



Line Maintenance Station - Setup & Survey Policy of the BCAA

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Purpose of this document

This document explains the policy of the BCAA with regard to the implementation of the rules of approval of a new Line maintenance Station (LMS), in order to shorten the timeframe necessary for the opening of a LMS by a Belgian Maintenance & Repair Organisation (MRO).

Scope

This procedure is applicable for the opening of Line Maintenance Stations only.

Consequently, this procedure is not applicable for the opening of a Base Maintenance Station nor for the opening of a component workshop. In these cases, a variation audit of the BCAA on beforehand is still required.

Regulatory References

- 145.A.10 – Scope (see also AMC thereof)
- 145.A.75 – Privileges of Organisation
- 145.B.35 – Changes (to an approval)

Other Guidance

- EASA publication "UG.CAO.00134-001 – Aircraft Line Maintenance" (available on EASA website)
- EASA publication "UG.CAO.00024-002 – User Guide for MOE" (available on EASA website)

Definitions

Line Maintenance

as per AMC 145.A.10

Line Maintenance Station (LMS)

Place, located on an airport which is not the home base of the organisation, where Line Maintenance is intended to be performed.

Occasionnal Line Maintenance Station

LMS being active for maximum 40 days.

Internal Desktop Audit of a LMS

Audit of a LMS performed by the internal Quality system; based on a pre-defined list of questions; that may be answered by the Line Maintenance Station representative with the support of evidences (pictures, ...). It does not require an on-site visit of the facilities of the LMS by the Internal Quality System.

Internal On-Site Audit of a LMS

Audit performed at the LMS location by the internal Quality system.

External On-site Audit of a LMS

Audit performed at the LMS location by the BCAA.

Principles

A **Continuous Quality Oversight** of the maintenance activities to be performed at the intended Line Station must be guaranteed. In this case, the oversight may be *internal* (Quality Dept.) or *external* (BCAA).

A preliminary **independent assessment** of the Line Station is required to ensure that all requirements are fulfilled before the beginning of the performance of the maintenance. The assessment may be accomplished by a *desktop audit* or an *on-site audit*, depending on the nature of the activities and expected duration of the Line Station.

The Line Station shall be **formally authorised** to start its operations after all corrective actions have been implemented in a satisfactory manner. The authorisation shall be given internally (Quality Dept.).

Eligibility

The implementation of this policy and associated procedures shall not be automatically granted to any MRO.

BCAA keeps right to decide whether an MRO is eligible or not to implement this procedure, according to several criteria, such as but not limited to :

- Efficiency of quality system,
- Intrinsic quality of the internal audit reports,
- Intended activities,
- Geographical location of the intended Line Station,
- Experience with the opening of Line Station, ...

The authorisation shall be formally granted by the approval of the MOE describing the implementation of this policy and associated procedures (see below). Even in this case, the BCAA keeps the right to perform supplemental oversight activities, depending on the situation.

Procedure

Following procedures shall be applied :

A/ In case the Line Station is expected to be in place for a duration of maximum 14 calendar days, the organisation shall perform a **desktop audit** covering the adequate items of the Part 145 regulation before the activation of the station.

The BCAA shall be informed in writing (= letter or e-mail) about this occasional Line Maintenance site before the start of operations. No update of the MOE is required.

B/ In case it is expected that the line maintenance station will be active for a period longer than 14 calendar days up to 40 days, an **on-site audit** has to be performed by a qualified auditor of the organisation before the end of the 14 days period described in paragraph A/ above.

The BCAA shall be informed in writing (= letter or e-mail) about this occasional Line Maintenance site before the start of operations. No update of the MOE is required.

C/ As soon as the maintenance station will be active for more than 40 days, the following documents shall be supplied by the organisation to the BCAA, before the end of the 40 days period described in paragraph B/ above:

- a) an EASA Form 2 introducing the site;
- b) the report of the on-site audit as per paragraph B);
- c) the update of MOE chapter 5.3.

MOE amendment

Useful guidance about the MOE may be found on EASA website (see above).

A/ Implementation of this procedure

MOE need to be amended in order to describe implementation of these principles by the MRO.
There are two chapters of MOE that are impacted: Chapter 1.10 – Notification of Changes and 2.24 Specific Maintenance Procedures.

This amendment must be approved before the procedure described in this note can enter into application.

Chapter 1.10 – Notification of Changes

The text of MOE chapter 1.10 should be in line with the procedure described above, for the case "40 days and on".

Chapter 2.24 – Specific Maintenance Procedures

The text of MOE chapter 2.24 should be in line with the procedure described above, for the two cases "up to 14 days" and "up to 40 days".

The Chap 2.24 shall contain a provision stating that the BCAA keeps the right to perform supplemental oversight activities, depending on the situation.

The management of AOG situations (as per Art. 145.A.(c)) must be kept in the existing (separate) procedure, in Chapter 2.24 - Specific Maintenance Procedures.

B/ Line Maintenance Station "more than 40 days"

Every new Line Maintenance Station (for more than 40 days) shall have at least an impact on these chapters of the MOE: Chapter 1.8 – Facilities and Chapter 5.3 – Line Maintenance Locations.

Chapter 1.8 - Facilities

It is acceptable that the layout of the facilities of the Line Maintenance Stations are placed into chapter 5.3, provided that a note explaining this situation is included into chapter 1.8.

However, the layouts of the facilities of the homebase, the base maintenance stations and the workshops shall continue to be included into chapter 1.8.

Chapter 5.3 – List of Line Maintenance Locations

This chapter should show:

all line maintenance locations of the organisation (more than 40 days) with following information :

- 1: Maintenance station location
- 2: Maintenance station scope of work
- 3: Maintenance station limitation (if applicable)
- 4: Maintenance station facilities layout (in order to comply with Chapter 1.8)

NOTE:

In case an organisation expects that the 'more than 40 calendar days' procedure will be used frequently, it is advised that chapter 5.3 makes reference to an annex, which is signed by the organisation and the BCAA independently from the MOE (i.e. with its own List of Effective Page), and containing the same information as above.

Continuous oversight

Internal

Each active maintenance station has to be included in the sampling plan of the organisations (AMC 145.A.65(c)1.8) and shall therefore be covered by an internal audit at least every 24 months.

External

Any location showing in chapter 5.3 of the MOE can be audited by the BCAA as part of the sample plan related to the continued oversight of the Part 145 Maintenance Organisation by the BCAA.

Question / Contact

Please refer to your usual Company Surveyor.