

AIRCRAFT MAINTENANCE PTY LTD

Operational Environmental Management Plan

Example

**Prepared by Chief Engineer
Date: 30th December 2008
Version 1.0**

Aircraft Maintenance Pty Ltd Operational Environment Management Plan

INTRODUCTION

Aircraft Maintenance Pty Ltd is an aircraft engineering business that has been operating for over 20 years at Bankstown Airport.

This document was created to help identify and manage the environmental risks associated with Aircraft Maintenance Pty Ltd operations.

It will be used to communicate our environmental management requirements throughout our organisation and to comply with the Bankstown Airport Environment Strategy, which requires all Tier 1 & 2 tenants on Bankstown Airport to prepare and maintain an Environment Management Plan (EMP) for their operations.

SITE AND OPERATIONAL DETAILS

Operator Details

Company Name: Aircraft Maintenance Pty Ltd

Postal Address: PO Box F7895843,
Condell Park, NSW, 2200

Managing Director Name: Robert Robertson

Postal Address: PO Box F7895843,
Condell Park, NSW, 2200

Site Description

Aircraft Maintenance Pty Ltd is based in a large single hangar. The hangar has been divided into 2 sections, an administration and reception centre and an engineering workshop.

The engineering workshop is fitted with numerous facilities required to undertake the operations conducted by Aircraft Maintenance Pty Ltd.

Facilities include:

- Spray Paint Booth
- Contained Chemical Baths for Paint Stripping
- Contained Parts Washing Bay
- Designated and Contained Dangerous Goods Storage Area
- Sand Blasting Equipment

In the near future Aircraft Maintenance Pty Ltd will construct an Aircraft wash bay on site to mitigate the environmental risk associated with washing aircraft.

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Description of Operations

Aircraft Maintenance Pty Ltd provides a wide range of aviation related engineering services. Engineering works conducted by Aircraft Maintenance Pty Ltd include;

Aircraft Maintenance and Service

Aircraft Maintenance and Service generally involves but is not limited to the following processes:

- Oil and Fuel draining and disposal
- Contaminated parts removal and disposal
- Parts washing and engine degreasing
- Sandblasting and metal works
- Aircraft wash down
- Aircraft engine running on completion of service
- Tyre replacement and disposal

Engine Rebuilds

An engine rebuild generally involves but is not limited to the following processes:

- Engine dismantling and contaminated parts disposal
- Waste oil and fuel disposal
- Parts washing and engine degreasing
- Sandblasting and metal works
- Aircraft engine running on completion of rebuild

Aircraft Restoration and Repair

Aircraft Restoration and Repair generally involves but is not limited to the following processes:

- Spray painting of small to large aircraft components; in some cases entire aircraft.
- Paint stripping through chemical processes, and disposal of wastes
- Sandblasting, welding and other metal works on aircraft components
- Aircraft Wash down
- Disposal of scrap metals and other industrial wastes
- Aircraft engine running at completion of works

Legislative Requirements

The key environmental legislation that applies to Aircraft Maintenance Pty Ltd includes but is not limited to the;

- *Airports Act 1996*
- *Airports (Environment Protection) Regulations 1997*
- *Bankstown (Camden) Airport Statutory Master Plan 2005 – 2035*
- *Bankstown (Camden) Airport Environment Strategy 2005 – 2010*
- *Environment Protection and Biodiversity Conservation Act 1999 and*

Key Legislation for individual procedures has been identified and including as part of the procedures developed in this OEMP.

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Responsibilities

Managing Director

- Responsible for Ensuring the OEMP is developed, implemented and remains current.
- Must ensure appropriate resources are available to implement the OEMP
- Maintaining records, including training, waste disposal receipts and environmental monitoring results

Chief Engineer

- Identify potential risks associated with Aircraft Maintenance Pty Ltd operations
- Assist in the development of measures to help mitigate the identified risks
- Ensure that all personnel receive training in OEMP procedures and that all environmental measures developed to mitigate or minimise risk are implemented.
- Environmental monitoring to ensure that the management adopted by the organisation are effective.

Personnel

- Assist in the development of measures to help mitigate the identified risks
- Follow measures that mitigate or minimise environmental risks
- Attend environmental training sessions
- Report incidents that occur on site
- Must be familiar with the most current version of the OEMP at all times.

Contractor and Sub-contractors

- Identify the environmental risks associated with their activities at the site
- Develop measures to mitigate the risks associated with their activities
- Follow instructions and implement measures to mitigate risks associated with their activities.

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GENERAL MANAGEMENT REQUIREMENTS

Environmental Awareness and Training Register

Aircraft Maintenance Pty Ltd currently has 15 professionally trained staff employed on site. All staff members undertake specific environmental training on employment with the company. This includes familiarization with this document and the procedures contained within. Training is repeated on a yearly basis with the revision of this document and other safety management plans.

Staff Position/ Staff Member	Training to be provided	Person Responsible for Training
<i>Chief Engineer</i> Mathew	<ul style="list-style-type: none"> • Spill Response Procedures • Waste Disposal • Emergency Response • Chemical Storage and Disposal • Chemical handling • Material Safety Data Sheets • Location of Facilities on Site • Complaint Handling • Records Maintenance • Environmental Inspections 	R. Robertson
<i>Mechanic</i> Steve Richard Peter Joe John Collin	<ul style="list-style-type: none"> • Spill Response Procedures • Waste Disposal • Emergency Response • Chemical Storage and Disposal • Chemical handling • Material Safety Data Sheets • Location of Facilities on Site 	Mathew
<i>Spray Painter</i> Danny	<ul style="list-style-type: none"> • Spill Response Procedures • Waste Disposal • Emergency Response • Chemical Storage and Disposal • Chemical handling • Material Safety Data Sheets • Location of Facilities on Site • Spray Paint Procedures 	Mathew

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<i>Engineer</i> Greg Anthony	<ul style="list-style-type: none"> • Spill Response Procedures • Waste Disposal • Emergency Response • Chemical Storage and Disposal • Chemical handling • Material Safety Data Sheets 	Mathew
<i>Chief Pilot/ Pilot</i> Andrew Mark	<ul style="list-style-type: none"> • Spill Response Procedures • Waste Disposal • Emergency Response • Fuel Sample Disposal • Material Safety Data Sheets 	R. Robertson
<i>Reception</i> Andrea	<ul style="list-style-type: none"> • Emergency Response • Complaint Handling 	R. Robertson
<i>Administration</i> Rachael	<ul style="list-style-type: none"> • Emergency Response 	R. Robertson
<i>Finance</i> Julie	<ul style="list-style-type: none"> • Emergency Response 	R. Robertson

Environmental Management Records

Records for the following will be maintained and kept on site for a period of 7 years.

- Internal Training Records
- External Training Records
- Environmental Monitoring Data
- Complaint and Incident Reports
- Licenses and Permits
- Waste Transfer Receipts

Monitoring and Auditing

The Managing Director will conduct a 6 monthly audit of the OEMP to ensure that it remains relevant and current.

The Chief Engineer will monitor all personnel on site to ensure procedures developed in this OEMP are being implemented at all times.

During works, all personnel will monitor and check for spills, leaks or any other environmental incidents which may occur as a result of their activities.

Water, soil and air quality monitoring will be undertaken in the event an environmental incident occurs or as is required.

Reporting

The Managing Director will forward a copy of the most recent OEMP to Sydney Metropolitan Airports as required.

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The Chief Engineer will report any environmental incidents, including fuel and chemical spills, which may occur on site to Sydney Metropolitan Airports as they occur.

Results of any water, air or soil quality monitoring will also be forwarded to Sydney Metropolitan Airports as they are received.

Complaint Handling

All complaints will be forwarded to the Chief Engineer to assess.

The Chief Engineer will be responsible for reporting, investigating and resolving the source of the complaint.

All noise complaints received by Aircraft Maintenance Pty Ltd will be reported, investigated and resolved by the Chief Engineer. Upon resolution the complaint will be forwarded to Sydney Metropolitan Airports to confirm the complaint has been adequately resolved.

Environmental Incidents and Emergencies

All environmental emergencies and incidents will immediately be reported to the Chief Engineer. Measures will be taken to contain or resolve the emergency or incident immediately.

As soon as practicable, the Sydney Metropolitan Airports Duty Operations Officer will be notified on 0419 294 432.

In the event of a fuel or chemical spill, action will be taken in accordance with the Sydney Metropolitan Airports Environment Information Sheet 8- Spill Response Procedure.

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ENVIRONMENTAL IMPACTS RISK ASSESSMENT

Table 1: Aspects and Impacts

Assessment of Operational Aspects and Impacts						
Operation Activity	Aspect	Impact	Risk Rating			Recommended Mitigation
			Likelihood	Consequence	Risk	
Aircraft Washing	Inappropriate disposal of wash water containing surfactants(detergent) hydrocarbons and heavy metals to stormwater drains and soil	Water and soil pollution	Common	Minor	Moderate	All aircraft wash down will occur in the designated wash bay at Bankstown Airport; Washing to occur using biodegradable detergents; Use minimum quantity of water possible. Train staff in aircraft washing procedure.
Parts Washing	Spill of solvent material to stormwater drain during parts washing	Water pollution	Possible	Moderate	Moderate	Install a parts washing bay in a contained area; All parts to be cleaned in the parts washing bay only.
	Spill of solvent material to soil during parts washing	Soil contamination	QL	Minor	Moderate	Install a parts washing bay in a contained area; All parts to be cleaned in the parts washing bay only.
	Inappropriate storage of waste solvent used to wash parts allows waste materials to enter stormwater drains and soil	Water and soil pollution	Possible	Minor	Low	Provide a drum for storing liquid wastes; Store liquid waste drum on a bunded pallet or in a contained area. Train staff in waste disposal procedure.
	Disposal of waste solvents to landfill	Water and soil pollution	QL	Moderate	High	Use an appropriately licensed contractor to dispose of liquid wastes Retain waste disposal receipts.

This table must be completed for all operations conducted by the company. Risk Matrix used for this assessment is in OEMP Guidance Material

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PROCEDURES

Procedure 1.1 Aircraft Wash Down

ACTIVITY Aircraft Wash Down		
OBJECTIVE To wash down aircraft with minimal impact on the surrounding environment.		
LEGAL REQUIREMENTS The Airport (Environment Protection) Regulations 1997 require;		
<ul style="list-style-type: none"> • Reg 4.01 Operators at the airport take all reasonable and practicable measures to prevent the generation of pollution. • Reg 2.02 Defines water pollution as something that causes or is reasonably like to cause the physical, chemical or biological condition of waters to be adversely affected • Schedule 2 Water Pollution – accepted limits, establishes limits for the level of a variety of contaminants in stormwater. 		
ACTIVITY	PROCEDURE	RESPONSIBILITY
Aircraft wash location	Aircraft wash down is to be done only in Bankstown Airport's designated aircraft wash bay. If this is not possible the chief engineer must be notified immediately.	Maintenance staff, Chief Engineer
Soap and Detergent Use	Only biodegradable detergents are to be used during aircraft wash down. Preferred detergent: CEE BEE Citrus Based Biodegradable Detergent.	Maintenance staff, Chief Engineer
Rinse and wash down	Aircraft are to be rinsed using as minimal amount of water as possible. A trigger nozzle will be used to help minimize water use. Aircraft Maintenance Pty Ltd aim to use less than 100L of water per aircraft wash down.	Maintenance staff, Chief Engineer
INCIDENT REPORTS	No Incident Reports to date.	

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Procedure 1.2 Parts Washing

ACTIVITY Parts Washing		
OBJECTIVE To wash aircraft parts and components with as little impact on the surrounding environment as possible.		
LEGAL REQUIREMENTS The EPA Guidelines: Servicing and Mechanical Repairs 1998, Information Sheet 3, Storm Water Management establish; <ul style="list-style-type: none"> • Engines may be degreased in a workshop if it is done in an approved wash bay, or if there is some other means of storing and treating the waste water. • Engines must not be degreased outside the workshop or in any area where run-off can enter the storm water system 		
ACTIVITY	PROCEDURE	RESPONSIBILITY
Small/ Medium Aircraft Parts Washing	Small/ medium aircraft parts washing is only to be done in the designated contained parts washing bay. The parts washing bay is located in southern corner of the hangar.	Maintenance staff, Chief Engineer
Engine Degreasing	<ol style="list-style-type: none"> 1. Engine degreasing is to only be done inside the hangar on a hardstand area with either a bund or a drip tray placed beneath the engine. 2. The hardstand area where the work is conducted is to be a minimum of 5m away from the closest stormwater drain or grass/ soil surfaced area. 	Maintenance staff, Chief Engineer
Spill Response	<ul style="list-style-type: none"> • If a spill occurs during these processes, it is to be contained immediately using the spill response equipment located adjacent to the parts wash bay. • Once the spill is contained and cleaned up the Chief Engineer is to be notified. • It is the Chief Engineers responsibility to notify Bankstown Airport Limited as required. • In the event of a large spill which cannot be contained by Aircraft Maintenance personnel the Chief Engineer is to notify Bankstown Airport Limited Operations staff immediately. • An environmental incident report form is to be submitted to the Chief Engineer on completion of the spill response. 	Maintenance staff, Chief Engineer
Liquid Waste Storage	Liquid wastes generated are to be stored in the designated 200L drum stored in the bunded and contained area located in the southern end of the hangar.	Maintenance staff, Chief Engineer
Liquid Waste Disposal	Liquid Wastes will be collected by Trusty Waste Disposal Pty Ltd and waste transfer receipts will be held for 5 years.	Chief Engineer
INCIDENT REPORTS	No Incident Reports to date.	

APPENDICES

1. Solid Waste Disposal Receipts (Up to 5 years old)
2. Liquid Waste Disposal Receipts (Up to 5 years old)
3. MSDS and Dangerous Goods Register For All Dangerous Goods Used and Stored On Site
4. Environment Incident Report Form
5. Past Environment Incident Report Forms (up to 10 years old)
6. BAL Environmental Information Sheets
7. Risk Matrix used for aspects and impacts table

Example