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BENJAMIN J. CAYETANO
GOVERNOR



ORIGINAL

KAZU HAYASHIDA
DIRECTOR
DEPUTY DIRECTORS
BRIAN K. MINAAI
GLENN M. OKIMOTO

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
AIRPORTS DIVISION
400 RODGERS BOULEVARD, SUITE 700
HONOLULU, HAWAII 96819-1 880

IN REPLY REFER TO:
AIR-EM
99.309

August 11, 1999

U. S. Department of *Transportation Dockets
Docket No. FAA-1999-5924-8
400 Seventh Street, SW
Room Plaza 401
Washington, D.C. 20590

99 AUG 17 AM 11:52
DEPT OF TRANSPORTATION
Docket Section

Gentlemen:

Subject: Comments to Proposed FAA Special
Federal Aviation Regulation

This is in reply to your letter dated July 8, 1999. We have one comment and one alternate proposal regarding the FAA proposed testing of Aircraft Rescue Fire Fighters (ARFF) vehicles after January 1, 1999, to include the discharge of fire extinguishing agents.

Several of our State of Hawaii airports have operations in the early morning hours, thus, will require ARFF vehicle testing immediately after midnight, January 1, 2000. Discharge testing of certain fire extinguishing agents on ARFF vehicles during these early morning hours will pose a hardship to us due to the required clean-up process following discharge testing.

Discharge testing of water and foam systems will not pose a problem due to simple system flushing. However, discharge testing of "dry chemical" and "Halon" secondary agents will pose a problem for us. After discharge testing of the dry chemical or Halon systems, we must flush the system by blowing clean compressed gas through the system from the host systems' compressed gas source; Nitrogen gas for dry chemical and Argon gas for Halon. Then, due to typically lowered compressed gas pressures in the source cylinder, we must replace the compressed gas cylinders with fully pressurized ones. This will be difficult to do in early morning darkness hours.

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We propose an alternative discharge test for these secondary agent systems. After midnight, we will disconnect the secondary agent source from the actuation valve and test only the system actuation valve for proper operation. The valve is the electro-mechanical part of the system that is problematic from a Y2K standpoint. If valve actuation is normal, the test will be reported as successful, and the secondary agent source will be reconnected. After daybreak later in the morning, the total system will be discharge tested, then follow up on cleanup and cylinder replacement will be performed in daylight conditions.

If you have any questions, please call Carl Kawauchi, Y2K Coordinator, at (808) 838-8803.

Sincerely,



JERRY M. MATSUDA, P.E.
Airports Administrator

c: Chuck McCormick, FAA-Western Region