**Activity:** Vessel and Equipment Painting and Paint Stripping

**EMP No.** O-7

**Description:**
Prevent discharge of pollutants from painting or paint stripping operations performed on vessels, vehicles, equipment, or containers.

**Targeted Activities:**
- Painting of vessels and vehicles
- Painting of yard equipment
- Painting of cranes
- Paint containers
- Paint stripping using abrasives or water blasting

**Development EMPs:**
- Designate special areas for painting and paint stripping
- Design areas to minimize releases
- Pave surfaces, preferably with concrete to allow easier removal of spills or stripping material
- Slope surface to allow capture of spills
- Use valved catch basins that allow spills and releases to enter a dead-end sump
- Use sand filters to capture spills and runoff of paint stripping operations
- Use berms to minimize run on of stormwater
- Use paint booth to capture air emissions
  - Booth may require air permit
  - Provide used paint disposal facilities
  - Provide paint stripping debris disposal area
- Paint stripping/painting area should be covered if possible.
- Conduct ship painting or stripping in dry dock, whenever possible
- Clean up stripping wastes immediately to reduce potential releases from wind or stormwater.

**Potential Pollutants:**
- Paints
- Solvents/Hydrocarbons
- Metals
- Solids

**Target Environmental Media:**
- Surface Water
- Soil
- Air

**US Regulatory Requirements & Guidance:**
- 40 CFR 50 -99 Clean Air Act Regulations
- 40 CFR 62 Ship building, ship repair NESHAPS
- 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
- 40 CFR 401 Effluent Limitation Guidelines
- 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-7

Operational EMPs:

- Minimize volume of paints and chemical strippers purchased and stored to minimize waste
- Conduct stripping and painting indoors where possible
- Use paint booth wherever possible
- Install wind screens and solids collection screens
- Use tools and procedures designed to capture stripping materials, including vacuum equipped Sanders and pressurized containment
- Clean up debris from stripping operations regularly
- Properly dispose of lead-contaminated waste according to state and local regulations
- Minimize amount of material subject to wind or rain
- Use drop cloth under stripping and painting operations on unpaved surfaces
- Vacuum or sweep paved surfaces regularly
- Do not hose down area
- Mix materials away from the water
- Reuse solvents and thinners
- Use brush or roller painting, rather than spray painting, where possible
- Dispose of empty solvent and paint containers properly.
- Do not pour out unused portions on the ground or down the storm drains
  - Use proper receptacles or disposal facilities for unused portions
- Use water-based paints and solvents, where possible
- Switch to longer lasting, less-toxic antifouling paints where possible
- Reuse blast material where possible
- All paint and chemical strippers should be labeled and stored properly
- Maintain adequate supplies of spill response material
- Spill response procedures should be posted and clearly visible in painting/stripping area
- Use protective barriers around painting/stripping area.
  - Tarps or canvas can be used to intercept windblown overspray and to keep sprays contained.

Considerations:

- Painting operations may require air quality permits
- All waste materials must be disposed of properly
- Spills and releases should be reported immediately
- Maintain adequate supplies of spill response equipment
- Provide spill response training to all personnel
- Provide training on operating and cleaning procedures
- Conduct routine maintenance of equipment