

Environmental Standard Operating Procedure			
Originating Office: Environmental Management Department	Revision: Original	Prepared By: Environmental Management Department	Approved By: William Moog
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Title: Paint Removal-Dry Abrasive Blasting

1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for paint removal through the use of dry abrasive blasting.

2.0 APPLICATION

This guidance applies to those individuals performing paint removal through the use of dry abrasive blasting onboard Marine Corps Air Station (MCAS) Miramar.

3.0 REFERENCES

- 29 CFR (Code of Federal Regulations)
- 40 CFR
- MCO P5090.2A (USMC Environmental Compliance and Protection Manual)

4.0 PROCEDURE

4.1 Discussion:

Certain paint operations require that paint be removed from the intended surface through the use dry abrasive blasting. Paint removal through the use of dry abrasive blasting can be harmful to the environment. It is critical to ensure that paint removal is performed according to guidance and that all agents used for dry abrasive blasting comply with regulatory requirements.

4.2 Operational Controls:

The following procedures apply:

1. Ensure MSDS are readily available and current.
2. Ensure personnel have had proper training on the equipment used for dry-abrasive paint removal.

3. Ensure that dry-abrasive sandblasting is performed in an enclosed unit for authorized locations aboard the installation. This is to prevent airborne contaminants from entering in the air.
4. Portable sand-blasting equipment shall be operated by contractors. Before usage, contractors must go through the REIR process. Contact Environmental Management Department for further information.
5. MCAS Miramar personnel will only use MCAS Miramar approved dry abrasive materials for paint removal blasting.
6. Use only CARB approved dry abrasive material for paint removal.
7. Ensure the paint removal dry-abrasives being utilized are on the unit's Hazardous Material Authorization Use List.
8. Lead base paint removal is strictly prohibited unless the effected area is completely enclosed.
9. Ensure that a permit is obtained if paint removal equipment (portable compression ignition engine) is greater than 50 brake horsepower (bhp).
10. Ensure all conditions of permits are adhered to. (If applicable)
11. Ensure PTO is posted. (If applicable)
12. Ensure that unused dry-abrasive materials used for paint removal are properly disposed of.
13. Ensure proper PPE (Personal Protective Equipment) is in use to include respiratory protection as applicable.
14. Ensure fire extinguishers are spaced adequately and available in work areas.
15. Do not perform paint removal operations outside of predetermined work areas or outside of enclosed equipment.
16. Post "No Smoking" signs where flammable vapors may be expected.
17. Properly contain and dispose of used products and clean-up materials.
18. Keep spill kit nearby.
19. Maintain a dry abrasive removal logbook consisting of the following:
 - a. Hours of operation.
 - b. Type and amount of material used or removed.
20. Turnover folder information must be maintained for this Standard Operating Procedure (SOP).
21. If there are any specific situations or other concerns not addressed by this procedure, contact MCAS Miramar Environmental Management Department.

4.3 Documentation and Record Keeping:

The following records must be maintained:

1. MSDS for dry-abrasive material being used.
2. Inspection and training records.
3. Dry-abrasive removal logbook.

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.
3. Operation and requirements for performing dry-abrasive paint removal.

4.5 Emergency Preparedness and Response Procedures:

Refer to: Marine Corps Order (MCO) P5090.2A, Environmental Compliance and Protection Manual; Chapter 7; Emergency Planning and Response.

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 Removal - Dry Abrasive Blasting - Inspection Checklist	
Date:	Time:
Installation:	Work Center:
Inspector's Name:	Signature:

Inspection Items	Yes	No	Comments
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1. Are MSDSs readily available and current? <i>(29 CFR 1910)</i>			
2. Have personnel had proper training on the equipment used for dry-abrasive paint removal? <i>(29 CFR 1910)</i>			
3. Is dry-abrasive sandblasting performed in an enclosed unit to prevent any contaminants from entering the air? <i>(29 CFR 1910)</i>			
4. Are only MCAS Miramar-approved materials for paint removal blasting used?			
5. Are unused dry-abrasive materials stored properly in accordance with the MCAS Miramar Hazardous Material Storage ESOP? <i>(29 CFR 1910)</i>			
6. Is paint removal equipment greater than 50 bhp; if so, has a permit been obtained?			
7. Is the PTO posted on site? (If applicable)			
8. Are the conditions of the PTO being adhered to? (If applicable)			
9. Is proper PPE used by the operator including respiratory protection as applicable? <i>(29 CFR 1910)</i>			
10. Are paint removal operations performed outside of predetermined working areas and/or outside of enclosed equipment? <i>(29 CFR 1910; 40 CFR)</i>			
11. Are “No Smoking” signs posted where flammable vapors may be expected? <i>(29 CFR 1910)</i>			
12. Is a spill kit maintained nearby? <i>(29 CFR 1910)</i>			
13. Are fire extinguishers stored near potentially flammable materials? <i>(29 CFR 1910)</i>			
14. Is PPE kept near any areas with potential health hazards? <i>(29 CFR 1910)</i>			
15. Is logbook maintained consisting of the following: a. Hours of operation. b. Type and amount of material used or removed.			
16. Are training and inspection records maintained and			

available for inspection? (MCO P5090.2A 9104.1(k)(5)- inspection only)			
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ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Environmental Compliance Coordinator

Name: _____

Signature: _____

Date: _____