Environmental Standard Operating Procedure			
Originating Office: **Environmental Management Department**	Revision: Original	Prepared By: Engineering Division	Approved By: William Moog
File Name: PAB-ESOP	Effective Date: 16 April 2007	Document Owner: Luis Eria	

Title: Painting Applications

1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for various paint application methods, including aerosol containers, paint brushes and paint spray guns.

2.0 APPLICATION

This guidance applies to those individuals working with paint aerosols, paint brushes, and paint spray guns aboard Marine Corps Air Station (MCAS) Miramar.

3.0 REFERENCES

- 40 CFR 261-262 (Code of Federal Regulations)
- 40 CFR 403
- 29 CFR 1910
- CCR, Titles 8 and 17 (California Code of Regulations)
- MCO P5090.2A (USMC Environmental Compliance and Protection Manual)
- MCO 5100.1 Occupational Safety and Health (OSH) Manual
- Fire Safety Regulations (FSR)
- MCAS Miramar Air Quality Management Plan (AQMP)
- MCAS Miramar Hazardous Waste Management Plan (HWMP)

4.0 PROCEDURE

4.1 Discussion:

Paint operations that utilize aerosol containers, paint brushes and paint spray guns for the purpose of applying paint are potentially a source of hazardous waste and can potentially generate air pollution. Because of this, it is critical that standard operating procedures are followed to ensure that painting applications produce the least to human health and the environment.

4.2 Operational Controls:

The following procedures apply for all painting applications:

1. Use only MCAS Miramar approved paint and painting products that are on the unit's Hazardous Material Authorization Use List (AUL).

2. MSDSs (Material Safety Data Sheets) for all paint products being used for painting applications must be available and current.

3. All hazardous waste containers must be marked on the outside with the name of hazardous substance inside the container.

4. All hazardous waste containers must be properly closed unless adding or removing waste.

5. Ensure fire extinguishers are accessible and maintained in adequate number in painting areas.

6. Do not paint outside of predetermined painting areas.

7. Do not use paint or painting products near open flames or heat sources.

8. Dry painted articles in a predetermined area, away from open flame and heat sources.

9. Keep painting areas free from the accumulation of deposits of combustible residues.

10. Post "No Smoking" signs where flammable vapors may be expected and in areas where painting application items are stored.

11. Keep spill kit nearby.

12. Maintain turnover folder information for this Standard Operating Procedure.

13. Contact EMD office if there are any specific situations or other concerns not addressed by the procedures for painting applications

Aerosol Paint Containers:

14. Remove all caps and tips from paint aerosol containers and dispose of them properly before disposing of container in Hazardous or Universal (H/U) waste container.

15. Remove gross contamination from the outside of paint aerosol containers before placing in a Hazardous or Universal (H/U) waste container.

16. Ensure that all paint waste aerosol containers and residue are collected and taken to the unit waste site for disposal.

17. Ensure waste paint aerosol containers and/or residues are stored in properly closed and labeled containers.

18. Ensure all aerosol containers are kept in a flammable material locker which is operated and maintained in strict accordance with the installation and manufacturer's regulations.

19. When applying paint using aerosol containers, only do so in a well ventilated area.

Paint Brushes:

20. Properly use and clean paint brushes per installation regulations.

21. Properly dispose of used paint brushes per installation regulations.

Paint Spray Guns:

22. Use only High Volume Low Pressure (HVLP) paint spray guns (in accordance with manufacture instructions) in installation-approved paint spray booths or designated areas.

    a. Comply with Permit to Operate (PTO) paint spray booth conditions.

23. Bond and ground all containers when transferring flammable liquids from container to paint spray gun container.

24. Ensure clean-up of paint spray guns are done in approved areas.

25. Ensure paint spray guns are cleaned with MCAS Miramar approved cleaning agents.

26. Ensure proper PPE is worn while utilizing paint spray guns.

27. All contractors conducting paint spray operations aboard the installation must contact EMD for further information.

All Painting Operations:

28. Ensure all coatings operations have SDAPCD permits when required.

29. During clean-up; keep all solvent containers closed when not in use.

30. Ensure all paint cans are kept closed when not in use.

31. Properly contain and dispose of any spills.

32. Ensure paint residues in empty cans are dry before disposal

4.3 Documentation and Record Keeping:

The following records must be maintained for paint aerosols, paint brushes and paint spray guns:

1. Inspection and training records.

4.4 Training:

All affected personnel must be trained in this Standard Operating Procedure and the following:

1. General Environmental Awareness training.

2. Hazard Communication Training.

4.5 Emergency Response Procedures:

CALL 9-1-1

4.6 Inspection and Corrective Action:

The Environmental Compliance Coordinator (ECC) shall designate personnel to perform inspections. The ECC shall ensure deficiencies noted during the weekly inspections are corrected immediately. Actions taken to correct each deficiency shall be recorded on the weekly inspection sheet. Designated personnel shall conduct weekly inspections.

Painting Applications- Inspection Checklist	
Date:	Time:
Installation:	Work Center:
Inspector's Name:	Signature:

Inspection Items	Yes	No	Comments
1. Are MSDSs readily available and current? *(29 CFR 1910)*			
2. Are only MCAS Miramar approved paint products being used? *AQMP)*			
3. Are all painting products and painting materials that pose a threat to the environment being stored in their designated places? *(40 CFR 302, HWMP)*			
4. Are all used painting material and products that display hazardous waste characteristics being disposed properly as hazardous or universal waste? *(40 CFR 260-270; 273;HWMP)*			
5. Are "No Smoking" signs posted where flammable vapors may be expected? *(8 CCR 1\4\7\20\137\5453(m) and 5460(j)), FSR)*			

6. In permitted coating operations, are all conditions in the permit met? *(AQMP)*			
7. Are paint, product spills, clean-up materials, and used filters properly contained, disposed, and reported? *(40 CFR 261.3(a)(2)(i) and (ii))*			
8. Are all health and safety considerations for the usage of aerosol containers being applied? *(29 CFR 1910)*			
9. Are spill kits and fire extinguishers kept nearby? *(29 CFR 1910)*			
10. Are training and inspection records maintained and available for inspection? *(MCO P5090.2A 9104.1(k)(5)- inspection only*			

ADDITIONAL COMMENTS:

_____

_____

_____

_____

CORRECTIVE ACTION TAKEN:

_____

_____

_____

_____

<u>Environmental Compliance Coordinator</u>

Name: _____

Signature: _____

Date: _____