Activity: Ship Breaking

EMP No. O-15

Description:
Prevent or reduce the release of contaminants during ship breaking activities

Targeted Activities:
Ship dismantling or demolition
Scrap metal storage
Scrap metal handling

Development EMPs:
Design new facilities to:
- Minimize contact of rust or paint stripping debris with surface water
  - Use dry dock facilities whenever possible
  - At a minimum, use dry-docks for final hull scrapping
  - Provide shroud between ship and pier to minimize materials spilling into water
- Cover work areas
  - Outfit new dry-docks with cover
  - Place tarp over work area where possible
- Cover storage areas
  - Provide covered storage for oily scrap materials
  - Provide covered storage space for hazardous materials (e.g., PCBs, asbestos, lead-paint, TBT)
- Scrapping and storage areas should be paved where possible
- Provide storm water runoff controls for scrapping and storage areas
  - For new uncovered dry-docks, provide stormwater capture and pumping system
  - Install oil/water separators to remove floatables
  - Maintain oil/water separators as discussed in EMP O-6
  - Pump captured stormwater to sanitary sewer or treatment facility
  - For uncovered scrap storage areas install oil/water separator to remove floatables and detention system to remove sediments and metal particles
  - Provide berms/dikes around scrapping and storage areas to minimize run-on of stormwater

Potential Pollutants:
Oils and grease
Heavy Metals
Suspended Solids
PCBs
Asbestos

Target Environmental Media:
Surface water
Soils
Air

US Regulatory Requirements & Guidance:
- 40 CFR 50 -99 Clean Air Act Regulations
- 40 CFR 110.3 Discharge of Oil
- 40 CFR 112 Oil Pollution Prevention (SPCC/OPA Plans)
- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
- 40 CFR 264-265 Preparedness, Prevention and Contingency (PPC) Plan
- 40 CFR 302 Designation, Reportable Quantities and Notification Requirements for Hazardous Substances under CERCLA
- 40 CFR 372 Toxic Chemical Release Reporting: Community Right-to-Know
- 49 CFR 171-173, 175, and 177 Department of Transportation (DOT) Regulations
- State and Local Regulations as appropriate to the Port
Environmental Management Practices

EMP No. O-15

Operational EMPs:

■ Cover work areas where possible
  ● Provide tarps or solid covers, particularly in areas where fuels, lubricants, and other hazardous materials were used and stored
■ Remove fluids before starting scrapping process
  ● Store fluids separately
  ● Do not mix fuel, lubricants, and other chemicals together
■ Provide adequate spill response material at scrapping and storage areas
  ● Clean up spills of fluids before scrapping
  ● Clean up spills during scrapping process as they occur
■ Cover all fluids removed during scrapping operations
■ Cover oily scrap with tarp to eliminate stormwater run-on
■ Encourage operators to keep equipment tuned up and in good working condition.
  ● Leaks should be identified and repaired
■ Retrofit storm drain system to allow capture and treatment of runoff
  ● Send runoff to sanitary sewer where possible
  ● Install oil/water separator to remove floatables
■ Place berms around storage areas to prevent stormwater from running onto area
■ For existing dry docks, provide pumps to remove stormwater to treatment system or sanitary sewer
■ Provide shroud between ship and pier/dock to prevent materials from spilling into surface water
  ● Clean shroud frequently to prevent material from being blown into the water
■ Clean work areas frequently
  ● Remove dust and spills on a daily basis and before hull is breached
■ Remove asbestos in accordance with local, state, and federal regulations
■ Remove and dispose of sand blast residue in accordance with local, state, and federal guidelines
  ● Do not sand blast over open water
  ● Provide cover over work area and shroud under work area
■ Remove PCB-containing materials in accordance with federal, state, and local guidelines
  ● Provide skin and respiratory protection for affected workers.

Considerations:

■ Conduct routine inspections of scrapping and storage areas to ensure releases are minimized
■ Conduct sampling of sediments beneath and around scrapping activities to determine current and future conditions
■ Workers should be trained in methods to reduce impacts from operations, particularly what actions should be taken in the event of a spill