14 CFR Part 139 Inspections

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Evelyn Martinez
Lead Airport Certification Safety Inspector
Airports Division, Eastern Region

Agenda

• Overview of the Part 139 Program
• How to prepare for your FAA Inspection
• Airport Certification Safety Inspectors Role
• Phases of the Inspection
  – Including special emphasis areas
• Enforcement Options
• Q&A
Overview of Part 139 Program

Legal Requirements

- Airports served by passenger aircraft with more than 9 passenger seats are **required** to have an Airport Operation Certificate
  - Airport certification requirements are contained in Title 14 Code of Federal Regulation Part 139
  - Applies to 570 civil airports nationwide
    - Eastern Region covers 65 civil airports across 7 states and the District of Columbia
      - 1 Lead Inspector, 4 Full time Inspectors & 2 Part Time Inspectors
Required movement area safety standards

- Safety Areas
- Marking/Lighting/Signs
- Paved Areas
- NAVAIDS/Obstructions

Required accident mitigation standards

- ARFF
- Airport Emergency Plan
Airport Certification Safety Inspectors Role

- Conduct periodic and surveillance (specific & unannounced) inspections at 139 Airports

- Conduct accident/incident investigations
  - Runway Incursions
  - Movement area excursions
  - Wildlife Strikes
  - NTSB Accident Investigation Team member

- Coordinate
  - Safety Hotline & NASA Aviation Reports
  - Airshow Ground Operation Plans

- Provide support and guidance to 139 and GA Airports
  - Coordinate with FAA Washington Headquarters and ADOs
  - Issue Regional Certification Bulletins
How to Prepare for your FAA Inspection

How to prepare

- Year-round
- Periodic ARFF Response Tests
- Training Program Annual Review
- Internal Audits of Training Records
  - ARFF, Operations
  - Driver Training, Fueling
  - Wildlife, Airport Management
- Mock Part 139 Inspection
Inspection Phases

- In Briefing
- Administrative Inspection
- Movement Area Inspection - Day & Night
- ARFF Inspection
- Fueling Facilities Inspection
- Wildlife/Driver Training Inspection
- Post Inspection Briefing

In Briefing

- Meet with key airport management
- Review schedule
- Discuss updates in Part 139 program
- Discuss any concerns
- Address questions
Administrative Inspection

ACM Review: Side by side review
Training Records: Operations, Drivers
Training Program: Training Curriculums
Inspection Records: Daily Self-Inspection, Periodic, Notams, Work Orders, Airport owned Navaids

Administrative Inspection cont’d

Airport Plans: Snow and Ice Control Plan/Equip.
Annual Reviews?
Ground Vehicle Ops Training Manual
Obstruction Survey
Airport Emergency Plan
Construction Safety Phasing Plan

Other Records: Master Record 5010
Notams
Work Orders
Modification to Standards
RSA Determinations
Air Show Ground Ops Plan (CB #09-04)
**Movement Area Inspection**

- Day & Night
- All Runways and Taxiways
- Apron areas available for air carrier use 139.305(a)
- Signage in accordance with approved Sign and Marking Plan
- Marking - Glass Beads
- Lighting - Outages
- Construction areas - CSPP review

**ARFF Inspection**

- Unannounced ARFF Response Test
  - Foam Test, Dry Chem Test
- Training Curriculum
  - Training Room, resources, includes mutual aid?
- Training Records
  - All subjects including HRET; Medical (LOA Review)
  - 100% Records - non-trained documentation
- ARFF Vehicle Inspection
- Agent/Dry Chem Supplies
Fueling Inspection

• Quarterly Inspections – Do they include review of training records?
• NFPA and local fire code training curriculum covered?
• Hands-on fire extinguisher training
• In-house fueling training in place?

Wildlife Inspection

• Wildlife Training & Records
  – Qualified Biologist? Train the trainer?
  – Agenda available for review in accordance with AC 150/5200-36A, Appendix D Training Curriculum Outline
• Wildlife Control Measures- equipment check
• Perimeter & movement area
• Annual Review WHMP- with all responsible parties?
• Triggering Events? Did you conduct a review of your WHMP? See Cert Bulletin 11-04
• Off-airport task force? Seasonal impacts being monitored?
Driver Training Program

Part 139.329 Pedestrian and Ground Vehicle Operations Requirements

- **Vehicle/Pedestrian Deviation (V/PD)** - Any entry or movement on the movement area by a vehicle (including aircraft operated by non-pilots) or pedestrian that has not been authorized by air traffic control.

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**Vehicle/Pedestrian Deviations (V/PD)**

A vehicle or pedestrian crossing holding position marking or entering a runway, without ATCT authorization, is a runway incursion.
Pedestrian/ Ground Vehicle Training Program

• Comprehensive
  – Train all personnel who access the movement area and safety area
  – Recurrent training every 12 months
  – Keep records for 24 months
  – Limit access to movement areas and safety areas
  – Consequences of noncompliance

V/PD Investigations

1. Letter of Investigation (LOI) to the airport operator.
   – 10 days to respond

2. FAA investigates the incident, reviews the airport’s ground vehicle program and past incidents within the last few years.

3. The FAA determines appropriate action to take against airport certificate holder. Issues:
   1. Closeout letter
   2. Warning Letter
   3. Letter of Correction
   4. Initiates civil penalty enforcement action
Airport Operator Actions to Reduce the Potential for Pedestrian and Ground Vehicle Deviations

- Recurrent Training for seasonal personnel.
- Review of special procedures for seasonal operations (mowing and snow removal).

Airline/FBO Personnel on Remote Deicing Pads
Snow Removal By Contractors or Other City Department Personnel

Airport Construction Barricades

- Use barricades to keep aircraft out of closed areas and construction vehicles out of active movement areas. Reference AC 150/5370-2F (4 feet apart for vehicles, interlocking for pedestrians).
Hot Spots

• A hot spot is defined as a location on an airport movement area with a history of potential risk of collision or runway incursion, and where heightened attention by pilots and drivers is necessary.

• Hot Spot Link:
  – [http://aeronav.faa.gov/d-tpp/1408/All_Hotspot.pdf](http://aeronav.faa.gov/d-tpp/1408/All_Hotspot.pdf)

XYZ Hot Spots

• HS 1 The hold line on Twy B4 south of Rwy 10–28 is the hold line for both Rwy 15R–33L and Rwy 10–28.
• HS 2 Rwy 06–24 and Rwy 10–28 complex intersection.
Getting the Word Out

- **Crew Briefing Web Sites**
- **Construction status Web Sites**
  - FAA’s Airport Construction Advisory Council
  - [ConstructionCouncil@faa.gov](mailto:ConstructionCouncil@faa.gov)
    - Construction Notices
    - [https://nfdc.faa.gov/xwiki/bin/view/NFDC/ConstructionNotices](https://nfdc.faa.gov/xwiki/bin/view/NFDC/ConstructionNotices)

Questions?

Post Inspection Briefing

• Meet with key airport management
• Review findings
• Discuss correction dates
• Review IOUs
• Address questions
• Discuss Letter of Investigation (if applicable)
Enforcement Action Options

- **Enforcement Actions**
  - Administrative Action
    - Warning Letters
      - Violation found but corrected
    - Letter of Correction
      - Includes agreed upon correction due dates
        » Extensions must be granted if not met
  - Civil Penalty Enforcement Action
    - Begins with a Letter of Investigation
      - May result in no finding
      - May result in civil penalty fines including consent orders and or agreements

FAA Updates

- **FAA Business Goals**
- **FAA Cert Alerts**
- **Eastern Region Cert Bulletins**
- **Advisory Circulars**
- **SMS**
Questions?

Evelyn Martinez
Lead Airport Certification Safety Inspector
718-553-3348
Evelyn.martinez@faa.gov