

NASSCO Environmental Instruction #7:

Environmental Requirements for Hazardous Materials and Waste

Shipyards activities that use hazardous materials and/or generate hazardous waste have a potential to generate pollution and to become a safety hazard. Examples of such activities include painting, abrasive blasting, adhesive use, as well as cleanup and repair activities using oils, solvents, cleaners, resins, or other chemicals. If your company engages in activities that utilize hazardous materials or generate hazardous wastes while operating at NASSCO, it must adhere to all applicable State, local and Federal laws pertaining to these activities. Your company is also required to follow NASSCO policies and procedures related to waste reduction, management, and disposal as well as spill prevention and reporting.

The term "**Hazardous Material**" generally refers to new or usable raw materials or products, that have a potential to pose a hazard to human health or the environment. Examples of commonly used hazardous materials include: paints, solvents, adhesives, oils, cleaners, fuels, acids, and other chemical products.

The term "**Hazardous Waste**" generally refers to solid, liquid, or gaseous waste materials that have been generated as wastes from processes that, if improperly managed, treated, stored, or disposed of, may pose substantial hazards to human health and the environment. Examples of typical shipyard hazardous waste include: paint, solvents, or adhesive waste, spent abrasive blast grit, used oil, asbestos, and contaminated consumables, such as dirty gloves, paint brushes, and rags.

This document provides a summary of the requirements for using hazardous materials or generating hazardous waste at NASSCO. For questions about these or any other NASSCO environmental requirements, call 619-544-7506.

Before You Begin

NASSCO Approval

Your company may not bring in any hazardous materials into any NASSCO facility without first applying for and obtaining approval from the Environmental Engineering and Safety Department to bring in such materials. Similarly, approval is required before any hazardous waste can be generated, stored, or removed from any NASSCO facility. Approval must be obtained for each contract award conducted that requires the use of hazardous materials or the generation of hazardous waste (one per ship or location). Separate approval must be obtained for the transportation of any material into NASSCO facility. To apply for approval, a completed and signed copy of [**NASSCO Environmental Forms #7a and #7b: Request for Authorization to Generate Hazardous Waste and/or The Request to Transport Hazardous Materials Waste from NASSCO Facility**](#) must be submitted to the NASSCO Environmental Engineering Department at Envreports@nassco.com.

Hazardous Materials

Each hazardous material that you propose to use at NASSCO must undergo a specific review by NASSCO's Environmental Engineering and Safety Departments in advance of work commencing. To initiate the MSDS review process, contact the Safety/Industrial Hygiene Department (x8444) as soon as you identify the need to bring such material into the yard. You will need to provide a copy of the current Material Safety Data Sheet (MSDS) for each product, along with a completed MSDS review form describing how you intent to use the product. For paints, solvents, adhesives, and other materials containing Volatile Organic Compounds (VOCs), you must also provide a technical data sheet or other documentation of VOC content, in order to demonstrate that the product is in compliance with local air pollution control regulations. You may not use the hazardous material until you have received confirmation from the Safety Department that the material is approved for use.

Hazardous Waste

Before beginning any work that will generate hazardous waste at NASSCO Facility, contact the Environmental Engineering Department at 619-544-7506 to arrange for training on the proper management, labeling, transportation, and disposal of these wastes at our facility. After the initial training has been received, a representative from your company will be required to attend refresher training annually.

Work Practices

You are responsible for educating your employees and subcontractors on the applicable environmental requirements associated with Hazardous Waste and Materials including the following:

Specific Requirements for Hazardous Materials

- All hazardous materials are required to be clearly and correctly labeled as to contents and hazards at all times. In most cases, the original product label will serve these purposes. However, if the label becomes unreadable or damaged, or if the material is transferred into a secondary container, you will need to apply a new label. Replacement product safety labels are available from the Safety Department. In addition to product safety information, subcontractor material must be labeled with subcontractor name and ship name (where applicable). This information is contained in Best Management Practice #401
- Hazardous material containers without proper secondary containment or labeling will be transported to and stored at GD NASSCO HazMat (x7736) until claimed. Unclaimed ship's material will be referred to the SUPSH IP or MSC/Coast Guard for proper disposal.
- The GD NASSCO Ship's Manager has the responsibility for ensuring vessel hazardous materials are managed properly. Contractors working for NASSCO will work with their Ship's Manager (or designee) to obtain hazardous waste labels and drums.
- Storage of liquid hazardous materials on piers, floating dry dock, and graving dock is not allowed unless:
 - Hazardous materials are in transit (max storage of 72 hrs.).
 - Stored within proper secondary containment. Contact your Environmental Contact Person or GD NASSCO Environmental Engineering 619-544-7506 for specific requirements.

Specific Requirements for Hazardous Waste

- In most cases, NASSCO will provide waste drums and labels to its direct contractors and will also arrange for final disposal of hazardous waste generated on these jobs. For Master Ship Repair (MSR) organizations such as BAE, Pacific Ship Repair, and Northrop Grumman will handle drums, labels, containment, and final disposal for their own subcontractors. MSRs generating hazardous waste inside a NASSCO facility must:
 - Obtain an EPA Generator's ID specific to the NASSCO facility where your company will generate hazardous waste
 - Use a properly licensed and insured hazardous waste hauling company having an EPA Transporter ID. The waste hauler must obtain clearance from the NASSCO Security office before coming on-site.
 - Provide hazardous waste drums and labels
 - Provide secondary containment, when required
- Third Parties are contractors who do not have any direct relationship with NASSCO or any MSRs. Third Parties desiring to conduct activities that generate hazardous waste must obtain authorization from the NASSCO Environmental Engineering Department prior to commencing such activities. If approved, the Third Party will have to make arrangements similar to those described for MSRs, above.
- All waste drums are required to be accurately and correctly labeled as soon as the first waste is placed in the drum. The hazardous waste label must remain legible and visible at all times.
- The GD NASSCO Ship's Manager has the responsibility for ensuring vessel hazardous wastes are managed properly. Contractors working for NASSCO will work with their Ship's Manager (or designee) to obtain hazardous waste labels and drums.

Hazardous Material and Waste Storage

All hazardous waste and material in the yard must be stored in a manner that prevents ruptures, leaks, or spills. The containers holding the material shall be in good condition with no signs of defects. Incompatible materials such as corrosives and flammables shall not be stored together in accordance with NASSCO Best Management Practice #403. All containers must remain closed at all times unless material or waste is being added or removed, in accordance with NASSCO Best Management Practice #202.

Secondary Containment

Secondary containment systems must be provided for liquid containers that are stored over 72 hours on a pier, berth, ways, or other areas that have a direct pathway to yard drains. Do not allow rainwater or spills to accumulate in secondary containment. Ensure storage of incompatible material does not occur in the same secondary containment, as outlined in Best Management Practice #405.

Spills or Environmental Releases

Care must be taken to prevent release of any material 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.

After the Work is Completed

Removal of Hazardous Materials

Upon completion of your job, your company is responsible for removing (or arranging for removal of) any unused hazardous materials from the NASSCO facility. Transportation of new and usable hazardous

materials must be performed in accordance with applicable Department of Transportation (DOT) regulations related to the transportation of hazardous materials, including the use of a "Bill of Lading" where required. If your company transports hazardous materials, it is responsible for knowing and complying with the laws applicable to this activity; for more information, visit <http://www.phmsa.dot.gov/hazmat/regs>

Removal of Hazardous Wastes

The transportation and disposal of hazardous waste is a highly regulated activity. For this reason, your company may not remove hazardous waste from NASSCO's facility without specific authorization from the NASSCO Environmental Engineering Department. Hazardous Waste may only be transported by a licensed waste hauler under a Uniform Hazardous Waste Manifest.

If you are a direct subcontractor to NASSCO to whom NASSCO has provided waste drums, you are responsible for ensuring that all waste drums are properly palletized and labeled for movement to NASSCO's hazmat yard at the end of your job. You may not remove hazardous waste from NASSCO.

If you are a Master Ship Repair (MSR) organization, or a subcontractor to an MSR working at NASSCO, your company must label and manage waste according to the MSR's direction. Hazardous waste generated by MSRs and their subcontractors may only be removed by the MSR's designated, licensed hazardous waste hauling company, under a Uniform Hazardous Waste Manifest. Questions regarding MSR waste disposal procedures should be directed to the MSR's Environmental Department.

Compliance Certification and Monthly Usage Reporting

NASSCO has not established a monthly reporting requirement specifically for the use of hazardous materials or the generation of hazardous waste. Unless your company performs another activity that requires monthly reporting (e.g., painting, blasting, welding, adhesive, solvent use, etc.), no monthly reports will be required.