



NASSCO Environmental Instruction #12:

Environmental Requirements for Welding

Welding operations generate air emissions which are required to be quantified by the San Diego Air Pollution Control District. For this reason, welding operations are subject to monthly reporting requirement. Furthermore, NASSCO has implemented some policies to reduce hazardous pollutant emissions from welding and associated operations.

For questions about these or any other NASSCO environmental requirements, call 619-544-7506.

Before You Begin

NASSCO Approval

Your company may not weld 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 welding job conducted (one per ship or location). To apply for approval, a completed and signed copy of ["NASSCO Environmental Form #13: Request for Authorization to Weld at NASSCO Facility"](#) to the NASSCO Environmental Engineering Department at envreports@nassco.com or fax to 619-744-1088. You may not begin welding until approval has been received from the Environmental Engineering Department.

If your company is proposing to perform ***stainless steel welding***, or any type of hot work that may create an exposure to lead, hexavalent chromium, or cadmium, then you must submit a copy of your company's written safety program to NASSCO's Safety Department before beginning the work. For complete details about this (or related) requirements, please contact NASSCO's Industrial Hygienist at 619-544-7544. ***Shielded Metal Arc Welding (SMAW) operations using stainless steel weld rods is prohibited.***

Material Safety Data Sheet Product Review

Before any chemical product (including weld rods and surface cleaning products or solvents) 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. 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.

Air Pollution Regulations and Permits

The San Diego Air Pollution Control District (SDAPCD) does not currently require permits for welding activities. If solvent is used for surface preparation, the subcontractor is responsible for complying with any applicable SDAPCD regulations.

Work Practices

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

Prohibition on Stainless Steel SMAW Welding

Shielded Metal Arc Welding (SMAW) operations using stainless steel weld rods is prohibited on work conducted for NASSCO or at any NASSCO facility.

Recordkeeping

Daily records must be maintained of all weld rod consumed. If solvents are used in surface preparation, then daily records of solvent use must also be maintained.

Closed Containers

To minimize emissions of volatile organic compounds (VOCs), any container holding solvent 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 use solvents or other VOC-Containing material must be trained on NASSCO's Paint and Solvent Container, Best Management Practice #202.

Waste Management

Waste/unusable weld rods shall be disposed of in a red skip tub or other container identified for scrap metal recycling. Waste solvent and solvent soaked rags or tools must be disposed of properly in a hazardous waste drum. 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. For additional information regarding hazardous waste disposal, refer to "*Environmental Instruction #7: Generation, Disposal, or Transportation of Hazardous Waste.*"

Over-Water Protection

All welding activities must be conducted in a manner as to prevent release of weld rods, metal chips, or any other debris into the Bay. Over-water protection requirements for over-water operations are described in greater detail in NASSCO's Best Management Practice #310.

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.

Compliance Certification and Monthly Usage Reporting

At the end of each month, all contractors performing welding are required to certify as to their compliance status using a "Subcontractor Title V Monthly Air Compliance Certification Form." Additionally, a summary of weld rod (and solvent, if any) 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 or faxed to 619-744-1088.

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