

NASSCO Environmental Instruction #3:

Environmental Requirements for Removal or Disruption of Asbestos

Asbestos removal or disruption is an activity highly regulated 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, in buildings, gaskets, lagging, insulation, ceiling tiles, tile or vinyl flooring, 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, please 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 notifying and obtaining approval from the Environmental Engineering Department. Notification is also required prior to any building demolition or renovation, whether asbestos is present or not. Authorization is granted on a project by project basis and a separate approval must be obtained for each asbestos job conducted. To apply for approval, the NASSCO department responsible for engaging or monitoring the asbestos contractor must submit an Internal Asbestos Renovation/Building Demolition form to Environmental Engineering.

Only companies working on jobs where NASSCO is the prime contractor will be eligible to remove or disrupt asbestos. Companies working directly for the government (AITs) are not allowed to perform work which may remove or disrupt asbestos at the NASSCO Shipyard.

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

Notification, Licenses, and Certification

Asbestos abatement and building renovation and demolition operations may require a 10 business day waiting 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. Additionally, 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 beginning work.

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 and SDAPCD Rule 1206, Asbestos Removal, Renovation, and Demolition.

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 "*NASSCO Environmental Instruction #7: Environmental Requirements for Hazardous Materials and Waste*".

Work Practices

In addition to ensuring employees have proper training and protective equipment for asbestos abatement, your company must follow certain work practices to prevent the release of regulated asbestos containing materials 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 containing and disposing of asbestos waste, gloves, plastic, filters, and other contaminated items in a secured hazardous waste drum or container.

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 feet, of the operation. A binder containing current documentation of employee's certification and training must be maintained 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 and regulated wastes. For additional information regarding hazardous waste disposal, refer to “NASSCO *Environmental Instruction #7: Environmental Requirements for Hazardous Materials and Waste.*”

Spills or Environmental Releases

Spills and releases of chemicals must be immediately reported to NASSCO Security at (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.