



AIRCRAFT SERVICE INTERNATIONAL GROUP™

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April 5, 2007

Mr. Chris Hoidal
Director, Western Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, Colorado 80228

RECEIVED

APR 13 2007

Reference: Notice of Probable Violation and Compliance Order CPF 5-2007-5012

Dear Mr. Hoidal:

On May 11, 2006 a representative of the Office of Pipeline Safety (OPS) Western Region, pursuant to Chapter 601 of 49 United States Code, conducted a Pipeline Integrity Management (IM) inspection of Aircraft Services international Group (ASIG) at our offices in Honolulu, Hawaii. As a result of the inspection, ASIG received a Notice of Probable Violation (NOPV) and Proposed Compliance Order letter from the OPS, dated March 5, 2007.

In accordance with § 49 CFR, Part 190.237, ASIG provides the attached response to the OPS NOPV letter. ASIG concurs with the NOPV and understands the importance of integrity management and intends to work with OPS to correct the shortcomings in our program. ASIG intends to act in accordance with the Proposed Compliance Order. Specifically;

1. ASIG will perform an evaluation of risk on the facilities.
2. Within 60 days of issuance of the Final Order, ASIG will complete the risk evaluation and submit required documentation and procedures to the Director, Western Region, Pipeline and Hazardous Materials Safety Administration.
3. ASIG will maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to the Director, Western Region, Pipeline and Hazardous Materials Safety Administration. Costs will be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.

Sincerely,

Joseph Lovan
Area General Manager
Aircraft Service International Group – Honolulu