



U.S Department  
of Transportation

**Federal Aviation  
Administration**

Western-Pacific Region  
Office of the Regional Administrator

P.O. Box 92007  
Los Angeles, CA 90009-2007

December 2, 2014

EIR: 2015WP800019

Ms. Janet Young  
Merced Regional/Macready Field  
20 Macready Drive  
Merced, CA 95341

**RECEIVED**  
**DEC 08 2014**

Merced Regional/Macready Field  
Merced California  
Letter of Correction

Dear Ms. Young:

The periodic certification inspection of the Merced Regional/Macready Field (MCE) was conducted 17-19 Nov 2014. The inspection revealed that the airport is not being operated in compliance with 14 CFR Part 139, the Airport Certification Manual (ACM), and the Airport Operating Certificate.

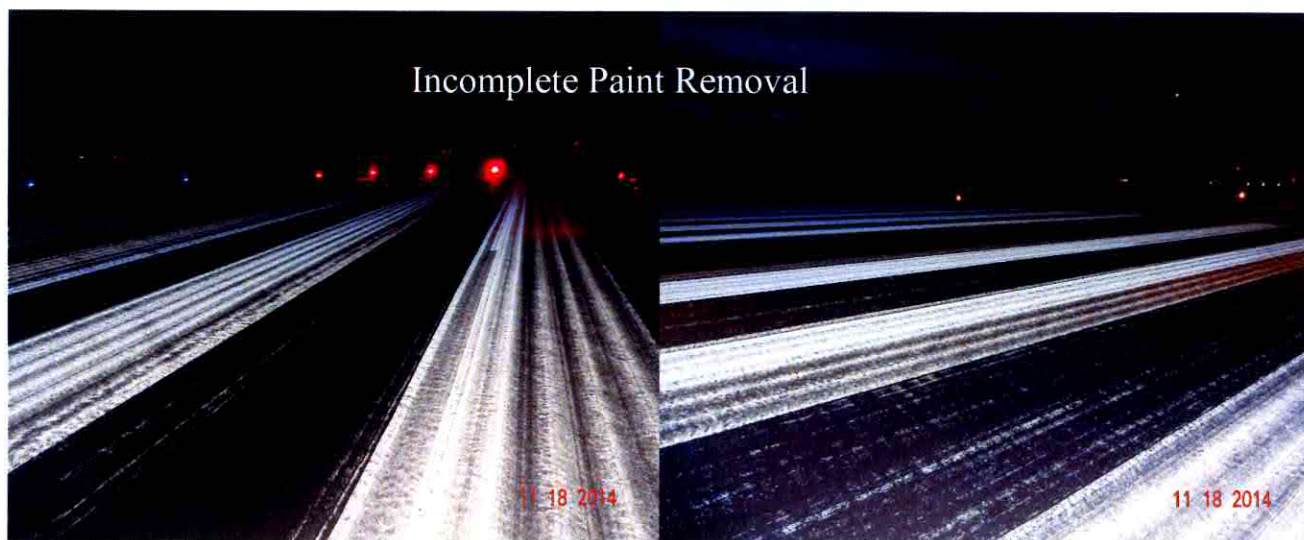
**§139.201(a) – Airport Certification Manual.** The certificate holder is not operating in compliance with the Airport Certification Manual (ACM) as related to the 11 discrepancies identified in the 2014 Part 39 Annual Inspection.

**Correction Date:** Feb 17, 2015

**§139.201(b) - Airport Certification Manual.** The certificate holder failed to ensure the ACM is current. For example, ARFF is not included in the distribution. Section 303 contact information for key personnel is outdated. Section 309 has the incorrect dimensions of the Runway Safety Area (RSA) as well as the information regarding the location of the localizer. It also incorrectly indicates that service roads are located in the RSA. Section 311 does not include an approved Sign and Marking Plan. Section 315 identifies the airport as Index C capable; however, the information does not match what's published on the Airport Master Record or in the Airport/Facility Directory. The Emergency Alerting System information in Section 319 does not accurately capture the how ARFF personnel are alerted of impending emergencies. Section 327 does not include inspection of the safety areas. Section 329 references an outdated advisory circular. Section 337 should be updated to reflect a wildlife hazard assessment was recently completed. Appendix A, the Part 139 Training Event Record does not include all training required under §139.319. Additionally, this training record is not being used by ARFF personnel. Appendix K has outdated information regarding persons authorized to issue NOTAMS. The certificate holder must conduct a thorough review of the ACM for accuracy and update as required.

**Correction Date:** Dec 19, 2014

**§139.311(a)(1) – Runway Markings.** The certificate holder failed to maintain runway markings. Runway 12-30 centerline markings were found badly faded. Runway designation and threshold markings exhibited both white and beige hues. Where the threshold markings width was decreased, remnants of the white paint is still visible during daytime and hours of darkness. Also, in some areas of the markings, the paint appeared to be missing beads. The certificate holder must ensure all runway markings meets the standards outlined in AC 150/5340-1, *Standards for Airport Markings*, current edition. Pavement markings that are no longer needed are not to be painted over but instead are to be physically removed. Physical removal of markings is achieved by water blasting, shot blasting, sand blasting, chemical removal, or other acceptable means that do not harm the pavement. The physical removal of any old marking(s) must include a pre-determined larger size and shape of a removal area that encompasses the old marking(s) and by grouping adjacent markings together into a larger rectangular removal area.



Faded Runway Centerline



**Correction Date:** Feb 17, 2015

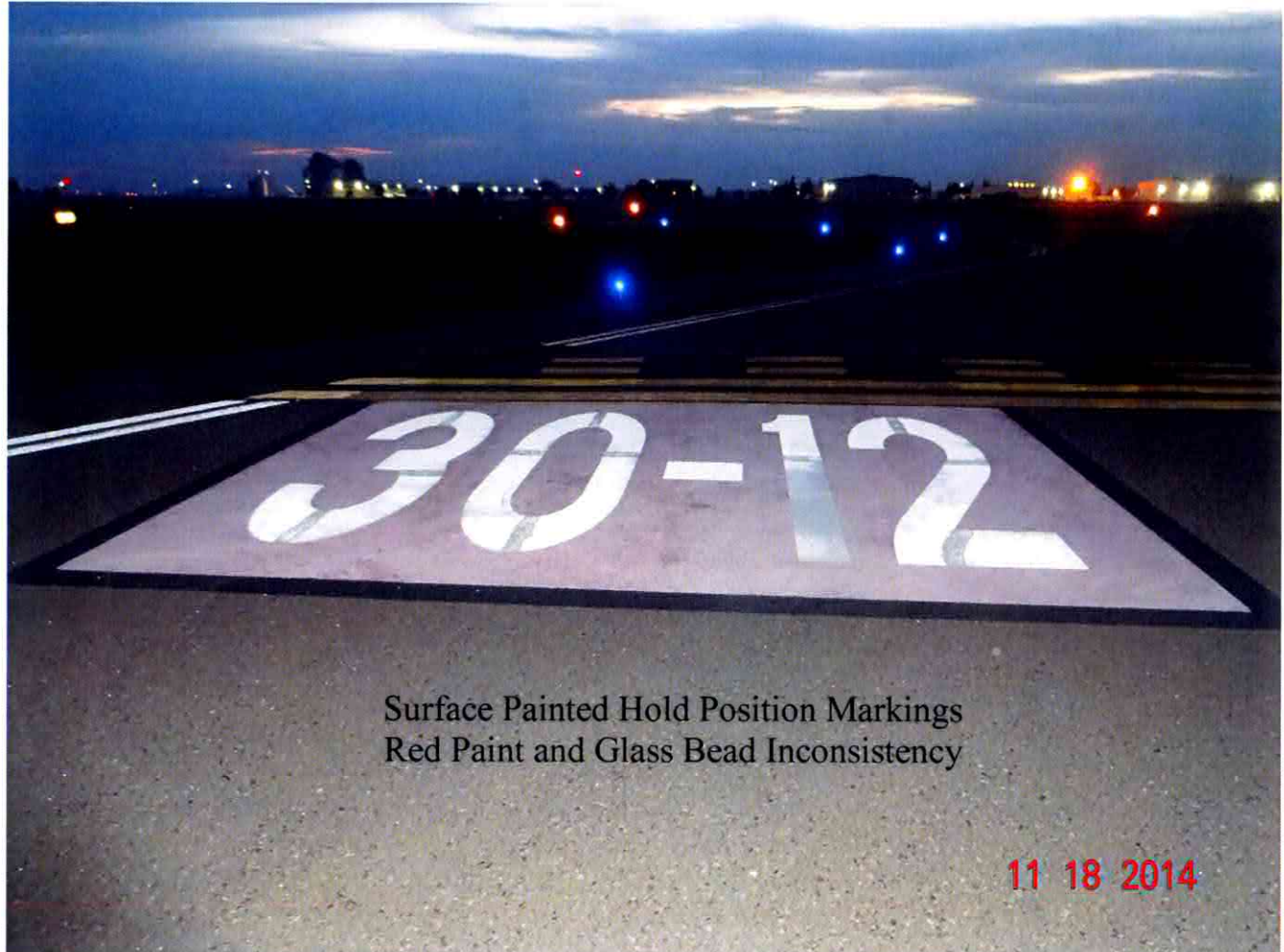
**§139.311(a)(2) – Taxiway Markings.** The certificate holder failed to maintain taxiway centerline markings. Taxiway centerlines were found badly faded. Additionally, not all lead-on/off lines that lead to the runway were visible. The certificate holder must ensure all taxiway markings meets the standards outlined in AC 150/5340-1, *Standards for Airport Markings*, current edition.

Faded Lead on/off line



**Correction Date:** Feb 17, 2015

**§139.311(a)(4) – Holding Position Markings.** During hours of darkness, the red background of some surface painted holding position sign (SPHPS) markings appears pink. Additionally, the glass beads distribution appears to be inconsistent. The certificate holder must ensure all SPHPS markings meets the standards outlined in AC 150/5340-1, *Standards for Airport Markings*, current edition and provide the required supplemental visual cues that alert pilots and vehicle drivers of an upcoming holding position location.



**Correction Date:** Feb 17, 2015

**§139.311(d) – Signs.** The certificate holder failed to maintain signs identifying taxiing routes on the movement area. Due to direct sunlight on some parts of the airfield, some direction sign panels were found faded and require replacement. Non-standard inbound destination signs were also found. Common names and abbreviations used for inbound destinations are: APRON - general parking, servicing, and loading areas; RAMP -synonymous with APRON; FUEL -areas where aircraft are fueled or serviced; TERM -gate positions at which aircraft are loaded or unloaded; CIVIL-areas set aside for civil aircraft; MIL -areas set aside for military aircraft; PAX -areas set aside for passenger handling; CARGO -areas set aside for cargo handling; INTL -areas set aside for handling international flights; and FBO -fixed-base operator. The certificate holder must conduct a thorough inventory of all signs, ensure compliance with A/C 150/5340-18F, *Standards for Airport Sign Systems*, and replace as required.



**Correction Date:** Feb 17, 2015

**§139.319(i)(2) - Aircraft rescue and firefighting: Operational requirements.** Records indicate that two ARFF personnel failed to complete recurrent instruction every 12 consecutive calendar months in application of the types of extinguishing agents and adapting and using structural rescue and firefighting equipment for ARFF. One individual failed to complete recurrent training in airport familiarization, including airport signs, marking, and lighting as well as rescue and firefighting personnel safety. A Letter of Investigation (LOI) will be issued.

**§139.319(i)(3) - Aircraft rescue and firefighting: Operational requirements.** Records indicate that one ARFF personnel failed to complete live-fire training prior to performing ARFF duties. A LOI will be issued.

**§139.321(c) – Hazardous Materials.** The fueling agent, TDL Aero Enterprises was found in non-compliance with the local Fire Safety Standards. For example, one tire on a mobile fueler was found to have worn treads. Additionally, an ABC extinguisher was found on a mobile fueler.

**Correction Date:** Dec 19, 2014

**§139.321(e)(1) – Hazardous Materials.** Documentation provided by the fueling agent indicates the supervisor failed to complete recurrent instruction at least every 24 consecutive calendar months. Although the company that provided the training is on a list of approved companies offering courses of instruction in line service training as well as supervisory training that are acceptable to the Administrator, the certificate provided does not meet the requirements. The certificate does not contain the following wording: (1) The individual completed the “Fuel Safety Supervisor” training and (2) “Has successfully completed all classroom and practical application for the requirements of 14 CFR §139.321(b)(1) through (b)(6) and §139.321(e) (1)”. A LOI will be issued.



**Correction Date:** Dec 19, 2014

**§139.323 - Traffic and wind direction indicators.** Runway 30 supplemental wind cone was found in the Runway Object Free Area (ROFA). The wind cone is located approximately 275 feet from the runway centerline, not fixed-by function, and must be moved out of the ROFA. The supplemental wind cone must be located near the runway end so that pilots have an unobstructed view during either landing or takeoff operations. The preferred location is on the left side of the runway when viewed from a landing aircraft. However, it may be located on the right side of the runway where conditions such as the existence of another runway, taxiway, apron, terrain problems, or navigational aids preclude its installation on the left side. The certificate holder must work with the SFO Airport District Office to address this 139 violation and correct at the earliest opportunity.



**Correction Date:** Feb 17, 2015

**Recommendations:**

1. Although the current 2000 E-One apparatus is operational, the airport has only one ARFF vehicle. If the vehicle should become unserviceable a replacement is not available. Recommend the airport plan for a new truck in order to have a reserve capable of maintaining its index.
2. Keeping records is crucial to Part 139 certification. A comprehensive record keeping system makes it possible to develop accurate and timely reports that show the progress and current status of individual training. Recommend simplifying ARFF training records for (a) easy review; (b) monitoring and measuring the progress of individual training; (c) a comparative analysis of training across periods of time (month, quarter or year); and (d) future planning/scheduling.
3. The asphalt on Taxiway Echo appears to be exhibiting a high degree of weathering. Recommend the airport plan for and conduct an immediate Pavement Management Program (PMP) to find optimum strategies for maintaining pavements in a safe serviceable condition. The PMP is also needed to publish the gross weight and pavement condition number in accordance with Advisory Circular 150/5335-5C, *Standardized Method of Reporting Airport Pavement Strength – PCN* by August 14, 2015.
4. The airport does not own any snow removal equipment or have continuous friction measuring equipment that can be used for conducting friction surveys on runways during winter

operations. As a result, braking action is reported based on pilot reports (PIREPs). However, while PIREPs of braking action provide valuable information, these reports may not apply to the full length of the runway as such evaluations are limited to the specific sections of the runway surface in which the airplane wheel braking was used. Recommend the airport review its procedures, A/C 150-5200-30, *Airport Winter Safety and Operation*, and A/C 150-5200-28, *Notices to Airmen for Airport Operators*, to ensure PIREP braking action includes all thirds of the runway and update as required.

We have given consideration to all available facts and concluded that this matter does not warrant legal enforcement. In lieu of such action, we are issuing this letter which will be made a matter of record. We will expect your future compliance with the regulations. Please advise in writing when the unresolved discrepancies are corrected within 15 days of the correction date.

Sincerely,



Charlotte Jones  
Airport Certification Safety Inspector  
FAA Western-Pacific Region