

NASSCO Environmental Instruction #2:

Environmental Requirements for Adhesive Application

Adhesive applications are strictly regulated by the San Diego Air Pollution Control District (APCD). Therefore, NASSCO carefully controls all adhesive operations within NASSCO facilities.

For questions about the requirements listed below or environmental regulations, please contact NASSCO's Environmental Engineering Department at 619-544-7506.

Before You Begin

NASSCO Approval

All contractors must first obtain authorization from the Environmental Engineering Department to apply adhesives at NASSCO. To request authorization, submit a signed and completed copy of "**NASSCO Environmental Form #2: Request for Authorization for Adhesive Application at NASSCO Facility**" to the NASSCO Environmental Engineering Department at envreports@nassco.com. If approved, your company will be authorized for the period of time listed on the form. Each new scope of work that includes adhesive application must have a separate authorization from NASSCO.

Permits

Applying more than 20 gallons of adhesives or using adhesives that emit more than 150 pounds of volatiles into the air within a 12-month period require a Permit to Operate from the APCD. Permits contain conditions like volatile organic compound (VOC) limits for adhesives and solvents to reduce emissions affecting the air quality of San Diego County. If your scope of work requires one of the two conditions listed previously, your company is required to obtain and maintain a valid APCD Permit to apply adhesives. For more information about San Diego County's permitting program, contact the APCD at 858-586-2600, or visit www.sdapcd.org

If applicable as part of the authorization request, you will be required to provide a current, unexpired copy of your APCD Permit to the NASSCO Environmental Engineering Department.

Some adhesive applications are exempt from needing an APCD Permit, such as using products containing less than 20 grams/liter of VOCs or products provided in non-refillable aerosol cans. Note that your company is responsible for maintaining any documentation that demonstrates exemption.

Air Pollution Regulations

In addition to the conditions outlined in an APCD Permit, adhesive application must comply with requirements specified in APCD Rule 67.21. This rule contains specific VOC content limits by type of adhesives and solvents, as well as specific recordkeeping requirements. Your company is responsible for complying with this rule by purchasing and using only products that comply with the VOC limits and training employees in the selection and use of compliant products and recordkeeping.

Each company that applies coatings in San Diego County must be familiar with and use products compliant with the VOC limits established in the application APCD rules. To demonstrate compliance, you must maintain and provide documentation from the product(s) manufacturer(s) listing VOC content and applicable coating category.

Safety Data Sheet Product Review

The NASSCO Safety and Environmental Departments review and approve all chemical products (including adhesives and associated solvents or surface preparation materials) 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. You may also be required to submit additional documentation (like Product Data Sheets) to demonstrate a product's VOC content. For more information on how to submit a product SDS and Review Form, please contact NASSCO's Safety Department at 544-8444.

Work Practices

Contactors are responsible for educating employees and subcontractors on the applicable environmental requirements associated with adhesive usage, including the following:

Closed Containers

APCD Rule 67.17 requires that any container holding paints, solvents, wastes, or other VOC-containing material must be kept closed unless in-use (using brush/roller, 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.

Recordkeeping

Daily records must be maintained of all adhesives and solvents used, including the exact product name, category of adhesive (APCD Category), mix ratio (where applicable), usage amount, and VOC content.

Waste Management

Properly dispose waste adhesives, solvents, and contaminated work materials (applicators, rags, consumables, etc.). Unless otherwise specified, NASSCO will provide hazardous waste containers and labels to its direct subcontractors. Master Ship Repair (MSR) Companies are responsible for providing waste containers and labels for their own activities and for those of their subcontractors. All contractors are required to follow all applicable laws as well as NASSCO procedures for handling and disposal of hazardous waste. For additional information regarding hazardous waste disposal, refer to "***Environmental Instruction #7: Generation, Disposal, or Transportation of Hazardous Waste.***"

Spills or Environmental Releases

In accordance with NASSCO's BMP #102, NASSCO employees and contractors must immediately report spills and releases of chemicals, including adhesives and solvents, 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 applied adhesives, 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 adhesive and solvent usage to the NASSCO Environmental Engineering Department using the provided reporting form. Submit the completed reports to envreports@nassco.com. For coating operations at non-NASSCO facilities, the information listed above must be submitted to that entity's Environmental Department each month.