



REGION 3

PHILADELPHIA, PA 19103

VIA ELECTRONIC MAIL

Xavier M. Travis
Senior Specialist, Industrial Engineer
American Airlines
1 Skyview Drive, Skyview 8A
Ft. Worth, Texas 76155
xavier.travis@aa.com

**RE: Notice of Violation
Piedmont Airlines Inc.
PWS ID No. AC0003028
Docket # SDWA-03-2025-005-VS**

Dear Mr. Travis:

This Notice of Violation ("Notice") is being issued pursuant to Section 1414(a) of the Safe Drinking Water Act ("SDWA" or "the Act"), 42 U.S.C. § 300g-3(a). Based on our records, the United States Environmental Protection Agency ("EPA") finds that Piedmont Airlines Inc. ("Piedmont Airlines" or "Respondent") has violated certain provisions of the SDWA, 42 U.S.C. §§ 300f-300j-26, and the National Primary Drinking Water Regulations ("NPDWR") found in 40 C.F.R. Part 141. Based on information we possess:

1. Piedmont Airlines is a "supplier of water" and owner/operator of aircraft A/C N651AE "public water system" (Public Water System Identification Number AC0003028) ("System"). See 42 U.S.C. §300f(4) and (5), and 40 C.F.R. § 141.2.
2. Respondent is a "person" as defined by the Act. See 42 U.S.C. § 300f(12); 40 C.F.R. § 141.2.
3. Respondent is an "air carrier" and the System is an "aircraft water system" as defined by 40 C.F.R. § 141.801.
4. Respondent is required to conduct routine sampling for total coliform in accordance with 40 C.F.R. § 141.803(b).

5. In the event a routine sample collected under 40 C.F.R. § 141.803(b) is total coliform-positive and *E. coli*-negative, Respondent is required to perform at least one corrective action under 40 C.F.R. § 141.803(c)(3).
6. Pursuant to 40 C.F.R. § 141.803(c)(3)(i), Respondent is required to conduct disinfection and flushing of the aircraft water system no later than 72 hours after the laboratory notifies the air carrier of the total coliform-positive and *E. coli*-negative result.
7. On February 14, 2025, at 8:55 AM, Respondent was notified of two total coliform-positive, *E. coli*-negative routine samples collected from the System.
8. Due to the total coliform-positive, *E. coli*-negative sample results, Respondent was required to perform one of the corrective actions under 40 C.F.R. § 141.803(c)(3) within the respective timeframes.
9. On February 18, 2025, Respondent completed disinfection and flushing of the aircraft water system and collected two follow-up samples for total coliform, as required by 40 C.F.R. § 141.803(c)(3)(i). Both samples were total coliform and *E. coli*-negative.
10. Although Respondent conducted disinfection and flushing of the System, it did not do so within 72 hours after the laboratory notified Respondent of the total coliform-positive and *E. coli*-negative result, as required by 40 C.F.R. § 141.803(c)(3)(i).
11. Respondent did not elect to perform either of the corrective actions under 40 C.F.R. § 141.803(c)(3)(ii) or (iii).
12. Respondent did not perform one of the corrective actions required under 40 C.F.R. § 141.803(c)(3) within the respective timeframes.
13. Failure to perform a requirement in accordance with 40 C.F.R. § 141.803 is a violation of 40 C.F.R. Part 141, Subpart X pursuant to 40 C.F.R. § 141.810.
14. As stated in Paragraph 9, Respondent completed disinfection and flushing of the aircraft water system and collected two follow-up samples for total coliform, as required by 40 C.F.R. § 141.803(c)(3)(i), on February 18, 2025. As such, EPA finds that the Respondent has returned to compliance with 40 C.F.R. Part 141, Subpart X.

Based on information currently available, the EPA finds that the Respondent violated certain provisions of the SDWA, 42 U.S.C. §§ 300f-300j-26, and the NPDWR found in 40 C.F.R. Part 141, Subpart X. By this Notice, the EPA is extending to you an opportunity to advise the Agency, in person, via a conference call, or in writing, of any further information the EPA should consider with respect to the alleged violations. Please contact Sara Calcinore at (215) 814- 2043 or calcinore.sara@epa.gov within ten (10) business days of receipt of this letter if you would like to confer.

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Public notice under 40 C.F.R. § 141.805 is not required in this situation.

If you have any information relating to the above violations, or questions regarding any of the above, please contact Sara Calcinore, Safe Drinking Water Act and Wetlands Section, at (215) 814- 2043 or calcinore.sara@epa.gov or Alysa Zirilli, Drinking Water Section, at (215) 814-5733 or zirilli.alysa@epa.gov.

Sincerely,

Karen Melvin
Director
Enforcement and Compliance Assurance Division

cc: Alysa Zirilli, Water Division, EPA Region III (zirilli.alysa@epa.gov)
Alison Aminto, Water Division, EPA Region III (aminto.alison@epa.gov)