



Key Lime Air

*Safety Program
Manual*

Key Lime Air
Document SPM-01

Director of Safety

Key Lime Air Corp.
FAA Air Carrier KY7A882H
13252 E. Control Tower Road
Englewood, CO 80112
(303) 768-9626

UNCONTROLLED WHEN DOWNLOADED



List of Effective Chapters and Approvals

Revisions to this manual are always distributed as complete reprints of the chapter(s) containing the revised material.

Chapter	Title	Pages	Revision Level	Control Date
	TOC, List of Effective Chapters, Revision Record, Approval	i - ix	2	12/15/2014
1	Safety Program Manual Introduction	1-1 – 1-4	2	12/15/2014
2	Safety Program Description	2-1 – 2-12	2	12/15/2014
3	KLA Internal Evaluation Program	3-1 – 3-32	2	12/15/2014
4	KLA Operations Risk Management Program	4-1 – 4-27	2	12/15/2014
5	KLA Voluntary Disclosure Program	5-1 – 5-9	Original	04/30/2012
6	KLA Aviation Safety Education Program	6-1 – 6-4	2	12/15/2014
7	KLA Emergency Response Plan	7-1 – 7-18	2	12/15/2014
8	KLA Safety Program Forms	8-1 – 8-46	2	12/15/2014
9	Appendix A – Reporting Matrix	9-1	Original	04/30/2012
10	Appendix B – IEP Audit Forms	See Appendix B Forms Index and Revision Status		

Manual/Program Approvals		
<input checked="" type="checkbox"/> Accepted Manual/Program: Corporate approval is required prior to implementation of any policies, procedures, and/or standards contained herein. The program is considered "provisionally accepted" upon submission to the CHDO. No FAA CHDO signature is required – record "Approval Not Required" in the FAA CHDO signature block below.		<input type="checkbox"/> FAA-Approved Manual/Program: Corporate approval AND FAA CHDO Principal Inspector approval are required prior to implementation of any policies, procedures, and/or standards contained herein.
	Key Lime Air Approval	FAA CHDO Approval
Signature		Approval Not Required
Name	Dan Steitz	
Title/Designation	Director of Safety	
Approval Date	12/16/2014	



1.0 Safety Program Manual Introduction

1.1 Purpose and Scope

1.1.1 Policies

All subject matter identified in the KLA manual section, sub-section, and sub-sub-section headers has been developed to deal with the general policies required by regulation for the processes described herein. [121.135(b)(1)]

1.1.2 System Safety

Key Lime Air's airline system is designed to maintain the highest degree of safety possible in providing air transportation to its customers and to provide its employees a safe and healthy workplace. In pursuit of this goal, an aggressive safety strategy has been incorporated into all company operations which is based upon the six attributes of System Safety.

The main processes covered in this manual are broken down into key procedures with embedded controls designed to ensure procedural completion. The interfaces between the processes and procedures are clearly identified to ensure compatibility with other departments and processes. The responsibility for the process and delegated authority to revise the process as necessary are clearly identified. Finally, the process results are measured to provide feedback to the entire system.

1.1.3 Distribution

KLA's manuals are distributed in accordance with the KLA Administrative Manual, ADM 6.6.

1.1.3.1 FAA

A copy of the SPM will be delivered to the Principle Operations Inspector (POI) at KLA's CMO.

1.1.3.2 KLA Manual Location

Copies of the SPM shall be located and maintained in each of the following KLA locations:

1. KLA Principal Base of Operations Master Manual Set
2. Dispatch Library
3. Station Library
4. Office of the Director of Safety
5. Company Website

1.1.3.3 KLA Individual Distribution

A distribution list for manual holders is maintained on company servers. See ADM 6.6 for distribution procedures.

1.1.4 Manual Holder Responsibility to Maintain Manual

Each KLA employee who is issued the SPM has the responsibility to maintain the manual in accordance with ADM 6.6.4 which lists the procedures for keeping the manual up-to-date with KLA changes and additions. Each KLA employee shall have the manual or appropriate parts of it accessible when performing their assigned duties. [121.137(b)]

All revisions must be inserted when received, and logged on the revision page of this manual in accordance with the procedures defined in ADM 6.6.



1.1.5 Reference to Regulatory Requirements

121.135(b)(3)

In accordance with regulatory requirements, KLA has inserted into their manuals, where applicable, references to the appropriate Federal Aviation Regulations or Operations Specifications. The references are inserted within the text and/or below a section/sub-section heading.

Any reference to 91.xxx, 119.xxx or 121.xxx implies that the reference is preceded by 14 CFR. The 14 CFR references will be inserted by using either of the following formats:

121.123(a), or [119.123(a)]

Regulatory references will be set in 8 font/gray in order to visually separate the reference from the manual content, policies and procedures.

1.1.6 Regulatory Compliance

All KLA personnel and all personnel with whom KLA holds contractual agreements must comply with all applicable sections of 14 CFR and applicable OpSpecs when performing their duties for KLA. To keep employees informed of their duties and responsibilities with regard to federal regulations and KLA OpSpecs, KLA has incorporated relevant excerpts and references to federal regulations and OpSpecs within the KLA manual system. If ever there is a conflict between any KLA manual and any federal regulation, the regulation shall take precedence over KLA's manual. Any KLA employee or contracted employee who becomes aware of a conflict between any KLA manual and any federal regulation or OpSpecs will immediately notify their KLA supervisor or KLA point of contact, who will report the conflict to the Director of Safety using the Aviation Safety Report (SPM-001). No work shall proceed which would result in a violation of federal regulations or OpSpecs.

1.2 Duties and Responsibilities

1.2.1 Positions

The following KLA positions have primary duties and responsibilities for the processes covered in the SPM:

1. Director of Safety
2. Director of Operations
3. CAS Manager
4. Chief Pilot
5. Chief Inspector
6. Director of Maintenance
7. Auditors
8. Technical Programs Director
9. President

1.2.2 Duties and Responsibilities

The duties and responsibilities of the positions listed in 1.2.1 above are delineated in ADM 3.6 and/or ADM 3.7. If more specific duties and responsibilities are applicable to the processes covered in this manual, they will be listed in the applicable section of this manual. [121.135(b)(2)]

1.3 Responsibility/Authority

The KLA Director of Safety (DS) is a full time position and is responsible for the content and quality and has the authority to prepare, modify and maintain the KLA Safety Program processes and procedures as stated in the KLA Administrative Manual (ADM 3.6.1). [119.65(a)(1)]



The DS is the management official responsible for SMS development.

1.4 **Manual Approval/Acceptance**

The SPM is accepted by the Principal Operations Inspector (POI) of the KLA CMO.

1.5 **Interfaces**

1.5.1 **Manual Interfaces**

Policies, procedures, information and instructions for implementing the processes described and defined in the SPM can also be found in applicable sections of the following manuals:

1. Carry-On Baggage manual (COB)
2. Operations Training Manual (OTM)
3. Station Operations Manual (SOM)
4. Safety Procedures Manual (SPM)
5. Dispatch Procedures Manual (DPM)
6. General Maintenance Manual (GMM)
7. Maintenance Inspection Program Manual (MIP)
8. Continuous Airworthiness Surveillance System Manual (CAS)
9. General Fueling Manual (GFM)
10. Hazardous Materials Operations Manual (HZM)
11. Deicing Manual (ICE)
12. Minimum Equipment List (MEL)

1.5.2 **Assessing the Impact of Changes to Interfaces**

The procedure for assessing the impact of changes to the associated interfaces with processes covered in the SPM is covered in ADM 6.12.1.

1.6 **SPM Feedback**

All personnel involved in the processes described in the Safety Procedures Manual are highly encouraged to submit feedback to the program. The preferred method is the KLA System Improvement Feedback Form (ADM-001) but any means available may also be used. Submit the feedback to your immediate supervisor or the Director of Safety. The ADM-001 is located in the forms chapter of the SPM. See SPM Chapter 8 for more information on the ADM-001.

1.7 **Regulatory and Guidance Material**

The following regulatory and guidance materials were used to develop the Key Lime Air (KLA) Aviation Safety Program:

- | | | |
|--------------------------|----------------------|------------------------------|
| 14 CFR 119.65(a) | 14 CFR 121.135(a)(1) | 49 USC 44701 |
| 14 CFR 119.65(a)(1) | 14 CFR 121.135(b)(1) | 49 USC 44702 |
| 14 CFR 119.65(b) | 14 CFR 121.135(b)(2) | FAA Order 8740.1D |
| 14 CFR 119.65(c) | 14 CFR 121.135(b)(3) | AC 120-66B (current version) |
| 14 CFR 119.65(d)(1) | | AC 00-58 (current version) |
| 14 CFR 119.65(d)(2) | | AC 120-59 (current version) |
| 14 CFR 119.65(d)(2)(i) | | AC 120-92 (current version) |
| 14 CFR 119.65(d)(2)(ii) | | |
| 14 CFR 119.65(d)(2)(iii) | | |



- 14 CFR 119.65(d)(2)(iv)
- 14 CFR 119.65(d)(2)(v)
- 14 CFR 119.65(d)(3)
- 14 CFR 119.65(e)(1)
- 14 CFR 119.65(e)(2)
- 14 CFR 119.65(e)(3)



2.0 Safety Program Description

2.1 Program Description

2.1.1 Purpose

The purpose of the Key Lime Air (KLA) Aviation Safety Program is to provide KLA management a means to achieve and maintain the highest degree of safety. [49 USC 44701 and 44702; 121.135(b)(26)]

In recognition of this fact, KLA is committed to providing a safe and healthful working environment free of recognized hazards for its employees and a safe operating environment for its customers. KLA has incorporated the principles of SMS (Safety Management System) throughout this safety program and throughout the organization. SMS is not simply a program, but rather a systematic approach to how we do business.

2.1.2 Program Scope

In pursuit of KLA's commitment to safety, an aggressive safety strategy has been incorporated into all company operations. Safety is not only a responsibility of all KLA management personnel but it is also an individual responsibility and must exist in each employee's thinking, planning, and actions. All KLA personnel, including contract employees, shall be held accountable for fulfilling their responsibilities under this safety program.

The organization and structure, which is described in this chapter, for the KLA Safety Program is appropriate for the scope and size of KLA operations. [119.65(b)]

2.1.3 Principles of System Safety

The foundation of the KLA safety program is built upon the principles of system safety. KLA is committed to eliminating hazards and minimizing potential risks through the diligent practice of risk analysis and risk management. Hazards and incidents resulting from KLA operations shall be identified at all levels. Conditions and acts posing unacceptable risk shall be eliminated or mitigated to prevent personnel injury or illness and property damage or loss. [121.135(b)(1)]

2.1.4 Safety Compliance

KLA shall ensure compliance with all regulatory safety requirements through its Internal Evaluation Program (see SPM Chapter 3), Risk Management Program (see SPM Chapter 4), and its comprehensive Aviation Safety Education program, (see SPM Chapter 6). Incorporating the concepts of system safety, the KLA Safety Program is designed to maintain the highest degree of safety possible in providing air transportation to its customers and to provide its employees a safe and healthy workplace.

The KLA SPM details how this will be accomplished.

2.1.5 KLA Safety Program Policy

In accordance with applicable CFRs and Federal Aviation Administration (FAA) guidelines, as referenced throughout the KLA manual system, the KLA safety program incorporates the following to improve and sustain safety:

1. Hazard identification,
2. Accident prevention strategies,
3. Risk management techniques,
4. Internal evaluation methods, and
5. Action policies and procedures.



KLA policy is to maintain an active and aggressive aviation safety program and all employees are expected to participate in the program and take an active role in the identification, reduction and elimination of hazards.

KLA will revise and publish, on an annual basis, a safety policy to convey its expectations and objectives to KLA employees. The safety policy will include:

- A commitment to implement and maintain SMS
- A commitment to continuously improve the level of safety
- A commitment to the management of safety risk
- A commitment to comply with applicable regulatory requirements
- A commitment to encourage employees to report safety issues without reprisal.
- Establish clear standards for acceptable operation behavior for all employees;
- Provide management guidance for setting and reviewing safety objectives
- A commitment to fulfill KLA's safety objectives as stated in SPM 2.1.7.1.
- A commitment to provide the necessary resources for the implementation of SMS.
- The safety policy will be signed by the president and vice president of KLA.

The safety policy will be communicated with visible management endorsement to all employees and responsible parties. KLA will regularly review the safety policy to ensure it remains relevant and appropriate to the organization. The safety policy will identify responsibility and accountability of management and employees with regard to safety performance.



2.1.6 Program Documentation

KLA has developed the following documents to serve as process measurements and controls in its Aviation Safety Program.

1. Aviation Safety Report (SPM-001) (see SPM 8.4)
2. Aviation Safety Report Tracking Record (SPM-002) (see SPM 8.5)
3. Safety Action Plan Record (SPM-003) (see SPM 8.6)
4. Audit Report: (SPM-004) (SPM 8.7)
5. Audit Report Tracking Record (SPM-005) (see SPM 8.8)
6. Auditor Training Record (SPM-006) (see SPM 8.9)
7. Preliminary Accident Reporting Form (SPM-007) (see SPM 8.10)
8. Accident/Incident Information Form (SPM-008) (see SPM 8.11)
9. Incident/Unusual Occurrence Report (SPM-009) (see SPM 8.12)
10. ERP Communication/Event Log (SPM-010) (see SPM 8.13)
11. ERP Checklist [SPM-011] (see SPM 8.14)
12. Risk Report (SPM-012) (see SPM 8.15)

This documentation may also be completed by electronic means via the KLA employee website or vendor websites on their equivalent forms.

2.1.7 Program Objectives and Elements

2.1.7.1 Program Objectives

In accordance with FAA guidelines and recommendations, The KLA Safety Program encompasses the principles of system safety by incorporating the following objectives and elements:

1. To motivate safe actions through developing and maintaining a dynamic corporate safety culture;
2. To identify hazards to safe operations; work with other company departments;
3. To develop and implement safety interventions;
4. To monitor intervention strategies to validate effectiveness; and,
5. To communicate the results throughout all KLA departments and offices.

2.1.7.2 Program Elements

1. An Internal Evaluation Program (IEP) (SPM Chapter 3);
2. A Voluntary Disclosure Program (SPM Chapter 5);
3. An Inflight Incident/Accident Reporting System (SPM 7.6);
4. Accident/Incident Notification (SPM 7.4);
5. Safety Audits And Inspections (SPM 3.5 and SPM 3.6);
6. Operational Risk Assessment/Safety Risk Assessment (SPM Chapter 4);
7. Open Reporting Systems (SPM Chapter 5);
8. Routine Monitoring And Trend Analysis Programs (SPM 3.6);
9. Review of External Evaluation Programs (SPM 3.1.1);



10. An active Safety Committee(s) (SPM 2.4);
11. Aviation Safety Education (SPM Chapter 6).

2.1.7.3 Program Element Review

To serve both as a process measure and control, the DS and the Safety Committee shall annually review current and suggested safety elements:

1. The Safety Committee shall evaluate the effectiveness of each element as practiced and will decide by majority vote if a new element shall be incorporated into the KLA Safety Program.
2. Elements may be deleted, revised, or adopted during any Safety Committee meeting.
3. Documentation for any element actions taken shall be maintained in Safety Committee minutes.
4. If it is determined that an elements shall be deleted or revised, an amendment to this manual will be prepared in accordance with the procedures defined in ADM Chapter 6.
5. The recommendation for an Aviation Safety Action Program [8900.1 Vol. 11, Ch. 2, Sec. 1] is not incorporated at this time in the KLA Safety Program due to the size and scope of KLA operations. Its applicability will be reviewed by the KLA Safety Committee on an annual basis to determine when KLA operations justify its incorporation.

2.1.8 Safety Program Training

All KLA employees will receive initial and recurrent safety training. This training will include the following:

- Principles of SMS
- KLA Safety philosophy
- Elements of SMS
- Duties and responsibilities with regard to Safety
- Reporting procedures

2.2 KLA Safety Philosophy

2.2.1 Flight Safety

Flight safety is the primary consideration in all flight operations. Every KLA employee and staff contracted by KLA must take all possible precautions to safeguard passengers, crewmembers, and equipment involved in aircraft operations. It is the responsibility of each KLA manager, crew member, employee and contractor/vendor to operate in accordance with the provisions of this manual.

2.2.2 Safety Guidelines

To accomplish the KLA safety philosophy, the following guidelines have been established. The DS shall ensure that these guidelines are reviewed with all KLA employees during basic company indoctrination, and as applicable: Maintenance indoctrination (MTM 3.1) and/or Operations Training Manual (OTM Chapters 3 and 6). Additionally, the guidelines shall be reviewed periodically during the KLA Safety Education program (SPM Chapter 6). The KLA safety guidelines are:

1. Safety will be considered by management and employees to be an integral and vital part of the successful performance of any job. To meet this objective, KLA will actively participate in industry and government safety forums and incorporate the lessons learned into all operational policies and procedures.



2. Flight and maintenance procedures shall be developed so that checks and double checks will reduce the chance of individual errors.
3. Direct responsibility for the safety of an operation will rest with the applicable manager of each operation.
4. Each employee is personally responsible for performing his or her duties and shall give primary concern to personal safety as well as that of his or her fellow employees, KLA passengers and the property and equipment entrusted to his or her care.
5. Employees shall take prompt corrective action to prevent situations developing into unsafe conditions. This includes situations involving individual and group work practices, work place conditions, and equipment hazards.
6. Each employee is encouraged to research, develop, and recommend procedures to the DS that will improve the safety of operations while being adaptable to the services provided. The KLA Aviation Safety Report (SPM-001) can be used for this purpose.
7. Any deteriorating condition or procedure that may jeopardize safety or lead to the violation of any Federal Aviation Administration (FAA) regulation or Company policy must be brought to the immediate attention of management personnel and the DS in accordance with the risk management procedures set forth in this manual.

2.2.3 Safety Responsibilities

It is the responsibility of all KLA management personnel, KLA employees, contractors and vendors to report conditions which could be detrimental to safe operations to their immediate manager and to the DS by means of the KLA Aviation Safety Report (SPM-001) as reflected in SPM 8.4.1, and in accordance with the instructions contained in SPM 8.4.2. This includes but is not limited to passenger misconduct, hijacking, sabotage, fires, dangerous goods incidents, and other hazards or situations, which may be a threat to the safety of the airplane and its occupants.

2.3 Program Staffing and the Director of Safety

2.3.1 Regulatory Requirements and Guidelines

This section of the KLA SPM meets the intent of the following regulatory requirements and applies the listed FAA guidelines [121.135(b)(3)]:

- | | |
|---------------------|----------------------------|
| 14CFR 119.65(a)(1) | 14 CFR 121.135(a)(1) |
| 14 CFR 119.65(b) | 14 CFR 121.135(b)(1) |
| 14 CFR 119.65(c) | 14 CFR 121.135(b)(3) |
| 14 CFR 119.65(d)(2) | 8900.1 Vol 11, Chapter 2 |
| 14 CFR 119.65(d)(3) | A.006 Management Personnel |
| 14 CFR 119.65(e)(2) | |
| 14 CFR 119(e)(3) | |
| 14 CFR 121.133 | |

2.3.2 Director of Safety

The Director of Safety (DS) is a full time position that reports directly to the President of KLA. It is the responsibility of the President of KLA to assure that the position of DS is filled by a qualified person in accordance with the criteria set forth in the KLA Administrative Manual (ADM 3.6.1). [119.65(a)(1); 119.65(d)(1); 119.65(d)(2); 119.65(d)(2)(i); 119.65(d)(2)(ii); 119.65(d)(2)(iii); 119.65(d)(2)(iv); 119.65(d)(2)(v); and OPSS A.006]



2.3.2.1 Director of Safety Qualifications

The list of qualifications for the DS, authority, duties and responsibilities are presented in ADM 3.6, which include the following:

1. The President of KLA shall ensure that the person assigned as DS possesses the required qualifications.
2. The President of KLA shall review the candidate's job history, training records, collegiate and government certificates and degrees, and conduct an interview with the candidate to validate knowledge of aviation matters pertaining to safety [119.65(d)].
3. It is highly desirable that the DS complete an aviation safety education program consistent with the position's responsibilities. If an individual has not completed such a program prior to appointment, the DS should attend one to supplement his/her experience. Participation in industry safety meetings, conferences or schools is considered an essential part of the continuing education of the DS. Training should include such subject areas as:
 - a. Corporate safety culture;
 - b. The role of the safety director as advisor to Senior management officials;
 - c. Safety philosophy;
 - d. Safety data collection and analysis programs;
 - e. Risk management;
 - f. Incident/accident prevention and investigation; and
 - g. Human factors.

2.3.2.2 Authority and Responsibility

The authority, duties and responsibilities for the DS position are presented in ADM 3.6. [119.65(d)(3); 119.65(e)(1); 121.135(a)(1); 121.135(b)(1); 121.135(b)(2)].

The DS is responsible for the conduct of the KLA Safety Program and has the authority to modify the program as needed. Additionally, the responsibilities of the DS include but are not limited to, the following:

1. The KLA Director of Safety (DS) is a full time position and is responsible for and has the authority to prepare, modify and maintain the KLA Safety Program processes and procedures.
2. Has the authority in conjunction with the KLA President to authorize external resources to conduct audits and/or evaluations of KLA operations, the KLA manual system, and external contractors that provide operational services or training to KLA.
3. Responsible for auditing the CAS program in accordance with the Internal Evaluation Program (IEP) process.
4. Serves as a member of the CAS Review Board.
5. Responsible for monitoring the CAS through attendance of CAS Review Board meetings and the review of CAS reports for proper performance and implementation and report to the DOM any issues regarding CAS implementation.
6. Responsible for implementing corrective action for deficiencies which the CAS Review Board determines are appropriate.
7. Responsible for and has the authority to prepare, modify and maintain the KLA Internal Evaluation Program (IEP) processes and procedures.
8. Responsible for scheduling and overseeing IEP audits.



9. Has the authority to designate, approve, and assign a KLA employee to serve as an auditor to augment the IEP.
10. Has the authority to modify audit reporting requirements.
11. Has the authority to perform evaluations, audits, and inspections as part of the KLA Internal Evaluation Program.
12. Responsible for the tracking and distribution of all KLA Audit and/or Evaluation Reports including an external resource audit/evaluation final report. The DS has the authority to modify the distribution and/or tracking process.
13. Responsible for and has the authority to prepare, modify and maintain the KLA Operations Risk Management (ORM) Program processes and procedures
14. Responsible for and has the authority to establish and modify the KLA Open Reporting System.
15. Responsible for and has the authority to prepare, modify and maintain the KLA Risk Management Process.
16. Responsible for ensuring that the findings and results of risk management activities are distributed to employees within the KLA network.
17. Responsible for and has the authority to prepare, modify and maintain the KLA Voluntary Disclosure Program
18. Responsible for ensuring that the required Voluntary Disclosure Report is prepared and submitted to the CHDO
19. Has the authority to develop, maintain, and modify the KLA Aviation Safety Education Program.
20. Responsible for providing KLA personnel avenues to gain the knowledge and training necessary to operate in the safest possible manner.
21. Responsible for and has the authority to prepare, modify and maintain the KLA Emergency Response Plan (ERP) processes and procedures and to ensure compliance with established ERP procedures.
22. Responsible for NTSB reporting of passenger injuries when applicable.
23. Responsible for the conduct of the KLA Safety Program and for maintaining related safety records and has the authority to modify the program as needed. Additionally, the responsibilities of the DS include but are not limited to, the following:
 - a. Monitor and report to senior management on all air carrier activities that may have an impact on safety;
 - b. Establish a reporting system which provides for a timely and free flow of safety-related information;
 - c. Develop and maintain a database of incident/accident information to monitor and analyze trends;
 - d. Monitor and evaluate the various safety and malfunction reporting systems to ensure appropriate integration and evaluation of data;
 - e. Investigate and report on incidents/accidents and make recommendations to preclude a recurrence;
 - f. Conduct safety audits and inspections;
 - g. Solicit and process safety improvement suggestions;
 - h. Develop and maintain a safety awareness program;



- i. Review and evaluate the adequacy of the emergency response plan;
- j. Monitor industry safety concerns that may have an impact on operations;
- k. Maintain close liaison with the FAA, NTSB and industry safety organizations and associations;
- l. Discharge his duties to meet applicable legal requirements and to maintain safe operations in accordance with section 119.65.
- m. Maintain currency and knowledge in the following areas with respect to KLA's operation [119.65(d)(2)]:
 - Aviation standards and safe operating practices [119.65(d)(2)(i)];
 - Federal Aviation Regulations [119.65(d)(2)(ii)];
 - KLA operations specifications [119.65(d)(2)(iii)];
 - Appropriate maintenance and airworthiness requirements of the CFR [119.65(d)(2)(iv)];
 - The KLA manual system [121.133];
- 24. Monitors subordinate(s) performance to ensure employees perform duties and responsibilities in a satisfactory manner.
- 25. May delegate any duty or authority but retains responsibility.
- 26. Ensure that processes needed for the SMS are established, implemented, and maintained.
- 27. Report to the president on the performance of the SMS and the need for improvement.
- 28. Ensure the promotion of awareness of safety expectations throughout the organization.
- 29. Attend safety programs as appropriate. KLA shall provide the DS the opportunity to attend industry conferences, workshops, and training programs in order to maintain a currency in the above areas. The DS shall attend a minimum of one conference per year. [119.65(d)(2)]

2.3.2.3 Director of Safety Physical Address

All SPM manual references to document/record storage or retention by the DS or Office of the DS that are related to any material developed as part of the KLA Safety Program shall be construed to mean the office located at 13252 East Control Tower Road Englewood, CO 80112. [119.65(e)(2)]

2.3.2.4 Unavailability of the Director of Safety

- 1. In the absence or unavailability of the DS, an individual designated by the President of KLA who is qualified in accordance with the qualification requirements contained in ADM 3.6, may assume the duties and responsibilities for the position of the DS.
- 2. In the event that the DS will remain absent or unavailable for a period in excess of 30 days, the President of KLA will designate an interim DS and advise the certificate holding district office (CHDO) of the designee and will ensure that the KLA Operation Specifications A.006, is amended within 10 days from the date of the designation in accordance with the procedures defined in ADM 3.4. [119.65(e)(3)].

2.3.3 KLA Safety Program Staffing

2.3.3.1 Staffing

The staffing for the KLA Safety Program consists of the following:

- 1. A Director of Safety (DS), as stated in KLA Operations Specifications [119.65(c)] (see A.006 Management Personnel).



2. A KLA Safety Committee (KLA-SC), see SPM 2.4., and
3. Designated Internal Evaluation Program Auditors, SPM Chapter 3.

2.3.3.2 Structure and Scope

The structure of the KLA Safety Program and assigned safety staff is appropriate for the scope and size of KLA operations [119.65(b)].

1. The program is designed to encompass both Part 91 and Part 121 operations.
2. The Safety Committee shall on an annual basis, or as needed, review the number of personnel assigned safety program responsibilities to determine if the size and scope of the program should be increased or decreased.

2.3.3.3 Safety Committee

The staffing requirements for the KLA Safety Committee are presented in Section 2.4 of this chapter.

2.3.3.4 Internal Evaluation Program Auditors

The staffing requirements and qualifications for the KLA Internal Evaluation Program Auditors are presented in SPM 3.4.