Environmental Standard Operating Procedure Painting Preparation

SF	Director:	Alicia	Florez

Signature: Date:

PURPOSE.

The purpose of this Environmental Standard Operating Procedure (ESOP) is to provide environmental guidelines for managing paint preparation operations. This guidance applies to those individuals who perform paint preparation operations, to include preparation and clean up, aboard Marine Corps Logistics Base (MCLB) Barstow.

PROCEDURES.

Operations aboard MCLB Barstow require the stripping, sanding and wiping of surfaces to prepare them for painting. Solvents, paint stripping, and sanding are used to prepare surfaces for painting. Paint preparation may impact air quality and generate hazardous waste; therefore, chemicals and any wastes remaining must be properly managed in order to reduce impacts to human health and the environment.

All hazardous materials and waste must be stored in approved containers that are kept securely closed unless adding or removing contents. Units are equipped with waste storage containers as necessary and should contact the Hazardous Waste Manager to replace or request additional containers.

The following procedures apply:

- 1. Ensure that Safety Data Sheets (SDSs) for all materials associated with this practice are current and available for inspection.
- 2. Maintain all required permits and ensure that all permits are current and available for inspection.
- 3. Ensure required training and certifications are current for all unit personnel and available for inspection.
- 4. Wear appropriate personal protective equipment (PPE) including eye protection, gloves, and either half-face respirators or dust masks, as necessary.
- 5. Maintain a fully stocked spill kit (where solvent tanks are used).
- 6. Turn on exhaust hood or room ventilation when using solvent tank, if applicable.
- 7. Do not use solvent tanks (which are designated for paint cleaning) for any purpose other than cleaning paint equipment and brushes.

- 8. Use drop cloths for sanding walls and other surfaces. Collect dust from sanding in drop cloth at the end of each workday. Transfer dusts to a hazardous waste container if dust waste is deemed hazardous.
- 9. Ensure that liquid waste is promptly disposed in a designated waste container and closed securely.
- 10. Store all usable hazardous materials (solvents, chemical strippers, etc.) in hazardous materials (HAZMAT) lockers.
- 11. Ensure that used fluids are not cross contaminated with any other fluids or materials. This includes using dedicated transfer containers with lids for each waste stream. Check containers for deterioration and structural integrity.
- 12. Manage hazardous waste according to established hazardous waste standard operating procedures (SOPs).
- 13. Solvent waste or used solvent rags should not be left out to dry prior to disposal.
- 14. Place used rags in approved containers for recycling or disposal.
- 15. Ensure that warning signs such as "Hazardous Materials/Dust" are clearly visible and legible from a distance of 25 feet in any direction.
- 16. The following records must be maintained:
 - a. SDSs for all materials associated with this practice.
 - b. Required permits.
 - c. Training records and certifications for personnel.
 - d. Daily logbook.
 - e. Hazardous materials inventory (must match Authorized Usage List).
 - f. Hazardous waste logbook.
 - g. Spill logbook.

- 17. The Environmental Compliance Coordinator (ECC) shall coordinate with their supervisor/leadership to ensure personnel are designated to conduct inspections. The ECC shall ensure deficiencies noted during the inspections are corrected immediately.
- 18. If there are any specific situations or other concerns not addressed by this procedure, contact the Environmental Division.

REFERENCES.

- a. 40 CFR 262 (Code of Federal Regulations)
- b. 22 CCR 66261 (California Code of Regulations)
- c. Integrated Contingency Management Plan for MCLB Barstow
- d. MCO P5090.2 (Marine Corps Environmental Compliance and Protection Manual)

TRAINING.

Unit personnel should be trained on all the provisions of this ESOP. All training must be requested through unit ECC or Environmental Compliance Branch.

All applicable personnel must be trained in this ESOP and the following:

a. On-the-job training.

Additional training may be required based on each employee's specific job duties and responsibilities:

- a. Hazard Communication (HazCom) training.
- b. First Responder Operations (FRO) Course
- c. FRO Refresher Course.
- d. Hazardous Waste Handlers Course.
- e. Hazardous Waste Handlers Refresher Course