

Notice of Environmental Requirements for Contractors Working at NASSCO San Diego Facilities

This document outlines the environmental requirements for contractors working at NASSCO facilities located in San Diego County. A separate document entitled “**Notice of Environmental Requirements for All NASSCO Contractors**” summarizes the environmental requirements for all contractors, regardless of work location. Contractors proposing to work at a NASSCO San Diego Facility are responsible for knowing and following the requirements contained in each of these documents. You can find these documents on NASSCO’s website at: <http://nassco.com/suppliers/doing-business-with-us/environmental-procedures/>

Subcontractors, suppliers, third parties, and alteration installation teams (AITs) are required to review this notice and complete the “**Environmental Requirement Review Checklist and Certification**” prior to conducting any work at any NASSCO San Diego facility, (e.g., NASSCO shipyard at 28th and Harbor, Tidelands 1 or 2, Otay, Mission Valley). NASSCO’s Environmental Management System (EMS) requires this review to maintain conformance with its ISO 14001 procedures and compliance with applicable environmental regulations and permits. If you have any questions or concerns about this notice, contact NASSCO’s Environmental Engineering Department at (619) 544-7506.

Each company proposing to work at a NASSCO San Diego facility is required to review this notice, then complete and submit the Environmental Requirement Review Checklist and Certification. Failure to submit the checklist or any of the documentation required by this notice may result in a delay to contract award, disqualify you from the proposed work, or prevent your access to NASSCO’s facilities. **This notice also identifies certain activities that cannot be performed at a NASSCO San Diego facility unless written authorization has been obtained from the NASSCO Environmental Engineering Department prior to conducting work; these requirements are summarized in Table 1.** The forms used to request authorization to perform these activities can be found on NASSCO’s website at: <http://nassco.com/suppliers/doing-business-with-us/environmental-procedures/>

It is your company’s responsibility to know and comply with federal, state, and local environmental regulations applicable to the activities to be performed. Your company is also responsible for complying with all applicable NAVSEA Standard Item requirements related to environmental performance, monitoring, or recordkeeping while working for NASSCO. If it is discovered that your company has violated applicable environmental regulations or did not follow NASSCO environmental policies while working at NASSCO, it may result in the issuance of an Environmental Corrective Action Request (ECAR) and/or revocation of facility access. **If your activities violate an environmental law or permit condition which results in a notice of violation from a regulatory body, your company will be responsible for all associated fines and/or penalties.**

Your company is responsible for providing the necessary training to ensure that your employees adhere to the requirements while working at NASSCO facilities. You are also responsible for informing your subcontractors of these requirements and their responsibility to comply. In addition, all subcontractors and/or third parties are required to request authorization to perform any activities listed in Table 1.

BEST MANAGEMENT PRACTICES

NASSCO has developed and implemented specific Best Management Practices (BMPs) for controlling operations and protecting the environment. A complete copy of the BMPs is available from the Environmental Engineering Department. Because of the variety of processes conducted at NASSCO’s facilities, various BMPs have been developed and implemented to cover these specific operations. However, there are facility-wide BMPs that apply to everyone, as summarized below:

BMP #101: General EMS Awareness

NASSCO has implemented an Environmental Management System (EMS) that supports our commitment to the environment and to continuous improvement. NASSCO's EMS has established three overarching goals that everyone who works at a NASSCO facility is expected to support. These are:

- Prevent Pollution
- Put Waste in the Right Place
- Use Resources Wisely

NASSCO's Environmental Policy is part of NASSCO's Mission, Vision, Values, and Guiding Principles. This is listed on the white card attached to your badge. All personnel on-site at NASSCO must have a white card and be familiar with NASSCO's Environmental Policy:

We are committed to protecting the environment and preventing pollution

BMP #102: Emergency Response

Everyone who works at a NASSCO San Diego facility is required to be aware of how to respond to emergencies and spills, the location of the nearest fire extinguisher, and their evacuation or muster location. NASSCO has an onsite fire department and is equipped to respond to medical emergencies. For a fire or medical emergency, call 619-544-8777 (or 911 from a RED NASSCO Phone).

NASSCO also has on-site spill response capabilities. Should you observe or cause a spill, immediately report it by calling 619-544-8401 (or 8401 from a RED NASSCO phone). The following spills are required to be reported:

- ***One drop or more of any material to San Diego Bay***
- ***One quart or more of any hazardous material onto the ground***

BMP #202: Paint and Solvent Container Management

NASSCO policy and San Diego Air Pollution Control District regulations require that all containers that hold materials or wastes containing Volatile Organic Compounds (VOCs) must be kept closed at all times when not adding or removing material. Typical VOC-containing materials include paints, solvents, and adhesives; typical wastes containing VOCs include solvent or paint contaminated rags and brushes, and other wastes contaminated by VOC-containing materials.

BMP #306: General Yard Cleanup

Clean work areas are essential for safety and to prevent the spread of trash and debris. All trash including paper, cans, bottles, wood, steel and other debris are to be removed regularly and properly disposed.

BMP #326: Parking Lot Housekeeping

It is prohibited to dispose of hazardous waste of any type into the parking lot trash cans or onto the ground. To prevent storm water pollution from NASSCO parking lots, vehicle maintenance, including adding oil or other fluids to the vehicle, is prohibited in NASSCO parking lots.

BMP #401: Container Labeling

All containers must be clearly and correctly labeled as to their contents and any required hazard labels must remain visible and legible. Should a new material label become damaged, or if material is transferred into another container, a new label can be obtained from the NASSCO Safety Department at 619-544-8444. If a hazardous waste label is damaged, contact the ship manager or hazmat coordinator designated to your area.

BMP #407: Universal Waste

Universal waste, such as electronic waste (e-waste), batteries, fluorescent bulbs, and ink and toner cartridges, is prohibited from being disposed of in the general trash and may never be placed in skip tubs.

HAZARDOUS MATERIAL APPROVAL PROCESS

The term “hazardous material” applies to any type of chemical or product containing any item or agent (biological, chemical, radiological, and/or physical), which has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. This includes, but is not limited to, products like paints, solvents, adhesives, cleaners, oils, fuels, acids, caustics, abrasive material, weld rod, lubricant, coolant, etc.

BEFORE bringing any hazardous material(s) into any NASSCO San Diego facility, your company must submit a Safety Data Sheet (SDS) to the NASSCO Safety Department for review. You may not use the product at NASSCO until you have received confirmation from the Safety Department that the product is acceptable for use. Additionally, documentation of “as applied” Volatile Organic Compound (VOC) content must accompany each paint, solvent, and adhesive product. This information is typically found on the product data sheet. For more information on the SDS Review process, please contact the Safety Department at 619-544-8444.

SOLID WASTE DISPOSAL

Trash and recycling receptacles called “skip tubs” are located at numerous locations throughout the yard. The skip tubs are color-coded to promote waste segregation and recycling as follows:

- BLUE SKIP TUBS: Wood
- RED SKIP TUBS: Scrap Metal
- WHITE SKIP TUBS: General Trash, Cardboard
- GREEN SKIP TUBS: Office Paper Only

It is prohibited to dispose of hazardous waste or material or medical/biological wastes in containers designated for trash or other non-hazardous waste. Contact Environmental Engineering for guidance on disposal of foreign garbage.

HAZARDOUS WASTE DISPOSAL

While working at NASSCO’s facilities, your company is responsible for complying with applicable federal, state, and local laws and regulations pertaining to management and disposal of the hazardous wastes generated from your activities. Examples of hazardous wastes include, but are not limited to: oil contaminated debris, waste paints and paint-related wastes, used solvents, spent chemicals, and waste adhesives, as well as used oil and abrasive blasting grit. Hazardous wastes are required to be discarded only in properly labeled waste drums or containers. It is prohibited to abandon or discard hazardous materials or wastes into any trash receptacle.

Before beginning any work that will generate hazardous waste at a NASSCO facility, contact the Environmental Engineering Department at 619-544-7506 for approval of the work and to arrange for training on NASSCO’s policies and procedures, if needed.

When NASSCO is the prime contractor, NASSCO will provide waste drums and labels and will arrange for final disposal of the wastes generated by its direct subcontractors. All waste containers must be clearly and properly labeled in accordance with applicable hazardous waste laws at all times. Containers of hazardous waste must be kept securely closed at all times except when actively adding waste to the container. **Your company may not remove hazardous waste from NASSCO without prior authorization from NASSCO’s Environmental Engineering Department.**

NASSCO will not provide hazardous waste containers or dispose of hazardous waste generated by the Navy, MSC, Coast Guard, or third parties such as AITs or any of their contractors. Responsibility for obtaining an EPA generator ID, managing, and properly disposing of these wastes rests with the generating entity.

AIR POLLUTION CONTROL

Activities that can generate air emissions are closely regulated by the California Air Resource Board (CARB) and the San Diego County Air Pollution Control District (SDAPCD). These activities either require permits or are subject to state or local air regulations which establish limitations on product use or VOC content, recordkeeping, and other requirements. These activities include:

- Abrasive Blasting
- Adhesive Use
- Asbestos Abatement, Removal, or Disruption
- Coating or Painting
- Demolition of Building, Equipment, or Structures
- Fiberglass/Polyester Resin Layup or Machining

- Operation of Non-Road Diesel Engines > 49 hp (including generators, compressors, pumps, hydro blasters, etc.)
- Operation of Off-Road Diesel Engines > 25 hp (including forklifts, construction equipment, load handlers, etc.)
- Solvent Use
- Thermal Spraying
- Welding
- Any other operation subject to San Diego Air Pollution Control District Rules or Permit Requirements

Any Company proposing to perform any of the above-listed activities must obtain written authorization from the Environmental Engineering Department before beginning the activity. Ship's Force shall also obtain authorization prior to performing these activities in the NASSCO shipyard.

Third Parties and AITs (entities not contracted by NASSCO) are prohibited from conducting the above-listed activities at any NASSCO Facility unless specific authorization has been obtained, in advance, from the NASSCO Repair Management (for on-board work) and the Environmental Engineering Department.

If the activity your company performs is required to have an Air Pollution Control Permit or Registration, then you must submit a copy of the permit or registration to the NASSCO Environmental Engineering Department **BEFORE** starting that activity. Furthermore, your company is responsible for complying with applicable SDAPCD Rules, whether or not a permit is required. For more information on permits and air pollution control regulations, contact the SDAPCD at 858-586-2600.

The SDAPCD has established stringent limitations on the VOC content of paints, adhesives, resins, solvents and other products. It is important that you familiarize yourself with these limits before you purchase any of these products to ensure that the product can legally be used in San Diego County.

Most of the activities listed above have daily or monthly recordkeeping requirements. For example, if you paint or apply adhesives, you are required to maintain records on the amount of paint or adhesive used. Your company is required to submit monthly usage records to NASSCO's Environmental Engineering Department, by the 10th of each month following the month that the work was performed. Reporting forms will be provided by NASSCO.

NASSCO operates under a Title V air permit. This permit has very strict requirements that require significant control over certain work activities that generate air emissions. Companies conducting operations at NASSCO's Shipyard (Harbor Drive) facility that can affect NASSCO's Title V Air Permit are required to submit a "Monthly Air Compliance Certification" form Part-A by the 10th of the following month.

WATER POLLUTION CONTROL ISSUES

Due to NASSCO's close proximity to San Diego Bay, extreme care must be taken to prevent negative impacts to the Bay. **All discharges to San Diego Bay are strictly prohibited.** Spills, leaks, and other unauthorized discharges to San Diego Bay must be immediately reported to NASSCO Security at 619-544-8401.

Your company is required to obtain approval from the Environmental Engineering Department prior to initiating any water or wastewater discharge. Apply for approval by submitting a "Wastewater Discharge Request" form and any required analytical data to the Environmental Engineering Department.

Over Water Activities: The over water activities listed below must be approved by NASSCO Executive Management, the NASSCO Department overseeing the activity, and NASSCO Environmental Engineering. To request approval for over water activities, a "Request for Authorization of High Risk Operations" must be submitted. The request **MUST** include a description of the activity, potential pollutants associated with the activity, and the controls to be implemented by the contractor to prevent discharge to San Diego Bay.

- Spray painting, welding or burning, grinding, chipping and blasting;
- Over water transfers of oil, oily water or fuels.

Over water transfers of oil, oily water and fuels must comply with all laws and regulations of the U.S. Coast Guard-San Diego and must satisfy NASSCO's Person-In-Charge (PIC) requirements.

FLOW DOWN REQUIREMENT

All companies working at NASSCO shall comply with all NASSCO environmental policies and procedures, applicable NAVSEA Standard Items, as well as all federal, state and local environmental rules and regulations. If your company will be hiring contractors to work at a NASSCO facility, it is your responsibility to ensure that NASSCO environmental requirements have been communicated to your contractor and that their work is sufficiently monitored to ensure compliance. All entities working within NASSCO's fence line are required to meet NASSCO's Environmental Requirements and have approval prior to beginning any of the activities listed in Table 1 of this notice.

CERTIFICATE OF COMPLETION (COC) CHECKLIST

In order to obtain a COC sign-off from Environmental Engineering, your company must submit a completed COC Checklist describing the activities performed to the NASSCO Environmental Engineering Office by email (envreports@nassco.com) with the COC signature page(s). All required permits and reporting documentation specified on the COC Checklist must also be received prior to Environmental Engineering sign-off. A copy of the COC Checklist is available on NASSCO's website at: <http://nassco.com/suppliers/doing-business-with-us/payment-release-forms/>

ENVIRONMENTAL CORRECTIVE ACTION REQUESTS (ECARs)

Failure to comply with applicable environmental rules and regulations and/or NASSCO environmental policies may result in your company being issued an Environmental Corrective Action Request (ECAR) by NASSCO Environmental Engineering or revocation of facility access. Most ECARs require a full root cause analysis of why the noncompliance occurred as well as a corrective action plan to prevent recurrence of a similar noncompliance.

CONTACTING NASSCO'S ENVIRONMENTAL ENGINEERING DEPARTMENT

The NASSCO Environmental Engineering Department is located on the ground floor of Building #51 at the main shipyard at 2798 Harbor Drive.

ADDRESS: General Dynamics NASSCO
Attn: Environmental Engineering Department (MS 22A)
PO Box 85278
San Diego, CA 92186-5278

E-MAIL: envreports@nassco.com

PHONE: 619-544-7506

Table 1: Activities Requiring Authorization by NASSCO Environmental Engineering Department

Before Conducting This Activity:	Review the Following NASSCO Environmental Instruction (EI)	Submit the following documents or Environmental Request Form (ERF) to NASSCO:
Working at any NASSCO San Diego facility	➤ Notice of Environmental Requirements	✓ NASSCO Environmental Requirement Review Checklist and Certification
Use of chemicals or hazardous materials such as paints, solvents, adhesives, oil, fuel, weld rods, abrasive grit, or other chemicals or hazardous materials	➤ Notice of Environmental Requirements	✓ Copies of Material Safety Data Sheets (MSDS) and Review Form for each material (to NASSCO Safety Department)
Abrasive Blasting	➤ EI#1: Environmental Requirements for Abrasive blasting	✓ ERF#1: Request for Authorization to Perform Abrasive Blasting
Adhesive Use	➤ EI#2: Environmental Requirements for Adhesive Use	✓ ERF#2: Request for Authorization to Apply Adhesives
Asbestos Abatement, Removal, or Disruption OR: Demolition of Building, Equipment, or Structures	➤ EI#3: Environmental Requirements for Removal or Disruption of Asbestos	✓ ERF#3: Request for Authorization to Perform Asbestos Abatement or Demolition
Coating or Painting	➤ EI#4: Environmental Requirements for Painting and Coating	✓ ERF#4: Request for Authorization to Apply Paint and Coatings
Over-Water Transfer of Oil, Fuel, Oily Water, or Other Petroleum-Containing Materials	➤ EI#5 Environmental Requirements for Overwater Transfers	✓ ERF#5 Request for Authorization to Perform Over-Water Transfers
Fiberglass/Polyester Resin Layup	➤ EI#6 Environmental Requirements for Fiberglass and Polyester Resin Work	✓ ERF#6 Request for Authorization to Apply Polyester Resin Materials
Generation, Disposal, or Transportation of Hazardous Waste	➤ EI#7 Environmental Requirements for Generation, Disposal, or Transportation of Hazardous Waste	✓ ERF#7 Request for Authorization to Generate, Dispose, or Transport Hazardous Waste
Generation or Disposal of Water or Wastewater (bilge, ballast, hydroblast, flushing)	➤ EI#8 Environmental Requirements for Generation and Disposal of Water or Wastewater	✓ ERF#8 Wastewater Discharge Request
Operation of Non-Road Diesel Engines > 49 hp (including generators, compressors, pumps, hydro blasters, etc.)	➤ EI#9 Environmental Requirements for Non-Road Diesels	✓ ERF#9 Request for Authorization to Operate Non-Road Diesels
Operation of Off-Road Diesel Engines > 25 hp (including forklifts, construction equipment, load handlers, etc.)	➤ EI#10 Environmental Requirements for Off-Road Diesels	✓ ERF#10 Request for Authorization to Operate Off-Road Diesels
Solvent Use	➤ EI#11 Environmental Requirements for Solvent Use	✓ ERF#11 Request for Authorization to Use Solvent Products
Welding	➤ EI#12 Environmental Requirements for Welding	✓ ERF#12 Request for Authorization to Perform Welding
Handling of Petroleum Products (> 50 gallons) within Facility (including fuel delivery and handling of oils and fuels, but excluding over-water transfers)	➤ EI#13 Environmental Requirements for Handling of Oils and Fuels	✓ ERF#13 Request for Authorization to Handle Oils and Fuels
Thermal Spraying	✓ Contact Environmental Engineering for more information	
Other activities subject to SDAPCD Prohibitory Rules, Environmental Permitting Requirements, or having potential to result in significant environmental impacts	✓ Contact Environmental Engineering for more information	

Subcontractors, customers, third parties, and AITs proposing to perform any of the above-listed activities at NASSCO must apply for and obtain written authorization from the Environmental Engineering Department prior to conducting these activities. The procedures and forms for obtaining authorization can be found on NASSCO's website at:

<http://nassco.com/suppliers/doing-business-with-us/environmental-procedures/>