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|--------------------------------------------------------------------------------------------|--------------------------------|---------------------------------------------------------------|----------------------------------|
| Environmental Standard Operating Procedure                                                 |                                |                                                               |                                  |
| Originating Office:<br><b>MCAS Miramar<br/>Environmental<br/>Management<br/>Department</b> | Revision:<br><br>Original      | Prepared By:<br><br>Environmental<br>Management<br>Department | Approved By:<br><br>William Moog |
| File Name: PBD-ESOP                                                                        | Effective Date: 29 August 2007 | Document Owner: EMD                                           |                                  |

## Title: Paint Booth Dry Filter

### 1.0 PURPOSE

The purpose of this work instruction is to provide environmental guidelines for the operation of paint booths onboard Marine Corps Air Station (MCAS) Miramar.

### 2.0 APPLICATION

This guidance applies to those individuals working with paint booths onboard Marine Corps Air Station (MCAS) Miramar.

### 3.0 REFERENCES

- 40 CFR 261-262
- CAR, Titles 8 and 17
- MCO P5090.2A (USMC Environmental Compliance and Protection Manual)
- MCAS Miramar Air Quality Management Plan (AQMP)
- MCAS Miramar Hazardous Waste Management Plan (HWMP)

### 4.0 PROCEDURE

#### 4.1 Discussion:

Paint booth operations, if not properly operated, may be a source of air pollution. Because of this, it is important to ensure that the paint booth is operating properly and to ensure that all paints and solvents are within regulatory requirements.

#### 4.2 Operational Controls:

The following procedures apply:

1. Current Permit to Operate (PTO) must be posted on site at all times.

2. Ensure filters are properly in place.
3. Inspect pressure drop across filters during use.
4. Ensure the exhaust fan is operational.
5. Discard filter pads and filter rolls properly.
6. Dry freshly sprayed articles only in spaces provided with adequate ventilation.
7. Bond and ground all containers when transferring flammable liquids from one container to another.
8. Keep sprinkler heads free from paint deposits by regular cleaning.
9. Ensure fire extinguishers are adequate in spraying areas.
10. Do not spray outside of predetermined spraying areas.
11. Keep spraying areas free from the accumulation of deposits of combustible residues.
12. Post "No Smoking" signs where flammable vapors may be expected.
13. Ensure electrical system is explosion-proof (i.e., are there covers on outlets, etc.).
14. Close solvent containers except when filling.
15. Close paint cans when not in use.
16. Properly contain and dispose of product spills and clean-up materials.
17. Ensure paint residues in empty cans are dry before disposal.
18. Keep spill kit nearby.
19. Turnover folder information must be kept for this Standard Operating Procedure.
20. Contact EMD office if there are any specific situations or other concerns not addressed by the procedures for painting applications

#### **4.3 Documentation and Record Keeping:**

The following records must be maintained for paint booth management:

1. Records of the paint and solvents used, including manufacturer, type coated, and amount used per day.
2. Logbook containing the quantity of coating used and the VOC content and the total VOC emissions.

3. Paint Booth Weekly Inspection.
4. Permit.
5. Inspection and training records.

**4.4 Training:**

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

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

**4.5 Emergency Preparedness and Response Procedures:**

**CALL 9-1-1**

**4.6 Inspection and Corrective Action:**

The Environmental Compliance Coordinator (ECC) shall designate personnel to perform inspections. The ECC shall ensure deficiencies noted during the weekly inspections are corrected immediately. Actions taken to correct each deficiency shall be recorded on the weekly inspection sheet. Designated personnel shall conduct weekly inspections.

|                                               |              |
|-----------------------------------------------|--------------|
| Paint Booth Dry Filter - Inspection Checklist |              |
| Date:                                         | Time:        |
| Installation:                                 | Work Center: |
| Inspector's Name:                             | Signature:   |

| Inspection Items                                             | Yes                      | No                       | Comments |
|--------------------------------------------------------------|--------------------------|--------------------------|----------|
| 1. Is the permit posted on-site?<br><i>(AQMP)</i>            | <input type="checkbox"/> | <input type="checkbox"/> |          |
| 2. Are the filters in place and functional?<br><i>(AQMP)</i> | <input type="checkbox"/> | <input type="checkbox"/> |          |
| 3. Is the manometer functioning?<br><i>(AQMP)</i>            | <input type="checkbox"/> | <input type="checkbox"/> |          |
| 4. Is the exhaust fan functional?                            | <input type="checkbox"/> | <input type="checkbox"/> |          |

|                                                                                                                                                                     |  |  |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| (AQMP)                                                                                                                                                              |  |  |  |
| 5. Are filter pads and filter rolls discarded properly?<br>(CAR 8\I\4\7\20\137\5447(a)(3))                                                                          |  |  |  |
| 6. Are freshly sprayed articles dried only in spaces provided with adequate ventilation?<br>(CAR 8\I\4\7\20\137\5450(k))                                            |  |  |  |
| 7. Are all containers bonded and grounded when transferring flammable liquids from one container to another?<br>(CAR 8\I\4\7\20\137\5451(e))                        |  |  |  |
| 8. Are "No Smoking" signs posted where flammable vapors may be expected?<br>(CAR 8\I\4\7\20\137\5453(m) and 5460(j))                                                |  |  |  |
| 9. Are spraying operations only conducted in predetermined spraying areas?<br>(CAR 8\I\4\7\20\137\5453(a))                                                          |  |  |  |
| 10. Are spraying areas kept free from the accumulation of deposits of combustible residues?<br>(CAR 8\I\4\7\20\137\5447(a)(6) and 5453(c))                          |  |  |  |
| 11. Are sprinkler heads kept free from paint deposits by regular cleanings?<br>(CAR 8\I\4\7\20\137\5452(d))                                                         |  |  |  |
| 12. Is the electrical system explosion-proof? (i.e., are there covers on outlets, etc.)?<br>(CAR 8\I\4\7\20\137\5449(f))                                            |  |  |  |
| 13. Is a logbook maintained that includes the type of coating used and the limit?<br>(AQMP)                                                                         |  |  |  |
| 14. Does the logbook contain the quantity of coating used and the VOC content and the total VOC emissions?<br>(AQMP)                                                |  |  |  |
| 15. Is the logbook maintained on-site for a minimum of 2 years?<br>(AQMP)                                                                                           |  |  |  |
| 16. Has an application for an Authority to Construct been submitted before making any modifications/repairs on the spray booth?<br>(CAR 17\3\7.5\93102.5(b)(17)(B)) |  |  |  |
| 17. Are records kept of the paint and solvents used, including manufacturer, type coated, and amount used per day?<br>(AQMP)                                        |  |  |  |
| 18. Do all thinners or solvents in use have a VOC less than 200 grams per liter?                                                                                    |  |  |  |

|                                                                                                                                                        |  |  |  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| (AQMP)                                                                                                                                                 |  |  |  |
| 19. Is the total amount of VOC emitted less than 240 pounds in any one day?<br>(AQMP)                                                                  |  |  |  |
| 20. Are paint, product spills, clean-up materials, and used filters properly contained, disposed of, and reported?<br>(40 CFR 261.3(a)(2)(i) and (ii)) |  |  |  |
| 21. Are training and inspection records maintained and available for inspection?                                                                       |  |  |  |

**ADDITIONAL COMMENTS:**

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**CORRECTIVE ACTION TAKEN:**

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**Environmental Compliance Coordinator**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

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