The Voice of Aviation Business

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National Air Transportation Association

Statement

of the

National Air Transportation Association

before the

Airport Facilities Committee

National Fire Prevention Association

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Chairman Doctorman and Members of the Committee:

Thank you for this opportunity to appear before you to discuss the impact of NFPA 409 – Standard on Aircraft Hangars, and its proposed changes, on our members.

My name is James K. Coyne, and I am president of the National Air Transportation Association (NATA). NATA, the voice of aviation business, is the public policy group representing the interests of aviation businesses before the Congress, federal agencies and state governments. NATA's over 2,000 member companies own, operate and service aircraft and provide for the needs of the traveling public by offering services and products to aircraft operators and others such as fuel sales, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, Part 135 on-demand air charter, fractional aircraft program management and scheduled commuter operations in smaller aircraft. NATA members are a vital link in the aviation industry providing services to the general public, airlines, general aviation and the military.

The National Air Transportation Association recognizes the countless hours of research and planning that go into creating and developing an NFPA code or standard. National Fire Prevention Association members have saved countless lives and treasure with their dedication to reducing the risk that fire presents. NFPA 409, Standard on Aircraft Hangars, is a product of those processes. NFPA 409 provides guidance on the fire protection requirements of all aircraft hangars, from the largest airline maintenance facility to a single-bay "garage" hangar. The comprehensiveness of this standard is, again, a testament to the individuals who have collaborated to create it, but it is also its greatest weakness. Because this standard covers such a broad range of structures, with values from a few thousand dollars to millions of dollars, it is not able to provide the detailed balance of risk vs. cost that an industry such as ours demands.

The newly proposed requirement for automatic sprinkler systems in all group III hangars is an example of this failure to weigh cost versus benefit. The construction costs for a small general aviation hangar, hardly much larger in size than a two-car garage, can quickly escalate to the point of infeasibility when an automatic fire suppression system is included. Those costs can become staggering if an adequate water source is not readily available. 44% of NATA members responding to a recent association survey said they have been forced either to cancel plans to build new hangars or reduce the sizes of those hangars because of the cost of compliance with NFPA 409. Over 77% of the respondents stated that the costs of the proposed changes in group III fire protection requirements would prevent them from constructing new hangars.

In addition, to the proposed changes to group III hangars, our members have expressed concern over the costs of complying with the group II hangar requirements. According to member data, the cost of installing a compliant foam fire suppression system can easily reach 1/3 of the construction cost of the hangar itself. A recent member survey indicated 53% of local jurisdictions do not require compliance with foam fire suppression

requirements. This puts our members located in jurisdictions that do require full compliance at an extreme economic disadvantage. This lack of adoption of foam fire suppression requirements brings into question the benefit of these systems versus their cost in a general aviation environment.

To understand the fire risk to general aviation hangars better, NATA contacted NFPA's "One Stop Data Shop" to obtain statistical data on hangar fires. We learned that over the last 10 years the National Fire Incident Reporting System did not even track hangar fires as a single entity. The only statistical data available is on vehicle, boat and aircraft storage facilities as a group.

I believe that the solution to this problem lies in collaboration between the general aviation industry and the professionals who compose the NFPA Standards Council and Technical Committees. The Technical Committee on Airport Facilities has already begun the process by receiving a proposal to create a new standard, NFPA 409A – Standard on Group III and Residential Hangars. It is my opinion that this new standard should incorporate all general aviation hangars and the first step in development must be to reject the proposed new requirements for Group III hangars. Adoption and enforcement of NFPA 409 codes already vary by locality and adding new requirements to Group III hangars while preparing to establish a new standard for those same hangars would only add to the disparity and confusion in adoption and enforcement.

I firmly believe that the effort to create a new standard on general aviation hangars must be driven by the realities of the general aviation environment. At the onset of development, limiting the new smaller hangar standard to only Group III hangars would be a mistake. The line between higher risk, large hangars and lower risk general aviation hangars must be set by analyzing actual fire date. I believe that, at least, a portion of group II hangars belong in this lower risk category. By tying the grouping of hangars to analysis of the actual fire risk data versus cost, a standard can be developed that allows the general aviation industry to continue to thrive while providing adequate protection for lives and property from fire.

I would like to thank Chairmen Doctorman and the entire committee for allowing me to present the opinion of the general aviation industry here today. The National Air Transportation Association looks forward to partnering with this committee and the professionals at the National Fire Prevention Association in the coming months. Together, we can find solutions that address the dangers of fire in a hangar setting while accounting for the cost of implementation on the general aviation industry.