



NASSCO Environmental Instruction #2:

Environmental Requirements for Adhesive Application

The use of 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, all adhesive application and associated surface preparation and cleanup 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 apply adhesives 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). To apply for approval, a completed and signed copy of ["NASSCO Environmental Form #2: Request for Authorization for Adhesive Application at NASSCO Facility"](#) to the NASSCO Environmental Engineering Department at 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

Many adhesive application operations require a permit from the San Diego Air Pollution Control District (SDAPCD), including those where more than 20 gallons of adhesive are applied in a 12-month period and those with volatile emissions greater than 150 pounds per year. Your company is responsible for obtaining and maintaining a valid permit for adhesive application when required by the SDAPCD. For more information about permit requirements, contact SDAPCD at 858-586-2600, or visit www.sdapcd.org

If your company is not exempt from the requirement to obtain a permit, then it is required to provide a copy of the current, unexpired SDAPCD permit to the NASSCO Environmental Engineering Department before applying any adhesive product 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.

Some adhesive applications, such as those using products containing less than 20 grams/liter of Volatile Organic Compounds (VOCs), are exempt from the requirement to obtain a permit. If your adhesive application 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, all adhesive application and associated surface preparation and equipment cleanup, must be performed in compliance with SDAPCD rule 67.21. This rule contains

specific limits for Volatile Organic Compound (VOC) content for adhesives and solvents, as well as specific recordkeeping requirements. Your company is responsible for complying with this rule by purchasing and using only products that comply with the VOC limits and training employees in the selection and use of compliant products and recordkeeping.

It is important to note that rule 67.21 establishes 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 complaint for one usage may not be complaint for another. Companies applying adhesives are responsible for ensuring that each product used is complaint 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 adhesives and associated solvents or surface preparation 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 adhesives, 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 adhesives, 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 all adhesives and solvents used, including the exact product name, category of adhesive (APCD Category), mix ratio (where applicable), usage amount, and VOC content.

Waste Management

Waste adhesive, 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 adhesives and 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.

After the Work is Completed

Compliance Certification and Monthly Usage Reporting

At the end of each month, all companies using adhesives at NASSCO are required to certify as to their compliance status using a "Title V Monthly Air Compliance Certification Form." Additionally, a summary of adhesive and 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 or faxed to 619-744-1088.

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