



NASSCO Environmental Instruction #3:

# Environmental Requirements for Removal or Disruption of Asbestos

Asbestos removal or disruption is a **highly regulated activity by the San Diego Air Pollution Control District (SDAPCD)**. Therefore it's essential that everyone involved with asbestos work or its oversight be familiar with NASSCO's procedures. Asbestos can be found aboard ships, buildings, gaskets, lagging, insulation, ceiling or tile/vinyl floor, and other locations. Since these operations are subject to strict local and federal laws, all asbestos 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 asbestos removal or disruption at any NASSCO facility or vessel where NASSCO is the prime contractor, without first applying for and obtaining approval from the Environmental Engineering Department to conduct this activity. Separate approval must be obtained for each asbestos job conducted (one per ship or location). To apply for approval, a completed and signed copy of "[NASSCO Environmental Form #3: Request for Authorization to Perform Asbestos Abatement or Demolition](#)" to the NASSCO Environmental Engineering Department at [envreports@nassco.com](mailto:envreports@nassco.com) or fax to 619-744-1088. **You may not begin asbestos abatement or demolition activities unless you have received approval from Environmental Engineering Department.**

In addition to meeting NASSCO environmental requirements, your company is also required to comply with all applicable NASSCO safety policies and procedures. Please contact [NASSCO's Safety Department at 619-544-8444](#) for information before beginning any asbestos work.

### Notification, Licenses, and Certification

Asbestos abatement or demolition operations may require a 10 day working day wait period imposed by the SDAPCD. For this reason, it is important to notify NASSCO's Environmental Engineering as soon as you become aware of the need to perform asbestos work. If SDAPCD Notification is required, it will be coordinated by the NASSCO Environmental Engineering Department as outlined in *NASSCO Environmental Engineering Manual, Work Instruction 205, Asbestos Notification*. Your company will be required to provide specific information for the notification, such as information about abatement methods and containment strategies.

Your company is responsible for ensuring that your employees have the training required under OSHA standards to perform asbestos work. You are required to have copies of the training certifications on-site for each employee that will be performing asbestos abatement. Further, for non-vessel work, you are required to provide a copy of your company's current Asbestos Certification issued by Contractor's State Licensing Board before work begins.

## **Air Pollution Regulations**

In addition to the requirements established by NASSCO your company must comply with the requirements established in National Emission Standard for Hazardous Air Pollutants, Asbestos, 40 CFR Part 61, Subpart M.

## **Removal of Insulation Material**

Insulation material which does not contain asbestos should be presumed to be hazardous waste unless testing has demonstrated otherwise. For additional information regarding hazardous waste disposal, refer to "*Environmental Instruction #7: Generation, Disposal, or Transportation of Hazardous Waste.*"

## **Work Practices**

In addition to ensuring the employees have proper training and protective equipment, asbestos abatement your company must follow certain work practices to prevent the release of asbestos fibers into the environment, including:

- Properly securing the work area to prevent release of visible emissions or dust from the work site.
- Keeping the regulated asbestos material adequately wet and sealed in leak proof containers.
- Labeling asbestos waste with a hazardous waste label and an asbestos hazard sticker.
- Properly transporting and disposing of asbestos waste, gloves, plastic. Filters, and other contaminated items at an authorized waste disposal facility

## **Permit and Contact Information Posting**

While conducting abatement activities at NASSCO, each area must have a legible copy of the current notification document posted on, or within 25' of the operation. A binder containing current documentation of employee's certification and training must be at the site.

## **Waste Management**

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. 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.