

**NASSCO Environmental Instruction #12:**

## **Environmental Requirements for Welding**

The San Diego Air Pollution Control District (APCD) monitors air emissions caused by welding operations. Therefore, NASSCO tracks monthly welding material usage and implements certain welding practice policies to reduce hazardous pollutant emissions.

For questions about the requirements listed below or environmental regulations, please call 619-544-7506.

### **Before You Begin**

#### **Authorization to Work at NASSCO**

You must first obtain authorization from the NASSCO Environmental Engineering Department to weld at NASSCO facilities. To request authorization, send a signed and completed copy of "**NASSCO Environmental Form #12: Request for Authorization to Weld at NASSCO Facility**" to the NASSCO Environmental Engineering Department at [envreports@nassco.com](mailto:envreports@nassco.com). If approved, your company will be authorized for the duration of the project listed on the form. Each new scope of work that includes a different welding method or material must have a separate authorization from NASSCO.

For **stainless steel welding**, or any type of hot work that may create an exposure to lead, hexavalent chromium, or cadmium, your company must submit a copy of your company's written safety program to NASSCO's Safety Department before beginning the work. For complete details about this (or related) requirements, please contact NASSCO's Industrial Hygienist at 619-544-8444.

Note: ***Shielded Metal Arc Welding (SMAW) operations using stainless steel weld rods are prohibited.***

#### **Material Safety Data Sheet Product Review**

The NASSCO Safety and Environmental Departments review and approve all chemical products (including welding rods/wire, and solvents) before they are used onsite at a NASSCO facility. To submit a product for review, provide a current Safety Data Sheet (SDS) and Review Form to the Safety Department. For more information on how to submit a product SDS and Review Form, please contact NASSCO's Safety Department at 619-544-8444

#### **Air Pollution Regulations**

Subcontractors performing welding or using solvents for surface preparation associated with welding are responsible for complying with any applicable APCD regulations.

### **Work Practices**

You are responsible for educating your employees and subcontractors on the applicable environmental requirements associated with welding, including the following:

#### **Prohibition on Stainless Steel SMAW Welding**

NASSCO prohibits stainless steel SMAW welding operations onsite and at any NASSCO facility due to increased fume generation and emission of hexavalent chromium associated with SMAW.

## Recordkeeping

Contractors are responsible for maintaining daily usage records of all welding materials and solvents, if any.

## Closed Containers

APCD Rule 67.17 requires that any container holding solvents or other VOC-containing material must be kept closed unless in-use (applying, mixing, or pouring into waste receptacles). All in-use containers must be within sight of the user. All persons who handle paints, solvents or other VOC-Containing material must be trained on NASSCO's Best Management Practice #202 for Paint and Solvent Containers.

## Waste Management

Properly dispose waste/unusable weld rods into red skip tubs or other containers identified for scrap metal recycling. Dispose waste solvent and solvent-soaked rags or tools into hazardous waste drums. Unless otherwise specified, NASSCO will provide hazardous waste drums and labels to its direct subcontractors. Master Ship Repair (MSR) Companies and third parties (AITs, ship's force) are responsible for providing waste drums and labels for their and their subcontractors' activities. Your company is required to follow all applicable laws as well as NASSCO procedures for handling and disposing hazardous waste. For additional information regarding hazardous waste disposal, refer to "***Environmental Instruction #7: Generation, Disposal, or Transportation of Hazardous Waste.***"

## Over-Water Protection

When working near or over water, NASSCO's Best Management Practice #310 requires additional housekeeping and containment procedures including deploying containment booms and floating platforms to capture welding slag and debris before entering the Bay.

## Spills or Environmental Releases

In accordance with NASSCO's BMP #102, NASSCO employees and contractors must immediately report spills and releases of chemicals, including welding slag and solvents into the Bay, to NASSCO Security at 619-544-8401.

## After the Work is Completed

### Compliance Certification and Monthly Usage Reporting

At the end of each month that your company welded, you must certify their environmental compliance status on a "Title V Monthly Air Compliance Certification Form." In addition, you must submit a summary of the month's welding rod/wire and solvent usage, if any, to the NASSCO Environmental Engineering Department using the provided reporting form. Submit the completed reports to [envreports@nassco.com](mailto:envreports@nassco.com).

If your company welds at any other shipyard or any Naval Installation, the information listed above must be submitted to that entity's Environmental Department each month.