

*NASSCO Environmental Instruction #4:*

# **Environmental Requirements for Painting and Coating**

Coating operations, applying paints, primers, sealers, and solvents, are strictly regulated by the San Diego Air Pollution Control District (APCD). Therefore, NASSCO carefully controls all coating operations conducted within NASSCO facilities.

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

## **Before You Begin**

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

All contractors must first obtain authorization from the Environmental Engineering Department to apply coatings at NASSCO. To request authorization, send a signed and completed copy of "**NASSCO Environmental Request Form #4: Request for Authorization to Apply Paint and Coatings**" to the NASSCO Environmental Engineering Department at [envreports@nassco.com](mailto:envreports@nassco.com). If approved, your company will be authorized for a period of time listed on the form. Each new scope of work that includes coating operations must have a separate authorization from NASSCO.

### **Permits**

Coating operations conducted within San Diego County require a Permit to Operate from the APCD. The Permits contain conditions, such as; Volatile Organic Compound (VOC) limits for paints and solvents to reduce emissions affecting the air quality of San Diego County. Companies working at Stationary "Host" Sources, like NASSCO, operate under the Host's Coating Permit(s). While working under a Host Permit, all parties are required to comply with the conditions and requirements therein and may be held liable for a violation of those rules. For more information about San Diego County's permitting program, contact the APCD at 858-586-2600, or visit [www.sdapcd.org](http://www.sdapcd.org)

Some coating operations are exempt from needing an APCD Permit, such as architectural coating and using non-refillable handheld containers (e.g., aerosol spray paint). Refer to ACPD Rule 11 for a comprehensive list of exempt activities and equipment. Note that your company is responsible for maintaining any documentation that demonstrates exemption for one or more coating operations.

### **Air Pollution Regulations**

In addition to the conditions outlined in a coating operation Permit, painting and coating must comply with the rules established by the SDAPCD. These rules, presented in the table below, specify limits for VOC contents, methods or application, and recordkeeping requirements.

<b>Coating(s) Applied To:</b>	<b>SDAPCD Rule:</b>
Marine Vessels or Vessel Components	67.18 Marine Coating Operations
Buildings, structures, roadways, fixed staircases or handrails, and other architectural components	67.0.1 Architectural Coatings
Wood Products (not including wooden objects attached to buildings or ships)	67.11 Wood Products Coating Operations

Metal Parts (not including vessels or vessel components or architectural elements)	67.3 Metal Parts and Products Coating Operations
Motor Vehicles and Mobile Equipment (Forklifts, Cranes, Trailers, Etc.)	67.20.1 Motor Vehicle and Mobile Equipment Coating Operations

### VOC Content

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, contractors must maintain and provide documentation from the product(s) manufacturers listing VOC content and applicable coating category.

### Recordkeeping

Daily records must be maintained of all paints and solvents used, including the exact product name, usage amount, VOC content, and method of application (roller, airless, etc).

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

The NASSCO Safety and Environmental Departments review and approve all chemical products (including paint, sealants, primers, 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. 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 619-544-8444.

## **Work Practices**

Contractors are responsible for educating employees and subcontractors on the applicable environmental requirements associated with coating, 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.

### **Container Management**

NASSCO Best Management Practice #401 on Container Labeling specifies that all containers for paints, solvents, and other hazardous materials are clearly and correctly labeled and kept in good condition. Remove damaged containers that cannot seal properly from service. Transferable contents from a damaged container may be placed in appropriate secondary container with a correct label. Product safety labels for secondary containers are available from the NASSCO Safety Department. Intentionally damaging or tampering containers, such as puncturing the lids, is prohibited. Empty containers shall be sent to the hazardous waste collection area.

## **No Thinning**

Mix and use all coating products according to manufacturer's specification. NASSCO strictly prohibits adding thinners and solvents to paints, which increases the VOC content of coatings beyond ACPD limits.

## **Shrouding and Over-Water Protection**

NASSCO BMP #203 on Shrouding requires erecting sturdy and protective shrouding around outdoor/unconfined coating activities to prevent overspray and releasing the product(s) into the environment. 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 overspray and debris before entering the Bay.

## **Waste Management**

Properly dispose waste paint, solvents, and contaminated work materials (paint brushes, 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. 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 paints 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 conducts painting or coating, you must certify your company's environmental compliance status on a "Title V Monthly Air Compliance Certification Form." In addition, you must submit a summary of the month's coating and solvent usage to the NASSCO Environmental Engineering Department using the provided reporting form. Submit the completed reports to [envreports@nassco.com](mailto: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.