



*NASSCO Environmental Instruction #1:*

# Environmental Requirements for Abrasive Blasting

Abrasive blasting operations are very closely regulated by the San Diego Air Pollution Control District. Since these operations are subject to strict local and federal laws, all abrasive blasting activities conducted at NASSCO 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 perform abrasive blasting 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 abrasive blasting job conducted (one per ship or location). To apply for approval, a completed and signed copy of "[NASSCO Environmental Form #1: Request for Authorization to Perform Abrasive Blasting 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 abrasive blasting until approval has been received from the Environmental Engineering Department.

### **Permits**

Most abrasive blasting operations require an air pollution control permit. The San Diego Air Pollution Control District (SDAPCD) is the permitting agency for stationary and portable abrasive blasting operations operated solely within San Diego County. Alternatively, portable abrasive blasting operations can be registered with the California Air Resource Control Board (CARB) portable equipment registration program, which authorizes statewide operation of the equipment. Your company is responsible for obtaining and maintaining the appropriate permit or registration for your abrasive blasting, as required. For more information about San Diego County's permitting program, contact SDAPCD at 858-586-2600, or visit [www.sdapcd.org](http://www.sdapcd.org). For information on the State of California's portable equipment registration program, contact the Statewide Registration Program Information Line at (916) 324-5869 or visit [www.arb.ca.gov](http://www.arb.ca.gov).

Before beginning abrasive blasting at NASSCO, you are required to provide a copy of your current, unexpired permit or registration to the NASSCO Environmental Engineering Department.

Some abrasive blasting operations, such as those performed with equipment that holds less than 100 pounds or 1 cubic foot of sand, do not require a permit; see SDAPCD Rule 11 for more information. If your abrasive blasting operation has 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**

In addition to the requirements established in your permit or registration, abrasive blasting operations must comply with the requirements established in the California Code of Regulations at Title 17, Subchapter 6 -

Abrasive Blasting (Sections 92000-92530) and with SDAPCD Rule 71. These regulations establish the prohibition against visible emissions from abrasive blasting operations. Additionally, these regulations require that certified abrasives must be used when unconfined portable abrasive blasting is performed, using materials other than steel shot or grit.

### **Material Safety Data Sheet Product Review**

Before any chemical product (including abrasive blast grit) 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. If you are using a material other than steel shot or grit, then you must also submit proof that the material is a certified abrasive as per California Code of Regulations Title 17, Subchapter 6, Section 92530. 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.

### **Removal of Heavy Metals**

If the abrasive blasting operation will remove paints/coatings that contain hexavalent chrome, lead, or cadmium, additional safety requirements exist. Contact the NASSCO Safety Department at 544-8444 for guidance before beginning this activity.

## **Work Practices**

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

### **Permit and Contact Information Posting**

While at operating at NASSCO, each piece of abrasive blasting equipment must be clearly and conspicuously labeled with your company's name and "point of contact" information (name and phone number). Furthermore, a legible copy of the current permit or registration document must be posted on, or within 25' of the permitted abrasive blasting equipment.

### **Pollution Prevention**

At all times, abrasive blasting operations must be controlled to prevent release of pollution into the air, onto the ground, and into the Bay. Equipment and containment shall be maintained and carefully monitored to prevent the release of dust and grit. NASSCO has established several Best Management Practices (BMPs) which are applicable to abrasive blasting operations, as follows:

- **BMP #201 Abrasive Blast Containment, Cleanup, and Storage:** Establishes general containment procedures for abrasive blast material and associated waste.
- **BMP #203 Shrouding:** Requires that shrouding be erected to prevent release of abrasive grit and waste into the Bay,
- **BMP #310 Over-Water Protection:** Establishes additional containment requirements for operations conducted over water.

- **BMP #313 Sally Port Screening:** Requires additional containment measures to prevent release of material through Sally ports when working on the Floating Drydock.

## **Recordkeeping**

Records must be maintained of the total amount and type of abrasive blast media used and any control methods employed.

## **Waste Management**

Waste generated from the abrasive blasting operations must be disposed of properly. Unless otherwise specified, NASSCO will provide waste drums and labels for hazardous waste generated by its direct subcontractors. If large quantities of waste are expected, larger containers such as super sacks or roll-offs can be provided, but these items must be requested in advance from Environmental Engineering or the Ship Manager. Waste abrasive blast grit/dust must not be mixed with other wastes and may not be placed in the trash for disposal. 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, 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 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. Any release of abrasive grit or dust into the Bay must be reported immediately using this procedure. Furthermore, any visible emission of dust from a dust collector or release of grit or dust into the air from a containment structure (shrouding) must be reported immediately. If you are working at any other shipyard or any Naval Installation on behalf of NASSCO, you are responsible for following that facility's spill reporting procedures.

## **After the Work is Completed**

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

At the end of each month, all contractors, team members, or other entities performing abrasive blasting are required to certify as to their compliance status using a "Title V Monthly Air Compliance Certification Form." Additionally, a summary of abrasive 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 performs abrasive blasting at any other shipyard or any Naval Installation, then your records must be submitted to that entity's Environmental Department monthly.