

NASSCO Environmental Instruction #8:

Environmental Requirements for Generation and Disposal of Water or Wastewater

NASSCO's proximity to the San Diego Bay requires that all activities be carefully controlled to prevent the release of wastes, wastewater, debris, or other foreign material into this water body. All persons working at NASSCO are required at all times to control their activities to prevent unauthorized releases into the San Diego Bay.

Occasionally, shipyard activities generate non-hazardous water or wastewater that will require disposal. In these instances, it is important to manage this wastewater in a manner that ensures environmental protection and compliance with applicable State, local, and Federal laws. All discharges must be reviewed and approved by NASSCO's Environmental Engineering Department in advance. Contractors generating water and wastewater must follow the following procedures for disposal of these liquids while working at NASSCO. For questions about these or any other NASSCO environmental requirements, call 619-544-7506.

Before You Begin

NASSCO Approval

Any contractor wishing to dispose of water or wastewater from shipyard activities must apply for and obtain authorization from NASSCO's Environmental Engineering Department before beginning such discharge, in accordance with NASSCO Environmental Engineering Work Instruction #304, Wastewater Discharges. Separate approval must be obtained for each ship, contract, or discharge location. To apply for approval, a completed and signed copy of "**NASSCO Environmental Request Form #8: Wastewater Discharge Request**" to the NASSCO Environmental Engineering Department at envreports@nassco.com. You may **NOT** begin wastewater discharges to sewer until approval has been received from the Environmental Engineering Department. WDR are approved in a month to month basis, if the discharge is lasting more than one month a new WDR will have to be opened for each consecutive month.

Laboratory Analysis

In many cases, it will be necessary to provide laboratory analysis to demonstrate that the wastewater is compatible with NASSCO's treatment system and/or meets treatment or discharge limits. In the event lab analyses are required, your company must collect a representative sample of the water to be discharged and have it analyzed by a laboratory accredited by the State of California's Environmental Laboratory Accreditation Program (ELAP). The laboratory results should be submitted including Quality Assurance (QA), Quality Control (QC) and Chain of Custody (COC) with your Wastewater Discharge Request Form, unless otherwise instructed by NASSCO's Environmental Engineering Department. Because laboratories may take as long as 10 days to provide results, you are advised to submit samples to the laboratory as soon as the need to dispose of wastewater is identified. Your company will be required to provide a second analysis if the discharge is ongoing for more than 6 months. To determine if lab analysis will be required, please contact NASSCO's Environmental Engineering Department.

Flow Monitoring

Your company will be responsible for reporting the total amount of water or wastewater discharged under each wastewater discharge authorization. In many cases, it may be possible to estimate the flow based on the size of the container or tank used to hold the water. However, in most instances, it will be necessary to provide a flow meter. This is usually the case when dealing with bilge, ballast water, comp water, or other jobs where continuous or high flow discharges will occur. If flow metering is required, your company is responsible for providing and monitoring the flow meter. Flowmeters must have current calibration stickers. Flowmeter cannot be used for two different jobs at the same time. Please contact NASSCO's Environmental Engineering Department to determine whether a flow meter will be required for your job.

Over-Water Transfers

If your job will involve transfers of oil, oily bilge or ballast water, or other oil-containing liquid, please refer to "**Environmental Instruction #5: Environmental Requirements for Overwater Transfers**". Discharges of oily water via pipeline to NASSCO's Wastewater Treatment Facility are considered to be over-water transfers that must be monitored as such. Contractors may not initiate oily water discharges to the wastewater treatment facility when an operator is not present. Contractors are required to provide a radio or other form of reliable, immediate two-way communication to the NASSCO Wastewater Treatment Facility Operator during transfers of oily water to ensure that the operator can quickly communicate a stop order in the event of problems.

Limitation on Point or Time of Discharge

If approved, your Wastewater Discharge Request will specify the location where your water or wastewater can be discharged (e.g., wastewater treatment plant, oil/water separator, pipeline.) You may not change the discharge location without getting approval from NASSCO's Environmental Engineering Department. Due to the potential risks associated with transfers occurring in the dark, **NASSCO does not allow wastewater discharge operations to occur after sunset without specific authorization from the Vice President of Operations, obtained in advance of the transfer activity.**

Work Practices

Waste Management

Some transfer activities, such as the removal of oily bilge water, may result in the need to dispose of residuals that are considered hazardous wastes (e.g., sludge, oil, fuel). Your company is required to follow all applicable laws as well as NASSCO procedures for handling, transportation, and disposal of hazardous wastes. Contact NASSCO's Environmental Engineering Department to arrange for disposal or recycling of bulk quantities of used oils and fuels. For additional information regarding hazardous waste disposal, refer to "**Environmental Instruction #7: Generation, Disposal, or Transportation of Hazardous Waste.**" Hazardous wastes may not be discharged into the sewer system or any NASSCO wastewater treatment facility.

Spills or Environmental Releases

At all times, care must be taken to prevent release of any hazardous material or waste material onto the ground or into the San Diego Bay. Spills and releases of chemicals or oil must be immediately reported to NASSCO Security 619-544-8401 according to NASSCO's spill reporting policy, as outlined in NASSCO's Best Management Practice #102.

Fire Fighting Foam

Any wastewater containing Aqueous Film Forming Foam (AFFF) must be treated with a de-foaming agent prior to disposal of the sewer system, whether directly or indirectly (through an oil water separator or wastewater treatment facility). Unless otherwise indicated in your contract with NASSCO, it is your company's responsibility to provide defoamer. Your company must also monitor its discharge, including downstream manholes and pumps, to ensure that its wastewater has been adequately treated with defoamer. If there is any evidence that foam is causing a problem with the sewer system, pumps, or NASSCO's treatment facilities, the discharge must be stopped until the foaming can be adequately controlled.

After the Work is Completed

Closeout of Wastewater Discharge Request

Upon completion of the authorized discharge, your company is responsible for "closing" the Wastewater Discharge Request. This is accomplished by entering total flow and "end date" information into Section #3 of the request form and returning a copy of the form to NASSCO's Environmental Engineering Department. For authorizations lasting more than one month, monthly flow reports will also be required.