

Gulfstream Aerospace  
Roswell, NM  
April 2, 2011  
DCA011MA076

**NATIONAL TRANSPORTATION SAFETY BOARD  
WASHINGTON, D.C.**

ATTACHMENT 11

FAA LETTER OF CORRECTION FOR 2010 ROW INSPECTION

8 Pages



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Federal Aviation Administration  
Southwest Region, Airports Division, Safety and  
Standards Branch

Fort Worth, Texas 76193-0620

December 15, 2010

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

Ms. Jennifer Brady  
Acting Airport Manager  
Roswell International Air Center  
1 Jerry Smith Circle  
Roswell, NM 88203

Dear Ms. Brady:

Subject: Letter of Correction, EIR No. 2011SW840010

A periodic certification inspection of Roswell International Air Center (ROW) was conducted November 2-4, 2010. The inspection revealed discrepancies to the Federal Aviation Regulations (FAR), Part 139, the Airport Certification Manual (ACM), and the Airport Operating Certificate.

The following discrepancies were found and as agreed at the post-inspection out-briefing, should be corrected by the dates indicated:

**1. Airport Certification Manual, 139.201(a):**

*.201 General Requirements.*

*(a) No person may operate an airport subject to this part unless that person adopts and complies with an Airport Certification Manual (ACM).*

Specifically the certificate holder did not properly train airport personnel for their assigned duties, document required training, maintain signs and markings, insure that Aircraft Rescue and Firefighting (ARFF) training and procedures properly supported personnel in the conduct of their required duties, insure that ARFF personnel could meet their timed response requirement, or stop the use of a taxi surface as an unapproved runway.

Correction Date: **December 6, 2010**

**2. Airport Certification Manual, 139.201(a):**

*.201 General Requirements.*

*(a) No person may operate an airport subject to this part unless that person adopts and complies with an Airport Certification Manual (ACM).*

Specifically the certificate holder was allowing a designated taxi surface, Taxiway-Bravo, to be utilized as a runway by USAF C-130 aircraft wishing to practice assault landings.

Taxiway-Bravo is not a designated runway and has not gone through the appropriate evaluation and approval process for it to be used as a runway. This practice must stop until such time as the taxiway has been approved and properly configured for use as a runway.

Corrected: November 4, 2010

**3. Personnel, 139.303(c):**

**.303 Personnel.**

*In a manner authorized by the Administrator, each certificate holder must—*

*(c) Train all personnel who access movement areas and safety areas and perform duties in compliance with the requirements of the Airport Certification Manual and the requirements of this part. This training must be completed prior to the initial performance of such duties and at least once every 12 consecutive calendar months (CCM).*

Discrepancies found in the performance and documentation of self-inspections indicate the need to develop a detailed training curriculum to support this requirement.

Correction Date: December 6, 2010

**4. Personnel, 139.303(d):**

**.303 Personnel.**

*In a manner authorized by the Administrator, each certificate holder must—*

*(d) Make a record of all training completed after June 9, 2004 by each individual in compliance with this section that includes, at a minimum, a description and date of training received. Such records must be maintained for 24 consecutive calendar months after completion of training.*

During our inspection we noted that training sign-in sheets were missing complete dates and instructor information.

Corrected: November 4, 2010

**5. Marking, Signs, and Lighting, 139.311(d):**

**.311 Markings, Signs, and Lighting.**

*(d) Maintenance. Each certificate holder must properly maintain each marking, sign, or lighting system installed and operated on the airport. As used in this section, to "properly maintain" includes cleaning, replacing, or repairing any faded, missing, or nonfunctional item; keeping each item unobscured and clearly visible; and ensuring that each item provides an accurate reference to the user.*

During our inspection, we found that the lower half of the message panel within the signs along Taxiway-Charlie have become obscured by the buildup of dirt on the interior surface of the panels.

Correction Date: November 11, 2010

**6. Marking, Signs, and Lighting, 139.311(d):**

*.311 Markings, Signs, and Lighting.*

*(d) Maintenance. Each certificate holder must properly maintain each marking, sign, or lighting system installed and operated on the airport. As used in this section, to "properly maintain" includes cleaning, replacing, or repairing any faded, missing, or nonfunctional item; keeping each item unobscured and clearly visible; and ensuring that each item provides an accurate reference to the user.*

During our inspection we found that the markings for Taxiway-Bravo, especially the centerline, have become very worn and have lost most of their required glass beads.

Correction Date:       **December 6, 2010**

**7. Marking, Signs, and Lighting, 139.311(d):**

*.311 Markings, Signs, and Lighting.*

*(d) Maintenance. Each certificate holder must properly maintain each marking, sign, or lighting system installed and operated on the airport. As used in this section, to "properly maintain" includes cleaning, replacing, or repairing any faded, missing, or nonfunctional item; keeping each item unobscured and clearly visible; and ensuring that each item provides an accurate reference to the user.*

During our inspection we found that the combination of wear and the residual effects from the recent rubber removal project has left the markings for Runway 3-21 requiring repainting. This includes the old runway side stripes that have been blackened out. The black paint covering these markings has worn to the point that this old stripe is as visible as the current one.

Correction Date:       **December 6, 2010**

**8. Aircraft Rescue and Firefighting (ARFF) Operations, 139.319(h)(2):**

*.319 ARFF Operations.*

*(h) Response requirements. (2)The response required by paragraph (h)(1)(ii) of this section must achieve the following performance criteria:*

*(i) Within 3 minutes from the time of the alarm, at least one required aircraft rescue and firefighting vehicle must reach the midpoint of the farthest runway serving air carrier aircraft from its assigned post or reach any other specified point of comparable distance on the movement area that is available to air carriers, and begin application of extinguishing agent.*

During our inspection ARFF personnel exceeded the allowed 3-minute response time limit by 50-seconds. Subsequent response test were within the allowed limits.

Corrected:               **November 4, 2010**

**9. ARFF Operations, 139.319(i)(3):**

*.319 ARFF Operations.*

*(i) Personnel. Each certificate holder must ensure the following:*

*(3) All rescue and firefighting personnel must participate in at least one live-fire drill prior to initial performance of rescue and firefighting duties and every 12 consecutive calendar months (CCM) thereafter.*

New record keeping and documentation procedures in use by ARFF allowed us to identify a training lapse during a previous 12-CCM training cycle. In an effort to re-align training dates the assigned training officer had extended almost all of the then assigned ARFF personnel's live-fire training out to 13-CCM. The consequences of such actions were discussed with both the responsible party and the individual that is scheduled to replace him.

Corrected: November 4, 2010

**10. ARFF Operations, 139.319(i)(7):**

*.319 ARFF Operations.*

*(i) Personnel. Each certificate holder must ensure the following:*

*(7) Procedures and equipment are established and maintained for alerting rescue and firefighting personnel by siren, alarm, or other means authorized by the Administrator to any existing or impending emergency requiring their assistance.*

During our inspection the initial ARFF timed response drill exceeded the allowed time limit. Post drill discussions identified a procedural issue that resulted in the failed response. The fire station at ROW is a mixed ARFF/structural station with an EMS support requirement. The typical 3-man shift assignment for ARFF is tasked with the EMS support. During an EMS run, two of the three firefighters are sent, thus leaving one firefighter to support the airport. There is not a process/requirement for this remaining individual to stage his equipment at the driver's position within the ARFF vehicle. The resulting time delay generated by having to reposition his equipment is why our first timed response drill exceeded the allowed time limit.

Correction Date: November 11, 2010

**11. Hazardous Materials, 139.321(b):**

*.321 Hazardous Materials.*

*(b) Each certificate holder must establish and maintain standards authorized by the Administrator for protecting against fire and explosions in storing, dispensing, and otherwise handling fuel (other than articles and materials that are, or are intended to be, aircraft cargo) on the airport. These standards must cover facilities, procedures, and personnel training.*

During our inspection we found that the local ARFF personnel tasked with conducting these inspections were not establishing firm suspense dates, consistently and properly documenting re-inspections, and were missing some inspection areas. This is a repeat discrepancy from the last inspection.

Corrected: November 4, 2010

**12. Hazardous Materials, 139.321(c):**

*.321 Hazardous Materials.*

*(c) Each certificate holder must, as a fueling agent, comply with, and require all other fueling agents operating on the airport to comply with, the standards established under paragraph (b) of this section and must perform reasonable surveillance of all fueling activities on the airport with respect to those standards.*

During our inspection we found that the training curriculum used by ARFF personnel tasked with conducting these inspections needed to be expanded in the areas being missed during inspections. These included, but are not limited to, testing the brake inter-lock system, tank dome covers, and suspense dates.

Correction Date:       **December 6, 2010**

**13. Self Inspection Program, 139.327(b)(3):**

*.327 Self Inspection Program.*

*(b) Each certificate holder must provide the following:*

*(3) Procedures to ensure qualified personnel perform the inspections. Such procedures must ensure personnel are trained, as specified under §139.303.*

During the course of our inspection we observed a night lighting inspection by ROW personnel. Said inspection was cursory in nature and incomplete. All personnel were briefed on proper night inspection procedures and depth of detail expected in these inspections.

Corrected:               **November 4, 2010**

**14. Self Inspection Program, 139.327(b)(3):**

*.327 Self Inspection Program.*

*(b) Each certificate holder must provide the following:*

*(3) Procedures to ensure qualified personnel perform the inspections. Such procedures must ensure personnel are trained, as specified under §139.303.*

During our self-inspection records review and discussions with ROW personnel we noted that not every discrepancy was being documented. Discrepancies that were commonly known to the maintenance/operations personnel have not been recorded. For example, the wear on the centerline markings for Taxiway-Bravo is a known issue, but due to materials shortages ROW has not been able to obtain the needed supplies to correct this issue. Discrepancies such as this, and any further changes in this items condition, are not being recorded during the self-inspections. Such practices are not acceptable. The self-inspection is to be an accurate and complete depiction of the condition of the airport and identify all issues in need of correction.

Corrected:               **November 4, 2010**

**15. Airport Condition Reporting, 139.339(b):**

*.339 Hazardous Materials. In a manner authorized by the Administrator, each certificate holder must—*

*(b) In complying with paragraph (a) of this section, use the NOTAM system, as appropriate and other systems and procedures authorized by the Administrator.*

During our inspection we noted inconsistencies in the monitoring and documentation of canceled NOTAMs. This was most evident when handling self-canceling NOTAM entries. Documentation and handling practices must be consistent and thorough.



Corrected:

November 4, 2010

We have given consideration to all available facts and concluded that this matter does not warrant legal enforcement action. In lieu of such action we are issuing this letter that will be made a matter of record. We will expect future compliance by the airport with the regulations.

Additional comments and recommendations are enclosed for your review.

Sincerely,

Richard Middleton  
Airport Certification  
and Safety Inspector

Enclosure

cc: Director, Aviation Division  
New Mexico Department of Transportation  
P.O. Box 1149  
Santa Fe, NM 87504-1149

COMMENTS & RECOMMENDATIONS  
PERIODIC CERTIFICATION INSPECTION  
Roswell International Air Center (ROW)  
November 2-4, 2010

**1. Positive "Team" Attitude:** We applaud the positive attitude demonstrated by the staff at the airport and their support personnel. They are eager for input and demonstrate a strong desire to improve the operational standards at ROW.

**2. Status of Runway 12/30:** Currently Runway 12/30 is indefinitely closed. It has been maintained in this status for many years. Currently, it is used for the storage of medium to large aircraft being processed by airport tenants. Retaining the "runway" status for this surface places an undue economic and manpower drain on airport management.

It is our position that Runway 12/30 should be closed, all associated signs and markings removed, and that it be converted into non-movement area. This would allow airport management to take whatever actions are necessary to protect the safety area for Taxiway Charlie and the dedicated ARFF emergency access lanes. Such measures will mitigate the current safety risk faced by responding ARFF vehicles and improve their response times.

**3. ARFF Staffing and Procedures:** The fire station at ROW is a mixed ARFF/structural station with an EMS support requirement. The typical 3-man shift assignment for ARFF is tasked with the EMS support, and when conducting an EMS run two of the three firefighters are tasked. This leaves one ARFF firefighter, typically the Lieutenant on duty, to man the response phone and answer any alerts. However, there is no requirement for this remaining individual to stage his/her equipment at the driver's position of the ARFF vehicle. The need to gather up and reposition equipment during such a situation resulted in an emergency response drill that exceeded the time limit by nearly a complete minute.

ARFF management must take into account their various taskings and insure that they have plans and policies in place to insure the promptest available response to an airport incident. ARFF manning must also support the published support capabilities for ROW. While ROW is listed as having index A ARFF support, it is noted as having Index B available. Without a stipulated coordination requirement for such support, the ARFF station should always be manned so that it can respond with two vehicles if needed.

**4. ARFF Movement Area Training:** Currently the airport movement area training is being delivered in sequence with the recurrent airport familiarization training, and the single sign-in sheet is used to record the training. The documentation for these two training events must be separated as they have two different retention requirements. ARFF should also conduct a regular review of their movement area training curriculum to insure it is current with that of the airport.

**5. Status of Crash 2 ARFF Vehicle:** During our records review at the ARFF station we noted the significant issues being faced by keeping an 18 year old ARFF vehicle ready for action. If ROW is to retain their Index B support flexibility we recommend that consideration be given to procuring a replacement vehicle. Since a considerable amount of



money has been spent to keep Crash 2 operation, the certificate holder could elect to retain this vehicle as a ready reserve for their operational vehicles.

**6. ASOS Training:** We recommend that consideration be given to sending employees, responsible for airport operations and maintenance, to both AAAE/FAA Basic and Advanced Airport Safety and Operations Schools (ASOS), which are conducted throughout the United States. Information pertaining to dates and locations for these schools can be found on the Association of American Airport Executives web page, [www.airportnet.org](http://www.airportnet.org)

In closing, we wish to thank you and your staff for the cooperation and courtesy shown to us during the inspection. It was greatly appreciated.