless fuel trucks and multiple fuel storage tanks. On average we pump 10,000-25,000 gallons per day and fill between 3 and 10 fuel trucks per day from our fuel storage facility. We have never had a failure of the high-level automatic shut off. We test all shutoff systems regularly in accordance with current regulations and requirements from our customers which include all of the major airlines. Each fuel truck and each tank at our fuel storage facilities have deadman-style switches that must be held and attended to when in operation. At our facility there has never been a failure of the high level shut-off systems and thus there have not been any related fuel spills.

The cost of the Scully-type system would be significant, tens of thousands of dollars, for our facility which includes 4 fuel farm tanks and six fuel trucks. We have already been faced with a significant downturn in operations due to COVID-19 and have had to change the way we operate as a result. Another large expense to us as an operator would impact our ability to serve our community.

In addition to the cost I am extremely concerned about the reliability of the systems. Westjet is located in a very cold climate and through my research I have found there could be a disruption in the system due to design of the systems and the impact on them in cold weather. If the system shuts down during cold weather due to moisture freezing we could be days or weeks without the ability to unthaw the system and would be without fuel in our trucks.

Being a small business in rural South Dakota we have also found other significant challenges in retrofitting this system to our tanks and trucks. There are no facilities in our state or the surrounding area. It could take months or even years for all of our tanks and trucks to be outfitted if this is passed, making much of our equipment unusable by June 2021.

I fear for us as well as other FBOs and fuel providers throughout South Dakota and other rural areas. The impact of this would be devastating for operators of all sizes from both a cost perspective as well as the ability to find a contractor to install the equipment. Should the Scully-type system freeze due to our cold climate it would cost us, the Airport and its tenants and clients tens of thousands of dollars in lost revenue and contract violations.
It is for the above reasons I fully support TIA 1558.

Regards,

Miranda Maleki  
*Vice-President Operations*  

Westjet Air Center, Inc.  
4190 Westjet Drive  
Rapid City, SD 57703  
www.westjetair.com
Foran, Rosanne

From: Andrew Ash
Sent: Friday, February 19, 2021 11:33 AM
To: Shared TIAs
Subject: Hill Aircraft (FTY) - Support of and request to pass TIA 1558

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Dear NFPA 407 Technical Committee Members,

I am writing to express our firm support for passage of TIA 1558 submitted by the National Air Transportation Association (NATA) on behalf of FBO operators like us.

Hill Aircraft is a small, family run fixed based operator located in Atlanta, GA. Since 1955, we have served the general aviation community, government agencies, military, and corporate flight departments operating out of Fulton County Executive Airport (FTY). Over the last 65 years our business has grown to be one of the leading independent operators in our area with a commitment to incorporating industry best practices and a priority for safety within our operations.

While we recognize the intent of NFPA 407 adopting section 5.1.12.4 to equip refuelers and fuel farms with new technology sensor systems that would assist in prevention of fuel spills, we are concerned over the consequences of how this section was written. Specifically, the requirement that this would apply to existing fuel systems retroactively creates a significant cost burden on our business, as well as hundreds of others throughout the country. This comes especially at a time where operators have been significantly impacted by COVID-19. Moreover, we believe that the retroactive requirement on this new scully-type shutdown system imposes an unnecessary cost burden and overreach in that our current fuel trucks already have existing systems designed to prevent such occurrences from happening. The overfill pre-check systems that our trucks have in place now more than sufficiently satisfy and mitigate this risk.

We support your efforts to apply this technology on new fuel trucks and fuel farms that are put into service, but respectfully request the technical committee’s approval of TIA 1558 to remove the retroactive nature of the mandate for the reasons included herein. I appreciate the consideration of this email in support for NATA’s efforts and believe them to be in the genuine best interest of everyone involved. Please contact me should you have any questions or to discuss this matter further.

Respectfully,

Andrew

~~

Andrew Ash
Vice President
General Manager

3948 Aviation Circle, Fulton County Airport - Brown Field (KFTY), Atlanta, GA 30336
Aircraft Sales | Aircraft Management | Charter | FBO Services | Maintenance | Parts Support
Good Afternoon:

Enclosed you will find a letter of support for TIA No. 1558 explaining the Cook Aviation views on this subject matter. Please review this letter.

Thank you,

Rex G. Hinkle, President
Cook Aviation Inc.
970 S. Kirby Road
Bloomington, IN 47403
The NFPA & The 407 Technical Committee: 02/18/21

Cook Aviation located in Bloomington, Indiana (KBMG) is a small FBO in our 33rd year of business. I am hearing that there is a proposed change to NFPA 407 requiring general aviation airports and FBOs to retrofit their fuel farms and mobile refuelers with automatic shut down system. This will cost Cook Aviation and other FBOs who are already financially burdened several thousands of dollars. With the COVID-19 Pandemic, undue stress is already placed on small businesses and extra expenses could cause companies to cease to exist.

NATA has proposed a Tentative Interim Amendment (TIA) removing the retroactive nature of the current language in NFPA 407, applying it to only new fuel farm/fuel truck installations. When an FBO is preparing to build a new aviation fuel farm or add an additional fuel truck, then this new equipment can be planned. When I had the aviation fuel farm built in November 1998, no such regulation was required. I complied with all regulations governing installation of aviation fuel farms at that time. Cook Aviation has a safety pre-check system and dead-man control located on the fuel farm which is implemented every time fuel is transmitted from the fuel farm to the trucks. There also is a safety high level shut off system in place which has not failed. The safety pre-check on the fuel trucks have not failed. Training is very important to make sure employees operating the systems do not override the safety protocol already in place. That is why training is so important, to make sure employees do not become complacent. At our company, we have had no problems/issues with overspill. I see no value in adding the proposed retrofit as the safety pre-check already in place works. We also have emergency “STOP” red push buttons located at the fuel farm, side of the operation building, and inside our FBO. This red button with emergency signage is highly visible and shuts down the fuel farm system immediately when activated. Asking our company and other FBOs to add thousands of dollars to our operating expenses is not the right thing to do currently.

Cook Aviation is in support of TIA 1558 and strongly encourage the Technical Committee to approve the TIA. Our company specializes in customer services providing aviation fuels (Jet A & 100LL Avgas), courtesy & rental vehicles, ground services, concierge, and aircraft catering.

In conclusion, Cook Aviation is in support of TIA 1558 and encourage you to support this Amendment.

Thank you,

Rex G. Hinkle, President
970 S. Kirby Road
Bloomington, Indiana 47403
From: Zachary Burch  
Sent: Friday, February 19, 2021 4:22 PM  
To: Shared TIAs  
Cc: Chris Rozansky  
Subject: NFPA TIA 1558 Comment from the Naples Airport  
Attachments: NFPA TIA 1558 Support Letter.pdf

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Please see the attached letter of support for NFPA TIA 1558 from Christopher Rozansky, Executive Director of the Naples Airport Authority.

Please let me know if you have any additional questions.

Respectfully,

Zac Burch

---

Zachary Burch | Community Engagement/Communications Manager

160 Aviation Drive North  
Naples, FL 34104  
flynaples.com
February 19, 2021

Mr. Cary Skinner, Chair
National Fire Protection
Association 407 Technical Committee
5939 North West Circle Avenue
Chicago, IL 60631

Dear Mr. Skinner:

Please consider this request on behalf of the City of Naples Airport Authority regarding approval of Tentative Interim Amendment (TIA) 1558 to NFPA 407- Standard for Aircraft Fuel Servicing. Approval of this TIA is critical, particularly to smaller General Aviation airports like the Naples Airport.

Current fueling systems at the Naples Airport already utilize a double-redundant system to prevent spills and accidents from occurring, meaning that the existing regulations would simply add another level of redundancy to an already safe system, with a proven safety track record. We are currently unaware of any incidents that have occurred with a double-redundant system like ours and would request that the committee share any information about any such incidents to better understand the risk.

The current unamended standard would have profound effects on airports large and small, including the Naples Airport. The loss of access to this critical fueling equipment while it is being retrofitted for a third redundant system would pose a serious operational issue for the airport, as we are the sole provider of fuel on the airport premises.

Additionally, based on the current number of fuel trucks and fuel farm loading racks at our facility, we estimate the financial impact of retrofitting our existing equipment to be at least $100,000.

While the Naples Airport Authority remains committed to purchasing new equipment that meets or exceeds the latest safety standards, retrofitting our existing equipment would have serious operational and financial implications for our facility.
In the future, issues like this could likely be resolved by first consulting with and obtaining feedback from stakeholders within the aviation and airports industry prior to the publication of proposed regulations.

We appreciate your consideration in the matter and urge you to approve TIA 1558 so that the Naples Airport can continue to meet critical safety standards while still providing the same excellent level of service to our customers.

Sincerely,

Christopher A. Rozansky
Executive Director

cc: Stephen Ganoe, Staff Liaison, National Fire Protection Association
    Yiu Lee, Project Administrator, National Fire Protection Association
February 19, 2021

TIAs_Errata_Fls@nfpa.org
RE: In support of TIA 1558 seeking further changes to NFPA 407

To whom it may concern,

I am writing in support of the National Air Transportation Association’s (NATA) call for complete removal of the requirements for automatic shutdown systems at airport loading racks that are also compatible with mobile refuelers.

Million Air is the third-largest FBO network in North America, located at airports in the United States, Canada, Columbia, and the Caribbean. Million Air FBOs have been providing over 35 years of services (including aircraft fueling, aircraft parking and storage, charter, GSE maintenance, and aircraft maintenance) to general aviation and corporate aircraft owners and users, commercial air carriers, and the military.

Million Air’s commitment to safety includes the NATA Safety 1st PLST program as well as a proprietary Learning Management System for initial and recurrent training.

All refueling trucks are equipped with automatic high-level shut-off devices. The devices are tested at the beginning of every bottom-loading event by way of pre-check valve. If the pre-check were to fail, bottom-loading activities would cease immediately, refueling truck would be removed from service, repaired, and then returned to service.

In addition to the automatic high-level shut-off device, the fuel storage facility is equipped with dead-man controls. The dead-man is engaged/disengaged by the same trained employee who is performing the bottom loading activity. The dead-man devices are tamper proof, cannot be blocked open, and are on a short tether keeping them within feet of the refueling truck and fuel farm controls. Truly a fail-safe operation!

As a direct result of Million Air’s commitment to safety, and the equipment already in place, there has been proven success in the reliability and safety at all Million Air locations. There have not been any events of overfilling equipment or high-level shut-off device malfunction resulting in fuel spills. Plainly put, the procedures have never failed.
Million Air stands behind the National Air Transportation Association’s position on NFPA 518 and urges the NFPA to reconsider this unnecessary addition of equipment and expense to the FBOs.

Sincerely,

John Bridi

Director of FBO Support

Vice President of International Operations

7555 Ipswich Rd. Houston, TX 77061
Foran, Rosanne

From: Cynthia Polk
Sent: Monday, February 22, 2021 11:34 AM
To: Shared TlAs
Subject: New Proposed Changes to NFPA 407

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As an FBO we are seek relief for aviation businesses from requirements in NFPA 407- Standard for Aircraft Fuel Servicing to install automatic shutdown systems at airport loading racks that are also compatible with mobile refuelers.

Large expenditures will be required for modifying and retrofitting airport mobile refuelers and fuel storage system loading racks. Estimated cost for each loading skid: $6,000-$10,000 | Estimated cost per refueler: $2,500-$3,500 Storage tank loading racks will be required to be equipped with a primary overfill system by June 2021. It may also be challenging to procure loaner refueler vehicle equipment that will work with each system at each airport.

Kindest Regards,

Cynthia Polk, M.B.A.
FBO Director
Gary Jet Center
Foran, Rosanne

From: Robbins, Andrew (SFS-AUS)
Sent: Monday, February 22, 2021 12:25 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1558 on NFPA 407

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Signature Flight Support AUS supports Proposed TIA 1558 and encourages the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of the approval.
We serve mostly General Aviation and Private Aircraft. We are committed to safety and believe the existing high level shutoffs are sufficient enough and have not experienced any failures. Our staff completes a calculated add to ensure that the pre-determined level is never exceeded during the bottom load process.

Thank you for your consideration,

Andrew Robbins | Duty Manager

Signature Flight Support AUS | 4321 Emma Browning Ave. Austin, TX 78719

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Foran, Rosanne

From: Brumback, Nik (SFS-LUK315)
Sent: Monday, February 22, 2021 1:12 PM
To: Shared TIAs

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We are in favor of not installing the scully systems to our fuel farms. I am supporting the use of our bottom load high level shut offs.

Thanks

Nik Brumback | Duty Manager
Cincinnati Municipal Lunken Airport
358 Wilmer Ave
Cincinnati, OH 45226

www.signatureflight.com

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Good Afternoon,

I support TIA 1558 and would like the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor as well. I have been in the industry for 17 years and with the current existing high-level shut off system and operational procedures for bottom loading in place, do not see this as a necessity.

Thank you

Chris McIntyre | General Manager
Cincinnati Municipal Lunken Airport
358 Wilmer Ave
Cincinnati, OH 45226

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Please consider the environment before printing this email.
Good Morning:

Enclosed you will find a letter of support for TIA No. 1558 explaining the French Lick Municipal Airports views on this subject matter. Please review this letter.

Thank you,

Matthew Carson  
Airport Manager  
French Lick Municipal Airport
The NFPA & The 407 Technical Committee: February 23, 2021

The French Lick Municipal Airport (KFRH) located in French Lick, Indiana is a small FBO that was established in 1964. We have read that there is a proposed change to NFPA 407 requiring general aviation airports and FBO’s to retrofit their fuel farms and mobile refuelers with automatic shut down system. This will cost us and other FBO’s that are already financially burdened several thousands of dollars. With the COVID-19 Pandemic, undue stress is already placed on small businesses and extra expenses could cause companies to cease to exist.

NATA has proposed a Tentative Interim Amendment (TIA) removing the retroactive nature of the current language in NFPA 407, applying it to only new fuel farm/fuel truck installations. When an FBO is preparing to build a new aviation fuel farm or add an additional fuel truck, this new equipment can be planned and resourced within the operation budget. When the fuel farm was built, in 1994, no such regulation was required. We complied with all regulations governing installation at that time. The French Lick Municipal Airport has safety measures in place that have never failed since their implementation. As with safety, training is very important to make sure employees operating the systems do not override the safety protocols already in place. We strive to make sure our employees do not become complacent. We see no value in the proposed retrofit as the safety procedures currently in place work. Asking our company and other FBO’s to add thousands of dollars to our operating expenses is not the right thing to do currently.

The French Lick Municipal Airport is in support of TIA 1558 and strongly encourage the Technical Committee to approve the TIA. Our company specializes in customer services providing aviation fuels (Jet-A & AVGAS), courtesy and rental vehicles, ground services as well as concierge services.

In conclusion, the French Lick Municipal Airport is in support of TIA 1558 and encourage you to support this Amendment.

Thank you.

Respectfully,

Matthew C. Carson, Manager
French Lick Municipal Airport
From: Kjell Lavoll  
Sent: Tuesday, February 23, 2021 11:45 AM  
To: Shared TIA  
Cc: Tom Auten; David Kucko  
Subject: Comment on Proposed TIA 1558 on NFPA 407

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To Whom It May Concern,

I am adding my support of TIA 1558 on NFPA 407. As the Safety Manager of several FBOs, I find the directives restrictive, expensive to implement and does little to reduce risk. The automatic shutoff system (5.1.12) has a negligible impact on reducing the overall risk since the current overfill mitigation procedures are already well established and functioning. Also, spills at the loading rack is not a known problem in the aviation industry, and if it did happen, containment and spill control procedures (SPCC plan) would minimize the consequences.

Spending thousands to implement and maintaining this system puts a strain on operating budgets, and the ROI is negligible. This money could be better spent elsewhere to reduce operational risk.

Regards,
Kjell Lavoll

Hawthorne Global Aviation Services

Kjell Lavoll | Captain & Safety Manager  
3800 Starr Ave. | Eau Claire, WI 54703

| www.hawthorne.aero
From: Cecilia Reyes
Sent: Tuesday, February 23, 2021 5:18 PM
To: Shared TIAs
Subject: TIA 1558
Attachments: NATA.pdf

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Hello,
We are emailing you our thoughts regarding the TIA 1558 changes that are enclosed in a PDF attached to this email. If you have any questions, feel free to email me in response to this email.

Thank you,

Cecilia Reyes
Marketing Manager
B. Coleman Aviation | Coleman Jet

THE NEW STANDARD IN AVIATION
COMMITTED TO SAFETY AND EXCEPTIONAL SERVICE
“30 minutes from downtown Chicago”
February 23, 2021

Hello –

On behalf of B. Coleman Aviation (GYY/KGY) located in Gary, Indiana, I would like to take the time to express our support for TIA 1558, the removal of the requirements on FPA 407 (to add additional shut offs to our current fueling system) and encourage NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval. B. Coleman Aviation is an independently owned and managed full service Fixed Base Operator. We as a company would be in favor of TIA 1558 as we have a long history ourselves of safety checking the high level shut offs equipped on our fuel farm and fuel trucks.

Thank you.
To Whom It May Concern,

I am writing you today to express my full support of Tentative Interim Amendment (TIA) 1558 and I encourage the technical committee to approve the TIA.

For many years the Shenandoah Valley Airport has safely and effectively used existing bottom loading mobile refuelers. We have done so by following the already well-defined requirements for high level shutoffs and bottom loading operations in the current version of NFPA 407. The Shenandoah Valley Airport has never had an incident where the preexisting measures have failed us. Adding an additional automatic shutdown system would unnecessarily cost the Shenandoah Valley Airport over $30,000 with no added benefit to our already long-standing safety record. Moreover, this would create a disproportionate business expense and burden, that would be difficult to offset based on the size of our operation and the volume of our business.

I appreciate your time in reading this email and I encourage you to contact me at this email or at if you have any questions or need any type of clarification.

Thank you,

Chris Botkin  |  FBO Business Manager

Shenandoah Valley Regional Airport
77 Aviation Circle | PO Box 125
Weyers Cave, Virginia 24486

www.flyshd.com
Good afternoon,

Please accept this as my support of TIA 1558 as it relates to overfill protection for fuel farms and trucks in the aviation industry.

Being employed at an FBO chain for over 25 years and in varying capacities and a 30+ year tenure in the aviation field, it’s evident that policies and procedures, individual airport authority requirements, regulatory and other mitigating factors suffice in the prevention of over-servicing refuelers and fuel farms.

Doug Drescher |Director – FBO Operations  
Signature Flight Support Corporation

www.signatureflight.com

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Foran, Rosanne

From: McMurran, Tom (SFS-IND)  
Sent: Thursday, February 25, 2021 2:07 PM  
To: Shared TIAs  
Subject: TIA 1558

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Good Afternoon,

I would like to provide my support in favor of TIA 1558. I have been in the industry for over 25 years and feel that the requirement is an unneeded and costly initiative that will be a final straw to some FBOs around the country as the project is expensive and well over what initial estimates are. In my tenure, I have found that training is the #1 prevention in fuel spills while loading a truck. Teaching the importance of how much the truck is down, how much fuel should be put in, testing the pre check valve(s), and knowing when to stop filling the truck are the best measures. If fuel farms/trucks need to be overhauled for such “improvements” I could see complacency while topping off coming into play and seeing an increase in occurrences.

My location got ahead of this requirement and completed the install last month. The project cost the base over $50,000. This was added to 2 farms and 4 fuel trucks. The costs associated with just the Scully portion is not the only expense(s) that FBO’s face. In addition to the equipment, labor hours are added, and for us we had to have conduit ran under ground which required concrete removal and replacement as part of the project.

Please contact me if you have questions.

Tom McMurran | General Manager
Signature Flight Support | 6390 Turner Drive | Indianapolis, IN 46241

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Foran, Rosanne

From: Joseph Carney
Sent: Thursday, February 25, 2021 2:56 PM
To: Shared TIAs
Subject: NFPA 407 update TIA

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To whom It may concern,

I would like to support the repeal of sections 5.1.12, and 6.1.3.12.2.7 through 6.1.3.12.2.9 of the NFPA 407.

I feel that this updated regulation is not necessary. We currently have a system that works well between our rack and the two (2) FBOs with a total of eight (8) trucks.

Here at our airport, Georgetown Municipal Airport (KGTU), we have not had a overspill since 1992. Before that we had top loading system, but after that date our rack went to belly loading with the high-level shut off systems.

Our procedures are to hook up the rack to the truck, activate the pumps, start the filling with the dead-mans switch and then throw the check valve to ensure that the High-level shut off system is in working order. If it fails, the FBO must take the truck and have it repaired/ixed.

We have been loading both 100LL and JetA trucks at an average of 5-7 times a week at a minimum without ANY overfill incidents.

Please feel free to contact me using the information in my signature block.

Joseph A. Carney, C.M.
Airport Manager
Georgetown Municipal Airport
500 Terminal Drive
Georgetown, TX 78628

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Foran, Rosanne

From: Conover, Rachel (SFS-OMA)
Sent: Thursday, February 25, 2021 4:14 PM
To: Shared TIAs
Subject: TIA 1558

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I wanted to voice support for TIA 1558 as it is an unnecessary expense and burden on FBOs based on the existing high level shut offs and training that our staff go through. This change does not make our industry or this job any safer its just a different way of doing something that already exists.

Thanks!

Rachel D. Conover | Station Manager
3636 Wilbur Plaza
Omaha, NE 68110

www.signatureflight.com

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Foran, Rosanne

From: Huber, Christopher (SFS-LUK315)
Sent: Sunday, February 28, 2021 11:41 AM
To: Shared TIAs
Subject: Comment on Proposed TIA 1558 on NFPA 407

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I am in support of TIA 1558 on NFPA 407 and encourage a vote of approval. I work at an FBO with two fuel farm facilities and four mobile refuelers that are in operation daily. All of our equipment is tested in compliance with ATA and ASTM regulations, to include high-level shut off alarms. Our current systems have proven to be reliable. Adding scully systems would be unnecessary.

Thank You,

Chris Huber | Operations Supervisor

Signature Flight Support LUK | 358 Wilmer Ave | Cincinnati OH 45226

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Good morning,

Please review the attached comment to TIA 1558.

Regards,

Andrew
Re: TIA 1558

The Tentative Interim Amendment (TIA) 1558 submitted by NATA’s Steve Berry is fully supported by Wilson Air Center. Wilson Air Center currently employs several countermeasures to ensure the safe bottom loading of aircraft refueling tankers at all four of its locations. In addition to those countermeasures, Wilson Air Center has adopted NATA Safety 1st’s stringent training courses for all employees responsible for fuel handling. The combination of training and failsafe countermeasures greatly mitigates the risk of fuel spills.

Additionally, Wilson Air Center leases fueling equipment through a fuel supplier, which if required to submit to the proposed 5.1.12 will ultimately have to choose a particular automatic shutdown system among several to be outfitted on the fueling equipment. Sequentially, Wilson Air Center will then have to install a compatible system on its fuel storage facilities to work with the fuel tankers. It is not uncommon for FBOs to change fuel suppliers, which may not employ the same automatic shutoff systems. The financial burden created by this variable in addition to the initial expenses would have a profound impact on not just the FBO and fuel suppliers, but ultimately to the general aviation community.

Wilson Air Center, to date has not experienced a significant fuel spill as the result of negligence and will continue to develop best management practices compounded with the latest training to ensure the safe handling of aviation fuels. We feel that the latter combined with the current systems applied to the fueling equipment and fuel storage facilities are sufficient in mitigating fuel spills.

Regards,

Andrew D. Swain
Operations Manager
Wilson Air Center - Chattanooga
From: Greg Banks  
Sent: Monday, March 1, 2021 2:17 PM  
To: Shared TIAs  
Cc: Terry Hart; Alex Nutt  
Subject: Comment on Proposed TIA 1558 on NFPA 407  
Attachments: TIA 1558 Comment.pdf

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Secretary, Standards Council,


Best regards,
Greg Banks
Manager of Operational Safety & Fire
Chattanooga Metropolitan Airport
01 March 2021

Comment for TIA 1558

The Chattanooga Metropolitan Airport Authority supports this TIA in its entirety with detail as follows:

We agree with Mr. Berry’s substantiation. After our own research, we have found no statistical data showing that the requirements of Section 5.1.12 and related requirements in Section 6.1.3.12.2 are necessary or justified. We also agree with Mr. Berry that intentional non-compliance and gross negligence of the operator will still negate existing and “to-be-required” automatic shutoff devices, no matter how simple or complex we choose to design and/or regulate them. Proper training and oversight of fueling operations and current equipment requirements already provide an environment free from fuel spills due to overfilling.

In reviewing of the previous attempt to amend the above sections (TIA 1539 Final Ballot), we believe that a comment by one of the technical committee voters sums the issue at hand well for TIA 1558 – that this rule falls outside of NFPA 407 - Standards for Aircraft Fuel Servicing and falls directly within NFPA 30 – Flammable and Combustible Liquids Code, Section 28.11. This rule relates to bulk loading and unloading from storage facilities to tank vehicles and not aircraft fuel servicing.

Further, we agree with Mr. Berry’s statement of emergency nature. General aviation is the backbone of the US aviation system. This new Advisory Circular’s mandatory adherence to NFPA 407 will cause significant financial burden to those nearly 3,000 AIP-eligible airports in the basic ruleset provided by the document. A portion of this burden can be lifted by passing this proposed TIA.

We see that several committee members keep referring to overfills being a continuous issue while reviewing several committee’s notes from other similar proposed TIA’s. We haven’t had any on our airfield and after research, can’t find any related material. If this is such an issue, we would appreciate relevant data showing that it is an ongoing issue on a national level.

Sincerely,

Terry Hart
President
Chattanooga Metropolitan Airport Authority

Greg Banks
Manager of Operational Safety & Fire
Chattanooga Metropolitan Airport Authority
Foran, Rosanne

From: Zachary Van Meir  
Sent: Tuesday, March 2, 2021 1:24 PM  
To: Shared TIAs  
Subject: Proposed TIA No. 1558, Reference: Section 5.1.12, 6.1.3.12.2.7, 6.1.3.12.2.8, 6.1.3.12.2.9 and Table C.1, comment closing date: 3/17/2021

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Good afternoon,

My name is Zach Van Meir and I am the current Line Supervisor at Base Operations at Page Field. I have close to 10 years experience in airport operations and refueling of aircraft and I wanted to give my thoughts and concerns from a fueling viewpoint about the proposed requirement of the primary electronic shut off devices for fueling equipment and fuel facilities.

First off, let me start with my qualifications in aviation refueling. My career in aviation refueling and FBO services began back in 2012 when I was hired as a line technician at University Air Center in Gainesville, FL. I worked at this location for almost 7 years progressing from a line technician to the Assistant Operations Manager of the FBO. I handled all the QA for all fueling equipment which consisted of 2 5,000 gallon jet fuel trucks, 1 3,000 gallon jet fuel truck and a 1,500 gallon avgas truck. We averaged over 4 million gallons of fuel sold each year and never had a hi level sensor fail or overflow a refueling vehicle or fuel farm tank. We would refill refueling equipment at least 3 times a day with no issue of overfilling. So you can imagine my surprise when I heard of the proposed requirement of a primary and secondary system when “topping off” a fuel truck.

Currently, I have been at Base Operations for close to 6 months now and the story remains consistent. We've never had a truck overfill at this airport from the fuel farm. Last year we sold just under 2 million gallons of fuel and are on track to obliterate those numbers this year. The hi level shut offs that are currently installed on the equipment work perfectly when it comes to keeping a truck from overfilling.

I hope my experience in the aviation industry can further assist in the decision making of the proposed changes that may take effect FBO’s and airports across the nation. To me, if it is not broken, well then let’s not try to fix it.

--

Zachary Van Meir

Line Supervisor
Lee County Port Authority
Base Operations at Page Field

Please note: Florida has a very broad public records law. Most written communications to or from Port Authority employees and officials regarding Port Authority business are public records available to the public and media upon request. Your email communication may be subject to public disclosure.
Foran, Rosanne

From: Sean Phillips
Sent: Wednesday, March 3, 2021 1:49 PM
To: Shared TIAs; Dwayne
Subject: TIA 1558

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To whom it may concern, I’m writing this in favor of TIA 1558. It is in our facilities best interest that TAI 1558 passes, because of the Pandemic our local FBO's has been hit hard enough with the loss of business and fuel sales. Yes this has been on the books for a while, but the extraordinary cost for this equipment is crazy. We have not in my 20 plus years here at the Arnold Palmer Regional Airport had any issues with the fuel trucks here being over filled. Both of our FBO's have done an outstanding job in training and compliance for many years. If we had any kind of issues with over filling, I would be pushing for this regulation myself, because some places might have issues with there stuff shouldn't punish places that have no problems with there's.

Thank you for your time and consideration on this matter.

Sean Phillips
Fire Chief
Arnold Palmer Regional Airport

Sent from my iPad
From: Alicia Rock  
Sent: Wednesday, March 3, 2021 3:31 PM  
To: Shared TIAs  
Cc: Mike Mattern; Robbie Stallings  
Subject: Support for TIA 1558

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Good afternoon.
I am writing to you to support TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

We are Northgate Aviation Chico Jet Center, a family owned and operated FBO in Chico, California. We have successfully and safely operated at KCIC for over 16 years now. We support one of the 13 Calfire Air Attack Bases strategically located throughout California to protect our communities during the ever growing Fire seasons that our state faces.

We have safely operated during high levels of fire activity and would greatly appreciate to continue to do so without these expensive and unnecessary additions to our farms and trucks. Our existing high level shut off systems and operational procedures for bottom loading our trucks has earned us a safety record that we continue to be proud of and continue to adhere to our safety standards that work efficiently and effectively.

If you have further need to discuss, please contact me:
Alicia Rock, COO
Northgate Aviation Chico Jet Center
109 Convair Avenue
Chico, CA 95973

Thank you for your time and dedication to industry safety as well as your understanding of the financial hardship that would hinder the growth and success of small family operated businesses like ours.

Very truly yours,
Alicia M. Rock
Chief Operating Officer
General Counsel

Rock this iPhone
Foran, Rosanne

From: Dennis Rouleau
Sent: Thursday, March 4, 2021 4:10 PM
To: Shared TIAs
Subject: NAFA 407 comment
Attachments: Letter to NFPA 03042021.pdf

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Please see the attached letter addressing my support for the TIA 1558.

Thanks for your consideration.

Dennis

Dennis G. Rouleau, CM
Executive Director
Barkley Regional Airport
2901 Fisher Road – P.O. Box 38
West Paducah, KY 42086

www.barkleyregional.com
Carpe diem
March 3, 2021

Mr. Cary Skinner
Aviation Fire Safety Consultants Inc.
5939 North West Circle Avenue
Chicago, IL 60631 United States

Re: TIA 1558
Best Regards,

Dear Mr. Skinner:

I am writing to you and the NFPA Aircraft Fuel Servicing Technical Committee to express my support for TIA 1558 and ask that this committee support it as well.

Barkley Regional Airport is a small Part 139 Airport in far western Kentucky that requires yearly financial assistance from the City and County we serve. Those financial resources are very hard to come by. Our annual contribution from the City and County has remained constant for many years, yet our expenses continue to increase.

Barkley Regional Airport manages and operates the fuel farm as well operate our own ARFF Department. I implore you to consider the financial impact this will have in areas far beyond the NFPA Committee for little if any gain. Please consider the overall cost of doing business and how this will impact Airports like Barkley. To my knowledge, we’ve never had a fuel spill that this system would’ve prevented.

Our Aircraft refuelers operated by our FBO already have high-level shut-off systems and have operational procedures for bottom loading. The refueling staff are all very well trained by the NATA safety first program. The added cost to install this system on the Trucks will ultimately fall on the Airport and the City and County.

Please reconsider your position and support TIA 1558. Your positive attention to this matter is appreciated.

Best Regards,

Dennis G. Rouleau
Executive Director
Foran, Rosanne

From: Barney Helmick
Sent: Friday, March 5, 2021 1:19 PM
To: Shared TIAs
Cc: Orville Wiseman
Subject: Comment on Proposed TIA 1558 on NFPA 407

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To the committee: I fully oppose this requirement. I have been in and around aircraft refueling for 34 years and not seen this issue. You are implementing a costly solution for a problem that doesn't exist. The industry has been performing fueling safely for years and now you are implementing a change that will cost thousands to the industry for a none issue.

I encourage that this not be implemented.

Barney

Barney Helmick AAE
Flagstaff Pulliam Airport Director
SWAAAE Board of Directors
Past President AzAA

“And I avow with my faith that we are marching towards better days.”
Winston Churchill
Good afternoon,

NATA and Airports have continued to highlight the lack of data supporting the need for additional automatic shutdown systems at airport loading racks. Citing our industry’s safety record in bottom loading mobile refuelers for decades following the existing, well-defined requirements for high-level shutoffs and bottom loading operations in NFPA 407.

Without the changes proposed in NATA’s TIA 1558, airports, FBOs, and other fuel farm operators across the country would be faced with an unnecessary bill of $6,000-$10,000 per fuel farm loading rack, and $2,500-$3,500 per fuel truck with a compliance deadline of June 2, 2021.

This will be especially difficult for airports and FBOs to afford during the dramatic down turn in aviation caused by the COVID 19 Pandemic. Airports such as ours have struggled financially during this time and to add such a cost will negatively affect our ability to maintain a financially stable condition moving forward.

The newly proposed TIA 1558 would:

- Relieve thousands of general aviation airports, FBOs, and fuel farm operators from the costly, and unnecessary requirements found in sections 5.1.12, and 6.1.3.12.2.7 through 6.1.3.12.2.9 of the NFPA 407 and allow for the continued safe and effective bottom loading operations they have been performing for years.

Sincerely,

Geoffrey R. Freeman

Airport Director/Airport Security Coordinator

Martha’s Vineyard Airport
71 Airport Road
Vineyard Haven, Ma. 02568
Foran, Rosanne

From: Joe Ceresa
Sent: Friday, March 5, 2021 2:18 PM
To: Shared TIAs
Cc: Support
Subject: TIA 1558
Attachments: TIA 1558.pdf; Fuel Transfer Ticket.pdf

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Dear NFPA representatives please see attachments regarding TIA 1558. Thank you.

Joe Ceresa

North Coast Air

ERI
Dear NFPA Representative,

Over 31 years ago I began my career in the FBO industry, with my main focus being on Line Service. Over these three decades, I have seen the up’s and downs of our industry. And, for the most part, at the time of, or in retrospect, I can understand what caused each.

There are two fundamental principles that have guided me and my team to success: safety and customer service. These two items need to remain the top priority for all aviation businesses. To that end, I am concerned that the new requirements from NFPA 407 would place extreme financial pressures on FBO’s, but cannot be directly tied back to increasing safety, or customer service. To be clear, I do not believe that the Scully system does not provide a benefit, but I do question if its necessity to implement to all airport fuel farms and trucks. A blanket approach cannot be taken without undo harm.

For background, our FBO is located on a Part 139 airport. This requires us to continually maintain strict safety and quality training, in addition to daily, weekly, monthly, quarterly, and annual equipment checks.

Over my tenure, safety practices have evolved, and we have continued to invest in these more modern approaches, however not all approaches demand to be implemented. For example, in addition to our containment dyke, we installed double-wall tanks. Each tank has a dead-man switch for fuel transferring, a site gauge, a high-level shut-off, and a backflow regulator. All of these individual items combined become an extremely safe set-up. I know some other operators may not have this extensive of a setup, which may warrant a Scully system, however the safety investments we have made over the years are negated if a one-fit approach is taken.

To safely “top off” any tank, a balance between human factors and mechanical devices must be taken. All parties must know A) how many gallons are out of the truck and B) how to safely perform a pre-check. When accepting a load of fuel into a farm you need to know 1) how big is the tank and 2) if the entire load will activate high level shutoffs. If the load does not fit, you should not put it in the farm period. We simply cannot rely on mechanical devices to save us. When at a fuel farm I want my line technicians to be clearly focused on their task at hand without distraction. If given the choice, considering the safety equipment we already have, I would much rather spend more dollars on human factors training.

I assure you, from my experience, that not approving TIA 1558 at this time will without a doubt lead to the lowest low of our industry. COVID-19 has decimated our business; We continue to see a 70%+ decline in revenue and hope to keep our lights on and employees employed. It feels like all aviation businesses are just trying to survive, and this will kill many FBO’s and 3rd party partners.

www.ncair.com
I have attached a simple fuel transfer card that we have used for over 15 years to mentally prepare our line technicians for a safe refilling of our truck. It is a useful checklist to help prevent fuel spills mutually exclusive from shutoffs and prechecks. I wish more FBO's used this prior to fueling. We can learn a lot from each other.

A balanced approach must be taken. Every day my goal is to please the customer safely and profitably.

Thank you for listening to my comments and considering the future of small to mid-sized FBO's.

Sincerely,

Joe Ceresa
Director of Operations
North Coast Air (ERI)
Jet A Fuel Transfer Ticket

NORTH COAST AIR

Date
Truck

BEFORE TRANSFER (Document BEFORE Transfer)
1. APPROX. GALLONS NEEDED
2. Is engine off?
3. Is PTO lever all the way off?
4. Is truck bonded?

DURING TRANSFER (Document AFTER Transfer)
1. NUMBER OF TIMES PRE-CHECK SUCCESSFUL:
2. On top of truck? □ Yes □ N/A

AFTER TRANSFER (Document AFTER Transfer)
1. Is hatch closed?
2. Is deadman cord wrapped neatly?
3. Is paperwork accurate/complete on ticket and in book?
4. Did you check your subtraction against the big meter numbers?

FUEL TRANSFER (word for word description):

<table>
<thead>
<tr>
<th>METER FINISH</th>
<th>During transfer, there were no leaks and no fuel spills.</th>
</tr>
</thead>
<tbody>
<tr>
<td>METER</td>
<td></td>
</tr>
<tr>
<td>TOTAL GALLONS</td>
<td>Initials</td>
</tr>
</tbody>
</table>

SERVICED BY  SOURCE
INVOICE

Reorder: Graphic Arts - (814) 836-8585
From: Joe Behling  
Sent: Friday, March 5, 2021 2:32 PM  
To: Shared TIAs  
Subject: Support of TIA 1558  
Importance: High

Good Afternoon:

I am sending this correspondence in support of NATA’s Tentative Interim Amendment 1558 which removes the requirement for an automatic shutdown system at airport loading racks that are also compatible with mobile refuelers. Not only is NFPA 407’s requirement for this shutdown system not supported by evidentiary data, the high cost will be crippling to an industry still reeling from the ongoing COVID-19 pandemic. The parameters of previous editions of the NFPA 407 have proven entirely adequate in the prevention of truck overfill and subsequent fuel spills.

Please be a voice of reason when voting on TIA 1558 and remove the requirement of the automatic shutdown system on airport loading racks.

Thank You:

Joe Behling  
Director of Fixed Base Operations  
FWA I SMD

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I am sending this email in support of NATA’s Tentative Interim Amendment (TIA) 1558 which removes the requirement for an automatic shutdown system at airport loading racks that are also compatible with mobile refuelers. Not only is NFPA 407’s requirement for this shutdown system not supported by evidentiary data, the high cost will be crippling to an industry still reeling from the ongoing COVID-19 pandemic. The parameters of previous editions of the NFPA 407 have proven entirely adequate in the prevention of truck overfill and subsequent fuel spills.

Please be a voice of reason when voting on TIA 1558 and remove the requirement of the automatic shutdown system on airport loading racks.

Thank You:

Justin Treft
Line Service Supervisor

Fort Wayne Aero Center
4401 Altitude Dr.
Fort Wayne, IN 46809

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From: Toby Tobin  
Sent: Friday, March 5, 2021 3:46 PM  
To: Shared TIAs  
Subject: TIA 1558

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I represent two FBO operations at RIC, in Virginia and stand in complete support of the TIA 1558. The cost in materials and the cost in labor to modify fuel storage with multiple tanks and multiple pumping cabinets as well as to modify 15 fuel trucks would be a major burden, especially during the current economic and business conditions. It is my opinion that the NFPA suggested changes related to high-level shut off protection at fuel facilities addresses a problem that does not exist and these modifications would most likely add unnecessary complexity to a system that is functioning exceptionally.

--
Sincerely,

Toby Tobin  
Aero Industries, Inc.  
Richmond Jet Center
Foran, Rosanne

From: Larry Graves  
Sent: Friday, March 5, 2021 3:50 PM  
To: Shared TIAs  
Cc: Jason Davis L; Lisa Javoric; Steven Dobbs; Mark Stevenson  
Subject: Support for Tentative Interim Amendment (TIA) 1558 to NFPA 407

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The Josephine County Airports Department **strongly supports TIA 1558 as a change to NFPA 407**. Standard for Aircraft Fuel Servicing.

**Without the change to NFPA 407 proposed in the TIA, we will be faced with a $10,000 bill for our fuel farm loading rack, and a $3,500 bill per each of our two fuel trucks, with all equipment needing to be retrofitted by June 2, 2021.**

Josephine County Airports has operated fuel servicing facilities at two airports for over 60 years without incident. We cannot afford to comply with this new, over-reaching technical standard, and in fact would not be able to do so. As a chronically underfunded County airport, we simply do not have the $17,000 (minimum) that this would cost us. We urge the NFPA technical committee to adopt TIA 1558.

If you have any questions about our position on this proposed change, which we very much support, please contact me at the numbers or email address below.

Thank you,

Larry Graves  
Director  
Airports Department  
1441 Brookside Blvd, Grants Pass, OR 97526  
josephinecounty.gov

PUBLIC RECORDS LAW DISCLOSURE
This email is a public record of Josephine County and is subject to public disclosure unless exempt from disclosure under Oregon Public Records Law. This email is subject to retention.
Foran, Rosanne

From:    Wiss, Dennis
Sent:    Friday, March 5, 2021 3:50 PM
To:      Jeremy Valcich
Subject: TIA 1558 Support

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Steve, Jeremy:

Thank you for providing the information in today’s webinar. This was most informative and I do appreciate it.

Although the proposal for the automatic shutdown systems at airport loading rack does not affect this airport, we do not have any mobile refuelers, I have managed and operated two FBO’s where I was the fuel system operator responsible for maintaining and operating the fuel tanks and systems and mobile refuelers. In the thirteen combined years that I was the manager of the fuel systems and refuelers, we never once had a failure of any of the bottom-loading safety systems and equipment or experienced a catastrophic fuel spill or discharge.

The proposed additional shutoff requirements would be onerously expensive for every fuel tank and fuel truck operator, be they private or airport/government-operated and there is no historical precedent to justify the time and expense needed to retrofit all of the tanks and mobile refuelers across the country. Adding additional equipment and requirements to address an issue that does not exist is unnecessary. The existing fuel tank and fuel truck bottom-loading safety equipment and the best-management practices of the operators are sufficient to prevent over-fueling and spills/discharges.

I fully support the proposed TIA 1558 calling for the complete removal of the requirements for automatic shutdown systems at airport loading racks that are compatible with mobile refuelers.

Dennis Wiss, A.A.E
Airport Manager
Facebook | Twitter | YouTube

St. Charles County
SMART Field Airport
From: Jeff Mallory  
Sent: Friday, March 5, 2021 4:04 PM  
To: Shared TIAs  
Subject: TIA 1558

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am writing this message in my support of the proposed TIA 1558, and would highly encourage the technical committee to approve it as well. I am the operations supervisor for the Pellston Regional Airport. We are a small county owned Part 139 airport with a very limited budget, and completely understand the need for progressive safety measures in the fueling industry. However, I do feel making this retroactive would not just place a financial burden on our airport, but so many other airports as well who have all complied with the current codes at the time of construction/installation. Our personnel have been trained to test the existing bottom loading safety devices on the vehicles before loading and make sure they work properly before filling the tank.  
Thank you for your time.

Jeff Mallory  
PLN ARFF INC  
Pellston Regional Airport
From: MAAE
Sent: Friday, March 5, 2021 4:53 PM
To: Shared TIAs
Subject: NFPA 407 - TIA 1558 MAAE Letter of Support
Attachments: MAAE LOS - NFPA 407 - TIA 1558 (2).pdf

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To Whom It May Concern: Attached please find Michigan Association of Airport Executives letter in regards to NFPA 407 - Standards for Aircraft Fuel Servicing
Date: March 4, 2021

From: Michigan Association of Airport Executives – Board of Directors (MAAE)

To: Secretary, Standards Council
   National Fire Protection Association – 407 Technical Committee (NFPA)

Re: NFPA 407 - Standards for Aircraft Fuel Servicing
   Letter of Support for pending Tentative Interim Amendment 1558 (TIA 1558)

Michigan Association of Airport Executives (MAAE) is the primary professional organization in support of Airport Executives, Airport Board Officials, Airport Employees, Aviation Service Consultants, Aviation Vendors and Suppliers across the State of Michigan. A primary goal of MAAE is to assist members with fulfilling their responsibilities to the airports and communities they serve. In support of those efforts, the MAAE Board of Directors is charged with analyzing proposed regulatory changes that may impact MAAE members and their airport operations.

Members of the MAAE Board have recently evaluated NFPA 407 - 2017 edition and the proposed 2022 edition, sections 5.1.12, 6.1.3.12.2.7, 6.1.3.12.2.8 6.1.3.12.2.9 and Table C.1. Likewise, MAAE Board Members have also evaluated the responding Tentative Interim Amendment (TIA 1558) -- which has been submitted on behalf of National Aviation Transportation Association (NATA). In short, members of the MAAE Board have subsequently voted unanimously in support of the proposed changes to NFPA 407 -- as set forth within TIA 1558. In doing so, it is believed that existing safety mechanisms and best practices are in place without mandating requirements for retrofitting existing fuel storage facilities and mobile refuelers with additional automatic shutdown systems.

In short, this letter is submitted to fervently encourage members of NFPA 407 Technical Committee to adopt the proposed changes recommended TIA 1558.

Sincerely,

Gary W. Kellan
President
Foran, Rosanne

From: Michael Clarke  
Sent: Friday, March 5, 2021 6:23 PM  
To: Shared TIAs  
Subject: TIA 1558

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To whom it may concern,

Thank you for your time, I know it is very valuable. I am writing to place my company's support behind the TIA 1558 proposal. Retrofitting our very old fuel farm (with 4 loading racks) and 10 very old fuel trucks would be a major burden on our operation. The age of both the fuel farm and the fuel trucks make the retrofit on equipment, with very little shelf life, prohibitive. During these trying times, we are working each day just to stay in business.

Please let me know if I can answer any further questions. Have a great weekend.

Michael Clarke  
President  
Richmond Jet Center Inc.