

NORTHWEST REGIONAL MAINTENANCE CENTER
LOCAL STANDARD ITEM

FY-17

ITEM NO: 099-03NW
DATE: 09/15/2016
CATEGORY: I

1 SCOPE

1.1 Title: General Contractor Air Pollution Control and Reporting Requirements for Bremerton Naval Complex (BNC); accomplish

2 REFERENCES

2.1 Standard Items

2.2 Puget Sound Clean Air Agency (PSCAA) Regulation I

3 REQUIREMENTS

3.1 The contractor shall submit a list of all air pollution generating equipment and any associated air pollution control devices to Code 106.31 via the SUPERVISOR at least 90 business days prior to scheduled work but no later than seven business days of contract award or change. NOTE: If a NOC is required for this work, the Puget Sound Clean Air Agency (PSCAA) requires a 90 day turnaround time to issue the approval. The minimum equipment identification requirements are:

3.1.1 For portable (typically skid or trailer mounted) internal combustion engines, submit the latest revision of the Non-Road Engine Notification Form PSNS 5090/380 via the SUPERVISOR.

3.1.1.1 For Non-Road engines that will be onsite greater than 12 months complete the entire Non-Road Engine Notification Form and submit to Code 106.31 at least 90 days prior to procurement.

3.1.2 Provide additional information upon request to support notification.

3.1.2.1 All non-road engines shall use ultra-low sulfur diesel or ultra-low sulfur biodiesel (a sulfur content of 15 ppm or 0.0015% sulfur by weight or less), gasoline, natural gas, propane, liquefied petroleum gas (LPG), hydrogen, ethanol, methanol, or liquefied/compressed natural gas (LNG/CNG).

3.1.3 For abrasive blast and dust control equipment, identify location, job description, manufacturer, equipment type, model, serial number, blast media type it will be controlling (if applicable), filter media manufacturer, model number, and type, CFM rating, reporting method and acceptable differential pressure operating range.

3.1.4 For any equipment not authorized by PSNS & IMF Code 106.31 under existing PSCAA equipment registration or otherwise

exempt under PSCAA Regulation I, coordinate submission of NOC with Code 106.31 via the SUPERVISOR.

3.1.5 Contractor use of air contaminant generating equipment and air pollution control equipment may be authorized by PSNS & IMF Code 106.31 under existing PSCAA registered operations for abrasive blasting in PSNS & IMF dry docks. Contact the SUPERVISOR to obtain authorization to utilize existing Order of Approval for pier side abrasive blasting and spray painting operations.

3.2 Submit a copy of the contractor's O&M Plan for all air contaminant generation equipment, other than non-road engines, to the SUPERVISOR for approval at least ten working days prior to planned use of the equipment:

3.2.1 Prepare the O&M plan using the template provided by 106.31 (via the SUPERVISOR) or other suitable format. Any changes to an approved O&M plan shall be submitted to the SUPERVISOR at least five working days prior to planned implementation of the change.

3.2.2 The O&M plan must address, at a minimum, the following elements:

3.2.2.1 Maintain all equipment in good working order, through following manufacturer's operation and maintenance recommendations.

3.2.2.2 Generation of documentation that the actions of the O&M plan were completed, e.g., inspections records, documenting the prompt repair of deficiencies, recording preventative measures, etc.

3.2.2.3 Periodic inspections, including but not limited to, evidence of fugitive emissions.

3.2.2.4 Ensure deficiencies are promptly repaired. Secure operation of such equipment if immediate repairs are not feasible.

3.2.2.5 Whenever unexpected visible fugitive emissions are found, take corrective action or stop operations immediately.

3.2.2.6 Include all requirements listed as conditions on any applicable Orders of Approval for the equipment. Contact the PSNS & IMF Contracting ESH Manager representative for the project if information is needed as to specific Order of Approval requirements applicable to the equipment. This may include the requirement for a differential pressure gauge installed across filters or specified filter efficiency used in air pollution control equipment.

3.2.3 Abrasive blasting must meet the following requirements:

3.2.3.1 Perform abrasive blasting operations inside an enclosure equipped with negative ventilation and emission collection devices. The dust collection system shall be sized to provide at least four air changes per hour in the area enclosure. The filters shall be of the high efficiency pleated fabric design and exhibit greater than 99.4% particulate control efficiency for particles 0.5 microns and larger before exhausting to atmosphere.

3.2.3.2 Acceptable vacuum recovery filters shall be employed to reclaim spent abrasive and return the media to the pressure vessel. The filters shall be of the high efficiency pleated fabric design and exhibit greater than 99.4% particulate control efficiency for particles 0.5 microns and larger before exhausting to atmosphere.

3.2.3.3 Equipment shall not be used for removal of asbestos, asbestos contaminated materials, or PCB contaminated materials.

3.2.3.4 Open blasting within an enclosure is acceptable with 100 percent containment and negative pressure ventilation with filtration. Post a watch stander to monitor blasting operations to ensure operations are ceased immediately upon the loss of grit or fugitive emissions outside the control area.

3.2.4 Upon the request of the SUPERVISOR, provide any supplemental documentation that may be necessary for evaluating the O&M plan, such as documentation of filter efficiency, operating manuals, maintenance history, or rental agreements.

(V) (G) "START OF PROCEDURE"

3.2.5 Conduct a walk through inspection with the SUPERVISOR of the installed equipment with approved O&M Plan and any related paperwork prior to initial operation.

3.2.6 Accomplish the requirements of the O&M plan during operation of the equipment.

3.2.6.1 Do not deviate from the approved O&M plan.

3.2.6.2 Have the O&M plan records available for prompt review when requested by regulatory agencies such as PSCAA, or PSNS & IMF Code 106 personnel, for inspection.

3.2.6.3 Submit copies of all records, (paper or electronic), required by the O&M plan to the SUPERVISOR within ten calendar days after the end of each month.

3.2.6.4 Maintain records as required by the O&M plan. Records may be in the form of a logbook.

3.2.7 Control fugitive emissions from loading and unloading abrasive blast media, or waste from the equipment, ventilation or containment.

3.2.7.1 Confine overspray from outdoor spray painting to the work area where painting is occurring; use tarps, shrink-wrap, mobile containments, or similar methods of overspray control.

3.2.7.2 Employ total containment or other dust suppression methods at material transfer points where visible dust is likely to be generated. If water spray methods are employed ensure the water does not cause run-on/run-off concerns to dry dock collections systems, storm water collection drains, or Sinclair Inlet.

3.2.7.3 Provide covers, wetting of materials or adequate freeboard as necessary to prevent loss of particulate matter in transit. Provide and position floats or tarps adjacent to and under the work area to contain fugitive emissions for over-water work.

3.2.7.4 Secure grinding, blasting, power tool cleaning, material transfer, and painting when the particulate control methods employed are not effective at keeping emissions from escaping the immediate work area.

3.3 Accomplish Material Usage Tracking Requirements for Emission Reporting as follows:

3.3.1 Refer to Reference 2.1 for hazardous material approval and reporting requirements.

3.3.2 Per Reference 2.1, report abrasive blast grit materials used monthly to the SUPERVISOR per one of the following criteria:

3.3.2.1 Either blast nozzle throughput in tons.

3.3.2.2 Blast nozzle diameter, vessel pressure, media type, number of nozzles, and total hours of operation.

3.3.2.3 Via alternate method described in the O and M plan and approved by Code 106.31.

3.3.3 Submit welding operations report monthly per Reference 2.1.

3.4 Accomplish the National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair (NESHAP), marine coating standards and work practices of Reference 2.1, and the following:

3.4.1 All coatings used on naval vessels, and their components being repaired shore side must comply with the NESHAP VOC limits of the marine coatings. Label all coating containers, or their components, with "no thinning" labels that are clearly readable.

- 3.4.2 If a non-compliant marine coating must be used provide the justification and planned usage to Code 106.31 via the SUPERVISOR on a Low Usage Exempt (LUE) Product Request form (PSNS&IMF 5090/389). The form will be provided by the SUPERVISOR upon request.
- 3.4.2.1 This request shall be submitted at least ten business days prior to the expected use of the coating being requested.
- 3.4.2.2 If approved, monthly, report the weight of the coating used by submitting a LUE Product Usage Report (PSNS&IMF 5090/213) to 106.31 via the SUPERVISOR.
- 3.4.2.3 An accurate scale, in weight increments of 0.1 ounce or less, shall be employed to measure the amount of coating used per month. This amount shall be determined by weighing each container initially, then weighing it again at the end of each month. All containers shall be weighed individually.
- 3.4.2.4 The reports shall be submitted no later than the 10th of the month.
- 3.4.2.5 Usage reports will be required until the LUE coating is removed from BNC.
- 3.4.3 Manufacturer's batch certification for all coatings brought on site, showing batch number, product description, VOHAP/VOC content minus water and exempt compounds, volume fraction of solids, method of VOHAP/VOC certification, and certification signature and date shall be provided to Code 106.31 via the SUPERVISOR.
- 3.4.4 Marine coatings shall be used as supplied by the manufacturer; no thinning or tinting is allowed.
- 3.4.5 Containers shall be closed/sealed unless adding or removing paint. Immediately clean up all drips/spills and place paint debris (wipe up cloths, stir sticks, paper paint buckets, etc.) in a sealed container.
- 3.4.6 Inspect all spray application equipment each shift, when in use, to ensure it is maintained in good working order and is free from leaks.
- 3.4.7 Conventional spray guns are prohibited. Only HVLP or airless spray equipment may be used without prior approval from Code 106.31 via the SUPERVISOR.
- 3.4.8 Notify the SUPERVISOR verbally and immediately, whenever a NESHAP for Shipbuilding and Ship Repair or an O&M Plan requirement has not been followed. Provide details of corrective actions taken as specified in the corrective action request.

4 NOTES

- 4.1 Local Standard Item Requirements apply to Prime Contractors and their subcontractors.
- 4.2 BNC includes Puget Sound Naval Shipyard & Intermediate Maintenance Facility PSNS&IMF Bremerton site and Naval Base Kitsap (NBK) at Bremerton.
- 4.3 The SUPERVISOR will consult with PSNS & IMF, Code 106 for clarification of any requirements specified in this local standard item.
- 4.4 When an individual contractor's cumulative engine HP exceeds 2000 on the same project, extensive delays may occur as a written approval must be received from PSCAA prior to operation.
- 4.5 Definitions.
 - 4.5.1 Visible Emissions. A visible emission is the visible particulate matter other than uncombined water that occurs as a result of a process and is released to the atmosphere via a stack or vent.
 - 4.5.2 Fugitive Emissions. Particulate matter or any visible air contaminants (smoke, dust, or fume) other than uncombined water that is not collected by a capture system but is released to the atmosphere at the point of generation or from process equipment leakage other than the stack or vent.
 - 4.5.3 Project. A specific task that is being performed by a specific contractor on a specific shipyard asset (e.g. nonskid work being performed by IMIA on the CVN 68). This definition will be used to calculate total engine HP for notification purposes to PSCAA.