



AFRA BMP

Aircraft Fleet Recycling Association
Best Management Practices



Today's Panel

- Bill Carberry, Boeing
 - AFRA Deputy Managing Director, Secretary and Board Member
- Jason Dickstein, Washington Aviation Group
 - AFRA General Counsel
- Kelly Lyon, Aviation Suppliers Association
 - AFRA Auditor
- Denis Oliver, ELG
 - AFRA Board Member



Discussion Elements

- What are the BMPs?
- BMP merger investigation
- The BMP audit process
- The future of the BMPs



What are the BMPs?

- Disassembly BMP
 - Best Management Practice for Management of Used Aircraft Parts and Assemblies
 - Published 2008
- Engine BMP
 - Not published – rolled into original BMP in 2009
- Recycling BMP
 - Best Management Practice for Recycling of Aircraft Materials
 - Published 2012



BMP Process

- Development
- Advantages/Benefits



The BMP Audit Process

- What have the BMP audits revealed?



System Requirments

- **BEST PRACTICE (II)(b) 1 - Each accredited company shall have a**
- **BMP Manual.**



Process Flow

- ***Article III e) – Process Flow and Process Management***
- **BEST PRACTICE (III)(e) 1 – The Facility should have a diagram that is marked to show process and / or material flow through the Facility**



Training

- **ARTICLE IV - TRAINING**
- **BEST PRACTICE (IV)(a) 1 – The Facility shall ensure that the recycling personnel have received appropriate training related to the functions they perform, including but not limited to use of equipment and machinery and materials identification techniques. The Facility shall prepare training records to document this training.**



Facility

- **BEST PRACTICE (III)(a) 2 - If the Facility has a fixed location for recycling, then the Facility shall identify, and ensure compliance with, applicable environmental laws and standards.**



Facility

- **BEST PRACTICE (III)(d) 2 - The Facility shall have a procedure for retaining documentation of periodic internal audits on how the company is following this Guidance, including results, and (where necessary) root-cause analysis, and corrective actions taken.**
- **BEST PRACTICE (III)(d) 3 - The Facility shall have a procedure for periodic verification of quality of recycled materials through auditing controls and procedures.**



Facility

- **BEST PRACTICE (III)(a) 5 - If the Facility recycles Assets at locations remote from the Facility's main location(s), then the Facility shall have one or more procedures designed to identify, and ensure compliance with, applicable occupational health and safety laws and standards.**



Dismantling findings

- **BEST PRACTICE (III)(d) 1 - The Facility shall have a procedure**
- for periodic internal audits to the BMP Checklist



Documentation & Records

- **BEST PRACTICE (V)(a) 2 – The Facility shall have or prepare a**
 - manifest of parts expected to be removed from the Asset.
- **BEST PRACTICE (V)(a) 3 – The Facility shall have a clear,**
 - written understanding of any customer expectations or
 - demands concerning disassembly of the Asset and recovery of
 - the parts removed.
- **BEST PRACTICE (V)(a) 4 - The Facility shall have a clear,**
 - written understanding of how the Asset is to be discarded
 - following disassembly.



Training

- **BEST PRACTICE (IV)(a) 2 – The Facility shall ensure that the**
- disassembly personnel have received appropriate training
- related to the functions they perform.



Hazardous Waste

- **BEST PRACTICE (VII)(a) 5 – Parts that are known to be**
- unusable, are intended to be scrapped or recycled, or are
- deemed unsalvageable shall not be admitted to the parts
- staging area. Instead, they shall be retained in the disassembly
- area or moved to a quarantine area for further processing or
- disposition consistent with their status.



Tagging

- **Article V c) – Tagging**
- **BEST PRACTICE (V)(c) 1 – For each part removed from the**
- Asset, the Facility shall prepare a disassembly identification tag
- to identify the part. Each tag shall be attached to the part or
- otherwise associated with it upon the part’s removal.

- **BEST PRACTICE (V)(c) 2 – If the Facility chooses to issue a**
- disassembly tag that is also an approval for return to service,
- then the Facility must confirm that it has appropriate certificated
- privileges permitting such an approval, and that it uses
- methods, techniques or practices for accomplishing the
- inspections that are acceptable to the appropriate government
- authority.



The Future of the BMPs