



NASSCO Environmental Instruction #11:

# Environmental Requirements for Solvent and VOC Material Usage

The use of solvents and materials containing volatile organic compounds (VOCs) adhesive products is an activity that is very closely regulated by the San Diego Air Pollution Control District. Since these operations are subject to strict local and federal laws, these materials are required to be carefully controlled at all times to ensure compliance. For questions about these or any other NASSCO environmental requirements, call 619-544-7506.

## Before You Begin

### **NASSCO Approval**

Your company may not use solvents or other materials containing Volatile Organic Compounds at any NASSCO facility without first applying for and obtaining approval from the Environmental Engineering Department to conduct this activity. Separate approval must be obtained for each adhesive application job conducted (one per ship or location).

**Painting and Coating:** If your company will be using solvents for surface preparation or equipment cleanup operations related to painting or coating, please follow the guidelines and approval process described in "NASSCO Environmental Instruction #4: Environmental Requirements for Painting and Coating"

**Adhesive Materials:** If your company will be using solvents for surface preparation or equipment cleanup operations related to adhesive application, please follow the guidelines and approval process described in "NASSCO Environmental Instruction #2: Environmental Requirements for Adhesive Application"

**Fiberglass and Polyester Resin:** If your company will be using solvents for surface preparation or equipment cleanup operations related to use of polyester resins, please follow the guidelines and approval process described in "NASSCO Environmental Instruction #6: Environmental Requirements for Polyester Resin and Fiberglass Work"

**Other Solvent or VOC Material Usage:** If your company will be using solvents for purposes other than listed above, it will need to submit a completed and signed copy of "[NASSCO Environmental Form #11: Request for Authorization for to Use Miscellaneous Solvents and VOC-Containing Materials at NASSCO Facility](#)" to the NASSCO Environmental Engineering Department at [envreports@nassco.com](mailto:envreports@nassco.com) or fax to 619-744-1088. *You may not begin using solvents until approval has been received from the Environmental Engineering Department.*

### **Permits**

Companies conducting activities that use solvents and VOC-containing materials may require a permit from the San Diego Air Pollution Control District (SDAPCD). Your company is responsible for obtaining and maintaining a valid permit for these activities, when required by the SDAPCD. For more information about permit requirements, contact SDAPCD at 858-586-2600, or visit [www.sdapcd.org](http://www.sdapcd.org)

If your company is required to obtain a permit for its activities, then it is required to provide a copy of the current, unexpired SDAPCD permit to the NASSCO Environmental Engineering Department before conducting that activity on-site. If the work will be performed at another shipyard or Navy facility, then a copy of the permit must be submitted to that facility's environmental department before beginning the work. If your activities have been determined to be exempt from the requirement to obtain a permit, you are responsible for maintaining any documentation required by SDAPCD to demonstrate that the exemption applies.

### Air Pollution Regulations

Whether or not a permit is required, almost all solvent use is subject to SDAPCD rules designed to limit the emission of VOCs. These rules may limit the VOC content, vapor pressure, or amount of a solvent that can be used, or they may establish work practices or recordkeeping requirements.

If your company will be using solvents for the following activities:	All activities must comply with SDAPCD Rule:
Surface Preparation or Equipment Cleanup Associated with Painting Marine Vessels or Vessel Components	67.18 Marine Coating Operations
Surface Preparation or Equipment Cleanup Associated with Painting of Metal Parts	67.3 Metal Parts
Surface Preparation or Equipment Cleanup Associated with Adhesive Application	67.21 Adhesives
Surface Preparation or Equipment Cleanup Associated with Polyester Resins or Fiberglass	67.12 Polyester Resins
Use of Solvent or Other VOC-Containing Materials <b>NOT</b> covered by other APCD Rules	66.1 Miscellaneous Surface Coating Operations and Other Processes Emitting VOCs

*Note: The table above is a summary of common shipyard solvent uses and applicable rule; it does not represent a complete listing of APCD Rules*

All solvent and VOC containing materials used at NASSCO must comply with applicable SDAPCD Rules. Your company is responsible for complying with applicable rules by purchasing and using only products that comply with the VOC limits and for training employees in the selection and use of compliant products and recordkeeping.

It is important to note that most rules establish VOC limits for specific product types, thus it is important to evaluate each product type and intended usage against the VOC limits established in the rule to ensure compliance. A product which is compliant for one usage may not be compliant for another. Companies using these products are responsible for ensuring that each product used is compliant for the intended use.

In order to demonstrate compliance, you must be able to provide documentation of product VOC content. This information is usually shown on the Material Safety Data Sheet or Product Data Sheet. This information must be provided when your product is initially reviewed by the Safety Department and must be readily available any time the product is in use at NASSCO.

## Material Safety Data Sheet Product Review

Before any chemical product (including solvents and other VOC-containing materials) can be brought into NASSCO, the product must be reviewed and approved by the NASSCO Safety Department. This is accomplished by submitting a Material Safety Data Sheet (MSDS) and Review Form to the Safety Department. You must also submit documentation of product VOC content. The product must not be brought on-site until you have received confirmation that the Safety Department has approved the product. For more information, contact NASSCO's Safety Department at 544-8444.

## Work Practices

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

### Closed Containers

To minimize emissions of VOCs, any container holding solvents, wastes, or other VOC-containing material must be kept closed unless a person is in the act of adding or removing material. All "in-use" containers must be within line of site of the person using the container. All persons who handle solvents or other VOC-Containing material must be trained on NASSCO's Paint and Solvent Container, Best Management Practice #202.

### Recordkeeping

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

### Waste Management

Waste solvents and contaminated work materials (applicators, rags, consumables, etc.) must be disposed of properly. Unless otherwise specified, NASSCO will provide hazardous waste drums and labels to its direct subcontractors. Master Ship Repair (MSR) Companies are responsible for providing waste drums and labels for their own activities and for those of their subcontractors. Your company is required to follow all applicable laws as well as NASSCO procedures for handling and disposal of hazardous waste. Your company is required to follow all applicable laws as well as NASSCO procedures for handling, transportation, 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

Spills and releases of chemicals, including solvents, 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.

### **Compliance Certification and Monthly Usage Reporting**

At the end of each month, all companies using solvents at NASSCO are required to certify as to their compliance status using a "Title V Monthly Air Compliance Certification Form." Additionally, a summary of solvent usage must be submitted to NASSCO using the reporting form provided (or approved equivalent). The signed forms must be sent to Environmental Engineering at [envreports@nassco.com](mailto:envreports@nassco.com) or faxed to 619-744-1088.

If your company uses solvents at any other shipyard or any Naval Installation, then your records must be submitted to that entity's Environmental Department monthly.