



Paint Tracking Requirements

A. Applicability

This section applies to all painting at NNS by contractors.

B. Painting of Ships and/or Ship Parts

1. Regulatory References

- a. The Clean Air Act Amendments (CAAA) of 1990 included paint and coating rules specifically for the shipbuilding and ship repair industry, the National Emission Standards for Shipbuilding and Repair - Surface Coating (40 CFR 63 Subpart II).
- b. These rules provide an absolute upper limit on the amount of certain solvents that can be contained in paint and require an accurate system to record daily paint use at NNS by all persons applying paint to ships, submarines and any other.
- c. Strict compliance with this regulation is required. Violations can result in significant fines. If enforcement fines result from a violation, the cost will be passed down to the offending contractor.

2. Operating Standards

a. Emission Limitations

- 1) All coatings applied to ships and/or ship parts must have an as-applied Volatile Organic Compound (VOC) content less than or equal to those limits listed in the VOC Limits For Marine Coatings Table (Paint Coating Categories) in the Appendix of this manual.
- 2) NNS has a "NO THINNING POLICY." If the use of thinner is necessary, the contractor must submit a WAIVER REQUEST FOR THINNING COATINGS (NN Form 9223), located in the Appendix to this manual) to their Contract Coordinator so that the allowable amount of thinner that can be added to each gallon of coating can be calculated. Under no circumstance shall thinner be added in a quantity that exceeds that granted through the Thinning Waiver Approval process.



b. Batch Certifications:

- 1) The coating manufacturer must certify the as-supplied VOC content of each batch of coating applied at NNS. The certification must include the following items:
 - a) The manufacturer's name;
 - b) The coating identification name;
 - c) The batch number;
 - d) The VOC content;
 - e) A statement that says the VOC content was determined by Federal Reference Method 24 or that the "VOC formulation value presented has a consistent and quantitatively known relationship to Method 24 results"; and,
 - f) A signature.
 - g) If the contractor is supplying the paint, the contractor must obtain and forward copies of all VOC Batch Certifications to their Contract Coordinator prior to the application of that batch of coating. Contractors must not take delivery of any paints for use on ships or subs without an accompanying VOC Batch Certification for each separate batch number/lot number.

3. Record-keeping Requirements

a. Paint Crew Usage Forms

- 1) All coatings applied shall be recorded on Paint Crew Usage Forms (NN Form 9221), located in the appendix to this manual), or similar form containing required information. If contractors use a form that they have developed, the form shall list a revision number and a revision date.
- 2) The completed Paint Crew Usage Forms must be legible and accurate. Failure to submit paint usage information accurately may result in significant fines and penalties for NNS and the contractor.
- 3) The following information must be included on the Paint Crew Usage Form, at a minimum:
 - a) The correct Manufacturer
 - b) The correct coating product identification name and color
 - c) The correct batch number. If the coating has more than one part, the batch number for each part must be included.



- d) The VOC/Coating category
 - e) The VOC content of that batch
 - f) The amount of paint applied, in gallons (do not include waste or discarded paint in the amount applied).
 - g) The date applied
 - h) The type and amount of thinner added, in ounces, if applicable.
- 4) Contractors shall compile Paint Crew Usage Forms weekly, at a minimum, and submit them to their Contract Coordinator.
- b. Records of VOC Batch Certifications shall be maintained, as described in the Operating Standards section above.

C. Painting of non-ship parts (buildings, machinery, roadways, equipment, etc.)

1. Contractors shall only use paint that has been approved for use at NNS by Department O27.
2. Contractors shall track the amount of paint applied to non-ship parts such as buildings, equipment, etc. using the Contractor MSDS Cover Sheet found in Appendix F. All information required on the cover sheet must be supplied.
3. Contractors shall submit the Contractor MSDS Cover Sheet to their Contract Coordinator. If the actual amount to be used is not known prior to application of the paint, the Contractor MSDS Cover Sheet shall be submitted immediately following completion of the project.

D. Cleaning Solvent Usage

1. Contractors shall only use solvent that has been approved for use at NNS by Department O27.
2. Contractors shall track the amount of cleaning solvent used to clean pumps, hoses, etc. using the Contractor MSDS Cover Sheet found in Appendix F of this manual. All information required on the cover sheet must be supplied.
3. Contractors shall submit the Contractor MSDS Cover Sheet to their Contract Coordinator. If the actual amount to be used is not known prior to application of the paint, the Contractor MSDS Cover Sheet shall be submitted immediately following completion of the project.



E. Container Compliance

1. Contractors shall ensure that the handling and transfer of paints and solvents to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.
2. All containers, tanks, vats, drums, and piping systems housing paints and solvents shall be free of cracks, holes, and other defects.
3. All containers, tanks, vats, drums, and piping systems housing paints and solvents shall remain closed at all times when not adding to or removing material from them. Open-top containers of paint and solvent shall never be transported or left unattended.
4. Report damaged containers that are not leaking to NNS Onsite Hazardous Waste Contractor by calling 688-7804.
5. Report leaking containers by calling 380-2222, or *911 from a shipboard landline phone.

F. Best Management

1. The following practices shall be part of the contractor's ongoing policies and procedures to the maximum degree practical to ensure that all handling and transfer operations are conducted in a manner that minimizes spills and leaks:
 - a. Maintain a neat and orderly work environment, including storing hazardous materials and wastes in a way that minimizes the potential for accidental releases.
 - b. Keep lids on all containers housing VOC-containing materials at all times when not directly in use.
 - c. Avoid the use of VOC-containing products for surface preparation and cleanup whenever possible (i.e., substitute aqueous cleaners where possible).
 - d. When using volatile solvents for surface preparation and cleanup, apply the solvent directly to the rag and avoid spraying solvent directly onto the surface.
 - e. Dispose of solvent contaminated rags, cloths, and materials immediately after use and store in a covered container.
 - f. Keep drums closed when not in use and equip drums with tight-fitting lids.



- g. Use funnels when filling and replace the cap covering the hole once filling is completed (or replace the funnel's lid, if used).
- h. Maintain paint guns and pots to minimize the potential for leaks and improper spraying.
- i. Clean lines or paint guns in a closed system to capture solvents.
- j. Provide containment for VOC-containing material storage areas.
- k. Perform mixing and transfer operations only in designated areas with containment.
- l. Implement the use of paint totes (large 200-500 gallon tanks) where practical.