

# Environmental Management Practices



## 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 260-262, 268, and 270-272 Hazardous Waste Management  
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

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### 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