

Environmental Standard Operating Procedure	
Painting	
SF Director: Alicia Florez Signature:	Date:

PURPOSE.

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for various paint application methods, including aerosol containers, paint brushes and paint spray guns aboard Marine Corps Logistics Base (MCLB) Barstow.

PROCEDURES.

Paint operations that utilize aerosol containers, paint brushes and paint spray guns for the purpose of applying paint are potentially a source of hazardous waste and can potentially generate air pollution. Because of this, it is critical that standard operating procedures are followed to ensure that painting applications produce the least impact to human health and the environment.

The following procedures apply for all painting applications:

1. Use only approved paint and painting products that are on the unit's Hazardous Material Authorization Use List (AUL).
2. SDSs (Safety Data Sheets) for all paint products being used for painting applications must be available and current.
3. All hazardous waste containers must be marked on the outside with the name of hazardous substance inside the container.
4. All hazardous waste containers must be properly closed unless adding or removing waste.
5. Ensure fire extinguishers and spill kits are accessible and maintained in painting areas.
6. Do not paint outside of predetermined painting areas.
7. Do not use paint or painting products near open flames or heat sources.
8. Keep painting areas free from the accumulation of deposits of combustible residues.
9. Post "No Smoking" signs where flammable vapors may be expected and in areas where painting application items are stored.

11. Properly use clean and dispose of paint brushes in approved HW container
12. Ensure all coatings operations have Mojave Desert Air Quality Management District (MDAQMD) permits when required.
13. During clean-up, keep all solvent containers closed when not in use.
14. Ensure all paint cans are kept closed when not in use.
15. Properly contain and dispose of any spills.
16. Ensure paint residues in empty cans are dry before disposal.
17. When using aerosol paint containers, the following procedures apply:
 - a. Remove all caps and tips from paint aerosol containers and dispose of them properly before disposing of container in hazardous waste container.
 - b. Remove gross contamination from the outside of paint aerosol containers before placing in a hazardous waste container.
 - c. Ensure that all paint waste aerosol containers and residue are collected and taken to the unit Process Generation Point (PGP) site for disposal.
 - d. Ensure waste paint aerosol containers and/or residues are stored in properly closed and labeled containers.
 - e. Ensure all aerosol containers are kept in a flammable material locker which is operated and maintained in strict accordance with the installation and manufacturer's regulations.
 - f. When applying paint using aerosol containers, only do so in a well-ventilated area.
18. When using paint spray guns, the following procedures apply:
 - a. Use only High-Volume Low Pressure (HVLV) paint spray guns (in accordance with manufacture instructions) in installation-approved paint spray booths or designated areas.
 - b. Comply with Permit to Operate (PTO) paint spray booth conditions.
 - c. Bond and ground all containers when transferring flammable liquids from container to paint spray gun container.
 - d. Ensure clean-up of paint spray guns are done in approved areas.

- e. Ensure paint spray guns are cleaned with approved cleaning agents.
 - f. Ensure proper PPE is worn while utilizing paint spray guns.
19. 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. Actions taken to correct each deficiency shall be recorded on the inspection sheet.
20. If there are any specific situations or concerns not addressed by this procedure, contact the MCLB Barstow Environmental Division.

REFERENCES.

- a. 40 CFR 261-262 (Code of Federal Regulations)
- b. 40 CFR 403
- c. 29 CFR 1910
- d. CCR, Titles 8 and 17 (California Code of Regulations)
- e. MCO P5090.2A (USMC Environmental Compliance and Protection Manual)
- f. MCO 5100.1 Occupational Safety and Health (OSH) Manual
- g. Fire Safety Regulations (FSR)
- h. MCO P5100.8F (Marine Corps Occupational Safety and Health Program Manual)
- i. Mojave Desert Air Quality Management District Permit to Operate (MDAQMD PTO)
- j. MCLB Barstow Integrated Contingency Management Plan (ICMP)

TRAINING.

All affected personnel must be trained in this Standard Operating Procedure and the following:

1. General Environmental Awareness training.
2. Hazard Communication Training.