U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

WARNING LETTER

VIA UPS GROUND: 1Z WR2 588 03 908 0201

September 9, 2011

Mr. Marc G. McCafferty
Plant Manager
Aircraft Services International Group
6000 Dehavilland Dr.
Anchorage, Alaska 99502

CPF 5-2011-1007W

Dear Mr. McCafferty:

On August 23, 2011, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Aircraft Service International Group's (ASIG) Public Awareness Program in Anchorage, Alaska.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

1. **§195.440 Public Awareness**
   (c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

ASIG did not perform the following program annual audits and program effectiveness evaluations as identified in API RP 1162, Sections 8.3, Section 8.4.2 through 8.4.4 and 8.5:

a) Annual audit or review of its program or justify why the audit/review was not conducted.

b) Evaluation of its program to determine the understanding of the stakeholders or justify why the evaluation was not conducted.
c) Evaluation of its program to determine whether appropriate preventive behaviors have been understood, and whether appropriate response and mitigation behaviors would occur, or did not justify why the evaluation was not conducted.
d) Evaluation of its program to measure the bottom line results or justify why the evaluation was not conducted.
e) The operator did not identify or implement improvements based on assessments and findings.

ASIG indicated that they will conduct an effectiveness evaluation base on API RP 1162 during 2012.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed $100,000 for each violation for each day the violation persists up to a maximum of $1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Aircraft Services International Group being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2011-1007W**, and send all documents to our office at 188 W. Northern Lights Blvd., Suite 520, Anchorage, AK 99503. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

Dennis W Hinnah

Dennis Hinnah
Deputy Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 B. Flanders (#135535)