AACEN POLICY This document sits within Chapter 2 of the AACen Directive			
Title: SOI 2.8.1 – AACen Portsmouth Naval Gliding Club AVGAS Policy			
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AACen Portsmouth Naval Gliding Club AVGAS Policy

References:

A. FGSR NOTICE (2019) 002 - FGSR Regulation 7-Flying/Gliding Clubs date 27 Sep 2019.

Introduction

- 1. The Portsmouth Naval Gliding Club (PNGC) operate a number of powered and unpowered aircraft from Middle Wallop Airfield. The majority of their operations are conducted 'outside of the wire' and are broadly independent of AACen physical services and resource. The notable exception is the supply and storage of AVGAS. While the club has a requirement for this fuel, the scale of their operation makes it impractical on cost and infrastructure grounds for them to store or resupply it on the airfield. As AACen has the facilities and scale of operation to support their requirement at net nil cost to AACen, it has been agreed by the Comdt AACen that limited physical support will be given to the club to store and re-bulk the club's AVGAS bowser. This is a car towed road trailer and cannot operate under its own power. This SOI details the policy for this service and is maintained by the Station Motor Transport Officer (MTO)⁴.
- 2. Compliance of the bowser, its trailer (plus any other supporting equipment) and training required for their use remains the responsibility of the Club and iaw Ref A, specifically their nominated Responsible Person (RP) Fuels. It is in governed by: Ref A; laws applicable to operating a vehicle on public highways⁵; and this SOI.

Outline of service to be provided

- 3. In outline, the following services shall be provided by AACen to the PNGC iso their AVGAS requirement:
 - a. The PNCG bowser will be stored within the bunded tanker parking area of the Bulk Fuel Installation (BFI) compound.
 - b. The bowser will be periodically re-bulked by the BFI RLC Petroleum Operations (Pet Ops) staff.
 - c. The PNGC will be billed for the fuel they are issued from the BFI. This service will be provided by AACen Central Management (CM).
 - d. As only qualified and authorised members of the club may enter the BFI and manoeuvre the bowser within it, training will be provided by the BFI staff to enable this activity. The MTO will retain a record of that training and audit it periodically to ensure currency is maintained.
 - e. 24/7 access will be granted to the BFI for the club whenever reasonably

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¹ While they physically operate from Middle Wallop and have a fixed and permanent presence on it, their activity, equipment, infrastructure etc. is all on the airfield itself away from the established camp. Additionally, the vast majority of their activity is conducted out of hours where no airfield services are provided.

² Limited staff provision is also provided by AACen and DIO to support their policy, legal and compliance where it requires liaison with Comdt AACen, DIO or the wider MOD where AACen has liability.

³ The bowser is a Fuel Proof Ltd, 990L Highway Aviation Bowser with serial 3552. This SOI only pertains to this specific trailer and any change to that equipment must trigger a review.

⁴ In the absence of the MTO, 2IC or OC HQ will manage AVGAS support to the PNGC.

⁵ Including the movement of dangerous goods.

practical. This notes the bowser must not be stored on the airfield overnight and must be returned to the BFI at the end of flying. Keys will be made available via the Guard Room.

Detail of services to be provided

- 4. **Bowser storage.** Dedicated parking will be provided within the BFI compound.
 - a. This will be on the bunded tanker park. Under the MTO, the Pet Ops SNCO is responsible for allocating this space.
 - b. When not conducting re-fuel duties during flying hours⁶, the bowser must not be parked anywhere else on the Middle Wallop estate other than its allocated space in the BFI, including elsewhere in the BFI, without consultation with the Pet Ops SNCO.⁷
 - c. A physical recorded check of the bowser condition and fuel state must be completed before the bowser is moved within the BFI and once it is parked at the end of each day.⁸ The PNGC are responsible for completing this, retaining the inspection sheets and making them available for inspection/audit by the MTO. A template for the checks is at Annex A.
 - d. The bowser may be operated as deemed necessary on the airfield by qualified and competent PNGC members but only during club operating hours. The minimum level of training and documentation required for this is detailed in Ref A including how regulator compliance should be managed.
- 5. **Re-bulking.** The Pet Ops SNCO will be responsible for ordering AVGAS on behalf of the PNGC and accepting delivery of it. The Middle Wallop BFI already orders and accepts AVGAS for storage in wheeled bowsers on behalf other fixed wing operators on the airfield. The PNGC requirement will be manged in the same way.
 - a. Normally fortnightly, but at the discretion of the Pet Ops SNCO, sufficient AVGAS will be ordered on behalf of the PNGC to fill the bowser to its maximum reasonably achievable safe level (at the time of ordering).⁹
 - b. AACen Pet Ops will take delivery of the fuel and ensure the bowser is re-bulked safely.
 - c. The club will then be invoiced via AACen Central Management for the cost of the fuel and any other charges incurred by AACen in the process of receiving it.¹⁰
 - d. The PNGC must inform the Pet Ops staff if they do not want the bowser topped up or if additional fuel is required. In the case of additional fuel, this will be supplied

⁶ When flying has ceased for the day, the bowser must be returned to the BFI. This must only be accomplished via the main road. Access to the BFI from the airfield is not to be made via the Airgates.

⁷ It is acceptable to park it elsewhere for short periods when it is being transited to or from the BFI, e.g. when collecting keys from the guardroom.

⁶ This ensures a constant and agreed fuel state is available to AACen and the PNGC while recording the condition of the vehicle should an incident occur with it. This process is not intended as a handover of responsibility for it between the PNGC and AACen and the PNGC must to be suitably insured for the use and storage of the bowser acknowledging they retain liability for it at all times.

⁹ Whilst the club is obliged in these orders to record the amount of fuel in the bowser each time it is returned, AACen will independently measure it to ensure the correct quantities are ordered.

¹⁰ This is charged via a fixed price per litre that is common to all AVGAS customers supplied from the BFI. The price is subject to change without notice at the discretion of the COS AACen. The Pet Ops SNCO is responsible for ensuring AACen CM receive the information they require to produce timely invoices.

on a best effort basis only and it may not be possible to achieve or may come at additional cost.

- **6. Access.** As the club normally operate outside of normal working hours for the BFI staff, on most occasions the BFI will be secured and unattended when the club require access.
 - a. The bowser may be collected and returned at any time without prior notice by authorised personnel from the club. The exception being if there is a reasonable operational or security reason as to why the club should be denied access to the camp or BFI. Camp access is sanctioned by the Station Staff Officer (SSO) and at the discretion of the Guard Commander and/or Station Orderly Officer (SOO). BFI access is at the discretion of the Pet Ops NCO or the SOO when it is unattended.
 - b. The MTO is responsible for authorising club members for access to the BFI. A list of authorised members will be supplied to the SSO for onward staffing to the MPGS Guard Platoon Commander. As a minimum they will need to complete the training detailed in Annex B. A record of this training will be held by the MTO who will also monitor training currency.
 - c. Control of the BFI keys is via the Station Guard Room.
 - d. Actions on spillages or incidents witnessed or caused by PNGC members while in the BFI is covered in the training provided to them. However, as a minimum they must immediately report all issues to the Guard Room or BFI staff if present.

Conditions of fuel supply and storage

- 7. **Bowser condition.** The bowser trailer must be maintained by the club so that it is safe and legal for road use. law Ref A, the fuel storage elements must be compliant with Defence fuels policy and may be subject to periodic inspections by the Defence Fuels and Gas Regulator (FGSR). It remains the club's responsibility to maintain its condition and compliance. However, as it is operated on the AACen estate, the MTO, or any empowered MOD representative, may refuse to accept it or allow its movement if they consider its condition to be non-road worthy or non-compliant.¹¹
- 8. **Insurance.** The bowser must be insured by the PNGC for use as outlined in this SOI. This must include cover for damage to MOD property caused in its operation by club members. The MTO will audit this cover on behalf of AACen.
- 9. **Fuel quality.** AACen are not responsible for the quality of the fuel supplied from the bowser. Although the same checks will be conducted on the fuel before it is put in the bowser as would be for all other customers. Regardless, the club must satisfy themselves the fuel is safe for use.

Review and distribution

10. This SOI should be reviewed at least annually or when there is a significant change. Comdt AACen as the HOE retains the authority to withdraw this agreement should circumstances dictate.¹²

¹¹ If it is later found to be non-compliant, it must be removed safely and legally from the MOD estate within 48hrs of notification of that non-compliance. If this is not possible, COS AACen must be approached to agree a bespoke mitigation plan.

¹² For example, MW no longer requires AVGAS due to a change in outputs making singular provision untenable.

11. The MTO will ensure the PNGC are supplied with a current copy of this SOI. The PNGC must acknowledge receipt in writing and that this forms part of their agreement with Comdt AACen allowing them to operate at Middle Wallop. The latter will be retained by the MTO.

OCHQ for Comdt

Annexes:

- A. Civilian fuel bowser before and after use first parade sheet Portsmouth Naval Gliding Club.
- B. Safety brief/training record for all PNGC personnel entering Middle Wallop Bulk Fuel Installation (BFI).

Annex A to SOI 2.8.1 Dated 05 Mar 21

Civilian fuel bowser before and after use first parade sheet - Portsmouth Naval Gliding Club

To be completed before removal from the BFI and on return to it. This sheet must be retained by the PNGC and supplied to AACen for audit / inspection on request.

Driver's name	
Equipment type	Fuel Proof Ltd, 990L Highway Aviation Bowser with serial 3552
Date	
Time removed from BFI	
Time returned to BFI	
Signature	

Start fuel level	
Finish fuel level	

System Spare wheel	Before use	After use	Notes
Spare wheel			
Wheels tures			
Wheels, tyres, tyre pressures & wheel nuts.			
& wheel nuts.			
Bowser tank			
Integrity			
Lights			
Reflectors			
Jockey wheel			
Coupling pins			
Coup.iiig piiio			
Wheel arches			

Record of bowser damage

Please CIRCLE where damage is known to be. If new damage is found, place a CROSS on the Image and date and time it.





Annex B to SOI 2.8.1 Dated 05 Mar 21

Safety brief/training record for all PNGC personnel entering Middle Wallop Bulk Fuel Installation (BFI)

- 1. This Annex details the training that must be delivered by an AACen RLC Pet Ops SNCO BFI Manager to PNGC members who require access to the Middle Wallop BFI.
- Both parties must complete all sections relevant to them and retain a copy for audit.
- 3. Once complete, the Station Staff Officer (SSO) must be informed by the Pet Ops SNCO so they can include the individual who has received the training on the key register for the BFI as required.
- 4. There are two parts to the training, a mandatory training brief and Middle Wallop BFI familiarisation training.

Part A

5. Mandatory briefing:

- a. Key withdrawal from the guard room. When unoccupied, gates are to be locked with access to keys restricted to authorised personnel only.
- b. Access and egress to the BFI including one-way system and security.
- c. Areas of access within Installation.
- d. Static electricity. AVGAS, petrol and diesel have low conductivity and hence, are static accumulators.
- e. Earthing and bonding.
- f. Control of contraband within the hazardous area (mobile phones /smart watches/etc).
- g. Hazards associated with the products held within the BFI.

- h. Fire risk and raising the alarm (comprehensive site-specific fire plan).
- i. Firefighting equipment locations including tank drench system (save life)
- j. Fuel Spillages/actions on/spill kits/reporting (Unit Spillage Reporting Plan (USRP))
- k. An overview of how to mechanically and electrically isolate system components including emergency shutdown procedures.
- I. The defect reporting procedure.

Part B

6. BFI familiarisation

- a. Demonstrate the location of firefighting equipment and drench system.
- b. Interpret the USRP and identify the location of all Pollution Control Points and demonstrate the correct use of Pollution Control Sorbents and Equipment.
- c. Understand & describe how to electrically isolate the installation.
- d. Identify and comply with the following Safety, Health, Environment and Fire (SHEF) Assessments:
 - i. Control of Substances Hazardous to Health (COSHH) Regimental Adviser (RA)
 - ii. Health & Safety (H&S) RA
 - iii. MOD Safety Data Sheet (MSDS)
 - iv. Defence Substances and Explosive Atmosphere Regulations (DSEAR) RA
 - v. Comprehensive Fire Plan
- e. Colour perception (if applicable)

Training Record to be completed by the Pet Ops SNCO

Name of individual being trained			
Training serial	Date	Initial	Comments
Part A - m	andatory	briefing	
а			
b			
С			
d			
е			
f			
g			
h			
i			
J			
k			
David D. D.			
Part B - B	Fi familiar	Isation	
а			
b			
d.i			
d.ii			
d.iii			
d.iii			
d.v			
e e			
<u> </u>			

Declaration by the PNGC member under training

7. I have received the training as recorded on the training record. I will inform the BFI SNCO of any physical conditions, medical conditions or circumstances that may impact on my ability to work in a fuels environment or impact the Health and Safety of others within a fuels environment. I will retain a copy of this training record and declaration for future audit as required.

Date	
Title	
Name	
Contact number	
Contact email	
Signature	

Declaration by the appointed Pet Ops SNCO/ Operating Authority of the installation(s)

8. The person named above has received specific fuels training and has demonstrated their competency to enter the Middle Wallop BFI unsupervised. I will retain a copy of this training record and declaration for future audit as required.

Date	
Name	
Rank/Grade	
Service/employee number	
Signature	

Annual review by the appointed Pet Ops SNCO

Date of Review	Rank & Name	Signature	Remarks