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

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<tr>
<td><strong>21-4-1</strong></td>
<td>Report of the Committee Membership Task Group (J. Quiter, Chair). No Attachment</td>
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<tr>
<td><strong>21-4-1-a</strong></td>
<td>Consideration of Non-Reappointments. No Attachment</td>
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<td><strong>21-4-1-b</strong></td>
<td>Act on pending applications for Committee Members. No Attachment</td>
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<tr>
<td><strong>21-4-1-c</strong></td>
<td>Request for classification reconsideration. No Attachment</td>
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<tr>
<td><strong>21-4-1-d</strong></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><strong>21-4-2</strong></td>
<td>Report of the Awards Task Group (J. Golinveaux, Chair). No Attachment</td>
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<td><strong>21-4-3</strong></td>
<td>Update from P&amp;P Chair. No Attachment</td>
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<td><strong>21-4-4</strong></td>
<td>Report of the December 2020 Minutes. No Attachment</td>
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<tr>
<td><strong>21-4-5</strong></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)

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<tr>
<td><strong>21-4-6</strong></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><strong>21-4-6-a</strong></td>
<td>Text of proposed TIA No. 1542. See Attachment 21-4-6-a</td>
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<tr>
<td><strong>21-4-6-b</strong></td>
<td>Ballot results of TIA No. 1542. PASSED 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><strong>21-4-6-c</strong></td>
<td>No comments were received.</td>
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<tr>
<td><strong>21-4-7</strong></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><strong>21-4-7-a</strong></td>
<td>Text of proposed TIA No. 1557. See Attachment 21-4-7-a</td>
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<tr>
<td><strong>21-4-7-b</strong></td>
<td>Ballot results of TIA No. 1557. FAILED 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><strong>21-4-7-c</strong></td>
<td>One comment was received. See Attachment 21-4-7-c</td>
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<tr>
<td><strong>21-4-8</strong></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><strong>21-4-8-a</strong></td>
<td>Text of proposed TIA No. 1543. See Attachment 21-4-8-a</td>
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<tr>
<td>21-4-8-b</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>21-4-8-c</td>
<td>No comments were received.</td>
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<tr>
<td>21-4-9 NFPA 13</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>21-4-9-a</td>
<td>Text of proposed TIA No. 1560. See Attachment 21-4-9-a</td>
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<tr>
<td>21-4-9-b</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</strong> CC 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>21-4-9-c</td>
<td>No comments were received.</td>
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<tr>
<td>21-4-10 NFPA 72</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>21-4-10-a</td>
<td>Text of proposed TIA No. 1548. See Attachment 21-4-10-a</td>
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<tr>
<td>21-4-10-b</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</strong> CC 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>21-4-10-c</td>
<td>Four comments were received. See Attachment 21-4-10-c</td>
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<tr>
<td>21-4-11 NFPA 72</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>21-4-11-a</td>
<td>Text of proposed TIA No. 1549. See Attachment 21-4-11-a</td>
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<tr>
<td>21-4-11-b</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</strong> CC 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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| 21-4-11-c | Two comments were received.  
See Attachment 21-4-11-c |
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<tr>
<td>21-4-12 NFPA 92</td>
<td>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).</td>
</tr>
</tbody>
</table>
| 21-4-12-a | Text of proposed TIA No. 1547.  
See Attachment 21-4-12-a |
| 21-4-12-b | 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.  
See Attachment 21-4-12-b |
| 21-4-12-c | No comments were received. |
| 21-4-13 NFPA 99 | 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, *Health Care Facilities Code* (TIA No. 1522). |
| 21-4-13-a | Text of proposed TIA No. 1522.  
See Attachment 21-4-13-a |
| 21-4-13-b | 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.  
See Attachment 21-4-13-b |
| 21-4-13-c | No comments were received. |
| 21-4-14-a | Text of proposed TIA No. 1559.  
See Attachment 21-4-14-a |
| 21-4-14-b | 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.  
See Attachment 21-4-14-b |
| 21-4-14-c | One comment was received.  
See Attachment 21-4-14-c |
| 21-4-15 NFPA 407 | 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, *Standard for Aircraft Fuel Servicing* (TIA No. 1558). |
| 21-4-15-a | Text of proposed TIA No. 1558.  
See Attachment 21-4-15-a |
<table>
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<tr>
<th>Date</th>
<th>Description</th>
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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><strong>APPEAL</strong> 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>
</tr>
<tr>
<td>21-4-16</td>
<td><strong>NFPA 499</strong> 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>Recommenced Practice for the Classification of Combustible Dusts and of Hazardous (Classified) Locations for Electrical Installations in Chemical Process Areas</em>, (TIA No. 1546).</td>
</tr>
<tr>
<td>21-4-16-a</td>
<td>Text of proposed TIA No. 1546. See Attachment 21-4-16-a</td>
</tr>
<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><strong>NFPA 909</strong> 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>
</tr>
<tr>
<td>21-4-18-a</td>
<td>Text of proposed TIA No. 1552. See Attachment 21-4-18-a</td>
</tr>
<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><strong>APPEAL</strong> 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>
</tr>
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</table>
21-4-19 NFPA 1977  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).

21-4-19-a Text of proposed TIA No. 1562. See Attachment 21-4-19-a

21-4-19-b 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

21-4-19-c No comments were received.

21-4-20 NFPA 1986  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).

21-4-20-a Text of proposed TIA No. 1545. See Attachment 21-4-20-a

21-4-20-b 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

21-4-20-c Nine comments were received. See Attachment 21-4-20-c

21-4-20-d APPEAL 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

21-4-20-d-1 APPEAL 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

REVISION CYCLES

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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

21-4-22 Consider the request of Christopher Wagner, AmeriGas Propane, to develop a standard to address Mobile Food Establishments/Mobile Cooking Operations. Seventeen (17) comments
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 |
Foran, Rosanne

From: Hillsdale Municipal Airport
Sent: Monday, March 8, 2021 10:31 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.

?Hi:

I'm just writing to let you know the Airport's support for the proposed TIA 1558.

Thank you,

Ginger Moore

Ginger R. Moore

Airport Manager
Hillsdale Municipal Airport
1727 Airport Rd.
Hillsdale, MI 49242
Foran, Rosanne

From: Daquilla, Steven
Sent: Monday, March 8, 2021 1:59 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.

Good Afternoon,

Avflight Columbus FBO would like to support TIA 1558 due to the high cost and on top of the hardships of the the ongoing COVID pandemic. Our professional line staff tests the automatic bottom load shut off every time a refuler is fueled as well as monitor the fuel meter. In the event that this test system fails, line techs are to stop the flow of fuel and contact the GM or supervisor. In turn the GM / Supervisor will tag out the system until it is repaired.

Thank you

Steve Daquilla
General Manager

Avflight Columbus Corporation
Golden Triangle Region Airport (KGTR)
COVID-19 Resources for You [feedback]
Foran, Rosanne

From: Billy Lewis
Sent: Monday, March 8, 2021 2:24 PM
To: Shared TIAs
Subject: TIA 1558 Support
Attachments: TIA 1558 Letter.docx

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.

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

Please find my letter supporting TIA 1558 attached.

Best regards,

Billy

William E. Lewis
Valdosta Flying Service, Inc.

This message is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone or via email and delete this file from your mailbox.
03/08/2020

To all parties concerned,

This letter is to notify all concerned parties of Valdosta Flying Service, Inc. and its operators FULL support of TIA 1558 and to request all powers that be vote in favor of its approval.

Valdosta Flying Service is a mid-sized FBO that handles approximately 675,000 gallons of aviation fuel per year. I personally have been associated with this FBO for over 32 years and we have never had a fuel spill or tank overflow at our fuel farm or any of our mobile fuelers. The spill prevention and overflow protection requirements currently in place provide well beyond 100% protection of any spill that could happen during the farm and mobile fueler loading process so any additional requirement(s) would be a costly, unnecessary and unjustifiable burden on us and all fuel providers. In addition, our farm and our mobile fuelers all have automatic high level shutoff systems that are tested prior to any loading operation so this, in addition to the listed burdens, would be wasted time duplicating existing protections.

Please continue your efforts to eliminate this overreaching code and feel free to contact me if needed.

Best regards,

[Signature]

William E. Lewis
Valdosta Flying Service, Inc.
Foran, Rosanne

From: MAAE
Sent: Monday, March 8, 2021 3:30 PM
To: Shared TIAs
Subject: FW: Comment on Proposed TIA 1558 on NFPA 407
Attachments: Clark Twp_Comment on Proposed TIA 1558_NFPA 407.pdf

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.

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

A letter from a Michigan Airport

From: Mark Clymer
Sent: Monday, March 8, 2021 11:12 AM
To: Dawn Bellis <TIAs_Errata_Plks@nfpa.org>
Subject: Comment on Proposed TIA 1558 on NFPA 407

Hi Dawn:

We are concerned about the potential requirement for additional fueling safety equipment at our local airport.

I am attaching a letter of support for the Proposed TIA 1558 on NFPA 407.

My understanding is that the Technical Review Committee is studying this issue for the pending 2022 edition of NFPA 407, and that comments are to be directed to you.

If this is not the case, please forward my comments to the appropriate individual that can distribute them to the Technical Review Committee for consideration.

Regards, Mark

--------------------------------------------------------
Mark Clymer, Supervisor
Clark Township
207 N Blind Line
Cedarville, MI 49719
March 8, 2021

To: Dawn Michele Bellis, Director and NFPA Standards Council Secretary  
National Fire Protection Association 407 Technical Committee (NFPA)  
1 Batterymarch Park, Quincy, MA 02169-7471

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

Dear Dawn & Members of NFPA 407 Technical Committee:

Albert J Lindberg (5Y1) Airport is a Municipal General Aviation airport that is located in the Eastern Upper Peninsula of Michigan.

Our airport & FBO dispensed approximately 436 gallons of aviation fuel during calendar 2020, and typically dispenses under 1000 gallons per year.

These fuel transfer activities are being successfully performed without overflow spills. In other words, existing safety mechanisms and best management practices are already in place without mandates to retrofit existing fuel storage facilities and mobile refuelers with additional automatic shutdown systems.

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

Sincerely,

[Signature]

Mark Clymer  
Clark Township Supervisor
Date: March 8, 2021

From: Lt. Douglas J. Conciatu (ret)
       Huntington Woods DPS

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)

Dear Members of NFPA 407 Technical Committee,

Ray Community Airport is a general aviation airport that is located in southeast Michigan. We are one of the most active small airports in the state. Our airport typically dispenses approximately 31,000 gallons of aviation fuel per year. Those fuel transfer activities are being successfully performed without overflow spills. In other words, existing safety mechanisms and best management practices are already in place without mandates to retrofit existing fuel storage facilities and mobile refuelers with additional automatic shutdown systems.

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

Sincerely,

Lt. Douglas J. Conciatu (ret)
Huntington Woods DPS
Airline Transport Pilot
Certified Flight Instructor (Gold Seal)
Foran, Rosanne

From: Travis Ragland
Sent: Tuesday, March 9, 2021 7:42 AM
To: Shared TIAs
Subject: TIA 1558 Comments

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This is in no way the time to make changes of this caliber and cost, when as stated, the high level systems are reliable, and have been for years. Our industry has taken one of the biggest hits in history, both financially and in the public's confidence to fly. I believe the NFPA should seriously reconsider this requirement, at least until we see who all makes it out of this terrible delima. Otherwise, you will have more layoffs and unemployment numbers through the roof, due to the cost of these upgrades and what it takes from the company itself.

Travis Ragland
Fuel Supervisor/Ramp Compliance
Aero Industries, Inc.

Sent from Mail for Windows 10
Foran, Rosanne

From: Kyle J. Kuebler
Sent: Tuesday, March 9, 2021 1:17 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1558 on NFPA 407

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To whom it may concern:

Please be advised that the Porter County Regional Airport, in Valparaiso, Indiana, supports the Tentative Interim Amendment (TIA), Number 1558, which proposes important changes to NFPA 407-2017, and the Proposed 2022 Editions of the Standard for Aircraft Fuel Servicing. The TIA has been originally submitted by the National Air Transportation Association (NATA). The language in sections 5.1.12, and 6.1.3.12.2.7 through 6.1.3.12.2.9 of the 2017 NFPA 407 mandates automatic shutdown equipped loading racks that are compatible with refueling mounted sensor systems, including “existing equipment”. The regular revision process offered no data supporting the need for additional automatic shutdown systems at airport loading racks. The Aviation Industry’s safety record has been exemplary regarding the bottom loading of mobile refuelers for decades, and follows the existing, well-defined requirements for high-level shutoffs being used during bottom loading operations in NFPA 407. I have been associated with the Airport and aviation fueling operations for over thirty-four (34) years, and an active line firefighter for the last twenty-four (24) years. Throughout this period, our Airport has successfully used the standard Bottom Loading System with pre-check and an automatic high-level shut-off control on our Aircraft Refuelers, with a history of no incidents.

The Aviation Industry is working through unprecedented times, as are many industries, during this worldwide pandemic. While some midsize to larger airports that are required to follow NFPA 407 (Part 139 Certificated) have already upgraded equipment to be compliant with the NFPA requirements as written, there are hundreds of others who do not have the flexibility to do so. The standard contains an error or 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 the Aviation Industry, in that the Standard was modified without adequate technical (safety) justification of the action.

Additionally, while many locations own their refueling equipment, like our Airport does, many more are provided by aviation fuel distributors through lease programs or other arrangements. Also, the leased fleet in the United States totals in the thousands, and mobile refuelers are moved throughout the country from airport to airport, providing the resources to keep our nation’s aviation fleet in the air. The ability to procure enough components, as well as contractors, to logistically retrofit so many airport fuel storage facilities and existing refueler trucks, during these very unstable and trying times, will be extremely difficult, if not impossible, to achieve.

With this, please consider these comments, and the proposed changes submitted by NATA in TIA 1558, in your Association’s (Technical Committee’s) actions concerning NFPA 407-2017, and the Proposed 2022 Editions, of the Standard for Aircraft Fuel Servicing. The Aviation Industry does not have a problem to be dealt with in this regard, and calls for complete removal of the requirements for automatic shutdown systems at airport loading racks, that are also compatible with mobile refuelers. The Porter County Airport Authority supports TIA 1558, and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of its approval. There is a demonstrated history that should be considered regarding the longstanding safety and reliability of the Aviation Industry’s existing high-level shut off systems and operational procedures for bottom loading. If considered by the Technical Committee, this will allow for the continued safe and effective bottom loading operations that has been historically achieved, for years to come. Thank you for your time and consideration of this matter.
Sincerely,

Kyle J. Kuebler, Airport Director
Porter County Regional Airport (KVPZ/VPZ)
4207 Murvihill Road
Valparaiso, IN 46383

www.vpz.org
Foran, Rosanne

From: Robert Steenbock
Sent: Tuesday, March 9, 2021 3:32 PM
To: Shared TIA
Subject: TIA 1558

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To Whom it May Concern;

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

Hun Pan Am Aviation, Inc. has operated at the Brownsville South Padre Island International airport for over 4 decades. In this period of time we have complied with all regulations related to aircraft refueling. Our current procedures are continually updated as necessary. We do not feel this proposal to install new shutoff devices will enhance our operations in a meaningful way.

As you know this has been a difficult year with Covid. Corporate and general aviation numbers have been down significantly. To fund this at this time would be devastating for small FBO's.

If there is further information required I can be reached at this email address
The Morgantown Municipal Airport fully supports TIA 1558 and we hope the Technical Committee will approve it.

The Morgantown Municipal Airport (MGW) is located in Morgantown, West Virginia. This is a city-owned airport, and the airport owns the FBO.

This airport has never had an issue with bottom loading our fuel trucks from our small fuel farm. We have passed every FAA Part 139 and DLA inspection of our fuel facilities and trucks, and we have never had a spill due to over-filling of a truck, because we follow the currently prescribed procedures.

- We test the high-level check valves every time we begin to bottom load our fuel trucks.
- We already have high level alarms on our fuel farm tanks, and the alarms are set to go off at 90% capacity.
- We never defeat the deadman switches while loading the tanks or the trucks.
- We never walk away and/or leave the area during the loading process.
- There are 3 emergency shutoff buttons at our fuel farm, all within reach of the deadman cable’s length.
- And finally, we make sure all personnel are properly trained and evaluated before they are allowed to perform any loading by themselves.

Additionally, this requirement to have automatic shutdown systems installed at our loading rack and on our fuel trucks will put an extremely unnecessary financial burden on us as we are already in financial duress due to the COVID Pandemic. We have already had quotes given to us on the costs to install the shutdown systems on the farm and trucks, and they are all $25,000.00+. We simply cannot afford to do this. We sold ~78,000 less gallons of Jet A in 2020 than our 6yr average, and ~4,400 less gallons of 100LL. And this doesn’t even include all the Landing Fees, Overnight Fees, GPU usage, Aviation Oil, etc. that we are not profiting from either. This has been disastrous for our small airport, and we simply cannot afford make these unnecessary changes that current procedures and guidelines already accomplish when followed correctly.

Please approve TIA 1558. I would assume our airport is not unique in the challenges we are facing right now, and without TIA 1558, we will face an even tougher road to recovery.

Respectfully,
Wes McVey
MGW FBO Manager
Foran, Rosanne

From: John Erskine
Sent: Wednesday, March 10, 2021 12:49 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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NFPA 407 Review Committee,

The City of Burnet Fire Marshal’s Office and the Operators and Managers of Burnet Municipal Airport-Kate Craddock Field wholeheartedly support the passing of this TIA.

Aside from the financial burden that TIA 1558 would erase for small FOBs and Municipal Airports, it corrects a revision that prevents an incident that could only occur through gross negligence or a deliberate act and more importantly lacks the statistical or anecdotal information that typically triggers a revision in the place.

Thank you for recording our support for TIA 1558.

Respectfully,

JOHN PAUL ERSKINE
Fire Marshal
City of Burnet, Texas
From: Devin Wells
Sent: Wednesday, March 10, 2021 12:57 PM
To: Shared TIAs
Subject: TIA 1558 Support Letter
Attachments: TIA 1558 Letter.docx

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Please see the attached letter for our support for TIA 1558.

Thank you,

Devin Wells
Line Service Supervisor
St Cloud Aviation
1544 45th Ave SE
St Cloud, MN 56304
TIA 1558

To whom it may concern,

My name is Devin Wells and I am the Line Service Supervisor for St. Cloud Aviation located in St. Cloud, MN. I am writing you this letter to show our support for the passing of TIA 1558. We hope that the technical committee will see how it is important to us and many other FBOs around the country that you vote to pass this TIA.

At St. Cloud Aviation, we are a small FBO in central Minnesota, we have two 100LL fuel trucks, two jet fuel trucks, and one tank for jet fuel and 100LL. We have been under the same ownership since 1988, and in that time there have been no failures for topping our fuel trucks that were related to the current overflow system that is in place. We are very confident in the current system and it has shown over the years that it is very effective. We don’t see a reason to change what is in place based on the current system showing that it works.

As you are all aware, 2020 and now 2021 have been hard on all of us. The aviation industry continues to be hit hard with people still not traveling to the capacity that they used to. It could be years before this industry is back to where it was prior to the pandemic. With the traffic slow down, comes the financial struggles. Like I said, we are a small business and for us to spend the kind of money that it will cost to have this system installed will be a huge burden on our business. This financial struggle isn’t only hitting us, but many of the other FBOs around the country.

Thank you for taking the time to read our view on why it is so important that you vote in support of TIA 1558.

Sincerely,

Devin Wells
To Whom it May Concern,

This email is in support of TIA 1558, which calls for the removal of requirements for automatic shutdown systems at airport loading racks. The proposed law change in NFPA 407 will result in an unnecessary redundancy to airport fuel farms. Currently our company operates the fuel farm at Morristown Municipal Airport. As part of the development and operation of the farm, there are several measures that were already existing to prevent an over fill incident.

Those measures include:

- Annual training for all staff with access to the fuel farm on bottom fuel loading operations and basic fuel farm safety.
- All mobile refuelers in use at the airport are already equipped with function high level shut offs.
- All refuelers are bonded to the fueling system; the system will not activate w/o a positive bonding signal continually sent to the fuel management computer. If bonding cannot be achieved or maintained, the fuel management computer will not allow the fuel system to operate.
- The fuel system will not activate unless the dead man is securely held by the fuel truck operator. The dead man cannot be bypassed or tied off.
- Once fueling begins, the precheck system of the refueler is checked by the fuel truck operator. The precheck must stop the flow of fuel into the truck within 3 seconds. If the precheck system is inoperative or otherwise fails to stop the flow of fuel, fueling will cease immediately. Airport personnel will not allow the refueler back into the fuel facility until repairs are conducted.

Many of the same measures listed above are utilized at airport fuel farms throughout the country. These measures already address the potential for an overfill incident by putting safeguards in place to ensure that it will not occur. Rather than requiring airports to install additional measures like the proposed automatic shut-down system, NFPA should consider the safeguards already in place. If a facility has these safeguards installed, then there should be no requirement to add additional redundancy measures. Further, the idea that this is a huge issue within the industry is not based upon a foundation of fact. The industry itself has a long history of safe operation history with bottom loading mobile refuelers and fuel farms with the current safeguards that have not experienced over fill incidents.

If you have any questions, please feel free to contact me at 973-538-6400 ext. 135.

Thank you,

Darren S. Large, A.A.E.
Director, Facilities & Operations
DM AIRPORTS, LTD. Operators of MMU
8 Airport Road, Morristown, NJ 07960
www.mmuair.com |
From: Ron Young  
Sent: Wednesday, March 10, 2021 2:01 PM  
To: Shared TIAs  
Subject: TIA 1558

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It is overkill and unnecessary to have a skully type high level system for privately owned fuel farms all of the aviation fuel trucks have a high level shut off and and a precheck for that shut off that is to be tested every time the fueler is loading the truck. What is being proposed is costly and telling everyone that there is a system that has been in place for years but let's not train the fueler correctly, Let's come up with a automated system that by the way when it doesn't get a good connection will not allow the farm to pump and has constant issues to control what is already being controlled.

Sent from my iPhone
Foran, Rosanne

From: Andrew Hartman
Sent: Wednesday, March 10, 2021 2:05 PM
To: Shared TIAs
Subject: Approve TIA 1558

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To whom it may concern, I am in full support of TIA 1558 and strongly recommend that it be approved without delay. There is no evidence to support the need for a secondary fuel shutoff during loading. In my experience operating 4 locations and loading fuel for over 20 years never once have I experienced an overfill scenario at any of my locations. Furthermore, I have not had a mechanical high-level shut-off fail the operational test. The draconian burden that will be placed on airports and FBOs during an already strenuous time is unwarranted. Please approve TIA 1558 for the good of the people.

Sincerely,

Andrew Hartman
Managing Member
2 N Main Street
Ste 302
Medford NJ 08055
Foran, Rosanne

From: Nick Tiwald
Sent: Wednesday, March 10, 2021 2:19 PM
To: Shared TIAs
Subject: Support for TIA 1558

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To whom it may concern,

My name is Nick Tiwald, and I am the Director of FBO Services at Silverhawk Aviation in Lincoln Nebraska KLNK. This message is regarding NFPA 407. Specifically, I would like to formally show support for TIA 1558 which calls for complete removal of the requirements for automatic shutdown systems at airport loading racks that are also compatible with mobile refuelers.

Silverhawk Aviation is one of two FBOs at KLNK field and we pride ourselves on safe and reliable operation for refueling. The sections of NFPA 407 which deal with the new requirements for automatic shutdown systems are completely unnecessary. Our mobile refuelers and loading rack already contain high level shut off systems. Our employees have been trained to test the precheck system at the beginning of all bottom loading operations, never bypass the dead-man device, and always attend bottom loading in its entirety. These systems and training have created a supremely safe system to safeguard against spillage with only one minor incident in the last decade.

In short, please go forward with the tentative interim amendment 1558.

Sincerely,

Nick Tiwald
Director of FBO Services
Silverhawk Aviation
a: 1751 West Kearney Ave. Lincoln,NE 68524
Foran, Rosanne

From: Chris Harrison
Sent: Wednesday, March 10, 2021 2:24 PM
To: Shared TIAs
Subject: TIA 1558
Attachments: Scanned from a Xerox Multifunction Printer.pdf

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Please see the attached letter in support of TIA 1558 regarding NFPA 407, 2017 and 2022 editions.

Chris Harrison, Fire Marshal
Galveston Fire Department
P.O. Box 779 Galveston, TX 77553 | 823 26th St. Galveston, TX 77550

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10MAR2021

National Fire Protection Association (NFPA)
NFPA 407 Committee
1 Battymarch Park
Quincy, Massachusetts
USA 02169-7471

Re: NFPA 407 Tentative Interim Amendment (TIA) 1558

Committee Members:

I write this letter in support of the TIA proposed by the National Air Transportation Association (NATA) removing the retroactive requirement from Section 5.1.12 of the 2017 edition of NFPA 407. I respectfully request this consideration under the allowances provided in Section 1.3.4, whereby an Authority Having Jurisdiction (AHJ) can modify retroactive requirements if their application clearly would be impractical, and where a reasonable degree of safety is provided.

As the AHJ for Scholes International Airport, I enforce the adopted provisions of the 2012 International Fire Code. Scholes was recognized as the Texas Department of Transportation General Aviation airport of the year in 2018. The airport is home to 1 Fixed Based Operator, 2 air charters that service the Gulf of Mexico oil platforms, and a robust number of private pilots that home base from here. There are approximately 35,000 operations per year, and approximately 800,000 to 1.2 million gallons of fuel dispensed in the same timeframe.

Currently, our existing fuel systems utilize protected tanks and fuel trucks. All have redundant safety systems that are operational and in compliance with the codes at the time they were installed. There have been no reported spills or hazardous events involving fueling that I can find record of.
I respectfully request that you grant the proposed amendment and remove the potentially burdensome requirement for existing systems to retroactively install additional safety measures that would create a financial hardship despite the proven track record of safety. As noted by NATA, thousands of General Aviation airports like Scholes International Airport have been operating safely under the existing provisions of previous editions of NFPA 407. I ask that you recognize that safety record and the current safety systems involving aircraft fueling by granting this amendment.

If you have any questions or require further information, please do not hesitate to contact me.

Respectfully,

Chris Harrison
Assistant Fire Chief/Fire Marshal
Hello,

My name is Cesar Gonzalez and I am the General manager of the Uvalde Flight Center here in Uvalde Texas.
This email is to inform you of our support for TIA 1558.
We are a locally owned business and have been operating the past 40 years.
In these 40 years we have not had a fuel spill incident caused by a faulty high-level shut off. Being a locally owned and operated FBO we find it difficult to justify a costly upgrade. We operate 3 fuel trucks and have 2 tanks at our fuel farm.

Please feel free to contact me @ 830-900-4204 or use this email address
Thank you for your time and consideration.

-Cesar

--
Cesar Gonzalez
Operations Manager
Uvalde Flight Center
From: BennetAndrew
Sent: Wednesday, March 10, 2021 5:31 PM
To: Shared TIAs
Subject: Collier County Airport Authority - Letter Supporting TIA 1558
Attachments: CCAA - Letter Supporting TIA 1558.pdf

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Good afternoon,

Please consider the attached request on behalf of the Collier County 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 Marco Island Executive Airport, Immokalee Regional Airport, and Everglades Airpark.

Respectfully,

Andrew Bennett, CM, CPM | Executive Manager – Interim
Collier County Airport Authority
2005 Mainsail Drive | Naples, FL 34114

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March 10, 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 Collier County 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 Marco Island Executive Airport, Immokalee Regional Airport, and Everglades Airpark.

Current fueling systems at Collier County’s three general aviation airports 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 our three airports. 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 $40,000.

While the Collier County 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.

Marco Island Executive Airport
2005 Mainsail Drive, Suite 1
Naples, FL 34114-8955

Immokalee Regional Airport
165 Airpark Boulevard
Immokalee, FL 34142

Everglades Park
650 E.C. Airpark Road
Everglades City, FL 34139
We appreciate your consideration in the matter and urge you to approve TIA 1558 so that the Collier County Airport Authority can continue to meet critical safety standards while still providing the same excellent level of service to our customers.

Sincerely,

[Signature]

Andrew H. Bennett
Executive Airports Manager – Interim
Foran, Rosanne

From: Robert FAHENSTOCK
Sent: Wednesday, March 10, 2021 6:25 PM
To: Shared TIAs
Cc: Michael Mays; Brittany Walker
Subject: Newly proposed TIA 1558

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To whom it may concern,

I writing in support of TIA 1558 and encourage the NFPA aircraft fuel servicing technical committee to vote in favor of approval.

I run BFE, LLC Boulder City Nevada's friendly FBO as the owner operator for the past 15 years. This airport has averaged over 2 million gallons of fuel flow-age a year and have had no issue with reliability or safety with our high level shut off systems and operational procedures for bottom loading.

Bob Fahnestock
BFE, LLC
1411 Airport Rd
Boulder City NV, 89005
From: David Christy
Sent: Wednesday, March 10, 2021 8:51 PM
To: Shared TIAs
Subject: NFPA Comments

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Parsons Tri-City Airport
Parsons, Kansas
620 336 3440
March 10, 2021

RE: NFPA 407

This letter is to express my enthusiastic support for NATA to challenge NFPA 407. NFPA has required the existing aviation fuel storage facilities and the mobile refueling trucks to undergo mandatory and costly alterations. No statistical data or studies have been performed that show or justify these alterations. The aviation refueling industry has safely transferred fuel into refueling vehicles for decades. Fuel trucks have been required and equipped with high-level shut off devices which close a value to prevent spills. No incident or accident has occurred that could support additional safety measures.

Without the changes proposed by NATA TIA 1558 airports across the country will be faced with unnecessary costs which may exceed $12,000 per tank and truck.

I have managed the Parsons Airport for over 13 years without any refueling accidents or incidents. Our airport has safely operated without any fuel spills since the city of Parsons took over operations from the military in the late forties.

In closing I support NATA’s proposed TIA 1558.

David Christy
Airport Manager
Parsons Tri-City Airport
Parsons, Kansas
From: Ken Swaringen  
Sent: Thursday, March 11, 2021 12:29 PM  
To: Shared TIAs  
Subject: Proposed Changes to NFPA 407

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We are in full support of TIA 1558. We encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval of TIA 1558.

The industry’s safety record well supports approval of TIA 1558.

We would encounter significant budget issues if faced with having to install new automatic shutdown systems.

Regards,

Ken E. Swaringen  
Airport Director  
North Carolina Airport Professional  

Stanly County AIRPORT  
43222 Lowder Aviation Parkway  
New London, NC 28127

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Foran, Rosanne

From: Scott Hinton
Sent: Thursday, March 11, 2021 1:43 PM
To: Shared TIA
Subject: TIA 1558 support

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Good afternoon,

I write in support of NATA’s TIA 1558. Please favorably consider the proposed TIA. I manage a GA airport that sells approximately 250k gallons of jet/AVGAS a year. Our margins are tight given the already great costs required to safely operate the airport. We currently meet ATA 103 requirements. Please consider the additional expenses placed on sponsors/operators when voting to require that certain NFPA 407 requirements be mandated retroactively. We have been in operation since 1972 without a single fueling mishap. Please eliminate the requirements for automatic shutdown.

Thank you,

Scott Hinton
Airport Manager
www.ecairport.com

Elizabethtown Regional Airport
To whom it may concern.

The (NFPA-407) is estimated at 100 million dollars needed across the country to equip aviation to meet the new standard.
We still struggling after a pandemic with a loss of revenue. How do we pay for this upgrade?

Spartanburg Memorial Airport has been here since 1927 and never had a fuel spill, so why a secondary automatic shutoff between Refueler and fuel farms?

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

Sincerely,

Terry Connorton
Airport Director
Spartanburg Memorial Airport
www.spartanburgdowntownairport.com/
From: Darin Bensinger  
Sent: Thursday, March 11, 2021 4:08 PM  
To: Shared TIAs  
Subject: TIA 1558 Approval

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The Gary Jet Center strongly supports TIA 1558 and we encourage the NFPA Aircraft Fuel Servicing Committee to vote in favor of its approval.

The Gary Jet Center has been in operations for 30 years. We have high safety standards when it comes to our Fuel Facility. We perform emergency shutoff and high level shutoff test bi-weekly on our equipment. We also stick our tanks for measurements monthly to verify that our gauges are calibrated. Our Line Service also performs a pre-check test during every fuel transfer from the loading rack to the refueler truck. Along with the tests that we perform, we also have a meter shutoff system on each of our loading racks. By having this system the lineman will pre-select the gallons of fuel to prevent the over fueling of a refueler truck. With all of these safety measures the Gary Jet Center has never had a spill incident during the loading and unloading of fuel at our facility.

Thank you,  
Darin Bensinger  
Gary Jet Center Line Manager

Sent from Mail for Windows 10
From: Paul Moses  
Sent: Friday, March 12, 2021 9:59 AM  
To: Shared TIAs  
Subject: NATA NFPA 407 INITIATIVE

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NFPA 407

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

I am the manager of the Lancaster County Airport (KLKR) in Lancaster, SC and have served in this capacity for over ten years. We have pumped thousands of gallons of fuel over the years with not one mishap. So, our long standing safety and reliability of our existing high-level shut off systems and operational procedures for bottom loading speaks for itself.

I respectfully request your support on this proposal.

Paul T. Moses, Sr.

Airport Manager

Paul Moses, Director  
Airport  
Lancaster County Government  
PO Box 1809  
101 N Main St  
Lancaster, SC 29720

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Foran, Rosanne

From: Jim Carrier  
Sent: Friday, March 12, 2021 2:08 PM  
To: Shared TIAs  
Cc: Jeremy Souza; jlaflamme@pvdairport.com  
Subject: Support for TIA 1558

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To Whom It May Concern:

I would like to provide comments in support of the proposed TIA 1558. I strongly encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

At Manchester-Boston Regional Airport (MHT) our fixed-base operator (FBO), Signature Flight Support, currently complies with NFPA 407, 2017 edition. All their mobile fuelers are already equipped with functional high-level shut-offs. To add another system to operate side by side with overfill protection is redundant. Signature has spent a lot of time, effort and money into training, mitigation of environmental impact, and equipment.

Additionally, Signature performs high level pre-checks three (3) times during the top off process. The top off area is also located on secondary containment that leads to a water/oil separator. These and other safety measures already in place address the potential for an overfill accident. I personally cannot recollect any spills here at MHT that were caused by the lack of such systems.

I strongly support TIA 1558 as proposed, and encourage you to do the same, thereby eliminating this redundant and costly requirement.

Respectfully,
~Jim

James M. Carrier  
Fire Chief

Manchester-Boston Regional Airport  
Aircraft Rescue and Fire Fighting Department  
402 Kelly Avenue  
Manchester, NH 03103

www.flymanchester.com
Foran, Rosanne

From: Tony Wright
Sent: Monday, March 15, 2021 10:06 AM
To: Shared TIAs
Subject: TIA 1558

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Dear committee Members,

As a long term FBO and aviation professional with over 30 years of experience I am writing to implore you to please vote yes to TIA 1558! The burden of needless requirements and added expenses for an unproven over spill protection system when there has not been a documented problem to the vast majority of fuel farms is borderline corrupt and at the very least unethical. The current protection systems have long proven effective, and there is no need for additional equipment to be installed.

Do the right thing, and don’t allow yourselves to be manipulated.

Thank you

Galaxy FBO
ANTHONY (TONY) WRIGHT | General Manager

WEB www.galaxyfbo.com

Galaxy FBO, 8812 Paul B. Kooce Street Houston, Texas 77081
WILLIAM P. HOBBY AIRPORT (KHOU)
From: Carlos Salinas  
Sent: Monday, March 15, 2021 12:45 PM  
To: Shared TIAs  
Subject: I support TIA 1558

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All,

• I support TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.  
• I manage a small county run FBO and have a longstanding safety and reliability record with my existing high-level shut off systems and operational procedures for bottom loading.  
• Please contact me below with questions.

Carlos V. Salinas  
Airport Administrator  
Pickens County Airport  
238 Airport Road,  
Liberty, SC. 29657  

www.co.pickens.sc.us
Galaxy FBO Holdings, LLC.
Conroe-North Houston Executive Airport
Conroe, Texas
936.494.4252
March 15, 2021

RE: NFPA 407

This letter is to express my enthusiastic support for NATA to challenge NFPA 407. NFPA has required the existing aviation fuel storage facilities and the mobile refueling trucks to undergo mandatory and costly alterations. No statistical data or studies have been performed that show or justify these alterations. The aviation refueling industry has safely transferred fuel into refueling vehicles for decades. Fuel trucks have been required and equipped with high-level shut off devices which close a valve to prevent spills. No incident or accident has occurred that could support additional safety measures.

Without the changes proposed by NATA TIA 1558 airports across the country will be faced with unnecessary costs which may exceed $12,000 per tank and truck. For the smaller airports and FBO’s across the country these costs will be hard to absorb.

I have managed FBO fueling operations at this Airport for over 14 years without any refueling accidents or incidents caused by overfilling a tank or truck and to add a secondary device at those costs is unwarranted.

Thank you for your time in reading this and in closing I support NATA’s proposed TIA 1558.

JOHN LOWRY | General Manager

WEB www.galaxyfbo.com
Dear Committee Members,

Please vote YES to TIA 1558!

My name is Hank Brown. I have been in the aviation industry for 63 years, and have owned FBOs in South Carolina for over 30 years. I started pumping fuel as a teenager and it has been a part of my life ever since. I have 25 years of corporate aircraft management experience, spent years servicing airlines such as Delta, Eastern and Southern Airways; and own FBOs at GMU, GYH and CDN. In all my decades in the industry, I have been involved with pumping more than 70 million gallons of fuel and have never once had an overfill spill incident of any kind.

As you are no doubt well aware, there has recently been a growing movement of great concern over the NFPA 407 section 5.1.12. So much so that there is now a 2nd TIA presented before you to remove the ridiculous requirement of installing additional equipment to currently installed overspill protection systems.

The fact that there is now a 2nd TIA should tell you something is wrong with this requirement. You should really take a closer look at what is at stake, and the lack of logic behind putting such requirements in the NFPA 407 in the first place. The current protection systems have long proven effective, and there is no need for additional equipment to be installed.

The estimated cost to install this additional equipment at all of our locations will be $85,000.

The direct result will be an immediate and substantial fuel price increase to our customers, which will wipe out some of the high-volume fuel discounts to corporate travelers. Not to mention the harmful impacts on flight school rates, cost to law enforcement air support, medical flights, and other customers we serve. The same will happen at the other 3,000 FBOs across the nation, and their customers will suffer, as well. The negative impact to the industry will be far reaching... unless you do the right thing and vote YES to TIA 1558!

You, the committee members, are in a position that holds great responsibility in helping to protect the aviation industry. You are obligated to make decisions that help keep FBOs and our customers protected from certain elements of harm. All of you are to be commended for the time and effort you put into your decisions, and I support your good work. However, in this case, I implore you to reconsider the ramifications of trying to fix something that is not broken. If you vote No to the current proposed TIA, it will result in massive needless harm to the industry you are duty-bound to protect.

I look forward to commending you again when you make the right decision, and vote YES to TIA 1558!

Sincerely,
Hank Brown, President/Owner
Greenville - Donaldson - Camden JET CENTERS, inc.
100 Tower DR
Greenville, SC 29607
From: Ryan Gauger
Sent: Monday, March 15, 2021 4:51 PM
To: Shared TIAs
Subject: Support of TIA 1558

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To Whom it may concern:

I would like to express my full support of TIA 1558. I am the President of a fueling operation in Salinas, CA. I have been working in the aircraft refueling industry since 1994. In my years of experience, I have never encountered a need for a Scully system in the operation. Our trucks and fuel farm are always attended to during fuel transfers. Primary shutoff systems are very reliable and tested each and every time a technician transfers product. This would be large expense for our operation and it will be at a time that is already a struggle due to COVID.

Thank you for your consideration,
Ryan Gauger, President
Jet West Inc.
280 Mortensen Ave.
Salinas, CA 93905
I am writing to you today to please...

- 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.

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

- I have been involved in general aviation since 1990 when I was a student pilot. Later I became a local airport commission member and currently serve on state wide aeronautics commission. I also own a single engine Cessna. During my time around airports I have never witnessed a fuel spill resulting from aircraft refueling. From what I understand increased requirements for fueling process will only add needless expenses with no discernible benefits.

- Doug Barnes

Lancaster SC

Sent from my iPad

Doug Barnes
From: Scotty Malta
Sent: Monday, March 15, 2021 6:00 PM
To: Shared TIAs
Cc: Caleb Whitby; Terry Blue, A.A.E; 'Justin Barkowski'; Lisa Edwards; admin@secaae.org; Jeremy Valcich; NATA President & CEO Timothy Obitts
Subject: Support for NATA TIA 1558 to NFPA 407

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Please accept the attached letter in support of the NATA TIA 1558 to the NFPA 407.

Thank you

Scotty

Scott Malta, A.A.E., C.A.E., Capt. USAF (Ret.)
Airport Manager
Moore County Airport
7825 Aviation Dr.
Carthage, NC 28327
March 15, 2017

Dear Committee Members,

Please vote YES to NATA’s Tentative Interim Amendment (TIA) 1558!

My name is Scott Malta. I have been in the aviation industry for over 40 years, and I have been the airport manager at the Moore County Airport, NC for the last year. I was an airport manager in CA for 18 years prior to my current location. According to my staff, the airport has owned and operated the FBO since 1992 and has never once had an overfill spill incident of any kind.

As you are no doubt well aware, there has recently been a growing movement of great concern over the NFPA 407 section 5.1.12. So much so that there is now a 2nd TIA presented before you to remove the ridiculous and unnecessary requirement of installing additional equipment to currently installed overspill protection systems.

The fact that there is now a 2nd TIA should tell you something is wrong with this requirement. You should really take a closer look at what is at stake, and the lack of logic behind putting such requirements in the NFPA 407 in the first place. The current protection systems have long proven effective, and there is no need for additional, expensive equipment to be installed.

The estimated cost to install this additional equipment at my airport (SOP) will be $40,000, which is a huge amount considering my revenue comes only from fuel sales, leases, and fees. Furthermore, it is estimated the cost nationally will be in excess of $100 million.

The direct result will be an immediate and substantial fuel price increase to our customers, which will wipe out some of the high-volume fuel discounts to corporate travelers. Not to mention the harmful impacts on flight school rates, cost to law enforcement air support, medical flights, military, military contractors, and other customers we serve. The same will happen at the other 3,000 FBOs across the nation, and their customers will suffer, as well. The negative impact to the industry will be far reaching… unless you do the right thing and vote YES to TIA 1558!

You, the committee members, are in a position that holds great responsibility in helping to protect the aviation industry. You are obligated to make decisions that help keep FBOs and our customers protected from certain elements of harm. All of you are to be commended for the time and effort you put into your decisions, and I support your good work.

However, in this case, I implore you to reconsider the ramifications of trying to fix something that is not broken. If you vote No to the current proposed TIA, it will result in massive needless harm to the industry you are duty-bound to protect.
I look forward to commending you again when you make the right decision and vote YES to TIA 1558!

Sincerely,

Scott C. Malta, A.A.E., C.A.E., Capt. USAF (Ret.)
Airport Manager

Cc: North Carolina Department of Transportation, Division of Aviation (NCDOT-DOA)
North Carolina Airports Association (NCAA)
Southeast Chapter AAAE (SEC-AAAЕ)
American Association of Airport Executives (AAAE)
National Air Transportation Association (NATA)
To Whom it may concern,

We agree with NATA's position that the retroactivity statement should be removed. We are open and flexible and will work to ensure all new equipment will follow the upgraded compliance request. We do believe it is a redundant safety fix that is an unnecessary expense for our current operation. The fact that World Fuel, Phillips 66, NATA, AvFuel - all industry-leaders - are saying the same thing is why we are asking for a review. Financially and also logistically, it is not an undertaking our company is able to take on. We have been in business since 1946 and have worked hard to be the safest operation we are able to be. We have met with our ARF leaders, our city Transportation Director and fellow FBOs on our airfield. Together, we agree we have the fix needed and will continue to be the best we can be.

--
Best,

Janna Caven
Administrative Director
Aberdeen Flying Service
Hertz/Thrifty/Dollar Rent-a-car
4430 E Hwy 12
Aberdeen, SD 57401

www.aberdeenflyingservice.com
From: Becky Barnes  
Sent: Tuesday, March 16, 2021 9:47 AM  
To: Shared TIAs  
Subject: Automatic "Scully Type" Shutdown Systems  

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NFPA or To whom it may concern:

We here at Shelbyville Municipal Airport support TIA 1558 and encourage the vote in favor of approval.

We take pride in our longtime records for safety and continue to promote with each employee on our daily checklist. Operation procedures our conducted with safety in mind and our current shut offs existing have always been reliable.

We are a small airport and I do not believe the expense of the new systems, NFPA 407, could be affordable for our Shelbyville Municipal Airport or would help us in anyway.

Thank you for your time
Sincerely,
Becky

Becky Barnes, Operations Coordinator  
Shelbyville Municipal Airport  
2828 Highway 231 North  
Shelbyville, Tennessee 37160

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Dear Committee Members:

Since May of 1983, I have been the Airport Director of the Greenville Downtown Airport in South Carolina. In my 38 years, we have never had a fuel overspill as a result of not having the equipment mandated by NFPA 407. The current protection systems that we have in place have proven effective. There is no need for additional equipment to be installed.

The estimated cost to install this unnecessary equipment at my airport is $30,000. It is estimated to cost our Nation's FBOs and airports $100 Million dollars! This will unnecessarily increase fuel prices and equipment maintenance costs, while resulting in little if any improvement in safety.

I normally appreciate all the work that you do to protect our aviation industry. In this case, however, I implore you to reconsider the costly ramifications of trying to fix something that is not broken.

Please vote YES to TIA 1558!

Sincerely yours,

Joseph R. Frasher, A.A.E.
Airport Director
Greenville Downtown Airport
100 Tower Drive, Unit 2
Greenville, SC 29607

Additional Credentials:
Bachelor of Aviation Management - Auburn University (1979)
2008 General Aviation Airport Manager of the Year for FAA Southern Region
Past Member of the South Carolina Aeronautics Commission (2005-2008)
Past President of South Carolina Aviation Association (SCAA)
Graduate of University of South Carolina School of Law (1982)
Member of South Carolina Bar
Former law clerk for George C. Kosko, Attorney at Law, who specialized in the practice of aviation related law
Private Pilot
Foran, Rosanne

From: Hank Duvall
Sent: Tuesday, March 16, 2021 10:36 AM
To: Shared TIAs
Subject: TIA 1558 Support

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

- I have worked at my Airport (KSCX) since 2007 and have had great results with our existing high-level shut off systems and operational procedures for bottom loading. Having to install this shutdown system on our refuelers would be costly to say the least and definitely not affordable for our small Airport.

- Contact Information Hank Duvall KSCX Manager

Sent from Mail for Windows 10
Foran, Rosanne

From: Randall Gober
Sent: Tuesday, March 16, 2021 11:05 AM
To: Shared TIAs
Subject: TIA 1558 Support

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Northeast Alabama Regional Aviation in Gadsden, Al is is support of passing TIA 1558. Is the NFPA knowledgeable about the systems already in place. Does NFPA know the cost to install, train and maintain such a redundant system?
At KGAD we have two 10000 gallon underground tanks, that use "the deadman system as well as the vehicles are all equipped with high level shutoff system, that have pre test installed to prevent any overfilling of our fuelling vehicles with 100% success rate.
The scully system is complex, cumbersome and does not have a 100% preventative record.
Not to mention the cost of installation and having to maintain such a system can be detrimental to most small operations in aviation.

Just show some commonsense and pass Tia 1558.

Thank You,

Randall Gober
KGAD Airport Manager
185 Ira Gray Dr.
Gadsden,Al 35904
I am the President of the Louisville-Winston County Airport Authority and, through our board, we administer the day to day operations of LMS. We offer both Avgas and JetA fueling by self serve and have plans to do so by fuel truck by mid year. Our current fuel farm tankage are equipped with high limit alarms to prevent over-fueling and spillage incidents. We will equip our recently acquired fuel truck with similar overflow protection. In addition, our airport manager has attended the requisite safety training for fuel handling, and we routinely both pre-check and perform a monthly inspection to insure that our overfill valves are operational. We have never had a fuel spill incident at our airport to my knowledge.

For this reason, we see no benefit to the proposed changes to NFPA 407 mandating the installation of “scully type” shutdown systems. We serve a community and county of 20,000 and the expense of these systems is beyond our budgetary capabilities. For this reason we strongly support TIA 1558 and encourage the NFPA Fuel Servicing and Tech Committee to vote in favor of approval.

Michael Forster
President
Louisville-Winston County Airport Authority
To whom it may concern,

The Vicksburg Tallulah Airport supports the TIA 1558. We are a small general aviation airport and these added costs would devastate us, especially while we are suffering from the COVID pandemic if the TIA 1558 is not approved. Our loading dock uses a dead-man on each fuel farm when bottom loading into our trucks which have the high level shutoffs on both. The dock is equipped with a catch basin with valves that are closed during refueling the trucks or taking in fuel off of a transport.

In closing, I hope that the committee votes in favor of TIA 1558.

Regards,

Randy Woods
Manager: Vicksburg Tallulah Regional
175 VTR Airport Rd.
Tallulah, La. 71282

http://www.vtrairport.com/
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We feel the requirement of NFPA 407 for installation of new automatic scully-type shutdown systems is both expensive and unnecessary. This new requirement places an undue burden on small airports.

We would like to voice our strong support of Tentative Interim Amendment 1558.

Thank you,
Doug Smith, Mgr.
Lawrenceburg/Lawrence County Airport
4110 Airport Dr.
Lawrenceburg, Tn. 38464
From: Thomas Harvin  
Sent: Tuesday, March 16, 2021 11:56 AM  
To: Shared TIAs  
Subject: TIA 1558 Support  

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Clarendon County/Santee Cooper Regional support TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

We operate a small airport with a longstanding safety and reliability of your existing high-level shut off systems and operational procedures for bottom loading.

Thomas L Harvin, Operations Manager  
Clarendon County/Santee Cooper Regional Airport
Foran, Rosanne

From: Cheri Little
Sent: Tuesday, March 16, 2021 12:29 PM
To: Shared TIAs
Subject: TIA 1558
Attachments: Letter to the Committee.pdf

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Dear Committee Members,

Please see attached .pdf for my comment submission regarding TIA 1558.

Thank you!

Cheri Little
Manager
Donaldson Jet Center
Dear Committee Members,

My name is Cheri Little. I am the manager of Donaldson Jet Center in Greenville, South Carolina. I have been involved in the aviation industry starting in 1993 when I acquired my private pilot's license. I began working at the Greenville Jet Center in 2012 and moved laterally to Donaldson Jet Center in 2013 to assume the role of FBO Manager. In the eight years I have served in this capacity, I have been privileged to work with some of the most professional, well trained, and safety conscience individuals in the aviation fueling industry. The safety measures achieved through rigorous safety courses, recurrent testing, frequent inspections, and the highest company expectations have resulted in NO overfill spill incidents in the history of this company!

My purpose in writing this letter is to implore you to vote YES concerning TIA 1558! It is of great concern to me that the NFPA 407 section 5.1.12 is pushing for additional safety equipment to be added to already effective fueling equipment. The excessive costs associated with this requirement will cause financial hardship to be felt throughout the FBO community. The additional measure is simply overkill and NOT needed! Since the safety measures, and currently installed overspill protection systems are already in place and working well, it makes no sense to impose undue hardship on this company and other FBO's. They are already fueling at a high level of proficiency, and achieving the safest results! There is simply not a problem with the current system!

I respectfully implore you to consider the financial implications and negative impact of a “no” vote to the current proposed TIA. You have this chance to make this right. Please protect us from this overreach and VOTE YES!!

Again, I respectfully implore you to please vote YES to TIA 1558.

Sincerely,

Cheri Little/ Manager - Donaldson Jet Center
From: Kevin C. Harvey  
Sent: Tuesday, March 16, 2021 12:32 PM  
To: Shared TIAs  
Subject: TIA 1558

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Vote YES to TIA 1558
From: Timothy Burke
Sent: Tuesday, March 16, 2021 1:06 PM
To: Shared TIAs
Subject: Support for NATA TIA 1558 to NFPA 407

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To whom it may concern,

I am writing to voice my support for TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

SUN Airport is a Non-Primary Commercial Service Airport with a near perfect safety record and a commitment to safety and reliability. Our existing infrastructure has a proven reliability for high-level shut off and operational procedures for bottom loading. Our primary concern with this financially crippling provision is that NFPA has not conducted any safety risk assessments to justify the need for any additional equipment. Our airport has not experienced have not experienced any of the incidents that these systems are designed to prevent.

If the TIA is not approved our Airport risks a financial burden that is simply not justifiable.

If you have any questions, feel free to contact me.

Tim Burke
Airport Operations Manager
Friedman Memorial Airport
1616 Airport Circle
Hailey, ID 83333

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From: Jody Weisner
Sent: Tuesday, March 16, 2021 1:23 PM
To: Shared TIAs
Subject: TIA 1558

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Dear Committee Members,

**Please Vote YES to TIA 1558!**

My name is Jody Weisner. I have worked Line Service and worn many other hats at the Greenville Downtown Airport in South Carolina for over 20 years. In my time here, there has never been a single overfill incident, or any incident period, at our fuel farm facility. We have existing equipment and procedures already in place that provide effective safety measures to prevent such events from happening. There is no justification for us being forced to incur the cost of installing additional equipment that is totally unnecessary.

I realize my comments, as well as the comments of others, are coming to you at the last minute. But it is only recently that the vast majority of us have come to truly realize the monstrous cost of compliance and the depth of irrelevance stated in the requirements of NFPA 407 section 5.1.12. Thank goodness this section of the NFPA 407 is no longer flying under the radar and is now getting the attention it deserves and needs!

It's not too late to remove these requirements. We, and other FBOs across the nation, are counting on you to prevent the forced spending of so much money on something that is completely unjustified and unnecessary.

Vote YES to TIA 1558!

Jody Weisner
Director of Operations
Greenville Jet Center
100 Tower Dr
Greenville, SC 29607
From: Tim Wasyluka  
Sent: Tuesday, March 16, 2021 12:27 PM  
To: Shared TIAs  
Subject: Comment on Proposed TIA 1558 on NFPA 407

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NFPA Aircraft Fuel Servicing Technical Committee:

I am writing to you today in support of TIA 1558 and to request that the NFPA Aircraft Fuel Servicing Technical Committee approve this critical TIA.

The Bessemer Municipal Airport (EKY), located in Central Alabama, is designated as a Reliever Airport for Birmingham-Shuttlesworth International Airport. The Bessemer Airport Authority (BAA), a non-profit corporation, operates EKY on behalf of the City of Bessemer.

EKY is committed to providing a safe airport environment above all else, while efficiently operating this important community resource. In addition to an active general aviation community, EKY also supports law enforcement entities, medevac operations, light freight and regional economic development through our growing corporate aviation clientele base. These activities generate roughly $1.3M in annual revenue for EKY from fuel sales, fees, hangar rent and land leases.

BAA has been providing all aircraft fueling services at EKY since September of 2010. I have been involved with EKY aircraft fueling services during this entire period, handling fueling, training and management responsibilities. During this period 20 fuelers have been trained and have delivered over 2,300,000 gallons of fuel. During this time the multi-level safety systems deployed at EKY, including functional high level shut off systems, pre-check training, dead-man usage and fully attended fuel transfer operations have resulted in no incidents where NFPA’s current requirement for automatic shutdown systems would have been of benefit.

Over 10 years - Over 2,300,000 gallons - Zero incidents requiring automatic shutdown systems.

Requiring EKY to incur the significant cost to install superfluous automatic shutdown systems on our two fuel farm loading racks and two fuel trucks will create a substantial negative impact on our ability to properly service the aviation community. This situation can be remedied by your adoption of TIA 1558. Please approve TIA 1558.

Thank you for considering my comment and request. Please do not hesitate to reach out to me with any questions that come to mind.

Best regards,

Tim Wasyluka  
Executive Director  

Bessemer Airport Authority  
Bessemer Municipal Airport  
900 Mitchell Field Road  
Bessemer, AL 35022
Hello,

Please note that the Columbus Regional Airport Authority supports the efforts in TIA 1558.

Being in Aviation Fueling for over 21 years the current high-level shutoff systems installed on mobile aircraft refuelers is a safe and effective means of stopping the loading process through bottom loadings and closing of the internal valve on the refueler. The required pre-check of the high-level shutoff system ensures its operation during each and every mobile refueler loading.

Please find my contact information in my signature below if you need any further information.

Thank you,

Tony Kyer
Senior Manager | Fixed Base Operations | Rickenbacker Aviation| Bolton Aviation

Columbus Regional Airport Authority
7250 Star Check Drive | Columbus, OH 43217
Columbusairports.com
Good afternoon,
Please see our attached document in support of TIA 1558.

Respectfully,
Malcolm Pledger
American Refueler Equipment Co. Inc.
PO Box 9849
Birmingham, AL 35220
American Refueler Equipment Co., Inc
P.O. Box 9849
Birmingham, AL 35220

Greetings,

American Refueler Equipment Company, Inc. supports NATA’s TIA 1558. We have used Hi-Level Shut-Downs on Refuelers for thirty-seven years. Our normal production yearly is 35-45 Refuelers - we have no failures on balanced valves with Hi-Level Shut-Down. Airport’s controlled by cities and county government could not handle the expense to modify Fuel Shut-Downs at storage. There are thousands of small airports that have this condition. Additionally, many small operations top load estimated cost per Fuel Farm is $7,500.00 to $11,000.00. The cost for Refuelers to add Bottom Loading with Jet Level Sensors is $6,500.00 estimated.

Respectfully,

Malcolm Pledger – President

March 16, 2021
Foran, Rosanne

From: Reneé Melvin, C.M., ACE
Sent: Tuesday, March 16, 2021 2:45 PM
To: Shared TIAs
Subject: Vote YES to TIA 1558

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Here at the Charleston County Aviation Authority are in support of TIA 1558 and encourage NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval of TIA 1558!

The Charleston County Aviation Authority own and operate three (3) Airports along with multiple FBOs under our jurisdiction: The Charleston International Airport - KCHS (Commercial Aviation fueler Allied Aviation, FBOs: Signature, and Atlantic Aviation), Mount Pleasant Regional Airport - KLRO (GA Airport managed by CHS Airport), and Charleston Executive Airport- KJZI (GA Airport Managed by Atlantic Aviation) all of which buy and sale aviation fuel and use the existing high-level shut off systems and operational procedures for bottom loading and during this time of utilization of this current system we have not incurred any overfill spill incident.

Given the NATA’s figures of $2,500-$3,500 per truck and $6,000- $10,000 per loading rack (using $3,500 for truck and $10,000 per loading rack) that would cost us (cumulatively) $209,500 to replace the systems on a minimum of 15 loading racks (4 for Allied, 2 for Signature, 3 for Atlantic, 2 for Atlantic’s Reserve Tanks, 2 for Mt. Pleasant, and 2 for JZI) and 17 trucks (6 for Allied, 4 for Atlantic CHS, 3 for Signature, 2 for LRO, and 2 for JZI) plus any additional expenditures for training and maintenance of the new systems.

Please Vote YES to TIA 1558

Best Regards,
Renee’

Reneé Melvin, C.M., ACE
SUPERVISOR OF AIRPORT OPERATIONS

Charleston County Aviation Authority
5500 International Blvd #101
North Charleston, SC 29418-6911
iflyCHS.com

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Good afternoon NFPA Staff,

Please see the attached letter of support for TIA 1558 which was mailed to our Washington DC Office.

Thank you,

Steve Berry
Manager of Fuel Quality and Safety
National Air Transportation Association
02-12-2021

National Air Transportation Association
818 Connecticut Ave.
Suite 900
Washington, D.C. 20006

To whom it may concern:

I am writing this letter to express my clear support for TIA 1558 and I would like to encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

Our company has been operating an FBO facility in Liberal, Kansas for over thirty years. During that time, we have upgraded our fueling facilities to meet current regulations and safety standards, as required, without complaint. Keeping our facility updated has allowed us to operate without a fuel spill or containment issue during those thirty years.

It is my opinion that the current regulations and safety procedures are adequate for the task performed. The more you automate the process, the more personnel will rely on the automated procedures. Next, the additional required equipment will lead to more failures. Then, with personnel relying on the automated procedures, more fuel spills will occur. I think one of the biggest reasons that we have not suffered a fuel incident is, we require our personnel to physically observe fuel levels in the tank, by being on top of the truck tank, with a dead-man control in hand, as the truck is being serviced.

The last thing I would like to mention is the cost. I do not think I need to remind anyone, that in today's environment many operators are struggling to stay open as we enter the second year of this pandemic. So, I think the question is: Does the increase in safety justify the cost involved to implement the regulations? In my opinion—NO, the timing could not be worse.

If you have any questions, please feel free to call me at 620-624-1646.

Bill Lyndon
Partner
Lyndon Aero Center, Inc.
From: Dusan Fridl
Sent: Tuesday, March 16, 2021 4:06 PM
To: Shared TIAs
Subject: NATA TIA

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Lake City Municipal Airport, Lake City, SC (51J) supports NATA TIA position.

Dusan Fridl
Chief Engineer
Aerospace Division
150 Godley Morris Blvd
Lake City, SC  29560
www.carbonconversions.com
From: Gould Jr., Steven A.  
Sent: Tuesday, March 16, 2021 4:41 PM  
To: Shared TIAs  
Subject: UZA Supports TIA 1558

Members of the NFPA Aircraft Fuel Servicing Technical Committee:

I am writing to you today regarding the newly proposed TIA 1558. The Rock Hill – York County Airport (UZA) overwhelmingly supports TIA 1558 and we encourage you to support and vote in favor of approval as well. UZA is a general aviation reliever airport and has operated under NFPA 407 guidelines for decades without a single incident of concern.

Our operation of aviation fueling has been safely performing bottom loading operations of mobile refueling vehicles for decades without the use of automatic shutoffs at loading racks. There are already requirements included in NFPA 407 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. These devices are also tested before every loading operation to ensure they work. When operated properly under the existing requirements defined in 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. There have been no statistical data or studies performed indicating that the requirements in section 5.1.12 and related requirements in section 6.1.3.12.2 are necessary or justified.

If TIA 1558 is not approved, the financial impact on our airport will be in the tens of thousands of dollars. This type of impact could and will be catastrophic for many airports across the country. Most of the general aviation community, including UZA, were unaware of the true impact they would face if the requirements of 5.1.12 and related sections in 6.1.3.12.2 were to be included in TIA 1558.

We all appreciate the work NFPA contributes to the safety of our aviation communities and we hope you will support the approval of the newly proposed TIA 1558.

Respectfully,

Steve

Steven A. Gould Jr., C. M.  
Airport Director  
Rock Hill-York County Airport  
550 Airport Road, Suite 205  
Rock Hill, South Carolina 29732

www.flyrockhill.com
Foran, Rosanne

From: Stacy Thomas  
Sent: Tuesday, March 16, 2021 4:48 PM  
To: Shared TIAs  
Subject: Support TIA 1558

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Members of the NFPA Aircraft Fuel Servicing Technical Committee:

I am writing to you today regarding the newly proposed TIA 1558. The Berkeley County Airport (KMKS) overwhelmingly supports TIA 1558 and we encourage you to support and vote in favor of approval as well. KMKS is a general aviation airport and has operated under NFPA 407 guidelines for decades without a single incident of concern.

Our operation of aviation fueling has safely performed bottom loading operations of mobile refueling vehicles historically without the use of automatic shutoffs at loading racks. There are already requirements included in NFPA 407 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 refueeler when full. These devices are also tested before every loading operation to ensure they work. When operated properly under the existing requirements defined in 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. There have been no statistical data or studies performed indicating that the requirements in section 5.1.12 and related requirements in section 6.1.3.12.2 are necessary or justified.

If TIA 1558 is not approved, the financial impact on our airport could be in the tens of thousands of dollars. This type of an impact could and will be catastrophic for many airports across the country. Most of the general aviation community, including KMKS, were unaware of the true impact they would face if the requirements of 5.1.12 and related sections in 6.1.3.12.2 were to be included in TIA 1558.

We all appreciate the work NFPA contributes to the safety of our aviation communities and we hope you will support the approval of the newly proposed TIA 1558.

Respectfully,

Stacy Y. Thomas

Stacy Y. Thomas
Airport Services: Airport Manager

www.berkeleycountysc.gov
1003 US Highway 52 Moncks Corner, SC 29461
Foran, Rosanne

From: Jeff Bilyeu
Sent: Tuesday, March 16, 2021 5:03 PM
To: Shared TIAs
Subject: TIA 1558

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Please accept this correspondence as support for and a request that the NFPA Aircraft Fueling Servicing Technical Committee vote in favor of TIA 1558.

This airport sponsor is also the FBO fueling agent on the airport. We currently have in place strong and effective procedures and processes in place designed to safely and reliably prevent any aviation fuel spills associated with bottom loading of refueling equipment.

It is my understanding that the NFPA has conducted no safety risk assessments to justify the need for the proposed additional equipment. In addition, this airport and associated fueling facilities has not to this date, experienced any incidents that these proposed systems are designed to prevent.

The financial impact on this airport sponsor and fueling agent would be severe, having two separate fuel farms with multiple tanks in each, and multiple fueling trucks that service aircraft.

I humbly and strongly encourage the committee to approve the TIA and prevent this unneeded hardship for this particular airport and fueling agent.

Regards,

Jeff

JEFF BILYEU, AAE | Aviation Director
Texas Gulf Coast Regional Airport
8000 Airport Way, Angleton, Texas 77515
www.flylbx.org

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Members of the NFPA Aircraft Fuel Servicing Technical Committee:

I am writing to you today regarding the newly proposed TIA 1558. Skytech, the FBO at Rock Hill, SC overwhelmingly supports TIA 1558 and we encourage you to support and vote in favor of approval as well. UZA is a general aviation reliever airport and has operated under NFPA 407 guidelines for decades without a single incident of concern.

Our operation of aviation fueling has been safely performing bottom loading operations of mobile refueling vehicles for decades without the use of automatic shutoffs at loading racks. There are already requirements included in NFPA 407 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. These devices are also tested before every loading operation to ensure they work. When operated properly under the existing requirements defined in 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. There have been no statistical data or studies performed indicating that the requirements in section 5.1.12 and related requirements in section 6.1.3.12.2 are necessary or justified.

If TIA 1558 is not approved, the financial impact on our airport will be in the tens of thousands of dollars. This type of an impact could and will be catastrophic for many airports across the country. Most of the general aviation community, including UZA, were unaware of the true impact they would face if the requirements of 5.1.12 and related sections in 6.1.3.12.2 were to be included in TIA 1558.

We all appreciate the work NFPA contributes to the safety of our aviation communities and we hope you will support the approval of the newly proposed TIA 1558.

Respectfully,

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

www.skytechinc.com

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Skytech Advantage!
From: Popovich, Brandon - WACC  
Sent: Tuesday, March 16, 2021 6:32 PM  
To: Shared TIAs  
Subject: Wilson Air Center comment on proposed TIA 1558  
Attachments: TIA 1558 Letter.docx

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Re: TIA 1558  
NFPA Aircraft Fuel Servicing Technical Committee-  
Please consider this attached letter from Wilson Air Center as our support for TIA 1558.  

Regards,

Seek Perfection, Find Excellence

Brandon Popovich  
Regional Safety Manager  
Address: 5400 Airport Drive Charlotte, NC 28208
Re: TIA 1558

In response to the proposed changes to NFPA 407 and specifically 5.1.12, and 6.1.3.12.2.7 through 6.1.3.12.2.9 of NFPA 407, Wilson Air Center supports the efforts found in TIA 1558. Wilson Air Center also encourages the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of TIA 1558 as this amendment illustrates the removal of the unnecessary high level shut-off systems at fuel farms that are compatible with mobile refuelers.

Wilson Air Center is a member of the National Air Transportation Association and is fully cooperative and certified under the demanding NATA Safety 1st Training Center. Along with the Safety 1st training, Wilson Air Center employs a stringent training program that incorporates strict requirements for refilling mobile refuelers at our fuel farms as well as the transfer of fuel from tanker to storage tank. These efforts would not benefit from the introduction of another over-fill system; however, it would only cause undue stress both financially and physically to our workload as our technicians would have yet another system to maintain.

The FBO industry works hard to maintain its’ safety record. Additionally, the financial burden placed on FBO’s could lead to smaller business’ being unable to comply which could lead to closing the doors permanently. Another factor to consider is the increase in fuel price or general services as FBO’s would have to pay for the initial cost of the system. In addition to cost, FBO’s would have to coordinate with their current fuel transport company to ensure compatibility with the shut-off system. Additional expenses could arise from the difference in transport companies and the fuel farm system installed.

We ask the NFPA Aircraft Fuel Servicing Technical Committee to highly consider TIA 1558 and its intended purpose. The safety standards maintained and that are currently implemented have proved to be quite effective in the prevention of a spill due to over-filling; the safety track record is impressive. The lack of data showing spills caused by over-filling is a sure sign that the current standards are working and are not in need of revision. The safety systems for bottom loading mobile refuelers are working and as an industry, we hold each other accountable to not only train fuel handling techs with a known and professional company but maintain in-house procedures that exceed current standards.

Regards,

Brandon Popovich

Brandon Popovich
Regional Safety Manager
Wilson Air Center
Good afternoon,

I, Daniel Gonzalez, support TÍA 1558 and encourage the NFPA aircraft fuel servicing technical committee to vote in favor of approval.
I have worked at American Aero FTW for 14 years and never had an issue with our existing high level shut off system and operational procedures for bottom loading.

Daniel González
American Aero FTW
Fort Worth TX 76110
Line service Manager

Get Outlook for iOS
From: john hudson  
Sent: Wednesday, March 17, 2021 8:38 AM  
To: Shared TIAs  
Subject: yes

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I vote yes to TIA 1558

john hudson, williamsburg regional airport
Foran, Rosanne

From: Bryan, Denise
Sent: Wednesday, March 17, 2021 9:39 AM
To: Shared TIAs
Cc: Stephens, James
Subject: Please vote YES to TIA 1558!

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Fairfield County Airport in Winnsboro, SC (KFDW) supports vote YES to TIA 1558.

Thank you,
Denise Bryan C.M.
Fairfield County Airport Director
1291 Airport Runway Rd.
Winnsboro, SC 29180
Foran, Rosanne

From: Keith Roach
Sent: Wednesday, March 17, 2021 10:30 AM
To: Shared TIAs
Subject: TIA 1558

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As manager of the Chester-Catawba Regional Airport I am in total support of a vote of yes on TIA 1558 as we have never experienced any problems with fueling procedures of the past that would justify the enormous cost.

Keith Roach

Airport Manager

Chester Catawba Regional Airport
To Whom It May Concern: TIAs Errata

The Blair Airport Authority, Blair, Nebraska (KBTA) strongly supports the adoption of TIA 1558, and urges the NFPA Aircraft Fuel Servicing Technical Committee to vote for its approval. The Blair Airport Authority takes safety very seriously and works hard with fuel suppliers to make sure off loading is constantly monitored to avoid any potential safety concerns. As a small airport we do not have the funds to add additional unnecessary and expensive equipment that does little or nothing to promote real aviation safety, especially since NFPA has not conducted any safety risk assessments to justify the need for any additional equipment. The City of Blair and Blair Airport Authority has operated an airport fueling facility since the mid fifties and has never had an overflow from filling operations. Again, we strongly urge the NFPA Aircraft Fuel Servicing Technical Committee to vote for the adoption of TIA 1588, to help Airports avoid this necessary and unneeded financial burden.

Sincerely,

Rodney Storm
City Administrator/Airport Manager
City of Blair, NE
Blair Airport Authority
Foran, Rosanne

From: Kathy R. Cleveland
Sent: Wednesday, March 17, 2021 11:11 AM
To: Shared TIA's
Cc: Brett Garrison
Subject: Please vote YES to TIA 1558!
Importance: HIGH

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Dear Committee Members,

Please vote YES to TIA 1558!

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

Anderson County has operated a Part 139 Airport with fueling services here for over 20 years, with private FBO's operating the prior 50 years, without incident. Our existing high-level shut off systems and operational procedures for bottom loading are reliable and have a longstanding safety record (zero overfill spill incidents). The current protection systems have long proven effective, and there is no need for additional equipment to be installed. The expense to install additional equipment would be extremely cost-prohibitive and would significantly impact our operations and customers in a negative way.

Please feel free to contact us if you need any other information.

Brett Garrison
Airport Manager

Anderson Regional Airport
5805 Airport Rd.
Anderson, SC 29626
From: Sharlette Wright  
Sent: Wednesday, March 17, 2021 12:45 PM  
To: Shared TIAs  
Subject: Comment on Proposed TIA 1558 on NFPA 407

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On behalf of Cleburne Regional Airport and the members of the Texas Airports Council I would like to state we support TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

I have been an airport manager for 20 years and managed various airports. Myself and airport managers across the state of Texas have all maintained a longstanding level of safety and reliability with our existing high-level shut off systems and operational procedures for bottom loading. The addition of unnecessary systems would be detrimental to the GA airports and the municipalities that own them.

Sharlette Wright, C.M.  
President, Texas Airports Council

---

**Sharlette Wright, C.M.**  
Airport Manager  
1650 Airport Dr  
Cleburne, Texas 76033

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**ATTENTION PUBLIC OFFICIALS**  
A 'Reply-All' of this email could lead to violations of the Texas Open Meetings Act. Please reply only to the sender.
From: Glen Spaugh  
Sent: Wednesday, March 17, 2021 1:44 PM  
To: Shared TIAs  
Cc: Mark Kruger  
Subject: TIA 1558 for Code 407  
Attachments: NFPA March 2021.pdf

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Please see the attached letter of support.

Regards,

_Glen E. Spaugh_  
*City Manager*  
P.O. Box 310  
Gordon, NE 69343
NATIONAL FIRE PROTECTION ASSOCIATION
NEBRASKA FIRE MARSHALLS OFFICE

Date: March 17, 2021

RE: NFPA 407 – Standard for Aircraft Servicing

I was recently made aware of new regulations for automatic shutdown systems at airport loading racks under NFPA Code 407. In response to the new guidelines, I want to express my full support for the Tentative Interim Amendment 1558 from the National Air Transportation Association.

Our airport services the City of Gordon, which has a population of 1,733 residents and is a general aviation airport. Our primary air traffic business is from local or transient pilots, as well as air ambulance services which transport patients from the local hospital to other regional health facilities. We have averaged 4,740 gallons of 100LL AV fuel, per year, over the last twenty (20) years; which translates to just under 400 gallons-a-month.

Our current system has a manual shutoff and we have not experienced any issues. The cost of any automatic shutdown system would greatly, and negatively, impact the financial status of our airport by absorbing up to 50% of our income from the sales of fuel. Also, as this is an unexpected expense, it is not included in our budget for the current fiscal year, 2020-2021.

I fully support fueling safety at every airport, but feel that this is not an efficient or necessary way to expend the limited funds which we have; plus, the fact that our safety record has been good through the years.

Sincerely,

Glen E. Spaugh
Airport & City Manager
To Whom it may concern: We the Board of Arapahoe Municipal Airport (37V) support Tia 1558 100%.

We have not the budget nor logical reason to change our existing fuel system. The current system has been in operation for 35 years with no incidents. Safety is our FIRST and LAST concern! We would entertain a safety assessment that proves different.

Sincerely, Arapahoe Municipal Airport (37V) Board

Todd Weverka
Foran, Rosanne

From: Mark Johnson
Sent: Wednesday, March 17, 2021 2:17 PM
To: Shared TIAs
Subject: support for TIA 1558

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I would like to provide support for TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

We are a General Aviation airport located in southeast Michigan. We have a fuel farm with both 100LL and Jet-A and three fuel delivery trucks. All of our delivery trucks have a high fuel shutoff system and we utilize a dead-man device when fueling the trucks. The high fuel shutoff systems have never had a failure and fueling operations are closely monitored by airport staff when bottom loading the trucks. I do not believe that further regulations are necessary regarding this issue.

Sincerely,

Mark D. Johnson
Airport Manager
Livingston County Spencer J. Hardy Airport
3399 County Airport Drive
Howell, MI 48855
Foran, Rosanne

From: Christopher Oswald
Sent: Wednesday, March 17, 2021 3:02 PM
To: Shared TIAs
Subject: Comment: Proposed TIA 1558 concerning NFPA 407
Attachments: ACI-NA TIF 1558 Comments.pdf

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NFPA Standards Secretariat:


We appreciate the opportunity to submit these comments on behalf of North American airport operators. Please contact me if you have questions.

Regards,
Chris

---

Christopher Oswald  
Senior Vice President, Safety and Regulatory Affairs  
Airports Council International – North America  
1615 L Street NW, Suite 300 | Washington, DC 20036  
| airportscouncil.org  
facebook | twitter | linkedin

ACI-NA recently switched web domains from aci-na.org to airportscouncil.org. Please be sure to update my contact information to reflect my new email address – coswald@airportscouncil.org

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March 17, 2021

Ms. Dawn Bellis  
Director and NFPA Standards Council Secretary  
National Fire Protection Association  
800 Independence Avenue  
Washington, DC 20591  
(Submitted via email to TiAs_Errata_Fls@nfpa.org)

Dear Ms. Bellis:

ACI-NA represents the local, regional and state governing bodies that own and operate commercial airports in the United States and Canada. ACI-NA is the largest of the five worldwide regions of the Airports Council International (ACI). Our members represent more than 300 airports operating in the United States and Canada and nearly 400 aviation-related businesses.

We are writing today in support for the proposed Tentative Interim Amendment (TIA) 1558, proposed by Steve Berry from the National Air Transport Association (NATA), regarding NFPA 407, Standard for Aircraft Fuel Servicing.

As Mr. Berry notes in the TIA, requirements to install additional shutoff systems on aircraft fuel vehicle servicing racks included in the 2017 version of NFPA 407 do not address demonstrated fire safety issues and would necessitate costly retrofits of both fuel racks and fueling vehicles with duplicative equipment.

These retrofits would be required for all U.S. airports certificated under the provisions of 14 CFR Part 139 and any airports that have committed to FAA grant assurances. This is because the FAA incorporates NFPA 407 standards by reference in Advisory Circular (AC) 5230-4B, Aircraft Fuel Storage, Handling, Training, and Delivery. Over 3,000 airports in the United States are facing new regulatory requirements as a result.

Airport operators and their tenants—including fixed base operators, ground service providers, and airlines—have experienced unprecedented and continuing financial hardships as a result of the COVID-19 pandemic. Implementation of costly new mandates without clear safety justification are inappropriate at any time, but are starkly so in the current environment.
Again, on behalf of the airport community that ACI-NA represents, we appreciate the opportunity to provide our support for TIA 1558 and encourage the Technical Committee to give it due consideration. Please contact me either at coswald@airportscouncil.org or 202.293.4539 if you have questions or need additional information.

Sincerely,

Christopher J. Oswald
Senior Vice President, Safety & Regulatory Affairs
Dear Sir / Madam:

I am an environmental consultant and also a National Air Transportation Association (NATA) member. Over the course of the last 15 years, I have written over 300 Spill Prevention Control and Countermeasures (SPCC) Plans across the nation and have participated in several committees for the NATA over the years. Recently, there has been a lot of discussion regarding the new revisions to the National Fire Protection Association (NFPA) Standard 407, Standard for Aircraft Fuel Servicing. Very few facilities that I have visited have the automatic shutdown system (Scully System) that is required under new standard. Even though the NFPA is trying to limit the impact to only Part 139 airports, it will have a more far-reaching effect because all airports that receive federal grants under the Airport Improvement and Passenger Facility Charge (AIP) program must comply with NFPA-407 in order to receive the grants. This grant money is extremely important for all airports, but especially for small airports. Many of these small airports are in small rural counties and there is not sufficient funding for projects locally without the AIP program. It is truly a lifeline to keep these small airports open to the public. Placing a requirement for an expensive automatic system on these small airports would be devastating. It is my understanding that the automatic shutdown systems required by the new NFPA-407 standard would cost between $6,000 and $10,000 per fuel farm and an additional $2,500 to $3,500 per refueler truck.

Under the previous standard, bottom loading refueler trucks were required to be equipped with a high level shut-off device which is checked before each loading operation begins. This system has worked very well for the aviation industry and especially for small airports in that it is built into the refueler truck and the airport does not need to invest in additional equipment. In comparison to the EPAs requirements for loading / unloading areas under the Spill Protection Control and Countermeasures (SPCC) Rule, there is sufficient flexibility in the rule to allow both curbed containment areas at the tank farm and also use of the spill kit (active containment system) to respond to spills. This flexibility is very important for these small airports. Many of these small airports have the fuel tanks on the edge of the ramp and fuel deliveries and refueler filling will take place right in front of the tank system. I would encourage the NFPA to provide some flexibility in the standard to allow a more simple solution for smaller airports.

The NATA has submitted TIA-1558 to request some relief from this new standard. I hope the committee will consider the NATA’s request and provide that needed relief.

George S. Gamble, PE
2G Environmental, LLC
From: Cathy Herring  
Sent: Wednesday, March 17, 2021 3:50 PM  
To: Shared TIAs  
Cc: Ken Moen  
Subject: Response to TIA 1558  
Attachments: 2021 March 17 SWAAAE Comment on Proposed TIA 1558 on NFPA 407 V2 (003).pdf  
Importance: High

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To Whom It May Concern,

Please find attached the Southwest Chapter of the American Association of Airport Executives’ response to TIA 1558.

Thank you,

Cathy Herring  
Executive Director  
Southwest Chapter of American Association of Airport Executives  
107 S. Southgate Dr. * Chandler, AZ 85226  
www.swaaae.org

Association Management Services provided: KCA, www.kc-a.com
SOUTHWEST CHAPTER of the AMERICAN ASSOCIATION OF AIRPORT EXECUTIVES

March 17, 2021

To Whom it May Concern,

The Southwest Chapter of the American Association of Airport Executives (SWAAAE) includes members in the states of Arizona, California, Hawaii, and Nevada. We represent a wide range of airports including large commercial to general aviation.

On behalf of our SWAAAE airport members, this letter is to support the Tentative Interim Amendment (TIA) 1558 which would assist in relieving airports from unnecessary requirements set forth in the new NFPA 407 provisions set to take effect on June 2, 2021. We encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval of TIA 1558.

There is no indication that the NFPA has conducted any safety risk assessments to justify the need for any additional required equipment identified in section 5.1.12 and related requirements in section 6.1.3.12.2. Our member airports report that they have not experienced any of the incidents that these systems are designed to prevent. 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. 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 function. 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. Our general aviation airports will be affected by the requirements of 5.1.12 and related sections in 6.1.3.12.2.

Again, on behalf of our general aviation airport members, this letter supports the Tentative Interim Amendment (TIA) 1558 which would assist in relieving airports from unnecessary requirements set forth in the new NFPA 407 provisions. Ken Moen, SWAAAE Chair, Legislative Committee, may be contacted for any additional information.

Sincerely,

Judy Ross, A.A.E., C.A.E.
President
Southwest Chapter of the American Association of Airport Executives
Dear Committee Members,

Please vote YES to TIA 1558!

The requirement of installing additional equipment to currently installed overspill protection systems is not necessary and would put a substantial burden on the 3000 FBOs across the nation.

As the owner of two FBOs that support recreational, corporate, and medical flights, the direct result will be an immediate and substantial fuel price increase to our customers, and it will have a far reaching negative impact on the aviation industry.

We look forward to you protecting our industry by making the right decision to vote YES to TIA 1558!

Sincerely,

Leah Kadar-Hodd on behalf of Michael Laver, President

Aiken Aviation Enterprises, Inc. (AIK)
129 Airport Blvd
Aiken, SC 29805

Glendale Aero Services (GEU)
6841 N. Glen Harbor Blvd.
Glendale, AZ 85307

Leah Kadar-Hodd
Customer Support
Air 1st Aviation Companies, Inc.
www.Air1st.com
www.MU2World.com
From: Lisa Carr  
Sent: Wednesday, March 17, 2021 4:38 PM  
To: Shared TIA  
Subject: FW: Comment on Proposed TIA 1558 on NFPA 407  
Attachments: Letter of Support for pending Tentative Interim Amendment 1558.pdf  

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Please see attached letter of support for TIA 1558 from the Gerald R. Ford International Airport.  

Thank you for your consideration,  

Lisa Carr, C.M., P.E.M., C.T.A. | Public Safety & Operations Director  
Gerald R. Ford International Airport Authority  
5500 44th St. SE, Grand Rapids, MI 49512  

This message has been prepared on resources owned by the Gerald R. Ford International Airport Authority (GFIAA). It is subject to the Acceptable Use Policy of GFIAA.
Date: March 16, 2021

From: Lisa Carr, Director of Public Safety & Operations
       Gerald R. Ford International Airport Authority

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)

Dear Members of NFPA 407 Technical Committee,

The Gerald R. Ford International Airport Authority (GFIAA), Grand Rapids, Michigan supports TIA 1558, which calls for complete removal of the requirements for automatic shutdown systems at airport loading racks that are also compatible with mobile refuelers.

Existing safety mechanisms and best management practices are already in place without mandates to retrofit existing fuel storage facilities and mobile refuelers with additional automatic shutdown systems. There is a lack of data, or any safety risk assessments completed, supporting that need. 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.

Airports are operating during a time of serious economic impacts from the pandemic and a financial burden such as this, without supporting safety risk assessments, is unnecessary and financially detrimental. We ask that the NFPA Aircraft Fuel Servicing Technical Committee votes in favor of approval of TIA 1558.
Foran, Rosanne

From: Danny Moyd
Sent: Wednesday, March 17, 2021 4:50 PM
To: Shared TIAs
Subject: Aircraft fueling

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GYH Airport supports TIA 1558. We have been fueling both military and civilian aircraft for a great number of years. We enforce the FAA fueling standards as they are now written. We feel the procedures that are currently in place are very effective. Our fueling safety track record is flawless. This new fuel loading requirement will place an unnecessary burden on our fuelers and will ultimately lead to higher fuel prices.
Danny Moyd
COO/ Airport Manager SCTAC/GYH

Sent from my iPad
Good evening,

Please accept the attached letter in support of the TIA 1558.

Thank you very much.

Jeremy D. Valcich
Director, Regulatory Affairs

American Association of Airport Executives
The Barclay Building  l  601 Madison Street
Alexandria, VA 22314
March 17, 2021

Aircraft Fuel Servicing Technical Committee
National Fire Protection Association
One Batterymarch Park
Quincy, MA 02169
TIAs_Errata_FIs@nfpa.org

RE: **Support for NFPA 407 Tentative Interim Amendment 1558**

Dear Committee Members:

The American Association of Airport Executives (AAAE), the world’s largest professional organization for airport executives, would like to express our full support for the proposed Tentative Interim Amendment (TIA) 1558 and highly encourage the National Fire Protection Association (NFPA) Aircraft Fuel Servicing Technical Committee to vote to approve the TIA.

Many of our airport members have expressed strong concerns over the new provisions in NFPA 407, *Standard for Aircraft Fuel Servicing*, that are set to take effect on June 2. First, we are unaware of any studies or data supporting the need for additional automatic shutdown systems at airport loading racks. Neither NFPA nor any other organization conducted a safety risk assessment to determine whether the systems would improve safety. This new requirement was effectively created without broad industry review, discussion, or comment. The short-notice compliance period will also be an issue for many airports because there are a limited number of system manufacturers capable of retrofitting these systems by the upcoming deadline.

Furthermore, the changes proposed will impose significant, unnecessary financial obligations on airports during a time when the aviation industry is facing unprecedented challenges, including the need for additional financial support. Airports have to remain open and operational, make debt service payments, and invest in increased public health mitigation measures, among many other commitments. According to one estimate, it will cost airports nationwide more than $100 million to install this additional, yet unnecessary, equipment. AAAE believes that this added cost for airports is untimely and unjustified given the lack of demonstrated safety value.

AAAE strongly urges the NFPA Aircraft Fuel Servicing Technical Committee to consider the significant operational and financial impacts these new provisions will have on airports, particularly with no added safety value, and approve the TIA.
*   *   *

Please do not hesitate to reach out if you have any questions or require any additional information.

Sincerely,

Jeremy Valcich
Director, Regulatory Affairs
I am the owner of Rebel Services, LLC. My company offers sales, service, repair and installation of aviation fueling equipment and systems. We have been overwhelmed with customer request for information as well as the outcry over estimated cost for automatic shutdown systems at airport loading racks that are also compatible with mobile Refuelers per NFPA 407. We service both large and small airports and each have concerns. With Covid winding down, business is not quite where it use to be for most of our airports and funding is not available for unjustly cost such as this especially considering all are single compartment trucks and already have not one but two overfill protection in place if built within the last two years. The float and jet level sensor has been successful in preventing overfill.

In recent years we have made great strides in educating and communicating with airports on the importance of good quality fuel and safety measures. We are seeing an influx of airports becoming compliant with industry standards due this education and communication of preventive maintenance programs and Quality Control Programs. To throw in a costly enforcement such as this could potentially encourage noncompliance in all areas of safety for airports due to the overwhelming cost burden.

Rebel Services currently repairs and encourages replacement of any and all existing high-level shut off systems that do not function properly, however, most airports are acutely aware and up-to-date on required checks and historically have contacted us or other service companies immediately of necessary repairs because they are very familiar with their system and commonly checking and testing their systems.

I can not name a single instance of a truck overfill and spill and I have been in the industry since 2001. I can not in good conscience state to my customers this requirement is justifiable and sincerely request you consider relieving 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.

Thanks,
Margie James

Margie James
Owner

5901 Hwy 4 West
Ripley, MS 38663
www.rebelservices.net

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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
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
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 refueling 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

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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 matric, 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
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

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.
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
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*

5035 Warbird Dr. | Denton, TX 76207
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.ecgairport.com
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
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
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.
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

Please consider providing us with your feedback.
https://www.getfeedback.com/r/12lnvXQZ
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.
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

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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
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

[Image of Minden Airport]

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)

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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.
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
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
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
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
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
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
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 TiA  
Cc: Tom Auten; Kjell Lavoll  
Subject: Letter of support regarding TIA #1558 - NFPA 407  

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

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
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
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
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
From: Mike Winkler
Sent: Tuesday, February 16, 2021 5:15 PM
To: Shared TIAs
Subject: I support TIA 1558. Here's why...

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
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
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
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 TIAs
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 rack, and $2,500-$3,500 per fuel truck with a looming deadline of June 2, 2021.
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 elsewhere, 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
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 compliance deadline of June 2, 2021.

Thank you,

Keith Hafenbreidel

Keith Hafenbreidel | FBO Manager

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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,
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.
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](http://www.westjetair.com)
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
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

TIA@Errata.Fl2@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, Colombia, 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 TIA 1558, 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
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
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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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

www.signatureflight.com
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
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
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
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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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 an 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/fixed.

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
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
I am in support of TIA 1558 on NPFA 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
Good morning,

Please review the attached comment to TIA 1558.

Regards,

Andrew

Andrew Swain
Operations Manager - KCHA

Address: 932 Jubilee Drive Chattanooga, TN 37421
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
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
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.
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
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
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
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
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.
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)
**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: 

Recorder: Graphic Arts - (814) 836-8665
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

Air Elite - FWAC
Fort Wayne Aero Center
Smith Field Aero Center

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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
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 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
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.
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
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
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,

[Signature]
Gary W. Kellan
President
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.
----- Forwarded Message -----  

From: Lisa LaMantia  
To: TIAs_Errata_Fls@nfpa.org <tias_errata_fls@nfpa.org>  
Sent: Friday, March 5, 2021, 10:46:05 PM CST  
Subject: Support of TIA 1558 

My name is Lisa LaMantia and I'm the owner of Advanced Air which is the Fixed Base Operation at the Council Bluffs Airport. I am a strong supporter of TIA 1558 and would like to encourage the technical committee to approve the TIA. I've been in business for 31 years providing maintenance, avionics and the largest flight school in the area. We operate 4 fuel trucks and have a longstanding safety and reliability record of our existing high-level shut off systems and operational procedures for bottom loading.

I hope you approve TIA 1558 and feel free to contact me with any questions.

Many Thanks!  
Lisa LaMantia  
President  
Advanced Air, Inc.  
Council Bluffs Airport  
101 McCandless Lane, Suite 1  
Council Bluffs, IA 51503 

www.advancedaircb.com

______
---o(____)o---
I want to understand... Please educate me on the need for the new safety shut off's so I can understand why this is being recommended? Can you email me examples of fuel spills that have happened and would have been stopped if the new, soon to be required, loading rack and fuel truck automatic shutoff had been in place? What damage was caused by these accidents? Number of lives lost? Environmental damage it caused?

I have asked our FBO, and this hasn't happened at our airport in the last 62 years (as long as he has been here). This will cost our FBO an estimated $30,000 during a time when business is drastically down due to Covid.

How can we, as a nation, justify spending an estimated $100 MILLION DOLLARS nationally for this if it isn't a big problem? End result is the end user will pay for it in fuel costs and ticket prices being raised. We have lots of other problems as a nation! I think this product could be a great thing for someone to add if they have had issues. This money could be better spent at our airport. We can't stop 100% of any potential accidents, there is always a chance something terrible might happen. Our current system has several safeguards already. This new one can also be bypassed. When this new system breaks it will result in a costly repair or replacement.

Please enlighten me to the need.
Also, I heard you will start the next revision soon. Can this be held off, and not implemented, until it can be researched in depth? Somehow with the huge volume of material that was relocated in this last revision, it was missed by many. Also the cost was not known. I don't think anyone knew it would be this much. Please help our struggling industry and not require this to be implemented by June 2.

Sincerely,

Lara Kaufmann
Associate Director, Greenville Downtown Airport
South Carolina Aeronautics Commissioner for District 4
I sent the below email to Jeremy Souza, Michael Motschman, Cary Skinner, Brittney Brown and others who appear to be in support of recommending this shut off equipment be required. I have not heard back from any of them. **From their lack of response, I must conclude that there is no compelling evidence to justify this expense.** Our fire marshall, and I believe most others across the country, won't modify these recommendations so that is not really an option.

**Our industry needs your support of the proposed TIA 1558 and for you to vote in favor of its approval.**

Dear __________

I want to understand... Please educate me on the need for the new safety shut offs so I can understand why you all are recommending this? Can you email me examples of fuel spills that have happened and would have been stopped if the new, soon to be required, loading rack and fuel truck automatic shutoff had been in place? What damage was caused by these accidents? Number of lives lost? Environmental damage it caused?

I have asked our FBO, and this hasn't happened at our airport in the last 62 years (as long as he has been here). This will cost our FBO an estimated $30,000 during a time when business is drastically down due to Covid.
How can we, as a nation, justify spending an estimated $100 MILLION DOLLARS nationally for this if it isn't a big problem? End result is the end user will pay for it in fuel costs and ticket prices being raised. We have lots of other problems as a nation! I think this product could be a great thing for someone to add if they have had issues. This money could be better spent at our airport. We can't stop 100% of any potential accidents, there is always a chance something terrible might happen. Our current system has several safeguards already. This new one can also be bypassed. When this new system breaks it will result in a costly repair or replacement.

I would love to wrap my child in bubble wrap and put him in a padded cell and hope he stays safe... but the building that he was in could burn down and what kind of life would that be! You cannot 100% stop anything from happening so we must balance risk vs cost.

Please enlighten me to the need.

Also, I heard you will start the next revision soon. Can this be held off, and not implemented, until it can be researched in depth? Somehow with the huge volume of material that was relocated in this last revision, it was missed by many. Also the cost was not known. I don't think anyone knew it would be this much. Please help our struggling industry and not require this to be implemented by June 2.

Sincerely,

Lara Kaufmann
Associate Director, Greenville Downtown Airport
South Carolina Aeronautics Commissioner for District 4
To Whom it may Concern,

The improvement you recommend or planning to make changes would bring a tremendous financial burden to the small towns like mine. In Llano, Texas, the cost of this kind of system would force the citizens of Llano, Texas, to put out more money to modernize the existing system. Please consider the cost to small town airports and communities before making this required for all airports.

Respectfully yours,

Roy Buntyn
Airport Manager
Llano Municipal Airport (KAQO)
3010 Highway 16 North,
Llano, Texas 78643
Dear 407 committee members,

I strongly encourage the 407 technical committee to approve the TIA 1558. In my opinion, it is totally unfair to ask operators to retrofit existing equipment, especially during this pandemic crisis when revenues are a fraction of what they were and we are struggling to make a profit now. With no clear date as to when the aviation community will restore to pre-COVID-19 travels, extra cost additions to an already safe operation is unnecessary and cumbersome.

I have been in business for over twenty-five years and have never had an overfill event or even heard of one that a secondary control would have stopped.

Regards,

Dan Klaas
Assistant Airport Director
Dubuque Regional Airport
11000 Airport Road
Dubuque, IA 52003-9555

www.flydbq.com

HERE FOR YOU: Dubuque Regional Airport and City of Dubuque is committed to and prepared for providing all essential services to our customers, tenants and residents during the Coronavirus (COVID-19) pandemic. Dubuque Regional Airport is open, most City of Dubuque offices and facilities are closed to the public, but staff are still working. We are continuing to provide services to the public electronically, by phone, by mail, and when/if necessary, by appointment.

- American Airlines latest information, visit www.aa.com
- To report a concern or submit an online service request, visit www.cityofdubuque.org/citizensupport.
- For the latest local information on COVID-19, visit www.cityofdubuque.org/covid19 or call 563.556.6200.
- For contact information and service delivery changes for all departments, visit www.cityofdubuque.org.
Hi:

I'm just writing to let you know the Airport's support for the proposed TIA 1558.

Thank you,

Ginger Moore

Ginger R. Moore

Airport Manager
Hillsdale Municipal Airport
1727 Airport Rd.
Hillsdale, MI 49242
Good Afternoon,

Avflight Columbus FBO would like to support TIA 1558 due to the high cost and on top of the hardships of the the ongoing COVID pandemic. Our professional line staff tests the automatic bottom load shut off every time a refueler is fueled as well as monitor the fuel meter. In the event that this test system fails, line techs are to stop the flow of fuel and contact the GM or supervisor. In turn the GM / Supervisor will tag out the system until it is repaired.

Thank you

Steve Daquilla
General Manager
Foran, Rosanne

From: Billy Lewis  
Sent: Monday, March 8, 2021 2:24 PM  
To: Shared TIAs  
Subject: TIA 1558 Support  
Attachments: TIA 1558 Letter.docx

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Please find my letter supporting TIA 1558 attached.

Best regards,

Billy

William E. Lewis
Valdosta Flying Service, Inc.

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03/08/2020

To all parties concerned,

This letter is to notify all concerned parties of Valdosta Flying Service, Inc. and its operators FULL support of TIA 1558 and to request all powers that be vote in favor of its approval.

Valdosta Flying Service is a mid-sized FBO that handles approximately 675,000 gallons of aviation fuel per year. I personally have been associated with this FBO for over 32 years and we have never had a fuel spill or tank overflow at our fuel farm or any of our mobile fuelers. The spill prevention and overflow protection requirements currently in place provide well beyond 100% protection of any spill that could happen during the farm and mobile fueler loading process so any additional requirement(s) would be a costly, unnecessary and unjustifiable burden on us and all fuel providers. In addition, our farm and our mobile fuelers all have automatic high level shutoff systems that are tested prior to any loading operation so this, in addition to the listed burdens, would be wasted time duplicating existing protections.

Please continue your efforts to eliminate this overreaching code and feel free to contact me if needed.

Best regards,

William E. Lewis
Valdosta Flying Service, Inc.
From: Rosanne Foran
Sent: Monday, March 8, 2021 3:30 PM
To: Shared TIAs
Subject: FW: Comment on Proposed TIA 1558 on NFPA 407
Attachments: Clark Twp_Comment on Proposed TIA 1558_NFPA 407.pdf

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A letter from a Michigan Airport

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From: Mark Clymer
Sent: Monday, March 8, 2021 11:12 AM
To: Dawn Bellis <TIAs_Errata_Fls@nfpa.org>
Subject: Comment on Proposed TIA 1558 on NFPA 407

Hi Dawn:

We are concerned about the potential requirement for additional fueling safety equipment at our local airport.

I am attaching a letter of support for the Proposed TIA 1558 on NFPA 407.

My understanding is that the Technical Review Committee is studying this issue for the pending 2022 edition of NFPA 407, and that comments are to be directed to you.

If this is not the case, please forward my comments to the appropriate individual that can distribute them to the Technical Review Committee for consideration.

Regards, Mark

---------------------------------------------------------------

Mark Clymer, Supervisor
Clark Township
207 N Blind Line
Cedarville, MI 49719

---
March 8, 2021

To: Dawn Michele Bellis, Director and NFPA Standards Council Secretary
National Fire Protection Association 407 Technical Committee (NFPA)
1 Batterymarch Park, Quincy, MA 02169-7471

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

Dear Dawn & Members of NFPA 407 Technical Committee:

Albert J Lindberg (5Y1) Airport is a Municipal General Aviation airport that is located in the Eastern Upper Peninsula of Michigan.

Our airport & FBO dispensed approximately 436 gallons of aviation fuel during calendar 2020, and typically dispenses under 1000 gallons per year.

These fuel transfer activities are being successfully performed without overflow spills. In other words, existing safety mechanisms and best management practices are already in place without mandates to retrofit existing fuel storage facilities and mobile refuelers with additional automatic shutdown systems.

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

Sincerely,

Mark Clymer
Clark Township Supervisor
Date: March 8, 2021

From: Lt. Douglas J. Conciatu (ret)
Huntington Woods DPS

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)

Dear Members of NFPA 407 Technical Committee.

Ray Community Airport is a general aviation airport that is located in southeast Michigan. We are one of the most active small airports in the state. Our airport typically dispenses approximately 31,000 gallons of aviation fuel per year. Those fuel transfer activities are being successfully performed without overflow spills. In other words, existing safety mechanisms and best management practices are already in place without mandates to retrofit existing fuel storage facilities and mobile refuelers with additional automatic shutdown systems.

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

Sincerely,

Lt. Douglas J. Conciatu (ret)
Huntington Woods DPS
Airline Transport Pilot
Certified Flight Instructor (Gold Seal)
This is in no way the time to make changes of this caliber and cost, when as stated, the high level systems are reliable, and have been for years. Our industry has taken one of the biggest hits in history, both financially and in the public's confidence to fly. I believe the NFPA should seriously reconsider this requirement, at least until we see who all makes it out of this terrible dilemma. Otherwise, you will have more layoffs and unemployment numbers through the roof, due to the cost of these upgrades and what it takes from the company itself.

--
Travis Ragland  
Fuel Supervisor/Ramp Compliance  
Aero Industries, Inc.
Comment No. 90
SUPPORT
page 1 of 2

To whom it may concern:

Please be advised that the Porter County Regional Airport, in Valparaiso, Indiana, supports the Tentative Interim Amendment (TIA), Number 1558, which proposes important changes to NFPA 407-2017, and the Proposed 2022 Editions of the Standard for Aircraft Fuel Servicing. The TIA has been originally submitted by the National Air Transportation Association (NATA). The language in sections 5.1.12, and 6.1.3.12.2.7 through 6.1.3.12.2.9 of the 2017 NFPA 407 mandates automatic shutdown equipped loading racks that are compatible with refueler mounted sensor systems, including “existing equipment”. The regular revision process offered no data supporting the need for additional automatic shutdown systems at airport loading racks. The Aviation Industry’s safety record has been exemplary regarding the bottom loading of mobile refuelers for decades, and follows the existing, well-defined requirements for high-level shutoffs being used during bottom loading operations in NFPA 407. I have been associated with the Airport and aviation fueling operations for over thirty-four (34) years, and an active line firefighter for the last twenty-four (24) years. Throughout this period, our Airport has successfully used the standard Bottom Loading System with pre-check and an automatic high-level shut-off control on our Aircraft Refuelers, with a history of no incidents.

The Aviation Industry is working through unprecedented times, as are many industries, during this worldwide pandemic. While some midsize to larger airports that are required to follow NFPA 407 (Part 139 Certified) have already upgraded equipment to be compliant with the NFPA requirements as written, there are hundreds of others who do not have the flexibility to do so. The standard contains an error or 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 the Aviation Industry, in that the Standard was modified without adequate technical (safety) justification of the action.

Additionally, while many locations own their refueling equipment, like our Airport does, many more are provided by aviation fuel distributors through lease programs or other arrangements. Also, the leased fleet in the United States totals in the thousands, and mobile refuelers are moved throughout the country from airport to airport, providing the resources to keep our nation’s aviation fleet in the air. The ability to procure enough components, as well as contractors, to logistically retro fit so many airport fuel storage facilities and existing refueler trucks, during these very unstable and trying times, will be extremely difficult, if not impossible, to achieve.

With this, please consider these comments, and the proposed changes submitted by NATA in TIA 1558, in your Association’s (Technical Committee’s) actions concerning NFPA 407-2017, and the Proposed 2022 Editions, of the Standard for Aircraft Fuel Servicing. The Aviation Industry does not have a problem to be dealt with in this regard, and calls for complete removal of the requirements for automatic shutdown systems at airport loading racks, that are also compatible with mobile refuelers. The Porter County Airport Authority supports TIA 1558, and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of its approval. There is a demonstrated history that should be considered regarding the longstanding safety and reliability of the Aviation Industry’s existing high-level shut off systems and operational procedures for bottom loading. If considered by the Technical Committee, this will allow for the continued safe and effective bottom loading operations that has been historically achieved, for years to come. Thank you for your time and consideration of this matter.
Sincerely,

Kyle J. Kuebler, Airport Director
Porter County Regional Airport (KVPZ/VPZ)
4207 Murvihill Road
Valparaiso, IN 46383

www.vpz.org
To Whom it May Concern;

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

Hun Pan Am Aviation, Inc. has operated at the Brownsville South Padre Island International airport for over 4 decades. In this period of time we have complied with all regulations related to aircraft refueling. Our current procedures are continually updated as necessary. We do not feel this proposal to install new shutoff devices will enhance our operations in a meaningful way.

As you know this has been a difficult year with Covid. Corporate and general aviation numbers have been down significantly. To fund this at this time would be devastating for small FBO's.

If there is further information required I can be reached at this email address
The Morgantown Municipal Airport fully supports TIA 1558 and we hope the Technical Committee will approve it.

The Morgantown Municipal Airport (MGW) is located in Morgantown, West Virginia. This is a city-owned airport, and the airport owns the FBO.

This airport has never had an issue with bottom loading our fuel trucks from our small fuel farm. We have passed every FAA Part 139 and DLA inspection of our fuel facilities and trucks, and we have never had a spill due to over-filling of a truck, because we follow the currently prescribed procedures.
- We test the high-level check valves every time we begin to bottom load our fuel trucks.
- We already have high level alarms on our fuel farm tanks, and the alarms are set to go off at 90% capacity.
- We never defeat the deadman switches while loading the tanks or the trucks.
- We never walk away and/or leave the area during the loading process.
- There are 3 emergency shutoff buttons at our fuel farm, all within reach of the deadman cable’s length.
- And finally, we make sure all personnel are properly trained and evaluated before they are allowed to perform any loading by themselves.

Additionally, this requirement to have automatic shutdown systems installed at our loading rack and on our fuel trucks will put an extremely unnecessary financial burden on us as we are already in financial duress due to the COVID Pandemic. We have already had quotes given to us on the costs to install the shutdown systems on the farm and trucks, and they are all $25,000.00+. We simply cannot afford to do this. We sold ~78,000 less gallons of Jet A in 2020 than our 6yr average, and ~4,400 less gallons of 100LL. And this doesn’t even include all the Landing Fees, Overnight Fees, GPU usage, Aviation Oil, etc. that we are not profiting from either. This has been disastrous for our small airport, and we simply cannot afford make these unnecessary changes that current procedures and guidelines already accomplish when followed correctly.

Please approve TIA 1558. I would assume our airport is not unique in the challenges we are facing right now, and without TIA 1558, we will face an even tougher road to recovery.

Respectfully,
Wes McVey
MGW FBO Manager
NFPA 407 Review Committee,

The City of Burnet Fire Marshal’s Office and the Operators and Managers of Burnet Municipal Airport-Kate Craddock Field wholeheartedly support the passing of this TIA.

Aside from the financial burden that TIA 1558 would erase for small FOBs and Municipal Airports, it corrects a revision that prevents an incident that could only occur through gross negligence or a deliberate act and more importantly lacks the statistical or anecdotal information that typically triggers a revision in the place.

Thank you for recording our support for TIA 1558.

Respectfully,

JOHN PAUL ERSKINE  
Fire Marshal  
City of Burnet, Texas
Foran, Rosanne

From: Devin Wells
Sent: Wednesday, March 10, 2021 12:57 PM
To: Shared TIAs
Subject: TIA 1558 Support Letter
Attachments: TIA 1558 Letter.docx

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

Please see the attached letter for our support for TIA 1558.

Thank you,

Devin Wells
Line Service Supervisor
St Cloud Aviation
1544 45th Ave SE
St Cloud, MN 56304
To whom it may concern,

My name is Devin Wells and I am the Line Service Supervisor for St. Cloud Aviation located in St. Cloud, MN. I am writing you this letter to show our support for the passing of TIA 1558. We hope that the technical committee will see how it is important to us and many other FBOs around the country that you vote to pass this TIA.

At St. Cloud Aviation, we are a small FBO in central Minnesota, we have two 100LL fuel trucks, two jet fuel trucks, and one tank for jet fuel and 100LL. We have been under the same ownership since 1988, and in that time there have been no failures for topping our fuel trucks that were related to the current overflow system that is in place. We are very confident in the current system and it has shown over the years that it is very effective. We don’t see a reason to change what is in place based on the current system showing that it works.

As you are all aware, 2020 and now 2021 have been hard on all of us. The aviation industry continues to be hit hard with people still not traveling to the capacity that they used to. It could be years before this industry is back to where it was prior to the pandemic. With the traffic slow down, comes the financial struggles. Like I said, we are a small business and for us to spend the kind of money that it will cost to have this system installed will be a huge burden on our business. This financial struggle isn’t only hitting us, but many of the other FBOs around the country.

Thank you for taking the time to read our view on why it is so important that you vote in support of TIA 1558.

Sincerely,

Devin Wells
From: Darren Large
Sent: Wednesday, March 10, 2021 1:36 PM
To: Shared TIAs
Subj: Comment on TIA 1588

To Whom it May Concern,

This email is in support of TIA 1558, which calls for the removal of requirements for automatic shutdown systems at airport loading racks. The proposed law change in NFPA 407 will result in an unnecessary redundancy to airport fuel farms. Currently our company operates the fuel farm at Morristown Municipal Airport. As part of the development and operation of the farm, there are several measures that were already existing to prevent an over fill incident.

Those measures include:

- Annual training for all staff with access to the fuel farm on bottom fuel loading operations and basic fuel farm safety.
- All mobile refuelers in use at the airport are already equipped with function high level shut offs.
- All refuelers are bonded to the fueling system; the system will not activate w/o a positive bonding signal continually sent to the fuel management computer. If bonding cannot be achieved or maintained, the fuel management computer will not allow the fuel system to operate.
- The fuel system will not activate unless the dead man is securely held by the fuel truck operator. The dead man cannot be bypassed or tied off.
- Once fueling begins, the precheck system of the refueler is checked by the fuel truck operator. The precheck must stop the flow of fuel into the truck within 3 seconds. If the precheck system is inoperative or otherwise fails to stop the flow of fuel, fueling will cease immediately. Airport personnel will not allow the refueler back into the fuel facility until repairs are conducted.

Many of the same measures listed above are utilized at airport fuel farms throughout the country. These measures already address the potential for an overfill incident by putting safeguards in place to ensure that it will not occur. Rather than requiring airports to install additional measures like the proposed automatic shut-down system, NFPA should consider the safeguards already in place. If a facility has these safeguards installed, then there should be no requirement to add additional redundancy measures. Further, the idea that this is a huge issue within the industry is not based upon a foundation of fact. The industry itself has a long history of safe operation history with bottom loading mobile refuelers and fuel farms with the current safeguards that have not experienced over fill incidents.

If you have any questions, please feel free to contact me at 973-538-6400 ext. 135.

Thank you,

Darren S. Large, A.A.E.
Director, Facilities & Operations
DM AIRPORTS, LTD. Operators of MMU
8 Airport Road, Morristown, NJ 07960
www.mmuair.com
Foran, Rosanne

From: Ron Young
Sent: Wednesday, March 10, 2021 2:01 PM
To: Shared TIAs
Subject: TIA 1558

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It is overkill and unnecessary to have a skully type high level system for privately owned fuel farms all of the aviation fuel trucks have a high level shut off and a precheck for that shut off that is to be tested every time the fueler is loading the truck. What is being proposed is costly and telling everyone that there is a system that has been in place for years but let’s not train the fueler correctly, Lets come up with a automated system that by the way when it doesn’t get a good connection will not allow the farm to pump and has constant issues to control what is already being controlled.

Sent from my iPhone
To whom it may concern, I am in full support of TIA 1558 and strongly recommend that it be approved without delay. There is no evidence to support the need for a secondary fuel shutoff during loading. In my experience operating 4 locations and loading fuel for over 20 years never once have I experienced an overfill scenario at any of my locations. Furthermore, I have not had a mechanical high-level shut-off fail the operational test. The draconian burden that will be placed on airports and FBOs during an already strenuous time is unwarranted. Please approve TIA 1558 for the good of the people.

Sincerely,

Andrew Hartman
Managing Member
2 N Main Street
Ste 302
Medford NJ 08055
To whom it may concern,

My name is Nick Tiwald, and I am the Director of FBO Services at Silverhawk Aviation in Lincoln Nebraska KLNK. This message is regarding NFPA 407. Specifically, I would like to formally show support for TIA 1558 which calls for complete removal of the requirements for automatic shutdown systems at airport loading racks that are also compatible with mobile refuelers.

Silverhawk Aviation is one of two FBOs at KLNK field and we pride ourselves on safe and reliable operation for refueling. The sections of NFPA 407 which deal with the new requirements for automatic shutdown systems are completely unnecessary. Our mobile refuelers and loading rack already contain high level shut off systems. Our employees have been trained to test the precheck system at the beginning of all bottom loading operations, never bypass the dead-man device, and always attend bottom loading in its entirety. These systems and training have created a supremely safe system to safeguard against spillage with only one minor incident in the last decade.

In short, please go forward with the tentative interim amendment 1558.

Sincerely,

Nick Tiwald
Director of FBO Services
Silverhawk Aviation

a: 1751 West Kearney Ave. Lincoln,NE 68524
Foran, Rosanne

From: Chris Harrison
Sent: Wednesday, March 10, 2021 2:24 PM
To: Shared TIAs
Subject: TIA 1558
Attachments: Scanned from a Xerox Multifunction Printer.pdf

Please see the attached letter in support of TIA 1558 regarding NFPA 407, 2017 and 2022 editions.

Chris Harrison, Fire Marshal
Galveston Fire Department
P.O. Box 779 Galveston, TX 77553 | 823 26th St. Galveston, TX 77550

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10MAR2021

National Fire Protection Association (NFPA)
NFPA 407 Committee
1 Batterymarch Park
Quincy, Massachusetts
USA 02169-7471

Re: NFPA 407 Tentative Interim Amendment (TIA) 1558

Committee Members:

I write this letter in support of the TIA proposed by the National Air Transportation Association (NATA) removing the retroactive requirement from Section 5.1.12 of the 2017 edition of NFPA 407. I respectfully request this consideration under the allowances provided in Section 1.3.4, whereby an Authority Having Jurisdiction (AHJ) can modify retroactive requirements if their application clearly would be impractical, and where a reasonable degree of safety is provided.

As the AHJ for Scholes International Airport, I enforce the adopted provisions of the 2012 International Fire Code. Scholes was recognized as the Texas Department of Transportation General Aviation airport of the year in 2018. The airport is home to 1 Fixed Based Operator, 2 air charters that service the Gulf of Mexico oil platforms, and a robust number of private pilots that home base from here. There are approximately 35,000 operations per year, and approximately 800,000 to 1.2 million gallons of fuel dispensed in the same timeframe.

Currently, our existing fuel systems utilize protected tanks and fuel trucks. All have redundant safety systems that are operational and in compliance with the codes at the time they were installed. There have been no reported spills or hazardous events involving fueling that I can find record of.
I respectfully request that you grant the proposed amendment and remove the potentially burdensome requirement for existing systems to retroactively install additional safety measures that would create a financial hardship despite the proven track record of safety. As noted by NATA, thousands of General Aviation airports like Scholes International Airport have been operating safely under the existing provisions of previous editions of NFPA 407. I ask that you recognize that safety record and the current safety systems involving aircraft fueling by granting this amendment.

If you have any questions or require further information, please do not hesitate to contact me.

Respectfully,

Chris Harrison
Assistant Fire Chief/Fire Marshal
Hello,

My name is Cesar Gonzalez and I am the General manager of the Uvalde Flight Center here in Uvalde Texas. This email is to inform you of our support for TIA 1558. We are a locally owned business and have been operating the past 40 years. In these 40 years we have not had a fuel spill incident caused by a faulty high-level shut off. Being a locally owned and operated FBO we find it difficult to justify a costly upgrade. We operate 3 fuel trucks and have 2 tanks at our fuel farm.

Please feel free to contact me @ 830-900-4204 or use this email address Thank you for your time and consideration.

-Cesar

--
Cesar Gonzalez
Operations Manager
Uvalde Flight Center
Good afternoon,

Please consider the attached request on behalf of the Collier County 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 Marco Island Executive Airport, Immokalee Regional Airport, and Everglades Airpark.

Respectfully,

Andrew Bennett, CM, CPM | Executive Manager - Interim
Collier County Airport Authority
2005 Mainsail Drive | Naples, FL 34114

Under Florida Law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by telephone or in writing.
March 10, 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 Collier County 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 Marco Island Executive Airport, Immokalee Regional Airport, and Everglades Airpark.

Current fueling systems at Collier County’s three general aviation airports 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 our three airports. 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 $40,000.

While the Collier County 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 Collier County Airport Authority can continue to meet critical safety standards while still providing the same excellent level of service to our customers.

Sincerely,

Andrew H. Bennett
Executive Airports Manager – Interim
To whom it may concern,

I am writing in support of TIA 1558 and encourage the NFPA aircraft fuel servicing technical committee to vote in favor of approval.

I run BFE, LLC Boulder City Nevada’s friendly FBO as the owner operator for the past 15 years. This airport has averaged over 2 million gallons of fuel flow-age a year and have had no issue with reliability or safety with our high level shut off systems and operational procedures for bottom loading.

Bob Fahnestock
BFE, LLC
1411 Airport Rd
Boulder City NV, 89005
Foran, Rosanne

From: David Christy
Sent: Wednesday, March 10, 2021 8:51 PM
To: Shared TIAs
Subject: NFPA Comments

Parsons Tri-City Airport
Parsons, Kansas
620 336 3440
March 10, 2021

RE: NFPA 407

This letter is to express my enthusiastic support for NATA to challenge NFPA 407. NFPA has required the existing aviation fuel storage facilities and the mobile refueling trucks to undergo mandatory and costly alterations. No statistical data or studies have been performed that show or justify these alterations. The aviation refueling industry has safely transferred fuel into refueling vehicles for decades. Fuel trucks have been required and equipped with high-level shut off devices which close a value to prevent spills. No incident or accident has occurred that could support additional safety measures.

Without the changes proposed by NATA TIA 1558 airports across the country will be faced with unnecessary costs which may exceed $12,000 per tank and truck.

I have managed the Parsons Airport for over 13 years without any refueling accidents or incidents. Our airport has safely operated without any fuel spills since the city of Parsons took over operations from the military in the late forties.

In closing I support NATA’s proposed TIA 1558.

David Christy
Airport Manager
Parsons Tri-City Airport
Parsons, Kansas
We are in full support of TIA 1558. We encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval of TIA 1558.

The industry's safety record well supports approval of TIA 1558.

We would encounter significant budget issues if faced with having to install new automatic shutdown systems.

Regards,

Ken E. Swaringen
Airport Director
North Carolina Airport Professional

Pursuant to North Carolina General Statutes, Chapter 132, email correspondence to and from this address may be considered public record under North Carolina Public record Laws and may be disclosed to third parties.
Good afternoon,

I write in support of NATA’s TIA 1558. Please favorably consider the proposed TIA. I manage a GA airport that sells approximately 250k gallons of jet/AVGAS a year. Our margins are tight given the already great costs required to safely operate the airport. We currently meet ATA 103 requirements. Please consider the additional expenses placed on sponsors/operators when voting to require that certain NFPA 407 requirements be mandated retroactively. We have been in operation since 1972 without a single fueling mishap. Please eliminate the requirements for automatic shutdown.

Thank you,

Scott Hinton
Airport Manager
www.ecgairport.com
To whom it may concern.

The (NFPA-407) is estimated at 100 million dollars needed across the country to equip aviation to meet the new standard. We still struggling after a pandemic with a loss of revenue. How do we pay for this upgrade?

Spartanburg Memorial Airport has been here since 1927 and never had a fuel spill, so why a secondary automatic shutoff between Refueler and fuel farms?

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

Sincerely,

**Terry Connorton**
Airport Director
**Spartanburg Memorial Airport**
www.spartanburgdowntownairport.com/
The Gary Jet Center strongly supports TIA 1558 and we encourage the NFPA Aircraft Fuel Servicing Committee to vote in favor of its approval.

The Gary Jet Center has been in operations for 30 years. We have high safety standards when it comes to our Fuel Facility. We perform emergency shutoff and high level shutoff test bi-weekly on our equipment. We also stick our tanks for measurements monthly to verify that our gauges are calibrated. Our Line Service also performs a pre-check test during every fuel transfer from the loading rack to the refueler truck. Along with the tests that we perform, we also have a meter shutoff system on each of our loading racks. By having this system the lineman will pre-select the gallons of fuel to prevent the over fueling of a refueler truck. With all of these safety measures the Gary Jet Center has never had a spill incident during the loading and unloading of fuel at our facility.

Thank you,
Darin Bensinger
Gary Jet Center Line Manager
NFPA 407

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

I am the manager of the Lancaster County Airport (KLKR) in Lancaster, SC and have served in this capacity for over ten years. We have pumped thousands of gallons of fuel over the years with not one mishap. So, our long standing safety and reliability of our existing high-level shut off systems and operational procedures for bottom loading speaks for itself.

I respectfully request your support on this proposal.

Paul T. Moses, Sr.
Airport Manager
From: Jim Carrier  
Sent: Friday, March 12, 2021 2:08 PM  
To: Shared TIAs  
Cc: Jeremy Souza; jlaflamme@pvdairport.com  
Subject: Support for TIA 1558

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To Whom It May Concern:

I would like to provide comments in support of the proposed TIA 1558. I strongly encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

At Manchester-Boston Regional Airport (MHT) our fixed-base operator (FBO), Signature Flight Support, currently complies with NFPA 407, 2017 edition. All their mobile fuelers are already equipped with functional high-level shut-offs. To add another system to operate side by side with overfill protection is redundant. Signature has spent a lot of time, effort and money into training, mitigation of environmental impact, and equipment.

Additionally, Signature performs high level pre-checks three (3) times during the top off process. The top off area is also located on secondary containment that leads to a water/oil separator. These and other safety measures already in place address the potential for an overfill accident. I personally cannot recollect any spills here at MHT that were caused by the lack of such systems.

I strongly support TIA 1558 as proposed, and encourage you to do the same, thereby eliminating this redundant and costly requirement.

Respectfully,

~Jim

James M. Carrier  
Fire Chief  
Manchester-Boston Regional Airport  
Aircraft Rescue and Fire Fighting Department  
402 Kelly Avenue  
Manchester, NH 03103

www.flymanchester.com
Dear committee Members,

As a long term FBO and aviation professional with over 30 years of experience I am writing to implore you to please vote yes to TIA 1558! The burden of needless requirements and added expenses for an unproven over spill protection system when there has not been a documented problem to the vast majority of fuel farms is borderline corrupt and at the very least unethical. The current protection systems have long proven effective, and there is no need for additional equipment to be installed.

Do the right thing, and don’t allow yourselves to be manipulated.

Thank you

[Signature]

Galaxy FBO
ANTHONY (TONY) WRIGHT | General Manager

WEB www.galaxyfbo.com

Galaxy FBO, 8812 Paul B. Koenen Street Houston, Texas 77081
WILLIAM P. HOBBY AIRPORT(KHOU)
Foran, Rosanne

From: Carlos Salinas
Sent: Monday, March 15, 2021 12:45 PM
To: Shared TIAs
Subject: I support TIA 1558

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All,

- I support TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.
- I manage a small county run FBO and have a longstanding safety and reliability record with my existing high-level shut off systems and operational procedures for bottom loading.
- Please contact me below with questions.

[Carlos V. Salinas]
Airport Administrator
Pickens County Airport
238 Airport Road,
Liberty, SC 29657

[www.co.pickens.sc.us]
Foran, Rosanne

From: John Lowry
Sent: Monday, March 15, 2021 12:52 PM
To: Shared TIAs
Subject: NFPA Comments

Galaxy FBO Holdings, LLC.
Conroe-North Houston Executive Airport
Conroe, Texas
936.494.4252
March 15, 2021

RE: NFPA 407
This letter is to express my enthusiastic support for NATA to challenge NFPA 407. NFPA has required the existing aviation fuel storage facilities and the mobile refueling trucks to undergo mandatory and costly alterations. No statistical data or studies have been performed that show or justify these alterations. The aviation refueling industry has safely transferred fuel into refueling vehicles for decades. Fuel trucks have been required and equipped with high-level shut off devices which close a valve to prevent spills. No incident or accident has occurred that could support additional safety measures.

Without the changes proposed by NATA TIA 1558 airports across the country will be faced with unnecessary costs which may exceed $12,000 per tank and truck. For the smaller airports and FBO’s across the country these costs will be hard to absorb.

I have managed FBO fueling operations at this Airport for over 14 years without any refueling accidents or incidents caused by overfilling a tank or truck and to add a secondary device at those costs is unwarranted.

Thank you for your time in reading this and in closing I support NATA’s proposed TIA 1558.

JOHN LOWRY | General Manager

WEB www.galaxyfbo.com

Galaxy FBO 2971 Hawthorne Dr. Conroe, TX 77301
CONROE NORTH HOUSTON REGIONAL AIRPORT | KCXO
Dear Committee Members,

Please vote YES to TIA 1558!

My name is Hank Brown. I have been in the aviation industry for 63 years, and have owned FBOs in South Carolina for over 30 years. I started pumping fuel as a teenager and it has been a part of my life ever since. I have 25 years of corporate aircraft management experience, spent years servicing airlines such as Delta, Eastern and Southern Airways; and own FBOs at GMU, GYH and CDN. In all my decades in the industry, I have been involved with pumping more than 70 million gallons of fuel and have never once had an overfill spill incident of any kind.

As you are no doubt well aware, there has recently been a growing movement of great concern over the NFPA 407 section 5.1.12. So much so that there is now a 2nd TIA presented before you to remove the ridiculous requirement of installing additional equipment to currently installed overspill protection systems. The fact that there is now a 2nd TIA should tell you something is wrong with this requirement. You should really take a closer look at what is at stake, and the lack of logic behind putting such requirements in the NFPA 407 in the first place. The current protection systems have long proven effective, and there is no need for additional equipment to be installed.

The estimated cost to install this additional equipment at all of our locations will be $85,000.

The direct result will be an immediate and substantial fuel price increase to our customers, which will wipe out some of the high-volume fuel discounts to corporate travelers. Not to mention the harmful impacts on flight school rates, cost to law enforcement air support, medical flights, and other customers we serve. The same will happen at the other 3,000 FBOs across the nation, and their customers will suffer, as well. The negative impact to the industry will be far reaching... unless you do the right thing and vote YES to TIA 1558!

You, the committee members, are in a position that holds great responsibility in helping to protect the aviation industry. You are obligated to make decisions that help keep FBOs and our customers protected from certain elements of harm. All of you are to be commended for the time and effort you put into your decisions, and I support your good work. However, in this case, I implore you to reconsider the ramifications of trying to fix something that is not broken. If you vote No to the current proposed TIA, it will result in massive needless harm to the industry you are duty-bound to protect.

I look forward to commending you again when you make the right decision, and vote YES to TIA 1558!

Sincerely,
Hank Brown, President/Owner
Greenville - Donaldson - Camden JET CENTERS, inc.
100 Tower DR
Greenville, SC 29607
To Whom it may concern:

I would like to express my full support of TIA 1558. I am the President of a fueling operation in Salinas, CA. I have been working in the aircraft refueling industry since 1994. In my years of experience, I have never encountered a need for a Scully system in the operation. Our trucks and fuel farm are always attended to during fuel transfers. Primary shutoff systems are very reliable and tested each and every time a technician transfers product. This would be large expense for our operation and it will be at a time that is already a struggle due to COVID.

Thank you for your consideration,
Ryan Gauger, President
Jet West Inc.
280 Mortensen Ave.
Salinas, CA 93905
I am writing to you today to please...

- 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.

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

- I have been involved in general aviation since 1990 when I was a student pilot. Later I became a local airport commission member and currently serve on state wide aeronautics commission. I also own a single engine Cessna. During my time around airports I have never witnessed a fuel spill resulting from aircraft refueling. From what I understand increased requirements for fueling process will only add needless expenses with no discernible benefits.

- Doug Barnes

  Lancaster SC
Please accept the attached letter in support of the NATA TIA 1558 to the NFPA 407.

Thank you

Scotty

Scott Malta, A.A.E., C.A.E., Capt. USAF (Ret.)
Airport Manager
Moore County Airport
7825 Aviation Dr.
Carthage, NC 28327
March 15, 2017

Dear Committee Members,

Please vote YES to NAT A’s Tentative Interim Amendment (TIA) 1558!

My name is Scott Malta. I have been in the aviation industry for over 40 years, and I have been the airport manager at the Moore County Airport, NC for the last year. I was an airport manager in CA for 18 years prior to my current location. According to my staff, the airport has owned and operated the FBO since 1992 and has never once had an overfill spill incident of any kind.

As you are no doubt well aware, there has recently been a growing movement of great concern over the NFPA 407 section 5.1.12. So much so that there is now a 2nd TIA presented before you to remove the ridiculous and unnecessary requirement of installing additional equipment to currently installed overspill protection systems.

The fact that there is now a 2nd TIA should tell you something is wrong with this requirement. You should really take a closer look at what is at stake, and the lack of logic behind putting such requirements in the NFPA 407 in the first place. The current protection systems have long proven effective, and there is no need for additional, expensive equipment to be installed.

The estimated cost to install this additional equipment at my airport (SOP) will be $40,000, which is a huge amount considering my revenue comes only from fuel sales, leases, and fees. Furthermore, it is estimated the cost nationally will be in excess of $100 million.

The direct result will be an immediate and substantial fuel price increase to our customers, which will wipe out some of the high-volume fuel discounts to corporate travelers. Not to mention the harmful impacts on flight school rates, cost to law enforcement air support, medical flights, military, military contractors, and other customers we serve. The same will happen at the other 3,000 FBOs across the nation, and their customers will suffer, as well. The negative impact to the industry will be far reaching... unless you do the right thing and vote YES to TIA 1558!

You, the committee members, are in a position that holds great responsibility in helping to protect the aviation industry. You are obligated to make decisions that help keep FBOs and our customers protected from certain elements of harm. All of you are to be commended for the time and effort you put into your decisions, and I support your good work.

However, in this case, I implore you to reconsider the ramifications of trying to fix something that is not broken. If you vote No to the current proposed TIA, it will result in massive needless harm to the industry you are duty-bound to protect.
I look forward to commending you again when you make the right decision and vote YES to TIA 1558!

Sincerely,

[Signature]

Scott C. Malta, A.A.E., C.A.E., Capt. USAF (Ret.)
Airport Manager

Cc: North Carolina Department of Transportation, Division of Aviation (NCDOT-DOA)
North Carolina Airports Association (NCAA)
Southeast Chapter AAAE (SEC-AAAE)
American Association of Airport Executives (AAAE)
National Air Transportation Association (NATA)
To Whom it may concern,

We agree with NATA's position that the retroactivity statement should be removed. We are open and flexible and will work to ensure all new equipment will follow the upgraded compliance request. We do believe it is a redundant safety fix that is an unnecessary expense for our current operation. The fact that World Fuel, Phillips 66, NATA, AvFuel - all industry-leaders - are saying the same thing is why we are asking for a review. Financially and also logistically, it is not an undertaking our company is able to take on. We have been in business since 1946 and have worked hard to be the safest operation we are able to be. We have met with our ARF leaders, our city Transportation Director and fellow FBOs on our airfield. Together, we agree we have the fix needed and will continue to be the best we can be.

--

Best,

Janna Caven
Administrative Director
Aberdeen Flying Service
Hertz/Thrifty/Dollar Rent-a-car
4430 E Hwy 12
Aberdeen, SD 57401

www.aberdeenflyingservice.com
From: Becky Barnes  
Sent: Tuesday, March 16, 2021 9:47 AM  
To: Shared TIAs  
Subject: Automatic "Scully Type" Shutdown Systems

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 or To whom it may concern:

We here at Shelbyville Municipal Airport support TIA 1558 and encourage the vote in favor of approval.

We take pride in our longtime records for safety and continue to promote with each employee on our daily checklist. Operation procedures our conducted with safety in mind and our current shut offs existing have always been reliable.

We are a small airport and I do not believe the expense of the new systems, NFPA 407, could be affordable for our Shelbyville Municipal Airport or would help us in anyway.

Thank you for your time  
Sincerely,  
Becky  

Becky Barnes, Operations Coordinator  
Shelbyville Municipal Airport  
2828 Highway 231 North  
Shelbyville, Tennessee  37160

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Dear Committee Members:

Since May of 1983, I have been the Airport Director of the Greenville Downtown Airport in South Carolina. In my 38 years, we have never had a fuel overspill as a result of not having the equipment mandated by NFPA 407. The current protection systems that we have in place have proven effective. There is no need for additional equipment to be installed.

The estimated cost to install this unnecessary equipment at my airport is $30,000. It is estimated to cost our Nation's FBOs and airports $100 Million dollars! This will unnecessarily increase fuel prices and equipment maintenance costs, while resulting in little if any improvement in safety.

I normally appreciate all the work that you do to protect our aviation industry. In this case, however, I implore you to reconsider the costly ramifications of trying to fix something that is not broken.

Please vote YES to TIA 1558!

Sincerely yours,

Joseph R. Frasher, A.A.E.
Airport Director
Greenville Downtown Airport
100 Tower Drive, Unit 2
Greenville, SC 29607

Additional Credentials:
Bachelor of Aviation Management - Auburn University (1979)
2008 General Aviation Airport Manager of the Year for FAA Southern Region
Past Member of the South Carolina Aeronautics Commission (2005-2008)
Past President of South Carolina Aviation Association (SCAA)
Graduate of University of South Carolina School of Law (1982)
Member of South Carolina Bar
Former law clerk for George C. Kosko, Attorney at Law, who specialized in the practice of aviation related law
Private Pilot
I do support TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

I have worked at my Airport (KSCX) since 2007 and have had great results with our existing high-level shut off systems and operational procedures for bottom loading. Having to install this shutdown system on our refuelers would be costly to say the least and definitely not affordable for our small Airport.

Contact Information Hank Duvall KSCX Manager
Foran, Rosanne

From: Randall Gober
Sent: Tuesday, March 16, 2021 11:05 AM
To: Shared TIAs
Subject: TIA 1558 Support

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Northeast Alabama Regional Aviation in Gadsden, Al is is support of passing TIA 1558. Is the NFPA knowledgeable about the systems already in place. Does NFPA know the cost to install, train and maintain such a redundant system?
At KGAD we have two 10000 gallon underground tanks, that use "the deadman system as well as the vehicles are all equipped with high level shutoff system, that have pre test installed to prevent any overfilling of our fuelling vehicles with 100% success rate.
The scully system is complex, cumbersome and does not have a 100% preventative record.
Not to mention the cost of installation and having to maintain such a system can be detrimental to most small operations in aviation.

Just show some commonsense and pass Tia 1558.

Thank You,

Randall Gober
KGAD Airport Manager
185 Ira Gray Dr.
Gadsden,Al 35904
I am the President of the Louisville-Winston County Airport Authority and, through our board, we administer the day to day operations of LMS. We offer both Avgas and JetA fueling by self serve and have plans to do so by fuel truck by mid year. Our current fuel farm tankage are equipped with high limit alarms to prevent over-fueling and spillage incidents. We will equip our recently acquired fuel truck with similar overflow protection. In addition, our airport manager has attended the requisite safety training for fuel handling, and we routinely both pre-check and perform a monthly inspection to insure that our overfill valves are operational. We have never had a fuel spill incident at our airport to my knowledge.

For this reason, we see no benefit to the proposed changes to NFPA 407 mandating the installation of “scully type” shutdown systems. We serve a community and county of 20,000 and the expense of these systems is beyond our budgetary capabilities. For this reason we strongly support TIA 1558 and encourage the NFPA Fuel Servicing and Tech Committee to vote in favor of approval.

Michael Forster  
President  
Louisville-Winston County Airport Authority
To whom it may concern,

The Vicksburg Tallulah Airport supports the TIA 1558. We are a small general aviation airport and these added costs would devastate us, especially while we are suffering from the COVID pandemic if the TIA 1558 is not approved. Our loading dock uses a dead-man on each fuel farm when bottom loading into our trucks which have the high level shutoffs on both. The dock is equipped with a catch basin with valves that are closed during refueling the trucks or taking in fuel off of a transport.

In closing, I hope that the committee votes in favor of TIA 1558.

Regards,

Randy Woods
Manager: Vicksburg Tallulah Regional
175 VTR Airport Rd.
Tallulah, La. 71282

http://www.vtraairport.com/
We feel the requirement of NFPA 407 for installation of new automatic scully-type shutdown systems is both expensive and unnecessary. This new requirement places an undue burden on small airports.

We would like to voice our strong support of Tentative Interim Amendment 1558.

Thank you,

Doug Smith, Mgr.
Lawrenceburg/Lawrence County Airport
4110 Airport Dr.
Lawrenceburg, Tn.  38464
Clarendon County/Santee Cooper Regional support TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

We operate a small airport with a longstanding safety and reliability of your existing high-level shut off systems and operational procedures for bottom loading.

Thomas L Harvin, Operations Manager

Clarendon County/Santee Cooper Regional Airport
Dear Committee Members,

Please see attached .pdf for my comment submission regarding TIA 1558.

Thank you!

Cheri Little
Manager
Donaldson Jet Center
Dear Committee Members,

My name is Cheri Little. I am the manager of Donaldson Jet Center in Greenville, South Carolina. I have been involved in the aviation industry starting in 1993 when I acquired my private pilot’s license. I began working at the Greenville Jet Center in 2012 and moved laterally to Donaldson Jet Center in 2013 to assume the role of FBO Manager. In the eight years I have served in this capacity, I have been privileged to work with some of the most professional, well trained, and safety conscience individuals in the aviation fueling industry. The safety measures achieved through rigorous safety courses, recurrent testing, frequent inspections, and the highest company expectations have resulted in NO overfill spill incidents in the history of this company!

My purpose in writing this letter is to implore you to vote YES concerning TIA 1558! It is of great concern to me that the NFPA 407 section 5.1.12 is pushing for additional safety equipment to be added to already effective fueling equipment. The excessive costs associated with this requirement will cause financial hardship to be felt throughout the FBO community. The additional measure is simply overkill and NOT needed! Since the safety measures, and currently installed overspill protection systems are already in place and working well, it makes no sense to impose undue hardship on this company and other FBO’s. They are already fueling at a high level of proficiency, and achieving the safest results! There is simply not a problem with the current system!

I respectfully implore you to consider the financial implications and negative impact of a “no” vote to the current proposed TIA. You have this chance to make this right. Please protect us from this overreach and VOTE YES!!

Again, I respectfully implore you to please vote YES to TIA 1558.

Sincerely,

Cheri Little/ Manager - Donaldson Jet Center
Vote YES to TIA 1558
To whom it may concern,

I am writing to voice my support for TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

SUN Airport is a Non-Primary Commercial Service Airport with a near perfect safety record and a commitment to safety and reliability. Our existing infrastructure has a proven reliability for high-level shut off and operational procedures for bottom loading. Our primary concern with this financially crippling provision is that NFPA has not conducted any safety risk assessments to justify the need for any additional equipment. Our airport has not experienced any of the incidents that these systems are designed to prevent.

If the TIA is not approved our Airport risks a financial burden that is simply not justifiable.

If you have any questions, feel free to contact me.

Tim Burke
Airport Operations Manager
Friedman Memorial Airport
1616 Airport Circle
Hailey, ID 83333
Dear Committee Members,

**Please Vote YES to TIA 1558!**

My name is Jody Weisner. I have worked Line Service and worn many other hats at the Greenville Downtown Airport in South Carolina for over 20 years. In my time here, there has never been a single overfill incident, or any incident period, at our fuel farm facility. We have existing equipment and procedures already in place that provide effective safety measures to prevent such events from happening. There is no justification for us being forced to incur the cost of installing additional equipment that is totally unnecessary.

I realize my comments, as well as the comments of others, are coming to you at the last minute. But it is only recently that the vast majority of us have come to truly realize the monstrous cost of compliance and the depth of irrelevance stated in the requirements of NFPA 407 section 5.1.12. Thank goodness this section of the NFPA 407 is no longer flying under the radar and is now getting the attention it deserves and needs!

It's not too late to remove these requirements. We, and other FBOs across the nation, are counting on you to prevent the forced spending of so much money on something that is completely unjustified and unnecessary.

Vote YES to TIA 1558!

Jody Weisner  
Director of Operations  
Greenville Jet Center  
100 Tower Dr  
Greenville, SC 29607
From: Tim Wasyluka  
Sent: Tuesday, March 16, 2021 12:27 PM  
To: Shared TIAs  
Subject: Comment on Proposed TIA 1558 on NFPA 407

NFPA Aircraft Fuel Servicing Technical Committee:

I am writing to you today in support of TIA 1558 and to request that the NFPA Aircraft Fuel Servicing Technical Committee approve this critical TIA.

The Bessemer Municipal Airport (EKY), located in Central Alabama, is designated as a Reliever Airport for Birmingham-Shuttlesworth International Airport. The Bessemer Airport Authority (BAA), a non-profit corporation, operates EKY on behalf of the City of Bessemer.

EKY is committed to providing a safe airport environment above all else, while efficiently operating this important community resource. In addition to an active general aviation community, EKY also supports law enforcement entities, medevac operations, light freight and regional economic development through our growing corporate aviation clientele base. These activities generate roughly $1.3M in annual revenue for EKY from fuel sales, fees, hangar rent and land leases.

BAA has been providing all aircraft fueling services at EKY since September of 2010. I have been involved with EKY aircraft fueling services during this entire period, handling fueling, training and management responsibilities. During this period 20 fuelers have been trained and have delivered over 2,300,000 gallons of fuel. During this time the multi-level safety systems deployed at EKY, including functional high level shut off systems, pre-check training, dead-man usage and fully attended fuel transfer operations have resulted in no incidents where NFPA’s current requirement for automatic shutdown systems would have been of benefit.

Over 10 years - Over 2,300,000 gallons - Zero incidents requiring automatic shutdown systems.

Requiring EKY to incur the significant cost to install superfluous automatic shutdown systems on our two fuel farm loading racks and two fuel trucks will create a substantial negative impact on our ability to properly service the aviation community. This situation can be remedied by your adoption of TIA 1558. Please approve TIA 1558.

Thank you for considering my comment and request. Please do not hesitate to reach out to me with any questions that come to mind.

Best regards,

Tim Wasyluka  
Executive Director  
Bessemer Airport Authority  
Bessemer Municipal Airport  
900 Mitchell Field Road  
Bessemer, AL 35022
Hello,

Please note that the Columbus Regional Airport Authority supports the efforts in TIA 1558.

Being in Aviation Fueling for over 21 years the current high-level shutoff systems installed on mobile aircraft refuelers is a safe and effective means of stopping the loading process through bottom loadings and closing of the internal valve on the refueler. The required pre-check of the high-level shutoff system ensures its operation during each and every mobile refueler loading.

Please find my contact information in my signature below if you need any further information.

Thank you,

Tony Kyer
Senior Manager | Fixed Base Operations | Rickenbacker Aviation| Bolton Aviation

Columbus Regional Airport Authority
7250 Star Check Drive | Columbus, OH 43217
Columbusairports.com
Good afternoon,
Please see our attached document in support of TIA 1558.

Respectfully,
Malcolm Pledger
American Refueler Equipment Co. Inc.
PO Box 9849
Birmingham, AL  35220
Greetings,

American Refueler Equipment Company, Inc. supports NATA’s TIA 1558. We have used Hi-Level Shut-Downs on Refuelers for thirty-seven years. Our normal production yearly is 35-45 Refuelers - we have no failures on balanced valves with Hi-Level Shut-Down. Airport’s controlled by cities and county government could not handle the expense to modify Fuel Shut-Downs at storage. There are thousands of small airports that have this condition. Additionally, many small operations top load estimated cost per Fuel Farm is $7,500.00 to $11,000.00. The cost for Refuelers to add Bottom Loading with Jet Level Sensors is $6,500.00 estimated.

Respectfully,

Malcolm Pledger – President
Here at the Charleston County Aviation Authority are in support of TIA 1558 and encourage NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval of TIA 1558!

The Charleston County Aviation Authority own and operate three (3) Airports along with multiple FBOs under our jurisdiction: The Charleston International Airport - KCHS (Commercial Aviation fueler Allied Aviation, FBOs: Signature, and Atlantic Aviation), Mount Pleasant Regional Airport - KLRO (GA Airport managed by CHS Airport), and Charleston Executive Airport- KJZI (GA Airport Managed by Atlantic Aviation) all of which buy and sale aviation fuel and use the existing high-level shut off systems and operational procedures for bottom loading and during this time of utilization of this current system we have not incurred any overfill spill incident.

**Given the NATA’s figures of $2,500-$3,500 per truck and $6,000-$10,000 per loading rack (using $3,500 for truck and $10,000 per loading rack) that would cost us (cumulatively) $209,500 to replace the systems on a minimum of 15 loading racks (4 for Allied, 2 for Signature, 3 for Atlantic, 2 for Atlantic’s Reserve Tanks, 2 for Mt. Pleasant, and 2 for JZI) and 17 trucks (6 for Allied, 4 for Atlantic CHS, 3 for Signature, 2 for LRO, and 2 for JZI) plus any additional expenditures for training and maintenance of the new systems.**

Please Vote YES to TIA 1558

Best Regards,

Reneé’

---

Reneé Melvin, C.M., ACE
SUPERVISOR OF AIRPORT OPERATIONS

Charleston County Aviation Authority
5500 International Blvd #101
North Charleston, SC 29418-6911

iflyCHS.com

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Good afternoon NFPA Staff,

Please see the attached letter of support for TIA 1558 which was mailed to our Washington DC Office.

Thank you,

Steve Berry
Manager of Fuel Quality and Safety
National Air Transportation Association
02-12-2021

National Air Transportation Association
818 Connecticut Ave.
Suite 900
Washington, D.C. 20006

To whom it may concern:

I am writing this letter to express my clear support for TIA 155B and I would like to encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

Our company has been operating an FBO facility in Liberal, Kansas for over thirty years. During that time, we have upgraded our fueling facilities to meet current regulations and safety standards, as required, without complaint. Keeping our facility updated has allowed us to operate without a fuel spill or containment issue during those thirty years.

It is my opinion that the current regulations and safety procedures are adequate for the task performed. The more you automate the process, the more personnel will rely on the automated procedures. Next, the additional required equipment will lead to more failures. Then, with personnel relying on the automated procedures, more fuel spills will occur. I think one of the biggest reasons that we have not suffered a fuel incident is, we require our personnel to physically observe fuel levels in the tank, by being on top of the truck tank, with a dead-man control in hand, as the truck is being serviced.

The last thing I would like to mention is the cost. I do not think I need to remind anyone, that in today's environment many operators are struggling to stay open as we enter the second year of this pandemic. So, I think the question is – Does the increase in safety justify the cost involved to implement the regulations? In my opinion – NO; the timing could not be worse.

If you have any questions, please feel free to call me at 620-674-1546.

Bill Lyndon
Partner
Lyndon Aero Center, Inc.
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Lake City Municipal Airport, Lake City, SC (51J) supports NATA TIA position.

Dusan Fridl  
Chief Engineer  
Aerospace Division  
150 Godley Morris Blvd  
Lake City, SC  29560  
www.carbonconversions.com
Foran, Rosanne

From: Gould Jr., Steven A.
Sent: Tuesday, March 16, 2021 4:41 PM
To: Shared TIAs
Subject: UZA Supports TIA 1558

Members of the NFPA Aircraft Fuel Servicing Technical Committee:

I am writing to you today regarding the newly proposed TIA 1558. The Rock Hill – York County Airport (UZA) overwhelmingly supports TIA 1558 and we encourage you to support and vote in favor of approval as well. UZA is a general aviation reliever airport and has operated under NFPA 407 guidelines for decades without a single incident of concern.

Our operation of aviation fueling has been safely performing bottom loading operations of mobile refueling vehicles for decades without the use of automatic shutoffs at loading racks. There are already requirements included in NFPA 407 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 refueeler when full. These devices are also tested before every loading operation to ensure they work. When operated properly under the existing requirements defined in 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. There have been no statistical data or studies performed indicating that the requirements in section 5.1.12 and related requirements in section 6.1.3.12.2 are necessary or justified.

If TIA 1558 is not approved, the financial impact on our airport will be in the tens of thousands of dollars. This type of impact could and will be catastrophic for many airports across the country. Most of the general aviation community, including UZA, were unaware of the true impact they would face if the requirements of 5.1.12 and related sections in 6.1.3.12.2 were to be included in TIA 1558.

We all appreciate the work NFPA contributes to the safety of our aviation communities and we hope you will support the approval of the newly proposed TIA 1558.

Respectfully,

Steve

Steven A. Gould Jr., C. M.
Airport Director
Rock Hill-York County Airport
550 Airport Road, Suite 205
Rock Hill, South Carolina 29732

www.flyrockhill.com
From: Stacy Thomas  
Sent: Tuesday, March 16, 2021 4:48 PM  
To: Shared TIAs  
Subject: Support TIA 1558

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Members of the NFPA Aircraft Fuel Servicing Technical Committee:

I am writing to you today regarding the newly proposed TIA 1558. The Berkeley County Airport (KMKS) overwhelmingly supports TIA 1558 and we encourage you to support and vote in favor of approval as well. KMKS is a general aviation airport and has operated under NFPA 407 guidelines for decades without a single incident of concern.

Our operation of aviation fueling has safely performed bottom loading operations of mobile refueling vehicles historically without the use of automatic shutoffs at loading racks. There are already requirements included in NFPA 407 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. These devices are also tested before every loading operation to ensure they work. When operated properly under the existing requirements defined in 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. There have been no statistical data or studies performed indicating that the requirements in section 5.1.12 and related requirements in section 6.1.3.12.2 are necessary or justified.

If TIA 1558 is not approved, the financial impact on our airport could be in the tens of thousands of dollars. This type of an impact could and will be catastrophic for many airports across the country. Most of the general aviation community, including KMKS, were unaware of the true impact they would face if the requirements of 5.1.12 and related sections in 6.1.3.12.2 were to be included in TIA 1558.

We all appreciate the work NFPA contributes to the safety of our aviation communities and we hope you will support the approval of the newly proposed TIA 1558.

Respectfully,

Stacy Y. Thomas

Stacy Y. Thomas  
Airport Services: Airport Manager  
www.berkeleycountysc.gov  
1003 US Highway 52 Moncks Corner, SC 29461
Foran, Rosanne

From: Jeff Bilyeu
Sent: Tuesday, March 16, 2021 5:03 PM
To: Shared TIAs
Subject: TIA 1558

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Please accept this correspondence as support for and a request that the NFPA Aircraft Fueling Servicing Technical Committee vote in favor of TIA 1558.

This airport sponsor is also the FBO fueling agent on the airport. We currently have in place strong and effective procedures and processes in place designed to safely and reliably prevent any aviation fuel spills associated with bottom loading of refueling equipment.

It is my understanding that the NFPA has conducted no safety risk assessments to justify the need for the proposed additional equipment. In addition, this airport and associated fueling facilities has not to this date, experienced any incidents that these proposed systems are designed to prevent.

The financial impact on this airport sponsor and fueling agent would be severe, having two separate fuel farms with multiple tanks in each, and multiple fueling trucks that service aircraft.

I humbly and strongly encourage the committee to approve the TIA and prevent this unneeded hardship for this particular airport and fueling agent.

Regards,

Jeff

JEFF BILYEU, AAE | Aviation Director
Texas Gulf Coast Regional Airport
8000 Airport Way, Angleton, Texas 77515
www.flylbx.org

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From: Rick Shepard  
Sent: Tuesday, March 16, 2021 5:23 PM  
To: Shared TIAs  
Subject: Skytech Supports TIA 1558  
Importance: High

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.

Members of the NFPA Aircraft Fuel Servicing Technical Committee:

I am writing to you today regarding the newly proposed TIA 1558. Skytech, the FBO at Rock Hill, SC overwhelmingly supports TIA 1558 and we encourage you to support and vote in favor of approval as well. UZA is a general aviation reliever airport and has operated under NFPA 407 guidelines for decades without a single incident of concern.

Our operation of aviation fueling has been safely performing bottom loading operations of mobile refueling vehicles for decades without the use of automatic shutoffs at loading racks. There are already requirements included in NFPA 407 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. These devices are also tested before every loading operation to ensure they work. When operated properly under the existing requirements defined in 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. There have been no statistical data or studies performed indicating that the requirements in section 5.1.12 and related requirements in section 6.1.3.12.2 are necessary or justified.

If TIA 1558 is not approved, the financial impact on our airport will be in the tens of thousands of dollars. This type of an impact could and will be catastrophic for many airports across the country. Most of the general aviation community, including UZA, were unaware of the true impact they would face if the requirements of 5.1.12 and related sections in 6.1.3.12.2 were to be included in TIA 1558.

We all appreciate the work NFPA contributes to the safety of our aviation communities and we hope you will support the approval of the newly proposed TIA 1558.

Respectfully,

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

www.skytechinc.com

Celebrating 45 years of the  
Skytech Advantage!
Re: TIA 1558

NFPA Aircraft Fuel Servicing Technical Committee-

Please consider this attached letter from Wilson Air Center as our support for TIA 1558.

Regards,

Seek Perfection, Find Excellence

Brandon Popovich
Regional Safety Manager

Address: 5400 Airport Drive Charlotte, NC 28208
In response to the proposed changes to NFPA 407 and specifically 5.1.12, and 6.1.3.12.2.7 through 6.1.3.12.2.9 of NFPA 407, Wilson Air Center supports the efforts found in TIA 1558. Wilson Air Center also encourages the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of TIA 1558 as this amendment illustrates the removal of the unnecessary high level shut-off systems at fuel farms that are compatible with mobile refuelers.

Wilson Air Center is a member of the National Air Transportation Association and is fully cooperative and certified under the demanding NATA Safety 1st Training Center. Along with the Safety 1st training, Wilson Air Center employs a stringent training program that incorporates strict requirements for refilling mobile refuelers at our fuel farms as well as the transfer of fuel from tanker to storage tank. These efforts would not benefit from the introduction of another over-fill system; however, it would only cause undue stress both financially and physically to our workload as our technicians would have yet another system to maintain.

The FBO industry works hard to maintain its' safety record. Additionally, the financial burden placed on FBO’s could lead to smaller business’ being unable to comply which could lead to closing the doors permanently. Another factor to consider is the increase in fuel price or general services as FBO’s would have to pay for the initial cost of the system. In addition to cost, FBO’s would have to coordinate with their current fuel transport company to ensure compatibility with the shut-off system. Additional expenses could arise from the difference in transport companies and the fuel farm system installed.

We ask the NFPA Aircraft Fuel Servicing Technical Committee to highly consider TIA 1558 and its intended purpose. The safety standards maintained and that are currently implemented have proved to be quite effective in the prevention of a spill due to over-filling; the safety track record is impressive. The lack of data showing spills caused by over-filling is a sure sign that the current standards are working and are not in need of revision. The safety systems for bottom loading mobile refuelers are working and as an industry, we hold each other accountable to not only train fuel handling techs with a known and professional company but maintain in-house procedures that exceed current standards.

Regards,

Brandon Popovich
Regional Safety Manager
Wilson Air Center
Good afternoon,

I Daniel Gonzalez support TÍA 1558 and encourage the NFPA aircraft fuel servicing technical committee to Vote in favor of approval. I have worked at American Aero FTW for 14 years and never had an issue with our existing high level shut off system and operational procedures for bottom loading.

Daniel González
American Aero FTW
Fort Worth TX 76110
Line service Manager

Get Outlook for iOS
I vote yes to TIA 1558

john hudson, williamsburg regional airport
Fairfield County Airport in Winnsboro, SC (KFDW) supports vote YES to TIA 1558.

Thank you,
Denise Bryan C.M.
Fairfield County Airport Director
1291 Airport Runway Rd.
Winnsboro, SC 29180
As manager of the Chester-Catawba Regional Airport I am in total support of a vote of yes on TIA 1558 as we have never experienced any problems with fueling procedures of the past that would justify the enormous cost.

Keith Roach
Airport Manager
Chester Catawba Regional Airport
To Whom It May Concern: TIAs Errata

The Blair Airport Authority, Blair, Nebraska (KBTA) strongly supports the adoption of TIA 1558, and urges the NFPA Aircraft Fuel Servicing Technical Committee to vote for its approval. The Blair Airport Authority takes safety very seriously and works hard with fuel suppliers to make sure off loading is constantly monitored to avoid any potential safety concerns. As a small airport we do not have the funds to add additional unnecessary and expensive equipment that does little or nothing to promote real aviation safety, especially since NFPA has not conducted any safety risk assessments to justify the need for any additional equipment. The City of Blair and Blair Airport Authority has operated an airport fueling facility since the mid fifties and has never had an overflow from filling operations. Again, we strongly urge the NFPA Aircraft Fuel Servicing Technical Committee to vote for the adoption of TIA 1588, to help Airports avoid this necessary and unneeded financial burden.

Sincerely,

Rodney Storm
City Administrator/Airport Manager
City of Blair, NE
Blair Airport Authority
Dear Committee Members,

Please vote YES to TIA 1558!

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

Anderson County has operated a Part 139 Airport with fueling services here for over 20 years, with private FBO’s operating the prior 50 years, without incident. Our existing high-level shut off systems and operational procedures for bottom loading are reliable and have a longstanding safety record (zero overfill spill incidents). The current protection systems have long proven effective, and there is no need for additional equipment to be installed. The expense to install additional equipment would be extremely cost-prohibitive and would significantly impact our operations and customers in a negative way.

Please feel free to contact us if you need any other information.

Brett Garrison
Airport Manager

Anderson Regional Airport
5805 Airport Rd.
Anderson, SC 29626
On behalf of Cleburne Regional Airport and the members of the Texas Airports Council I would like to state we support TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

I have been an airport manager for 20 years and managed various airports. Myself and airport managers across the state of Texas have all maintained a longstanding level of safety and reliability with our existing high-level shut off systems and operational procedures for bottom loading. The addition of unnecessary systems would be detrimental to the GA airports and the municipalities that own them.

Sharlette Wright, C.M.
President, Texas Airports Council

Sharlette Wright, C.M.
Airport Manager
1650 Airport Dr
Cleburne, Texas 76033
From: Glen Spaugh  
Sent: Wednesday, March 17, 2021 1:44 PM  
To: Shared TIAs  
Cc: Mark Kruger  
Subject: TIA 1558 for Code 407  
Attachments: NFPA March 2021.pdf

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Please see the attached letter of support.

Regards,

Glen E. Spaugh  
City Manager  
P.O. Box 310  
Gordon, NE 69343
Date: March 17, 2021

RE: NFPA 407 – Standard for Aircraft Servicing

I was recently made aware of new regulations for automatic shutdown systems at airport loading racks under NFPA Code 407. In response to the new guidelines, I want to express my full support for the Tentative Interim Amendment 1558 from the National Air Transportation Association.

Our airport services the City of Gordon, which has a population of 1,733 residents and is a general aviation airport. Our primary air traffic business is from local or transient pilots, as well as air ambulance services which transport patients from the local hospital to other regional health facilities. We have averaged 4,740 gallons of 100LL AV fuel, per year, over the last twenty (20) years; which translates to just under 400 gallons-a-month.

Our current system has a manual shutoff and we have not experienced any issues. The cost of any automatic shutdown system would greatly, and negatively, impact the financial status of our airport by absorbing up to 50% of our income from the sales of fuel. Also, as this is an unexpected expense, it is not included in our budget for the current fiscal year, 2020-2021.

I fully support fueling safety at every airport, but feel that this is not an efficient or necessary way to expend the limited funds which we have; plus, the fact that our safety record has been good through the years.

Sincerely,

Glen E. Spaugh
Airport & City Manager
To Whom it may concern: We the Board of Arapahoe Municipal Airport (37V) support Tia 1558 100%.

We have not the budget nor logical reason to change our existing fuel system. The current system has been in operation for 35 years with no incidents. Safety is our FIRST and LAST concern! We would entertain a safety assessment that proves different.

Sincerely, Arapahoe Municipal Airport (37V) Board

Todd Weverka
I would like to provide support for TIA 1558 and encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval.

We are a General Aviation airport located in southeast Michigan. We have a fuel farm with both 100LL and Jet-A and three fuel delivery trucks. All of our delivery trucks have a high fuel shutoff system and we utilize a dead-man device when fueling the trucks. The high fuel shutoff systems have never had a failure and fueling operations are closely monitored by airport staff when bottom loading the trucks. I do not believe that further regulations are necessary regarding this issue.

Sincerely,

Mark D. Johnson
Airport Manager
Livingston County Spencer J. Hardy Airport
3399 County Airport Drive
Howell, MI 48855
NFPA Standards Secretariat:


We appreciate the opportunity to submit these comments on behalf of North American airport operators. Please contact me if you have questions.

Regards,
Chris

Christopher Oswald
Senior Vice President, Safety and Regulatory Affairs
Airports Council International – North America
1615 L Street NW, Suite 300 | Washington, DC 20036
| airportscouncil.org
facebook | twitter | linkedin
March 17, 2021

Ms. Dawn Bellis  
Director and NFPA Standards Council Secretary  
National Fire Protection Association  
800 Independence Avenue  
Washington, DC 20591  
(Submitted via email to TIAs_Errata_Fls@nfpa.org)

Dear Ms. Bellis:

ACI-NA represents the local, regional and state governing bodies that own and operate commercial airports in the United States and Canada. ACI-NA is the largest of the five worldwide regions of the Airports Council International (ACI). Our members represent more than 300 airports operating in the United States and Canada and nearly 400 aviation-related businesses.

We are writing to today in support of the proposed Tentative Interim Amendment (TIA) 1558, proposed by Steve Berry from the National Air Transport Association (NATA), regarding NFPA 407, Standard for Aircraft Fuel Servicing.

As Mr. Berry notes in the TIA, requirements to install additional shutoff systems on aircraft fuel vehicle servicing racks included in the 2017 version of NFPA 407 do not address demonstrated fire safety issues and would necessitate costly retrofits of both fuel racks and fueling vehicles with duplicative equipment.

These retrofits would be required for all U.S. airports certificated under the provisions of 14 CFR Part 139 and any airports that have committed to FAA grant assurances. This is because the FAA incorporates NFPA 407 standards by reference in Advisory Circular (AC) 5230-4B, Aircraft Fuel Storage, Handling, Training, and Delivery. Over 3,000 airports in the United States are facing new regulatory requirements as a result.

Airport operators and their tenants—including fixed base operators, ground service providers, and airlines—have experienced unprecedented and continuing financial hardships as a result of the COVID-19 pandemic. Implementation of costly new mandates without clear safety justification are inappropriate at any time, but are starkly so in the current environment.
Again, on behalf of the airport community that ACI-NA represents, we appreciate the opportunity to provide our support for TIA 1558 and encourage the Technical Committee to give it due consideration. Please contact me either at coswald@airportscouncil.org or 202.293.4539 if you have questions or need additional information.

Sincerely,

Christopher J. Oswald
Senior Vice President, Safety & Regulatory Affairs
Dear Sir / Madam:

I am an environmental consultant and also a National Air Transportation Association (NATA) member. Over the course of the last 15 years, I have written over 300 Spill Prevention Control and Countermeasures (SPCC) Plans across the nation and have participated in several committees for the NATA over the years. Recently, there has been a lot of discussion regarding the new revisions to the National Fire Protection Association (NFPA) Standard 407, Standard for Aircraft Fuel Servicing. Very few facilities that I have visited have the automatic shutdown system (Scully System) that is required under new standard. Even though the NFPA is trying to limit the impact to only Part 139 airports, it will have a more far-reaching effect because all airports that receive federal grants under the Airport Improvement and Passenger Facility Charge (AIP) program must comply with NFPA-407 in order to receive the grants. This grant money is extremely important for all airports, but especially for small airports. Many of these small airports are in small rural counties and there is not sufficient funding for projects locally without the AIP program. It is truly a lifeline to keep these small airports open to the public. Placing a requirement for an expensive automatic system on these small airports would be devastating. It is my understanding that the automatic shutdown systems required by the new NFPA-407 standard would cost between $6,000 and $10,000 per fuel farm and an additional $2,500 to $3,500 per refueler truck.

Under the previous standard, bottom loading refueler trucks were required to be equipped with a high level shut-off device which is checked before each loading operation begins. This system has worked very well for the aviation industry and especially for small airports in that it is built into the refueler truck and the airport does not need to invest in additional equipment. In comparison to the EPAs requirements for loading / unloading areas under the Spill Protection Control and Countermeasures (SPCC) Rule, there is sufficient flexibility in the rule to allow both curbed containment areas at the tank farm and also use of the spill kit (active containment system) to respond to spills. This flexibility is very important for these small airports. Many of these small airports have the fuel tanks on the edge of the ramp and fuel deliveries and refueler filling will take place right in front of the tank system. I would encourage the NFPA to provide some flexibility in the standard to allow a more simple solution for smaller airports.

The NATA has submitted TIA-1558 to request some relief from this new standard. I hope the committee will consider the NATA’s request and provide that needed relief.

George S. Gamble, PE
2G Environmental, LLC
To Whom It May Concern,

Please find attached the Southwest Chapter of the American Association of Airport Executives’ response to TIA 1558.

Thank you,

Cathy Herring
Executive Director
Southwest Chapter of American Association of Airport Executives
107 S. Southgate Dr. * Chandler, AZ 85226
www.swaaae.org

Association Management Services provided: KCA, www.kc-a.com
March 17, 2021

To Whom it May Concern,

The Southwest Chapter of the American Association of Airport Executives (SWAAAE) includes members in the states of Arizona, California, Hawaii, and Nevada. We represent a wide range of airports including large commercial to general aviation.

On behalf of our SWAAAE airport members, this letter is to support the Tentative Interim Amendment (TIA) 1558 which would assist in relieving airports from unnecessary requirements set forth in the new NFPA 407 provisions set to take effect on June 2, 2021. We encourage the NFPA Aircraft Fuel Servicing Technical Committee to vote in favor of approval of TIA 1558.

There is no indication that the NFPA has conducted any safety risk assessments to justify the need for any additional required equipment identified in section 5.1.12 and related requirements in section 6.1.3.12.2. Our member airports report that they have not experienced any of the incidents that these systems are designed to prevent. 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. 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 function. 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. Our general aviation airports will be affected by the requirements of 5.1.12 and related sections in 6.1.3.12.2.

Again, on behalf of our general aviation airport members, this letter supports the Tentative Interim Amendment (TIA) 1558 which would assist in relieving airports from unnecessary requirements set forth in the new NFPA 407 provisions. Ken Moen, SWAAAE Chair, Legislative Committee, may be contacted for any additional information.

Sincerely,

Judy Ross, A.A.E., C.A.E.
President
Southwest Chapter of the American Association of Airport Executives
Dear Committee Members,

Please vote YES to TIA 1558!

The requirement of installing additional equipment to currently installed overspill protection systems is not necessary and would put a substantial burden on the 3000 FBOs across the nation.

As the owner of two FBOs that support recreational, corporate, and medical flights, the direct result will be an immediate and substantial fuel price increase to our customers, and it will have a far reaching negative impact on the aviation industry.

We look forward to you protecting our industry by making the right decision to vote YES to TIA 1558!

Sincerely,

Leah Kadar-Hodd on behalf of Michael Laver, President

Aiken Aviation Enterprises, Inc. (AIK)
129 Airport Blvd
Aiken, SC 29805

Glendale Aero Services (GEU)
6841 N. Glen Harbor Blvd.
Glendale, AZ  85307

Leah Kadar-Hodd
Customer Support
Air 1st Aviation Companies, Inc.
www.Air1st.com
www.MU2World.com
Foran, Rosanne

From: Lisa Carr
Sent: Wednesday, March 17, 2021 4:38 PM
To: Shared TIAs
Subject: FW: Comment on Proposed TIA 1558 on NFPA 407
Attachments: Letter of Support for pending Tentative Interim Amendment 1558.pdf

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Please see attached letter of support for TIA 1558 from the Gerald R. Ford International Airport.

Thank you for your consideration,

Lisa Carr, C.M., P.E.M., C.T.A. | Public Safety & Operations Director
Gerald R. Ford International Airport Authority
5500 44th St. SE, Grand Rapids, MI 49512

This message has been prepared on resources owned by the Gerald R. Ford International Airport Authority (GFIAA). It is subject to the Acceptable Use Policy of GFIAA.
Date: March 16, 2021

From: Lisa Carr, Director of Public Safety & Operations
       Gerald R. Ford International Airport Authority

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)

Dear Members of NFPA 407 Technical Committee.

The Gerald R. Ford International Airport Authority (GFIAA), Grand Rapids, Michigan supports
TIA 1558, which calls for complete removal of the requirements for automatic shutdown systems
at airport loading racks that are also compatible with mobile refuelers.

Existing safety mechanisms and best management practices are already in place without
mandates to retrofit existing fuel storage facilities and mobile refuelers with additional automatic
shutdown systems. There is a lack of data, or any safety risk assessments completed,
supporting that need. 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.

Airports are operating during a time of serious economic impacts from the pandemic and a
financial burden such as this, without supporting safety risk assessments, is unnecessary and
financially detrimental. We ask that the NFPA Aircraft Fuel Servicing Technical Committee votes
in favor of approval of TIA 1558.
Foran, Rosanne

From: Danny Moyd  
Sent: Wednesday, March 17, 2021 4:50 PM  
To: Shared TIAs  
Subject: Aircraft fueling

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GYH Airport supports TIA 1558. We have been fueling both military and civilian aircraft for a great number of years. We enforce the FAA fueling standards as they are now written. We feel the procedures that are currently in place are very effective. Our fueling safety track record is flawless. This new fuel loading requirement will place an unnecessary burden on our fuelers and will ultimately lead to higher fuel prices.

Danny Moyd  
COO/ Airport Manager SCTAC/GYH

Sent from my iPad
Good evening,

Please accept the attached letter in support of the TIA 1558.

Thank you very much.

Jeremy D. Valcich
Director, Regulatory Affairs

American Association of Airport Executives
The Barclay Building  l  601 Madison Street
Alexandria, VA 22314
March 17, 2021

Aircraft Fuel Servicing Technical Committee
National Fire Protection Association
One Batterymarch Park
Quincy, MA 02169
TIAs_Errata_FIs@nfpa.org

RE: Support for NFPA 407 Tentative Interim Amendment 1558

Dear Committee Members:

The American Association of Airport Executives (AAAE), the world’s largest professional organization for airport executives, would like to express our full support for the proposed Tentative Interim Amendment (TIA) 1558 and highly encourage the National Fire Protection Association (NFPA) Aircraft Fuel Servicing Technical Committee to vote to approve the TIA.

Many of our airport members have expressed strong concerns over the new provisions in NFPA 407, Standard for Aircraft Fuel Servicing, that are set to take effect on June 2. First, we are unaware of any studies or data supporting the need for additional automatic shutdown systems at airport loading racks. Neither NFPA nor any other organization conducted a safety risk assessment to determine whether the systems would improve safety. This new requirement was effectively created without broad industry review, discussion, or comment. The short-notice compliance period will also be an issue for many airports because there are a limited number of system manufacturers capable of retrofitting these systems by the upcoming deadline.

Furthermore, the changes proposed will impose significant, unnecessary financial obligations on airports during a time when the aviation industry is facing unprecedented challenges, including the need for additional financial support. Airports have to remain open and operational, make debt service payments, and invest in increased public health mitigation measures, among many other commitments. According to one estimate, it will cost airports nationwide more than $100 million to install this additional, yet unnecessary, equipment. AAAE believes that this added cost for airports is untimely and unjustified given the lack of demonstrated safety value.

AAAE strongly urges the NFPA Aircraft Fuel Servicing Technical Committee to consider the significant operational and financial impacts these new provisions will have on airports, particularly with no added safety value, and approve the TIA.
Please do not hesitate to reach out if you have any questions or require any additional information.

Sincerely,

Jeremy Valcich
Director, Regulatory Affairs
I am the owner of Rebel Services, LLC. My company offers sales, service, repair and installation of aviation fueling equipment and systems. We have been overwhelmed with customer request for information as well as the outcry over estimated cost for automatic shutdown systems at airport loading racks that are also compatible with mobile Refuelers per NFPA 407. We service both large and small airports and each have concerns. With Covid winding down, business is not quite where it use to be for most of our airports and funding is not available for unjustly cost such as this especially considering all are single compartment trucks and already have not one but two overfill protection in place if built within the last two years. The float and jet level sensor has been successful in preventing overfill.

In recent years we have made great strides in educating and communicating with airports on the importance of good quality fuel and safety measures. We are seeing an influx of airports becoming compliant with industry standards due this education and communication of preventive maintenance programs and Quality Control Programs. To throw in a costly enforcement such as this could potentially encourage noncompliance in all areas of safety for airports due to the overwhelming cost burden.

Rebel Services currently repairs and encourages replacement of any and all existing high-level shut off systems that do not function properly, however, most airports are acutely aware and up-to-date on required checks and historically have contacted us or other service companies immediately of necessary repairs because they are very familiar with their system and commonly checking and testing their systems.

I can not name a single instance of a truck overfill and spill and I have been in the industry since 2001. I can not in good conscience state to my customers this requirement is justifiable and sincerely request you consider relieving 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.

Thanks,
Margie James
To Whom it May Concern:

Meacham International Airport on behalf of the City of Fort Worth fully supports the TIA 1558 and we strongly recommend that the NFPA’s Aircraft Fuel Servicing Technical Committee vote in favor of its approval.

The new NFPA 407 provision requires FBOs to install an expensive system to shut down the loading rack at the fuel farm when the level of fuel in a refueler reaches a certain level. This would be the fourth level of overfill protection for fuel trucks and, in our opinion, unnecessary and onerous. The existing three levels of protection already in existence are: 1) the deadman control held by the Line Service Technician that stops the flow of fuel when released; 2) the high level shutoff in the truck tank that closes the belly valve of the truck at a pre-determined level and stops fuel from entering the truck; and 3) the fuel spill containment area around the loading rack itself. In looking at our records, we have found that the existing fueling requirement in place has yielded great results in regards to safety, with no fuel incidents or accidents related to the loading rack or fuel farm.

That we are aware of, the NFPA has not conducted any safety risk assessments to justify the need for any additional equipment. As mentioned above, the existing requirement has been more than adequate level of safety, as our records indicate no incidents or accidents related to this provision has occurred at our airport.

In our estimation, the cost of the newly proposed provision would be approximately $6,000-$10,000 per fuel farm loading rack, and $2,500-$3,500 per fuel truck in the event that the TIA is not approved. That would translate into hundreds of thousands of dollars for an excessive and unnecessary update that would need to be spent by our FBOs, as they own and operate over 20 fuel trucks and 10 fuel tanks.

Your consideration is deeply appreciated regarding this matter.

Regards,

Aaron M. Barth
Airport Manager
Meacham International Airport
City of Fort Worth
Meacham.com
From: Adam Hasbrouck
Sent: Monday, March 22, 2021 11:53 AM
To: Shared TIAs
Subject: Please vote YES to TIA 1558!

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Please vote YES to TIA 1558!
March 31st, 2021

National Fire Protection Association
Standards Council
1 Batterymarch Park
Quincy, MA 02169-7471

Dear NFPA Standards Council,

As per the requirements of section 1.6.3 of the NFPA Standards Directory 2020, the following is being submitted as an official notice of appeal regarding the ballot results of TIA 1558:

1) **Appellant**
   Steve Berry- Staff Liaison- NATA GA Fuel Handling Subcommittee
   National Air Transportation Association (NATA)
   818 Connecticut Avenue, NW, Suite 900
   Washington, DC 20006

2) **Statement identifying the particular action to which the appeal relates**
   This appeal seeks to overturn the ballot results of TIA 1558.

3) **Arguments setting forth the grounds for the appeal**
   3.1. We believe the standards creation process has failed in this specific instance. Primarily because we were prohibited from speaking at the virtual second draft meeting. Had we not been denied a meaningful opportunity to address the Technical Committee, we could have corrected the misinformation surrounding the necessity and scope of the requirements we are seeking removed.

   3.2. TIA 1558 has comprehensive industry support with 156 public comments submitted from nearly every segment of the aviation fueling industry (and only two opposed). These were not “form letters” or generic responses, but real, earnest solicitations for approval from a wide range of industry classifications. These included enforcement authorities, special experts, installers, users, and consumers.

   3.3. There is no data to justify the need, or expense of a third, redundant means of overfill protection. As evidenced by the public comments, bottom loading operations already employ two means of over-fill protection THAT WORK.
4) **Statement of the precise relief requested.**

We request that the Standards Council overturn the ballot results of TIA 1558. However, NATA is open to compromised solutions such as extending compliance deadlines until the conclusion of the next revision cycle; Or limiting the scope of applicability.

5) **Whether a hearing on the appeal is being requested**

Yes, a hearing is requested.