

GENERAL DYNAMICS NASSCO-Norfolk NIMS	ENVIRONMENTAL REQUIREMENTS Process Owner - EHS	WI-EHS-2043
---	--	--------------------

LEVEL	NAME TITLE	SIGNATURE
Author	Donna Watkins Environmental Engineering Manager	
Reviewed	Kira Stokes EHS Specialist	
Reviewed	Stephen Davenport Environmental Engineer	
Reviewed	John Thompson Subcontract Manager	
Approved	Dawn Kriz Director, EHS	

(Signed copy on file in originating department listed in header.)

All printed copies are uncontrolled

The user is responsible for verifying that any printed copy of this document is current before use.

Documents viewed in HTML format may lose content and formatting information.
Use "download" function to see or print this document for correct rendering.

(Signed copy on file in originating department and the Technical Library)

**This Tier III Work Instruction is the Property of
General Dynamics NASSCO-Norfolk**

REVISION June 30, 2020

1.0 PURPOSE

- 1.1 General Dynamics NASSCO-Norfolk's Environmental Requirements Work Instruction (WI) summarizes the environmental compliance requirements to meet environmental regulations and permit requirements as well as customer standards. Environmental compliance is the responsibility of all those working at any General Dynamics NASSCO-Norfolk facilities or worksites.
- 1.2 Our expectation is that everyone will fully comply with all applicable Federal, State, and Local laws relating to environmental compliance and protection.
- 1.3 In addition to these regulations, NASSCO-Norfolk (Company) requires compliance with other established controls such as:
- The Environmental, Health, and Safety (EHS) Policy,
 - The Company policies and procedures,
 - Specific contract language,
 - General Dynamics NASSCO-Norfolk General Terms and Conditions (Reference A),
 - Customer requirements, including NAVSEA Standard Items (Reference B), and
 - Work Instructions (WIs).

2.0 SCOPE

This WI applies to all persons working for/at NASSCO-Norfolk locations. Supervisors must ensure that their employees are fully knowledgeable of their environmental responsibilities prior to performing work at any Company facility or contract location.

3.0 RESPONSIBILITIES

- 3.1 Prior to starting contract work, Service Providers who do work on Company contracts are responsible for:
- 3.1.1 Understanding the EHS Policy and complying with it.
 - 3.1.2 Reviewing environmental terms and conditions in purchase orders and this WI.
 - 3.1.3 Submitting completed Environmental Requirements Certification Forms upon receiving a purchase order.
 - 3.1.4 Providing updates to the Company's Environmental Engineering Manager upon changes in personnel or work performed prior to change being implemented.
- 3.2 Service Providers must submit specific documents including:
- 3.2.1 Safety Data Sheets (SDSs).



- 3.2.2 Volatile Organic Compound (VOC) paint certifications. For example, Certification of Analysis or Laboratory Report – Sherwin Williams and PPG’s and International paints must include all data sheets for individual batch numbers.
- 3.2.3 Other data required by EHS, prior to work start and during each avail as applicable, including:
- Weekly reports, and other required information (as applicable) to the EHS Department regarding paint, abrasive grit, welding rod, and fuel usage.
 - Point of Contact (POC) changes, including updated phone numbers, email addresses, and dates subcontractor/shop is actively working on a specific avail
 - Start and end dates of scheduled emissions-controlled operations such as abrasive blasting and/or hydro-blasting, fuel transfers, and other high-risk environmental-threatening operations.
- 3.3 Prior to starting work on the contract, the Service Provider Representative is responsible to:
- 3.3.1 Ensure Service Provider employees have read and understood the requirements in this WI, and that pertinent information about the Service Provider and work to be done has been submitted prior to work.
- 3.3.2 Contact the Environmental Engineering Manager:
- Should information about the Service Provider or work being done changes;
 - With any questions about this WI; or
 - If any of the requirements stated within were not fulfilled.
- 3.3.3 Ensuring that required weekly reports are submitted to the EHS Department no later than 10:00 a.m. on Monday for the previous week.
- NOTE: For months that end in the middle of the week (i.e., before Friday), the forms are due to EHS no later than 10:00 a.m. on the first day of the following month.**
- 3.4 The Environmental Engineering Manager is responsible for updating this WI including the regulatory requirements within it, as applicable.
- NOTE: It is understood within this document that any titled individual, such as Project Manager, Environmental Engineering Manager, etc. may appoint a designee to represent their responsibilities throughout.**
- 3.5 The Subcontract Manager is responsible for communicating this policy to all applicable Service Providers, including any updates and changes.



- 3.6 The Director of Programs is responsible for communicating these requirements to Project Managers who are responsible for all aspects of work conducted at ship availabilities, including management of Service Providers.
- 3.7 The Project Manager/Program Manager who provides general oversight of service providers are responsible for understanding this WI. They are also responsible for ensuring compliance with the requirements contained within this WI.

NOTE: This includes ensuring reports are submitted as directed and on time.

4.0 DEFINITIONS

- 4.1 Collection Holding and Transfer (CHT) - Liquid from tanks, pipes, or containers that contains sewage.
- 4.2 Company - Refers to General Dynamics NASSCO-Norfolk.
- 4.3 Down River - Refers to off-site locations where the Company provides services, also referred to as contract locations.
- 4.4 DOT - Department of Transportation.
- 4.5 Environmental, Health & Safety (EHS) - Company's EHS Department
- 4.6 Hazardous Material - Any item or chemical which is a "health hazard" or "physical hazard," including the following:
- Chemicals that are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, hepatotoxins, nephrotoxins, neurotoxins, agents that act on the hematopoietic system, and agents that damage the lungs, skin, eyes, or mucous membranes;
 - Chemicals that are combustible liquids, compressed gases, explosives, flammable liquids, flammable solids, organic peroxides, oxidizers, pyrophorics, unstable (reactive) or water-reactive; and
 - Chemicals that, in the course of normal handling, use, or storage may produce or release dusts, gases, fumes, vapors, mists, or smoke which have any of the above characteristics.
- 4.7 Hazardous Substance - Refers to any item or chemical which is reportable or potentially reportable or noticeable as inventory under the reporting requirements of the Hazardous Chemical Reporting (40 CFR Part 302), or as an environmental release under the reporting requirements of the Toxic Chemical Release Reporting: Community-Right-To-Know (EPCRA) (40 CFR Part 372).
- 4.8 SDS - Safety Data Sheet - Written or printed material concerning a hazardous chemical that is prepared in accordance with OSHA Hazard Communication Standard.
- 4.9 NAVSEA - Naval Sea Systems Command.
- 4.10 NESHAP - National Emission Standards for Hazardous Air Pollutants.



- 4.11 NFPA - National Fire Protection Agency.
- 4.12 TAO - Temporary Access Opening.
- 4.13 OSHA - Occupational Safety and Health Association.
- 4.14 RCRA Empty – EPA defines a container as “RCRA Empty” in 40 CFR 261.7. In addition, NASSCO-Norfolk requires containers to have less than 1 inch of product (e.g., liquid or solid) in any “empty” container to be considered a solid waste.
- 4.15 SARA Title III - Superfund Amendment and Reauthorization Act Title III is the Emergency Planning and Community Right-To-Know Act (EPCRA). SARA Title III establishes requirements for facilities to document and report storage and usage of hazardous and toxic chemicals.
- 4.16 Service Provider Representative - A supervisor or management representative from a business providing services or supplies to the Company or the Company's customer under a contract or subcontract in accordance with the Company's General Terms and Conditions (Reference A). This also refers to the Service Provider's employees.
- 4.17 Standard Items - Refers to standard specifications for ship repair that are published annually by NAVSEA (Reference B).
- 4.18 UHP - Ultra High Pressure - Refers to type of blasting equipment used for hydro blasting.
- 4.19 Volatile Organic Compounds (VOCs) - organic chemicals that have a high vapor pressure at ordinary room temperature. Their high vapor pressure results from a low boiling point, which causes large numbers of molecules to evaporate or sublime from the liquid or solid form of the compound and enter the surrounding air, a trait known as volatility.
- 4.20 VOC Certification – Includes the entire report showing the analytical data for a particular paint. For each manufacturer (e.g., Sherwin Williams (SW), International Paints (IP), Pittsburgh Plates & Glass (PPG)), the VOC Certification includes all data sheets for individual batch numbers.

5.0 INSTRUCTIONS

- 5.1 All personnel working on behalf of the Company must understand the environmental risks of the work they will perform, and the Company policies and procedures to minimize these risks.
- 5.2 Service Providers’ employees working on behalf of the Company must know the Environmental, Health, and Safety (EHS) Policy and how they meet this policy within their job duties.
- 5.2.1 The EHS Policy is communicated through the acronym P.O.R.T.
- **P**revent Injuries
 - **O**bey the Rules



GENERAL DYNAMICS NASSCO-Norfolk NIMS	ENVIRONMENTAL REQUIREMENTS Process Owner - EHS	WI-EHS-2043
---	---	--------------------

- Reduce Waste
- Track Improvement

5.2.2 The EHS Policy is issued to Service Providers via (P.O.R.T.) badge cards during the badging process.

5.2.3 Service Providers are expected to know:

- EHS Policy, where to find it, and how to execute the policy in day-to-day job activities.
- Who to call in case of an emergency which includes fire, injury, spill, or environmental release/issue (for example, at NASSCO-Norfolk, call Security at 757-966-3600).

5.3 Purchase Orders and Agreements

5.3.1 Service Providers who receive requests for quotes from the Company shall agree to the General Terms and Conditions (Reference A) provided with the request for quote.

5.3.2 Service Providers shall agree to comply with the requirements of this WI in order to provide services on the Company's facilities and job sites.

5.3.3 Upon selection and prior to entry on or work for the Company, there may be several forms the Service Providers may need to submit. A list of forms and requirements (and to whom they need to be submitted) is provided in the Environmental Requirements Summary Form (F-144).

5.3.4 At least five days prior to start of work, the Service Provider Representative shall submit a completed Environmental Requirements Certification Form (F- 132) to the EHS Department.

5.4 Hazardous Material Approval Process

5.4.1 Before a Service Provider/Company may bring hazardous materials (such as paint, solvent, fuel, oils, welding rods, fuel tanks, etc.) onsite, the Service Provider shall complete the Subcontractor Hazardous Substance Control Form (F-133) and submit a SDS for each hazardous material to be brought onsite **at least 30 days prior**. For paints, a Volatile Organic Compound (VOC) Certification **must include all data sheets for individual batch numbers** and be submitted with the SDS 30 days prior to use.

NOTE: In some cases, the project materials have not been determined 30 days prior to start of avail. In such cases submit SDS as soon as materials have been determined.

5.4.2 The completed form will be submitted to the EHS Department for approval.

- 5.4.3 EHS staff will either approve the substance and sign off on the form or reject it. If approved, the EHS Supervisor will sign and return a copy of the form to the Service Provider Representative or Company.
- 5.4.4 The Service Provider/Company must have a copy of the signed form (indicating approval) before the material is allowed in the facility.
- 5.4.5 If bringing a storage unit (e.g., Paint Locker or Flammable Storage Locker), the Service Provider must contact EHS **at least 30 days prior** to bringing it onsite and provide information as to the types and amounts of materials to be stored.
- In addition, information on fire suppression systems, secondary containment, and ventilation systems must be provided PRIOR to bringing a hazardous material (hazmat) storage locker onsite.
 - Hazmat storage lockers (as well as other Service Provider equipment) is subject to an EHS inspection and must meet regulatory and Company requirements.

NOTE: In accordance with NASSCO-Norfolk's October 12, 2015 Letter, all connex, hazmat, and material storage boxes must be labeled with standard colors, lettering, and information. This became effective on December 14, 2015. Contact EHS for a copy of this letter. See Reference C.

5.5 Subcontractor Point of Contact

- 5.5.1 Each Service Provider shall designate a point of contact and submit a name and 24-hour emergency phone number (in addition to an office phone number) to the EHS Department prior to beginning work.
- 5.5.2 This can be accomplished through completing Environmental Requirements Certification Form (F-132).

5.6 Arrival Conference

- 5.6.1 Before a vessel arrives for repair in-plant, an Arrival Conference is typically scheduled by Project Managers to brief the Project Team (including subcontractors) and Ship's Force on Company requirements. Environmental requirements are summarized within the Arrival Conference Presentation.
- 5.6.2 The Project Manager is responsible for understanding environmental requirements of Service Providers working on the project, and ensuring that required weekly reports are received on time by the EHS Department.
- 5.6.3 The Subcontracts Department is required to provide a list of subcontractors who will provide services during the availability. The list must include the name, email, and cell phone number of each Service Provider Representative. The Subcontracts Department shall provide updates should Service Providers be added or removed from the project.



5.6.4 This WI and associated forms are available through the Tech Library on the Company website.

- The EHS Department will verify that the Service Provider Representative has submitted an Environmental Requirements Certification Form (F-132).
- Additional forms may be required if the Service Provider will bring hazardous materials onto Company property or generate VOCs typically through blasting and coating operations or use of oil-containing equipment. See Sections 5.8 through 5.26 of this WI.

5.7 This WI addresses Service Provider requirements for complying with the following environmental programs:

- Handling and Storage of Hazardous Material
- SARA Title III (Hazardous Material Usage Reporting)
- Waste Management (Hazardous and Non-Hazardous)
- Universal Waste Management
- Protection Against Spills
- Petroleum Transfers including Fueling of Equipment
- Tank Washings / Fuel or Oil-Contaminated Water
- Prohibited Discharges (to surface waters, soil or sewer lines)
- Vessel Work
- Painting and Blasting Compliance
- Spent Grit from Abrasive Blasting
- National Emission Standards for Hazardous Air Pollutants (NESHAPs)
- Storm Drains

NOTE: Unless otherwise stated, the Service Provider Representative is responsible to ensure that all their employees working at Company locations/contracts meet these requirements. The Representative will be held accountable by the EHS Department and the Subcontract Manager. If resolution is not reached; the Project Manager and/or Area Manager may be contacted for assistance.

5.8 Handling and Storage of Hazardous Materials

5.8.1 In order to comply with Federal, State and Local laws, the handling and storage of hazardous materials must be carried out as described below.

- All chemicals used by subcontractors shall be properly stored and secured within marked/labeled containers while on Company property.



Marking shall be in accordance with OSHA, NFPA and DOT regulations as applicable.

- Secondary containers (e.g., 1-gal or 5-gal buckets) must include tags (or labels) with the company name, POC, name of material stored, and the hazard associated with the material in accordance with OSHA and EHS.

NOTE: Tags/labels must be legible and accessible.

- Hazardous materials (and oils) must be under the control of the service provider at all times (e.g., in a manned or locked connex box or hazmat locker), being carried/transported by the service provider, or in route based on directional tag.
- Flammable materials must be stored in appropriate flammable lockers.
- Paint or solvent used in separate containers shall be positively identified with Hazardous Communications (HAZCOM) labels, and shall have a lid properly fastened when not in use.
- Connex boxes, HazMat and material storage lockers/boxes must be labeled with standard colors, lettering, and information as noted in the NASSCO October 12, 2015 letter. (See Reference C.)
- Material must be compatible with the material of the storage container.
- Prior to bringing hazardous substances or materials into the facility, the Service Provider must complete a Hazardous Substance Control Form (F-133) listing the hazardous material to be stored or used on-site as well as provide a contact name, number, and email.
- The EHS Department must approve the material to be used or stored by signing the form and returning the signed form to the Service Provider. The signed form must be kept with the material stored.
- Liquid materials must be stored within secondary containment (if outdoors, the containment must contain 110% of the capacity of the container). Containments must be sturdy enough to contain liquid and pumped out if rain water accumulates.
- Unused and/or surplus hazardous materials which are not declared waste by the Company's Environmental staff must be returned to the Service Provider's facility. The Company will not store unused/surplus hazardous materials.

5.8.2 Service Providers must transport hazardous materials in accordance with DOT regulations.

5.9 SARA Title III (Hazardous Material Usage Reporting)

5.9.1 In order for the Company to comply with the reporting requirements of the SARA Title III regulation, Company department representatives and



Service Providers are required to submit weekly reports to Environmental to include the following information. See Reference D.

5.9.2 Paint, Thinners, Solvents, Non-skid, or Other Chemical Usage

- Prior to bringing any hazardous material to the work site, the Service Provider must complete a Hazardous Substance Control Form (F-133) listing the hazardous material to be stored or used on-site as well as provide a contract name, number, and email.
- Provide a SDS for each paint/chemical component used (that had not already been previously submitted).
- Types of paint, solvent, adhesives, and nonskid used must match their SDS. Submit special certifications for special use paint systems to Environmental.
- Mix ratios must be specified for multi-component products, such as paint and epoxies. This is required for accurate reporting of quantities to the United States Environmental Protection Agency (USEPA).
- Document the daily quantity of paints/chemical components (in pounds) used on the job on the Daily Coating Usage Form (MARMC Form "Attachment D"). See Reference E.
- Weekly reports are due to the EHS Department by 10:00 a.m. each Monday for the previous week using the Daily Coating Usage Form (MARMC Form "Attachment D"). See Reference E.
- At the end of the month, the daily quantity of paint/chemical compounds used must be submitted the next calendar day. Reports for paint/chemical usage are due to MARMC by the 4th of the month (in accordance with Local Standard Item 042-37-001).

5.9.3 Reportable Compounds

- Service Providers are required to report the used amount of any reportable compounds under SARA Title III (in pounds) and provide a SDS for each compound used. The following list represents the typical compounds used by Service Providers which are reportable items under SARA Title III.

Ethylene Glycol (anti-freeze)	Sulfuric Acid
Hydrochloric Acid	Hydrazine
Degreasing Agents	Fiberglass
Acetone	Resins
Carbon Tetrachloroethene	Styrene
1,1,1 – Trichloroethene	Urethane
1,1,2 – Trichloroethene	Epoxy
1,1,3 – Freon	Hardeners

NOTE: This list is not all inclusive and other compounds requiring reporting under SARA Title III may be required.



5.9.4 Abrasive Blast Grit Usage

- At least 3 days prior to the start of blasting, the Service Provider must document the anticipated dates and run start time and run end time for blasting and painting evolutions and email this information to the contact listed in Environmental Requirements Summary Form (F-144). Weekly reports (due Monday by 10:00 a.m. for the previous week's data) must provide the following information:
- Provide the manufacturer of abrasive blast grit.
- Document the daily quantity of blast media used in pounds.
- Provide hourly usage, shift used, and amount of the abrasive blast grit used externally on a daily basis. This does not include tanks and voids accessed from Temporary Access Openings (TAOs).
- Provide included hourly usage, shift used, and amount of paint for external paint spraying evolutions. This does not include tanks or voids accessed from TAOs.
- Submit weekly reports to the EHS Department by 10:00 a.m. on Monday for the previous week using the MARMC Usage Form "Attachment E" Monthly Air Emissions Source Data (Reference E).
- At the end of the month, the daily quantity of grit/paint/solvent used must be submitted the next calendar day. Reports for paint/chemical usage are due to NASSCO Norfolk by the 1st of the month. NASSCO-Norfolk will submit reports to MARMC by the 4th of the month (in accordance with Local Standard Item). If the 4th falls on a weekend or holiday, arrangements may be made to submit report on the next closest business day not to exceed the 5th of the month.

NOTE: Service Providers must follow all health and safety requirements when conducting abrasive blasting. These are described in WI EHS 2051 Abrasive Blasting (Reference X)

5.9.5 Welding Rods

- Service Providers that use welding rods must document this use daily and report usage weekly.
- Document the specific product used in welding application including manufacturer, type of application, and the amount used in pounds on the Material Usage Form (Reference E).
- Submit weekly reports to the EHS Department on by 10:00 a.m. on Monday for the previous week's usage using the MARMC Material Usage Form (Reference E).
- At the end of the month, the daily quantity of welding rods used must be submitted no later than the next calendar day to NASSCO Norfolk.



NASSCO-Norfolk will submit reports for welding rod usage to MARMC by the 4th of the month (in accordance with Local Standard Item). If the 4th falls on a weekend or holiday, arrangements may be made to submit report on the next closest business day not to exceed the 5th of the month.

5.9.6 Hydro Blasting Operations

- **At least 24 hours** prior to conducting hydro blasting operations, notify the EHS Department. This is necessary for personnel to activate the dry dock containment pumps.
- Maintain positive control of water usage during blasting. Leaky hoses must be repaired.
- Depending on the size and energy rating of the water blast machines, the fuel usage and run time may need to be documented and reported.
- If using an Ultra High Pressure (UHP) blasting machine with internal combustion engine greater than 50 brake horsepower (bhp) report fuel usage.

5.9.7 Fuel Usage

- Use of portable internal combustion (IC) engines greater than 50 brake horse power must be documented.
- Provide name and manufacturer of equipment and brake horse power.
- Document the daily amount of fuel used in gallons and hours of equipment operation by completing the Fuel Usage Form (F-137) for all locations except NNSY. For NNSY avails, use form F-143.
- Submit weekly reports to the EHS Department by 10:00 a.m. on Monday for the previous week using the Fuel Usage Form (F-137 or F-143).

5.10 Fuel Tanks [also known as Fuel Cells or Aboveground Storage Tanks (ASTs)]

5.10.1 Prior to bringing fuel onsite, complete and submit the Hazardous Substance Control Form (F-133) and submit a SDS.

5.10.2 Indicate on the Hazardous Substance Control Form (F-133) the amount of material for the capacity of both the container and the secondary containment. If the container is double-walled, indicate this on this section of the form.

5.10.3 Fuel cells must be clearly labeled with the name of the contents, capacity of the tank; and hazard(s) present. (Use of NFPA or DOT warning labels is encouraged.) Also, the name of the Company, Point of Contact, and 24-hour phone number of contact must be clearly visible on or near the tank.



- 5.10.4 Fuel cells must have two working fire extinguishers with inspection label indicating they have been inspected within the last 30 days in accordance with NAVSEA Standard Items (Reference B).
- 5.10.5 Fuel in containers with a capacity of 55 gallons or more must have secondary containment that can hold 110% of the capacity of the container, unless the container is double-walled.
- 5.10.6 When not in use, fuel cells must be stored in the facility designated holding or laydown area. Cells are still subject to the above requirements.
- 5.10.7 Adding or removing fuel from the container must be done within (or over containment) to prevent spills or leaks entering storm drains or the River.
- 5.10.8 Fuel cells must be grounded and two fire extinguishers must be present during fueling operations. Spill cleanup materials must be readily available.
- 5.10.9 Containment (at minimum a 5-gal container) must be placed under the nozzle of a fuel cell when not in use. Nozzle can be placed within a container if no holster is provided.

NOTE: Fuel nozzles must be kept within holsters or secured in a non-leaking position within containment. Never leave fuel nozzles on top of the fuel cell.

- 5.10.10 Fuel cells must be inspected by Service Provider daily Form (F-037) by owner/operator to evaluate compliance with above requirements and correct any discrepancies.
- 5.10.11 If a spill or leak occurs (outside of containment), and has the immediate potential of entering a storm drain or the River, place containment materials around spill and then immediately notify Security (prior to cleanup).
- 5.10.12 For all spills, contain and clean up the spill using absorbent materials (spill kits are located throughout the facility) and notify Environmental for questions about proper disposal of spill cleanup materials. Call 757-215-2121 to reach the EHS Hotline.
- 5.10.13 Repair or replace any damaged fuel cell or associated equipment. This may include moving the fuel cell off of Company property until repaired.
- 5.10.14 Service Providers are responsible for ensuring secondary containment is in good condition, sufficient to contain 110% of largest oil container, and free of debris and standing water. Contact the EHS Department if assistance is requested to have containment pumped out.

NOTE: Service Providers with secondary containment berms must make arrangements for pumping out secondary containment.



5.11 Oil or HazMat (HM) Transfers

- 5.11.1 Any transfer from one vehicle/equipment to another must be conducted over secondary containment.
- 5.11.2 Operator must remain present during the entire transfer. If operator must leave, the transfer must be terminated until the operator can return to continue.
- 5.11.3 Potential spill scenarios or other hazards (e.g., fire, fumes, pressurized releases) must be discussed with team conducting the work and nearby workers (as necessary) PRIOR to start of work.
- 5.11.4 Cosmoline, fuel, and other transfers involving compartments larger than 50 gallons (typical size of forklift/JLG tank) must be communicated to EHS prior to start including company name, POC, material being transferred, and scheduled start and end date/time.
- 5.11.5 Containers (including secondary containers and waste containers) must be labeled and sealed (except when adding or removing material) in accordance with OSHA and EPA regulations.
- 5.11.6 All other EHS requirements, including Job Hazard Analysis (JHA), waste management, and spill/incident reporting apply,

5.12 Waste Management (Hazardous and Non-Hazardous)

- 5.12.1 In order to comply with Federal, State and Local laws, handling and storage of hazardous and non-hazardous wastes must be carried out as described in this WI.
- 5.12.2 Waste Types Generated at the Company
 - Service Provider who might generate hazardous waste must review and comply with WI-EHS-2037 Hazardous Waste Management (Reference F).

NOTE: SERVICE PROVIDER MUST ALSO FOLLOW HAZARDOUS WASTE REQUIREMENTS WHEN WORKING AT OTHER DOWN RIVER FACILITY LOCATIONS.

- Hazardous materials declared as hazardous waste by Environmental that was generated while on Company property, will be disposed of by the EHS Department. The point of contact, job name, work order number, and item number must be provided for reporting and invoicing purposes.

NOTE: DO NOT TRANSPORT HAZARDOUS WASTE FROM ONE FACILITY TO ANOTHER OR FROM ONE SATELLITE ACCUMULATION AREA (SAA) TO ANOTHER.

- Unused hazardous materials, due to their chemical constituents, may result in the generation of a hazardous waste. Any unused hazardous



material declared by Environmental as waste will be managed onsite by the EHS Department.

- Service Provider must mark hazardous waste containers with the company name that generated the waste, type of waste that was generated, and the date the waste was generated. Contact the EHS Department to obtain labels that are designed to document this information.
- Notify the EHS Department prior to transportation of waste to the onsite Central Accumulation Area (CAA).
- Empty containers (e.g., paint cans, paint liners, drums, etc.) must be RCRA empty (e.g., no more than 1 inch of residue) in order for these containers to be recycled or be disposed of as solid waste.

NOTE: Recycled materials must be placed in the appropriate dumpster labeled for that material.

- Containers of paint, solvent, adhesive, etc. must be scrapped and/or wiped clean to remove as much material as possible. Spent liners and rags (used to wipe out containers) must be placed in drums for disposal as paint waste (solid).

NOTE: NASSCO-Norfolk does not allow the use of thinner to clean cans. Thinner rags must be disposed of as hazardous waste. Containers with thinner rags must be labeled and managed as hazardous waste in accordance with state and federal regulations.

- Jobs requiring flushing boil out, hydro blasting, or chemical cleaning could result in the generation of a hazardous waste. No process water, chemicals, or hazardous wastes shall be disposed of through the onsite wastewater treatment plants, sanitary sewer/CHT system, or storm drain system.
- Service Provider who may generate a re-occurring waste that may be hazardous (or need to store such wastes more than 24 hours) must contact the EHS Department a minimum of **one week in advance** of commencement of work.
- The EHS Department will determine if a waste area setup will be required. Approval must be obtained prior to the start of the job by completing the Satellite Accumulation Area (SAA) Request Form (F-138).

5.13 Waste (Less than 55-gallons)

5.13.1 Contact EHS at least 3 days in advance for pick-up of hazardous waste and transport to the Company's CAA.



- 5.13.2 The Service Provider must complete the Waste Transfer Request Form (F-139) prior to relocating waste to the CAA.
- 5.14 Waste (Greater than 55-gallons)
- 5.14.1 The EHS Department assist in ordering a tanker storage truck for large volume collection if requested at least 3 days prior to waste generation, depending on the type of material.
- 5.14.2 Analysis of waste will be performed by EHS and, if found to be hazardous, EHS will dispose of it in accordance with applicable regulations.
- 5.14.3 Non-hazardous waste generated by the Service Provider, must be disposed of by the Service Provider within the requirements of Federal, State, and Local laws (and service provider contract) as quickly as possible.
- 5.14.4 Under no circumstances will waste material be allowed to be taken off of Company property without prior approval of the EHS Department.
- 5.15 Universal Waste Management
- 5.15.1 Universal waste includes batteries, light bulbs, spent pesticides, and waste electronic equipment.
- 5.15.2 These wastes must be turned over to the EHS Department for disposal.
- 5.16 Protection Against Spills
- 5.16.1 Prevention against spills is required at all times. Maximum efforts shall be made to eliminate spills at any of our facilities.
- NOTE: Spills should be contained, cleaned up immediately and called in to 757-966-3600 to report (no matter what facility, including down river). A Service Provider who does not properly report and/or manage spills is subject to disciplinary action up to and including payment for spill cleanup and/or removal from the contract.**
- 5.16.2 The Integrated Contingency Plan (ICP) (Reference G) contains emergency response procedures related to oil and chemical spills. It is available through the EHS Department or Security.
- 5.16.3 If a spill occurs on the pier, dry dock, or any paved (contained) area, immediately notify the EHS Department and follow the requirements listed in the ICP (Reference G). Contact Security (757-966-3600) if the spill (any amount of oil, CHT, or chemical) occurs outside containment and could enter the River or storm drain.
- 5.16.4 Painting operations shall employ sufficient containment measures to avoid any materials/overspray from entering the River. See Section 5.21 of this procedure for additional requirements for painting.



5.16.5 Movement and use of equipment and materials that contain oils, chemicals, or other materials must be conducted in such a manner to avoid spills.

- Equipment, vehicles, containers, etc. must be inspected prior to movement and any holes, breaches, leaks, etc. must be repaired PRIOR to movement.
- If material has spilled outside of containment, report the spill to Security (757-966-3600) prior to cleaning it up.
- If material spilled is contained, clean up the material and contact EHS for guidance on proper disposal.
- If it is a vehicle that is leaking, have the vehicle serviced (or removed from the facility) for repairs; make sure leak is stopped or contained prior to moving the equipment.

5.17 Petroleum Transfers

5.17.1 Over water transfer of hazardous materials, petroleum, and petroleum-contaminated liquids shall be accomplished in accordance with the requirements of 33 CFR 154 and as specified in your company's written Operations Manual approved by the U.S. Coast Guard Captain of the Port.

5.17.2 While at the Ligon facility, you must also follow the Company's U.S. Coast Guard-approved Oil Transfer Operations Manual (Reference H).

5.17.3 Frac trailers (typically 20,000-gal storage tanks for oily water) are only allowed at the Ligon and Harper facilities, to be operated by Service Providers who have been trained to NASSCO-Norfolk's Oil Transfer Operations Manual and are designated by NASSCO-Norfolk as Persons-In Charge (PIC) as required by US Coast Guard rules.

5.18 Tank Washings/Fuel or Oil-Contaminated Water

5.18.1 Tank washings and fuel/oil-contaminated water shall be processed by the EHS Department. Material may be unloaded into oily water surge containers (e.g., FRAC tanks or tanker trucks).

5.18.2 Prior to transfer of any material, the Service Provider is required to contact the Company's Oily Wastewater Treatment Plant Operator. Contact between the assigned pumper and spotter must be maintained for the duration of the unloading.

5.19 Prohibited Discharges

5.19.1 Discharges other than domestic sewage into the sanitary sewer/CHT system are prohibited.

5.19.2 Only authorized individuals in the Company's Temporary Services (Shop 41) Department are allowed to connect hoses to the facility CHT system.

5.20 Vessel Work



- 5.20.1 Hull washing is NOT permitted if wash water will come in contact with spent abrasive.
- 5.20.2 All empty containers shall be removed as soon as possible, or at the end of each shift.
- 5.20.3 Paint mixing shall be accomplished in a manner to prevent spillage at all times.
- 5.20.4 Non-contact cooling water discharges shall be channeled overboard by the use of piping or tubing.
- 5.20.5 Equipment that discharges water (other than non-contact cooling water) shall be handled on a case-by-case basis. The Environmental Engineering Manager must approve the manner of handling discharges.
- 5.20.6 Permission for temporary chemical storage in the dock must be obtained through the EHS Department. Only the necessary material required to work one shift is allowed on the dock. All materials must be removed after the work stops. Areas for placement will be defined by the Environmental Engineering Manager and the Dockmaster.
- 5.20.7 Fueling activities shall be conducted in a manner to avoid spills on the dock.
- 5.21 Painting and Blasting Compliance
- 5.21.1 All painting and blasting operations will be carried out in compliance IAW WI-EHS-2017 (Reference I) and WI-EHS-2072 (Reference J).
- 5.21.2 External spray painting, blasting, and solvent use must be documented daily on Attachment E Weekly/Monthly Air Source Data (MARMC Form) and submitted by 10:00 a.m. on Monday for the previous week's data.
- 5.22 Blast Media from Abrasive Blasting
- 5.22.1 Spent media used in blasting operations with resulting hazardous residue will require the Service Provider to bear the cost of the disposal.
- 5.22.2 If blast media has come in contact with hazardous residue, disposal will be arranged through the EHS Department.
- 5.22.3 Grit usage must be recorded daily on MARMC Material Usage Form Attachment E Monthly Air Emissions Source Data (Reference E) and reported weekly (by 10:00 a.m. on Monday for the previous week's data).
- 5.22.4 Grit disposal must also be reported weekly on the Daily Abrasive Blast Grit Usage Form (F-135).
- 5.23 National Emission Standards for Hazardous Air Pollutants (NESHAPs)
- 5.23.1 Service Providers must adhere to all conditions in this WI when using Marine Coatings.



- 5.23.2 Each batch of coating received shall be certified volatile organic compound (VOC) compliant as supplied and verified by EPA Method 24.
- 5.23.3 All reporting must be done on the following Company forms and submitted to the EHS Department no later than 10:00 a.m. on Monday for the previous week.
- MARMC Daily Marine Coating Usage Form (Reference E) must be completed daily and turned in no later than 10:00 a.m. on Monday for the previous week.
 - External spray painting, blasting, and solvent use must be documented daily on MARMC Material Usage Form Attachment E Monthly Air Source Emissions Data (Reference E) and submitted by 10:00 a.m. on Monday for the previous week's data.
- 5.23.4 The EHS Department and Quality Assurance (QA) Departments must approve low usage exempt paint.
- 5.23.5 Paint thinning is not allowed.
- 5.23.6 All violations of the requirements specified in this WI must be reported to the EHS Department immediately, at most within 24 hours.
- 5.24 Storm Drains & Bodies of Water
- 5.24.1 At no time shall any material, waste, wastewater, etc. be placed in or around any storm drain or body of water throughout our facilities. This includes any material (e.g., paint chips, trash, and debris) that is placed in the River.
- 5.25 Accountability
- 5.25.1 EHS or the Subcontracts Manager will contact the Service Provider Representative with any concerns about compliance to this WI or questions about late or missing reports.
- 5.25.2 Unresolved conflicts between the EHS and/or the Subcontracts Manager and the Service Provider will be communicated to the Project Manager.
- 5.25.3 If the Project or Program Manager is not able to resolve the conflict, it may result in disciplinary action against the Service Provider including dismissal from the job until corrected.
- 5.26 Training
- 5.26.1 Company employees who perform operations described in this WI shall receive initial and annual training on the requirements of this WI. Annual training will be provided by the EHS Department. Project Managers and/or supervisors may provide training to Company employees via pass downs and on-the-job training.
- 5.26.2 Each Service Provider employee who will perform work at any Company location or contract must be trained to this WI prior to commencing work as contracted.



- 5.26.3 Employees of the Service Provider shall sign the Group Training Form (F-001) indicating they have read and understand the requirements of this WI prior to doing work at Company locations or contract.
- 5.26.4 The training shall be completed periodically. At a minimum upon initial task of assignment to work on Company locations or contract and upon changes to this WI, as necessary. Training to Service Providers may be covered in indoctrination training and/or on an annual basis through renewal of contracts and purchase orders.
- 5.26.5 The Subcontracts Manager will notify Service Provider of changes to this WI and provide communication regarding EHS requirements.
- 5.26.6 Service Providers must provide required training records of their employees upon request depending on the type of work to be performed. Lack of documentation for required environmental training may result in delayed or revoked work orders.

6.0 FORMS AND RECORDS

FORMS AND RECORDS	
Document No.	Document Title
F-001	Group Training Form
F-037	Subcontractor Daily Fuel Cell Inspection Checklist
F-132	Environmental Requirements Certification Form
F-133	Subcontractor Hazardous Substance Control Form
N/A	MARMC Material Usage Form Daily Marine Coatings Usage Form
F-135	Daily Abrasive Blast Grit Disposal Form
N/A	MARMC Material Usage Form
F-137	Fuel Usage Form
F-138	Satellite Accumulation Area (SAA) Request Form
F- 139	Waste Pick-up Request Form
Attachment E	MARMC Material Usage Form Attachment E:Monthly Air Emissions Source Data
F-143	Fuel Usage Form – NNSY
F-144	Environmental Requirements Summary

7.0 ENCLOSURES

ENCLOSURES		
Encl.	Document No.	Document Title
N/A		



8.0 RELATED DOCUMENTS

RELATED DOCUMENTS	
Document No.	Document Title

9.0 REFERENCES

REFERENCES		
Ref.	Document No.	Document Title
A	N/A	General Dynamics General Terms and Conditions
B	N/A	Current Edition, NAVSEA Standard Items, including Local Standard Items (e.g., 042-37-001, 042-37-001, and 042-11-001)
C	N/A	NASSCO-Norfolk 12 October 2015 Letter “Requirements for Connex Boxes, Hazardous Material Storage Lockers and material Storage Boxes
D	WI-EHS-2015	EPCRA and Air Reporting Requirements
E	N/A	MARMC Material Usage Form which includes: Tab 1: Material Usage Monthly Report Tab 2: Attachment E Monthly Air Emissions Source Data Tab 3: Attachment D Daily Marin Coatings Usage Log
F	WI-EHS-2037	Hazardous Waste Identification and Management
G	N/A	Integrated Contingency Plan (ICP)
H	WI-EHS-2029	Oil Transfer Operations Manual
I	WI-EHS-2017	Outdoor Abrasive Blasting and Spray Painting Requirements
J	WI-EHS-2072	Breathing Air Procedure for Blasting and Spray Painting
H	WI-EHS-2051	Abrasive Blasting

10.0 REVISION RECORD

REVISION RECORD	
Rev. Date	Summary of Change
10/14/2013	Initial Issue.
12/19/2013	Add Checklists and language.
6/10/2014	Add NSSA Contact Number

REVISION RECORD	
10/31/2014	Reformatted document.
12/08/2014	Revised Fuel Cell Requirements based on NAVSEA Standard Item updates.
1/15/2015	Updated phone numbers in Attachment A.
5/01/2015	Updated contact names, added Abrasive Blasting WI Reference.
2/23/2016	Updated references from Environmental to EHS, edited signature page, added reference to connex requirements, and updated various form names and numbers.
9/23/2016	Added reference to Local Work Items and requirement to submit reports to Customer no later than the 4 th of the month.
9/15/2017	Updated WI format and changed WI and related form numbers. Also, added MARMC Material Usage Report Form (Reference E) which replaces some of NASSCO-Norfolk reporting forms.
6/07/2018	Added Sections 4.15 RCRA - empty definition; 5.8: Labeling of Secondary Containers; and 5.11: Oil/HazMat Transfers. Updated Sections 5.12 and 5.17 - empty container disposal and over water transfer requirements.
6/30/2020	Added EHS Specialist as reviewer. Provided requirements for inspecting oil-containing equipment prior to transport or usage. Added clarification on the use of frac trailers. Added Local Work Item reference 042-38-001. Made several formatting and grammatical changes throughout.

