



MEMORANDUM FOR RECORD

Lynn Spencer
Air Safety Investigator
Eastern Region Aviation

June 2, 2020

Accident Number: ERA19FA124

Subject: Summary of email correspondences with Bill Phillips

Dates of Correspondence: April 2019 to February 2020

The follow is a summary of correspondences and responses with Mr. Phillips:

I posed the following questions:

1. If you have any maintenance issues with any of the airplanes you are flying for Marc, Inc., who do you generally contact and how do you contact that person?
2. If you have any maintenance issues with any of the airplanes you are flying for Marc, Inc. how and where do you typically annotate those issues?
3. Please provide information related to your recent single-engine landing in N400MJ in Smyrna, GA, including:
 - a. The date and time of that single-engine landing. Was an emergency declared?
 - b. What you experienced in flight that caused you to secure the engine
 - c. Which engine was secured
4. Were you aware of any fuel leaks on N400JM?
5. Had you experienced any problems with fuel transfer on any Marc, Inc PA-31-350?

On April 10, 2019, Mr. Phillips emailed the following responses:

1. Ben Spencer, Butch Miller. By phone.
2. In a provided "Taylors Flight Time Log Book". kept in the airplane.
3. A. 02/09/2019 approximately 3pm. No emergency declared. Smyrna, TN.
 - B. Oil Pressure in the yellow range.
 - C. Right engine,
4. No, if the airplane was cold and was fueled and brought into a heated hangar it would vent overboard though the fuel vent.
5. No.

On January 29, 2020, I emailed Mr. Phillips the following questions related to his Feb 9, 2019, landing in Smyrna due to low oil pressure on the right engine of N400JM.

1. What, if any, maintenance work was done on the airplane after you landed
2. Was a reason determined for the low oil pressure on the right engine?
3. When/where did you next fly the airplane?

On February 2, 2020, I received the following responses:

1. We had Contour Aviation located at MQY checkout the oil leak. Work order RPE739.
2. External oil leaks.
3. Flew from Smyrna, TN (KMQY) to Raymond, MS (KJVV) on 2/13/19.



MEMORANDUM FOR RECORD

Lynn Spencer
Air Safety Investigator
Eastern Region Aviation

April 24, 2019

Accident Number: ERA19FA124

Subject: Summary of email correspondences with Billy Miller

Dates of Correspondence: March 16 – April 5, 2019

The follow is a summary of correspondences and responses with Mr. Miller:

March 16, 2019: I requested a list of names and contact information for company pilots who had flown the PA-31-350 airplanes.

March 18, 2019: I received a list of names and contact information from the above referenced request. I posed the following questions:

1. How are maintenance write-ups logged by the pilots and recorded for your company aircraft until they can be addressed?
2. Have there been any reports from pilots as to fuel leaks on N400JM?
3. How many hours had Mr. Sapp flown the PA-31-350 for your organization up to and including the day of the accident?
4. Are any logs kept as to who flies which airplane and when (and hours logged?)
5. Who keeps the company records as to maintenance inspection requirements for each airplane (100-hr, annual, etc)
6. Who interviews, hires and does initial orientation or training for your pilots?
7. Who do your pilots directly report to? (Contact information?)
8. Are there any company Standard Operating Procedures relating to fuel management or mission planning for pilots?
9. How many Piper PA-31 airplanes are owned by Marc, Inc?
10. Who were the last three Marc pilots to fly N400JM prior to Mr. Sapp?
11. Do all of your Piper PA-31 airplanes have nacelle fuel tanks? If not, please provide an accounting by N number of which airplanes do and do not contain these nacelle tanks. And had Mr. Sapp flown any of the airplanes without these nacelle tanks?
12. Are the instructions that are provided with the STC for the nacelle tanks provided to the pilots hired by Marc, Inc?
13. Would you send me the usage instructions for the nacelle fuel tanks that was part of the nacelle tank STC?

March 26, 2019: I received the responses via Memorandum form, made part of this MOR.

March 28 and April 4, 2019: I emailed Mr. Miller with additional information requests, including:

1. Do you have a company operations manual, or standard operating procedures, that you provide to the pilots? If so, please provide us with those items.
2. Please indicate for all 15 Marc, Inc. PA-31 aircraft (whether operational or non-operational) which contain nacelle fuel tanks.
3. Please specify by N-number which Marc, Inc. airplanes were flown by Mr. Sapp
4. When pilots have difficulty with an aircraft, what is the process for pilots to report those problems and who do they report the problems to? (Name, address, phone, email)
5. Who is responsible for the maintenance of Marc, Inc aircraft? (Name, address, phone, email)
6. Please share any and all information known to Marc Inc maintenance or management personnel related to engine or fuel issues related to N400JM, including single-engine landings and fuel leaks.
7. Please provide records of any maintenance related to nacelle fuel tanks or nacelle fuel transfer system for any of Marc, Inc PA-31-350 in the last 2 years.

April 4, 2019: I received the responses via email, made part of this MOR.

April 5, 2019: I reiterated my request for item #7 above since his response was that there were no such maintenance records, and I had been made aware by several pilots of this maintenance.

April 5, 2019: Mr. Miller, "Yes, I missed read question 7. The only maintenance that we have preformed on the Nacelle systems are occasionally r&r the transfer pumps. N59984 just had one done, N31NW had one done since the first of the year. Going back two years will take some time but we are checking those records now. Paper work for the above mentioned to follow."

MEMORANDUM

NTSB Responses

1. Flight times and maintenance notes are normally included in a flight time log kept in the aircraft.
2. The company has no record of such report.
3. Approximately seven hours.
4. The pilots normally report hours to the company on a daily basis for billing purposes.
5. Company employees Frank May , Ben Spencer and Butch Miller.
6. Raymond Laper
7. The pilots report directly to the customer for operational control while conducting operations.
8. The company utilizes FAA required instructional and operational materials which are supplied to the pilots.
9. Marc Inc. currently owns 15 PA 31 aircraft, 4 of which are nonoperational.
10. Wayne Headlough, William Phillips, Raymond Laper.
11. No

	YES	NO
N400JM	X	
N59984	X	
N31WW	X	
N140RD	X	
N154WW	X	
N59906		X

N640WA	X	
N3589X	X	
N31PR	X	

12. Yes these are included in aircraft documents kept in the aircraft.

13. Yes attached

Marc, Inc. [REDACTED]

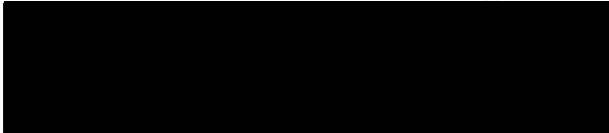
Dear Lynn,

I am answering your questions to the best of my abilities and information provided to me.

1. No, the pilots are to use aircraft flight manuals.
2. N31NW, N3589X, N140RD, N59984, N31PR, N154WW, N640WA, N400JM.
3. N400JM, N314BB.
4. Via phone, Ben Spencer, Frank May, Butch Miller, [REDACTED].
5. Same as question 4.
6. I, Butch Miller know of no single engine landings or fuel leaks in regards to N400JM.
7. No recorded maintenance records to nacelle fuel tanks, last two years, Jackson FSDO has log books.

Thank you for your assistance.

Butch Miller

O&N AIRCRAFT MODIFICATIONS, INC.


AIRPLANE FLIGHT MANUAL SUPPLEMENT NO. 25135-5

FOR

Piper Model PA-31-350, S/N 31-5001 and Up

with

Nayak Auxiliary Nacelle Fuel Tanks

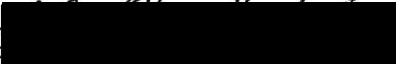
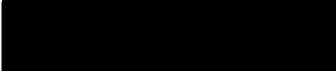
Registration No. _____

Serial No. _____

This supplement must be attached to the Piper PA-31 FAA approved Flight Manual when Nayak Auxiliary Nacelle Tanks have been installed in accordance with STC SA1161SW.

The information contained herein supplements or supersedes the information of the basic Airplane/Rotorcraft Flight Manual only in those areas listed.

For Limitations, Procedures and Performance Data not contained in this supplement, consult the basic Airplane/Rotorcraft Flight Manual.

FAA APPROVED: 
*Scott A. Horst*Aircraft Certification Office
DATE 6-4-2015

LOG OF REVISIONS

REV.	DESCRIPTION	PAGES REVISED	APPROVED BY	DATE
1R	Flight Manual Supplement	None	Jack E. Owens	02/26/1973
1	Installation of Piper Vent Information, Delete Piper Vent Part Nos.	Page 1	Jack E. Owens	11/03/1976
2	Revised Supplement Information, Delete Piper Vent Part Nos.	Page 1	Jack E. Owens	01/21/1982
3	Installation of Nayak Non-Icing Vents	Page 1	A. A. Mercer	04/08/1998
4	Change of Ownership Information and Address add "or left side of cockpit instrument panel" to transfer switch location listed under Normal Operating Procedures.	All		6-4-2015

FAA APPROVED

DATE: JUN 04 2015

INTRODUCTION

Installation of Nayak Aviation Auxiliary Fuel Tanks on Piper PA31-350 aircraft.

OPERATING LIMITATIONS

- A. Do not transfer fuel until main tanks are at least one-half full or less.
- B. Previously approved operation in icing conditions prohibited unless Piper non-icing vents or Nayak non-icing vents are installed at Nayak vent locations under this STC.

NORMAL OPERATING PROCEDURES

Transfer control switches are located on left side of pedestal or left side of cockpit instrument panel.

Approximately 55 minutes are required to transfer all the fuel out of the nacelle tanks.

EMERGENCY PROCEDURES: NO CHANGE

PERFORMANCE: NO CHANGE

PLACARDS

- A. Adjacent to switches:
DO NOT TRANSFER UNTIL MAIN TANK IS BELOW HALF FULL
- B. Inside Nacelle locker door:
BAGGAGE LIMITED TO 50 POUNDS CAPACITY WHEN NACELLE TANKS CARRY FULL FUEL

WEIGHT AND BALANCE DATA

Additional position has been provided for regular Navajo weight and balance plotter to be used in convenient manner.

Nacelle tanks C.G. location: 144.7 in. aft datum

<u>FUEL MOMENT</u>		
<u>GALLONS</u>	<u>WEIGHT</u>	<u>MOMENT</u>
54	324	46882
50	300	46410
40	240	34728
30	180	26046
20	120	17364

FAA APPROVED
JUN 04 2015

DATE: _____



MEMORANDUM FOR RECORD

Lynn Spencer
Air Safety Investigator
Eastern Region Aviation

June 2, 2020

Accident Number: ERA19FA124

Subject: Summary of email correspondences with Wayne Headlough

Dates of Correspondence: March-November, 2019

The follow is a summary of correspondences and responses with Mr. Headlough:

On March 30, 2019, Mr. Headlough, who had shared with me in a conversation that N400JM had a fuel leak, emailed me a photo of the fuel stains on the floor the morning after fueling N400JM (attached to this memo).

On November 4, 2019, Mr. Headlough wrote to inform me that he had experienced a fuel transfer pump a few months prior in N59984 (P-31-310). He stated that he discontinued the transfer to both sides and shortened the flight. After he had landed, he activated the pump, but it did not come on. He explained that you can hear it run/not run when on the ground. He ordered a new pump and replaced it.

