

NAVSEA  
STANDARD ITEM

FY-25

ITEM NO: 009-02  
DATE: 01 OCT 2023  
CATEGORY: I

1. SCOPE:

1.1 Title: Environmental Compliance Report for Material Usage; accomplish

2. REFERENCES:

2.1 42 USC 7412(b), Clean Air Act, Section 112(b), List of Hazardous Air Pollutants

2.2 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart II

3. REQUIREMENTS:

3.1 Contractor facility availabilities:

3.1.1 Designate a contractor primary and secondary point of contact to receive reports applicable under this item.

3.1.2 Submit one legible copy, in approved transferrable media, of the names of the primary and secondary point of contact to the SUPERVISOR prior to availability start date.

3.2 Naval facility availabilities:

3.2.1 Submit one legible copy, in approved transferrable media, of an Environmental Compliance Report for Material usage at Naval Facility as follows:

3.2.2 Submit applicable permits for portable, registered, or rental emission units to the SUPERVISOR prior to start of work.

3.2.3 Establish a record-keeping program to reflect the manner in which the material records will be maintained and submitted to the SUPERVISOR.

3.2.4 Maintain facility specific records to ensure accurate reporting for all preservation, welding repairs, and fuel consumption for each individual portable internal combustion engine or portable emission unit. Provide the SUPERVISOR sufficient details to track usage of all paints, solvents, adhesives, welding rods, and fuel used for each individual portable internal combustion engine over 50-brake horsepower. Report any other materials used which contain chemicals listed in 2.1.

3.2.5 Maintain current usage records of materials listed in 2.1.

3.2.6 Negative reports are required.

3.2.7 Reports for paint, solvent, adhesive, and nonskid usage records must contain the following items based upon category of the material.

3.2.7.1 Product manufacturer, identification or color

3.2.7.2 Net daily paint usage in gallons, paint application method (airless spray, HVLP, brush, or roller) per paint type, amount of paint disposed as hazardous waste; density of mixed paint; net daily onsite solvent usage in gallons used for equipment cleaning and surface preparation; net amount of adhesives in unit of measure (ounces, quart, gallons or pound)

3.2.7.3 Product Safety Data Sheet (SDS), technical data sheet, VOC certification for paint and nonskid product

3.2.7.4 Government site location, applicable local Air Pollution Control District (APCD) permit number, date, and ship's name

3.2.8 Abrasive blast grit materials used must be submitted monthly and must include:

3.2.8.1 Manufacturer of abrasive blast grit and SDS

3.2.8.2 Abrasive blast grit usage certification if required by the cognizant state or local authorities

3.2.8.3 Amount and hourly usage of the abrasive blast grit

3.2.8.4 Permit associated with the abrasive blasting equipment if required by the cognizant state or local authorities

3.2.9 Welding operation report must be submitted monthly and must include filler metal manufacturer, specific product used in welding application, SDS, usage in pounds, and type of welding application.

3.2.10 Portable internal combustion (IC) engine greater than 50 brake horse power operation report must be submitted monthly and must include:

3.2.10.1 Amount of fuel used in gallons and the hours of operation

3.2.10.2 IC engine permit number and site location if required by the cognizant state or local authorities

3.3 Submit one legible copy, in approved transferrable media, of each report required by 3.2 to the SUPERVISOR no later than 10 days after the end of the month throughout the availability.

3.4 Provide a deviation request for each coating that thinning is required to the SUPERVISOR. Upon approval of deviation use Attachment A for Volatile Organic Compounds (VOC) (for Option 1, 2, and 3 thinning requirement use only), or Attachment B for Volatile Organic Hazardous Air Pollutants (VOHAP) (for Option 4 thinning requirement), on the as-supplied coating by the manufacturer, or similar form.

3.4.1 For coatings to which thinners must not be added, the coating container must have a label stating, "NO THINNING".

3.4.2 For coatings to which thinners are to be added, designate a single thinner to be used and determine the maximum allowable thinning ratio using Equation One of 2.2, apply a label to the coating container stating that "THINNER MAY BE ADDED" and also supply the maximum allowable thinning ratio.

3.4.3 No later than the 10th of each month, or at the end of each job, whichever is earlier; submit one legible copy, in approved transferrable media, of a report listing the following to the SUPERVISOR:

3.4.3.1 Volume and type of each coating used the previous month.

3.4.3.2 Volume and type of thinner used the previous month.

3.4.3.3 Calculations used to determine the maximum allowable thinning ratio for each coating that was thinned the previous month.

3.4.4 All handling, thinning, and transfer of coatings, solvents, and related waste must be done in a manner that minimizes spills.

3.4.4.1 All containers of coatings, solvents, and related waste must be free of cracks, holes, and defects such as damage, dents, or ill-fitting lids or covers that compromise the integrity of the container. The containers must remain closed unless materials are being added or removed from the container.

3.4.4.2 All waste materials including rags, brushes, and rollers must be kept in tightly closed containers that minimize evaporation.

#### 4. NOTES:

4.1 Examples of paint and nonskid manufacturers may be Ameron, International, American Safety Technology, or others as applicable.

4.2 Examples of American Welding Society Classifications for welding rod may be E316-16, E7018-AL 308-16, or others. If there is no American Welding Society (AWS) classification assigned, use the product name and circle the product on the SDS.

4.3 Examples of welding applications may be Shielded Metal Arc Weld (SMAW), Gas Metal Arc Weld (GMAW), Flux Core Arc Weld (FCAW), and others.

ATTACHMENT A  
(For Option 1, 2, & 3 Thinning Requirement Use Only)  
VOC DATA SHEET

PROPERTIES OF THE COATING "AS SUPPLIED" BY THE MANUFACTURER

Coating Manufacturer:

Coating Identification:

Batch Identification:

Supplied To:

Properties of the coating as supplied to the customer:

A. Coating Density:  $(D_c)_2$  \_\_\_ g/L

\_\_\_ ASTM D 1475-90 \_\_\_ Other<sup>1</sup>

B. Total Volatiles:  $(m_v)_s$  \_\_\_ Mass Percent

\_\_\_ ASTM D 2369-93 \_\_\_ Other<sup>1</sup>

C. Water Content:

1.  $(m_v)_s$  \_\_\_ Mass Percent

\_\_\_ ASTM D 3792-91 \_\_\_ ASTM D 4017-90 \_\_\_ Other<sup>1</sup>

2.  $(v_w)_s$  \_\_\_ Volume Percent

\_\_\_ Calculated \_\_\_ Other<sup>1</sup>

D. Organic Volatiles:  $(m_o)_s$  \_\_\_ Mass Percent

E. Nonvolatiles:  $(v_n)_s$  \_\_\_ Volume Percent

\_\_\_ Calculated \_\_\_ Other<sup>1</sup>

F. VOC Content (VOC)<sub>s</sub>:

1. \_\_\_ g/L solids (nonvolatiles)

2. \_\_\_ g/L coating (less water and exempt compounds)

G. Thinner Density:  $D_{th}$  \_\_\_ g/L

\_\_\_ ASTM \_\_\_ Other<sup>1</sup>

Remarks: (use reverse side)

H. Certification:

Signed: \_\_\_\_\_ Date:

<sup>1</sup> Explain the other method used under "Remarks"

ATTACHMENT B

(For Option 4 Thinning Requirement Use Only)  
VOHAP DATA SHEET

PROPERTIES OF THE COATING "AS SUPPLIED" BY THE MANUFACTURER

Coating Manufacturer:

Coating Identification:

Batch Identification:

Supplied To:

Properties of the coating as supplied to the customer:

A. Coating Density:  $(D_c)_2$  \_\_\_\_ g/L

\_\_ ASTM D 1475-90 \_\_ Other<sup>1</sup>

B. Total Volatiles:  $(m_v)_s$  \_\_\_\_ Mass Percent

\_\_ ASTM D 2369-93 \_\_ Other<sup>1</sup>

C. Water Content:

1.  $(m_v)_s$  \_\_\_\_ Mass Percent

\_\_ ASTM D 3792-91 \_\_ ASTM D 4017-90 \_\_ Other<sup>1</sup>

2.  $(v_w)_s$  \_\_\_\_ Volume Percent

\_\_ Calculated \_\_ Other<sup>1</sup>

D. HAP Volatiles:  $(m_{hap})_s$  \_\_\_\_ Mass Percent

E. Nonvolatiles:  $(v_n)_s$  \_\_\_\_ Volume Percent

\_\_ Calculated \_\_ Other<sup>1</sup>

F. VOHAP Content (VOHAP)<sub>s</sub>:

1. \_\_\_\_ g/L solids (nonvolatiles)

2. \_\_\_\_ g/L coating (less water and exempt compounds)

G. Thinner VOHAP Density:  $D_{th(vohap)}$  \_\_\_\_ g/L

\_\_ ASTM \_\_\_\_ \_\_ Other<sup>1</sup>

Remarks: (use reverse side)

H. Certification:

Signed: \_\_\_\_\_ Date:

<sup>1</sup> Explain the other method used under "Remarks"