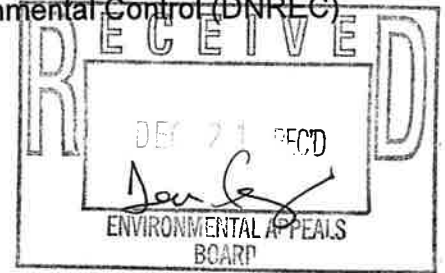


21652 Nanticoke Avenue  
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December 19, 2023

**To:** Delaware Department of Natural Resources and Environmental Control (DNREC)  
Office of the Secretary  
89 Kings Highway  
Dover, DE 19901



**Subject: Appeal Submittance – Order No. 2023-WH-0030  
Per 7 DE Admin. Code §105**

PATS Aircraft, LLC, dba ALOFT AeroArchitects, wishes to appeal the Notice of Administrative Penalty Assessment and Secretary's Order No. 2023-WH-0030 received via certified mail on December 4, 2023.

We are committed to implementing processes and procedures to ensure zero harm to our natural resources and recognize our responsibility in managing our hazardous waste program. Although the June 9<sup>th</sup> compliance inspection identified nine violations, the infractions were administrative in nature and were not a result of malicious intent. At no time was there any release of hazardous waste or any impact to the environment. We do acknowledge our processes did not prevent the administrative lapses identified in the Secretary's Order and required immediate effective preventative measures.

As a result of the compliance inspection, we immediately took corrective actions to the Department's satisfaction, as detailed in the Order. Further, we implemented the following effective measures to prevent reoccurrence:

- Ensure all adhesive-backed labels identifying hazardous waste, the classification of the hazards of each waste, and accumulation start dates, are reinforced with a secondary means of security by applying adhesive tape to ensure all labels stay secured to the containers.
- Train additional personnel to conduct weekly inspections of all containers and accumulation sites, and ensure all required information is accurate, securely attached, and properly tracked to guarantee timely disposal.
- Increase oversight to ensure all manifests are effectively tracked for closure dates and receipt.

Over the last four years, our company has experienced significant financial challenges stemming from the two-year grounding of the Boeing 737 Max program, our primary source of

business, followed immediately with the COVID-19 pandemic. The cumulation of these events put a significant strain on our resources and business from which we are just starting to recover from the associated impact to over 60% of staff, loss of business, debt financing and installment of a new CEO. We look to the state to support our recovery as a long-standing Delaware business with an impeccable safety record and a commitment to be fully compliant in our administration of hazardous waste.

We understand non-compliance is not acceptable, but we ask DNREC and the State of Delaware to support us during our recovery mode and reconsider the \$10,000 penalty assessment with a formal written warning and zero tolerance going forward. Together, our company can look forward to another 40 years of reputable business operations providing unique high paying aviation jobs in Sussex County.

Sincerely,



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Cheryl Parker  
VP, People



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Scott A. Meyer  
President & CEO