

<p align="center">CONTINENTAL MARITIME OF SAN DIEGO (CMSD)</p> <p align="center">PROCEDURE</p> <p>Subject: Environmental Requirements for Work in CMSD Shipyard - General</p> <p align="center">AUTHORIZED DOCUMENTS ARE PUBLISHED ONLINE ONLY. VERIFY ANY COPY AGAINST THE ONLINE SYSTEM BEFORE USE.</p>	DOC NO. EC-01* REV C
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	SUPERSEDES REV B
	REVISION/REVIEW Company Name Change

1 PURPOSE:

- 1.1 Provide general procedure for adherence to all Environmental regulatory requirements applicable to CMSD operations.

2 RESPONSIBILITY/AUTHORITY:

- 2.1 The Environmental, Health & Safety Department has primary responsibility and accountability for the process authorization and implementation.
- 2.2 All Departments, subcontractors are required to comply with this procedure.
- 2.3 All customers and third parties working in the CMSD shipyard are required to comply with this procedure.

NOTE: Due to significant environmental compliance and permit constraints, Third Party Personnel are **not** authorized to perform Marine Coating Applications or welding at CMSD facility.

3 REFERENCES

- 3.1 Environmental Management System EMS-01
- 3.2 Storm Water Pollution Prevention Plan (SWPPP) EC-02
- 3.3 Industrial Waste Water Management EC-03
- 3.4 Best Management Practices (BMPs) EC-06
- 3.5 Emergency Action Plan EC-07
- 3.6 Waste Management EC-08
- 3.7 Polychlorinated Biphenyls (PCB) Management EC-11
- 3.8 Air Pollution Management EC-13
- 3.9 Hazardous Waste Management EC-14
- 3.10 Hazard Communication Program (HAZCOM) HSM-03
- 3.11 Metropolitan Industrial Wastewater Program Permit # 11-0417-03-A
- 3.12 CMSD USCG Marine Operations Manual / Oil Spill Contingency Plan
- 3.13 CMSD USCG Spill Control and Countermeasure (SPCC) Plan
- 3.14 Business Plan for Hazardous Material and Emergency Response
- 3.15 Federal Regulations
 - A. US Coast Guard (33CFR)
 - B. Protection of the Environment (40CFR)

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- C. Transportation (49CFR)
- D. Clean Water Act
- E. Resource Conservation and Recovery Act (RCRA)
- 3.16 State of California
 - A. Title 22 (Social Security) Division 4 – Environmental Health
 - B. Title 22 (Social Security) Division 4.5 – Environmental Health Standards for the Management of Hazardous waste
 - C. Health and Safety Code – Division 20, Chapter 6.5 – Hazardous Waste Control
 - D. Health and Safety Code – Division 20, Chapter 6.6 – Safe Drinking Water and Toxic Enforcement Act of 1986
 - E. Air pollution Control District (APCD) Rules
- 3.17 County of San Diego Department of Environmental health (DEH) Rules
- 3.18 NAVSEA Standard Items

4 DEFINITIONS

- 4.1 **Waste** – Material that has no further useful life

5 PROCEDURE

- 5.1 **Pollution Prevention Policy** – CMSDs policy is to minimized and control sources of pollution to the extent practicable, in the following order:
 - A. Prevent or reduce pollution at the source
 - B. Recycle
 - C. Send for treatment to reduce toxicity
 - D. Release or send for land disposal is the last resort, and shall be used only as allowable by law.
 - E. In case of an accidental loss of control of a pollution source that causes, or threatens to cause an uncontrolled or illegal release of pollutants; the Emergency Action Plan (EC-07) shall be executed.
- 5.2 **Water**
 - A. No discharges from industrial activity are allowed to flow directly into the bay.
 - B. All planned waste water discharges from to industrial activity shall be contained in an approved container and sampled for contamination to determine if the waste can be discharged to the sewer connection per EC-03, or handled as Hazardous Waste per EC-08.
 - C. Any activity that notices an industrial discharge (in any form) directly to the bay or a sewer connection, shall notify security at Extension 218.

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- D. Industrial Materials staging areas shall be kept clean and contained so that hazardous substances or oily substances do not contaminate storm waters during a rain event, and that trash will not clog the storm water conveyance system.
- E. All vessels that dock at our piers (not in transit) shall be boomed to prevent the spread of oil contamination in case of a leak
- F. Water pollution prevention programs:
 - 1) **Storm Water** pollution is controlled per the Storm Water Pollution Prevention Plan (SWPPP) EC-02 and related Best Management Practices (BMPs) EC-06 as approved by the Regional Water Quality Control Board (RWQCB).
 - 2) **Industrial Waste Water** shall be discharged to the sanitary sewer per the Industrial Wastewater Management Plan (EC-03) as permitted by the Metropolitan Industrial Wastewater Program (MIWP) permit number 11-0417-03-A
 - 3) **Over Water Operation and Transfers** Shall be in accordance with the CMSD USCG Marine Operations Manual / Oil Spill Contingency Plan and the CMSD USCG Spill Prevention Control and Countermeasure Plan.

5.3 Air

- A. All activities that conduct Coatings Operation (including Marine, Metal Parts or architectural, including solvent cleaning) shall obtain advanced permission from the EHS Department. Prior to authorizing any activity to conduct coating operation in the CMSD yard, the EHS department ensured the activity has received a copy of the applicable APCD permit, and have been provided proper direction for required reporting procedures. Strict compliance with CMSDs APCD permits and adherence to APCD Rules is enforced.
- B. All activities that use abrasive blasting equipment shall provide a copy of their certificate of registration and permit to operate, and obtain permission from the EHS department prior to use. Strict adherence to the recordkeeping, reporting and permit requirements will be enforced.
- C. All activities using diesel powered equipment >50bhp (rented or owned) shall notify the EHS department in advance, and shall adhere to all requirement listed on the certificate of registration, recordkeeping and reporting requirements.
- D. All activities that perform welding operations shall obtain advanced permission and shall maintain proper usage records and report usage.

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- E. All activities that perform adhesive application shall receive advance permission from the EHS Department, and shall comply with the requirements of the APCD including recordkeeping requirements and shall submit reports.
- F. **Reports** – All required air pollution reports shall be submitted to the EHS Department monthly prior to the 10th day of each month, using the reporting form provided by the EHS department.
- G. Air Pollution Prevention Programs:
 - 1) Air Pollution Management (EC-13)
 - 2) Air Pollution Control District (APCD) rules apply, including all provisions of CMSDs APCD stationary source permits to operate, as applied to Marine Coating Operations, Metal Parts Coating Operations, Abrasive Blasting, Solvent Cleaning, and stationary Diesel engines. APCD Portable equipment permits apply to Portable Abrasive Blasting Equipment and Portable Non-self propelled Diesel Engines >50 BHP.
 - 3) Air Resources Board (ARB) Equipment Registration requirements apply to self propelled Diesel Engine powered equipment.

5.4 Hazardous Materials

- A. All materials that are releasable to the environment (liquids, gasses or powders) shall be properly labeled such that the content is readily identified. All such materials that are hazardous shall be accompanied by a Safety Data Sheet (SDS).
- B. All activities authorized to use Coatings, Solvents and Adhesives shall ensure their specific product is approved for their use by ensuring that substance is listed on the air pollution reporting form obtained from the EHS department, prior to use. If the substance is not listed, a copy of the SDS (and Product Data Sheet if applicable) shall be submitted to the EHS department for approval and inclusion on the reporting form, prior to use.
- C. All hazardous materials shall be kept in tightly sealed containers that will prevent release.
- D. All hazardous material containers shall have labels that meet the labeling requirements of the Hazardous Communication Program per 29CFR1915, and have an SDS available for each substance.
- E. Day use containers are authorized if they can be tightly sealed, are labeled sufficiently to identify the substance in the container, and SDS for the substance is readily available. Day use containers shall remain under the control of the user at all times. Day use containers for flammable liquids with flashpoint below 200F shall be metal containers. Day use container for

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fuel, used for fueling of motor operated equipment, shall be metal safety cans designed for that use.

- F. Hazardous Material Stowage lockers and their staging locations shall be approved by EHS in advance.
- G. Non-compatible Hazardous materials shall not be stored in the same locker.
- H. Movement of Hazardous materials to and from CMSD shall meet all the DOT requirements for labeling, bill of lading and placarding, as required.
- I. Pollution Prevention Programs:
 - 1) Control of Hazardous Materials shall be per the Hazardous Communication Program (HAZCOM) and the San Diego County Department of Environmental Health (DEH) Business Plan for Hazardous Material and Emergency Response.

5.5 **Waste Disposal**

- A. Waste shall be separated to the extent practical, to segregate recyclable materials from general trash and from Hazardous or Universal waste.
- B. All activities shall only use the appropriate provided containers for each type of waste.
- C. If additional containers are required, or if there are any questions regarding a specific waste category, contact the EHS department.
- D. Land Pollution Prevention Programs:
 - 1) Waste disposal shall be per the Waste Management Procedure (EC-08)

5.6 **Universal Waste** – a category of hazardous wastes that are widely produced by many different types of businesses, for which the DTSC specified different handling and recordkeeping requirement compared with Hazardous Waste. Universal wastes include televisions, computers and other electronic devices as well as batteries, fluorescent lamps, mercury thermostats, and other mercury containing equipment, among others.

- A. Universal waste shall be accumulated and turned in to the location designated by the EHS Department.
- B. All other activities (i.e. Prime contractors or third Parties) that are responsible for disposal of Universal Waste shall coordinate their activity through the EHS department. Movement and disposal of Universal waste shall be documented and transferred to an authorized collection facility as required by the CA DTSC.

- 5.7 **Hazardous Waste** – A hazardous waste is a waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment.
- A. No hazardous waste shall be brought into the CMSD yard from other locations.
 - B. No Hazardous Wastes shall be removed from the CMSD yard unless they are manifested as required by the CA Department of Toxic Substances Control (DTSC).
 - C. For hazardous waste streams where CMSD is responsible for disposal; arrangements for the proper container, container labeling, staging location and secondary containment shall be made with the EHS Department prior to generating the waste. Activity generating the waste shall notify EHS immediately if there is a problem with any of the specified arrangements.
 - D. For Hazardous Wastes that are the responsibility of another activity (i.e. Prime Contractor or third party) that activity must have an EPA ID number for the CMSD yard, provide all required containers and labeling, and shall coordinate accumulation areas and satellite accumulation areas through the EHS department prior to waste generation. The responsible activity shall coordinate, direct, instruct and oversee all contractors that will generate the waste in their waste stream. Movement of Hazardous Waste out of the CMSD yards shall be coordinated through the EHS Department.
 - E. Land Pollution Prevention Programs
 - 1) Hazardous Waste shall be controlled per the Waste Management Procedure (EC-08), Polychlorinated Biphenyls (PCB) Management (EC-11) and the Hazardous Waste Management Program (EC-14).

6 RECORDS

- 6.1 Hazardous Waste Manifests
- 6.2 Monthly Emissions reports

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