

AEROSOL PAINTING

1. Version, Date. 3, 14 May 2013
2. Purpose. This Environmental Standard Operating Procedure (ESOP) summarizes the procedures for conducting aerosol painting at Marine Corps Base, Quantico (MCBQ). These procedures are implemented to ensure compliance with state and Federal regulations, and Marine Corps and Department of Defense (DoD) orders, as referenced in paragraph 11.
3. Applicability
 - a. Audience. The procedures described in this ESOP apply to all MCBQ personnel involved in aerosol painting.
 - b. Scope. This ESOP addresses aerosol spray painting from aerosol cans. This type of painting is conducted utilizing spray paint cans for touch-up painting of equipment. Refer to ESOP #27 (Paint Gun Use and Cleaning) for procedures for painting from a High Pressure, Low Volume Paint (HVLV) Gun.
4. Definitions. The following definitions are provided to support this procedure:
 - a. Authorized Use List (AUL): A list of approved hazardous materials (HM) necessary to support the mission requirements of the command, facility, or activity. The AUL includes all consumer-use types of HM utilized aboard MCB Quantico as per Marine Corps Base Order (MCBO) 6280.4. For specific information, please contact 432-0539.
 - b. Paint Booth: An enclosure that limits the escape of paint, vapor, and residue.
 - c. Spray Painting: a painting technique where a device sprays a coating through the air onto a surface.
5. Responsible Parties. The following parties are responsible for aerosol painting activities at MCBQ:
 - a. Any personnel utilizing aerosol spray paint cans for painting operations.
 - b. G-5, Natural Resources and Environmental Affairs (NREA) Branch, Environmental Compliance Section.

6. Procedures for Aerosol Painting (Instructions for Operational Control). The following procedures are implemented to minimize the potential release of volatile organic compounds (VOCs) in paint. Aerosol paint cans also have specific disposal requirements, depending on if paint is still in the can when disposed and whether or not the unit has an aerosol can crusher.

a. Only conduct aerosol painting operations in approved or well ventilated areas.

b. Ensure that all aerosol paints used in the work center are included on the AUL for that work center. A work center that requires aerosol paint not on the current AUL should complete and submit a Hazardous Material Authorization Request Approval Form to the Natural Resources Environmental Affairs Branch, G-5 Division for review and approval.

c. When not in use, store all aerosol paint cans inside flammable lockers.

d. Prohibit smoking in areas where aerosol painting operations are occurring and post "NO SMOKING" signs around approved painting areas.

e. Utilize aerosol paint can puncturing device to remove residual contents of spray cans and then manage cans as recyclable scrap metal. DO NOT STORE EMPTY CANS THAT HAVE NOT BEEN PUNCTURED. If aerosol paint can puncturing device is not available, contact NREA at (703)784-4030 for disposal assistance.

f. If using aerosol paints inside a paint booth, maintain paint usage logs and provide to the NREA Air Program Manager on a monthly basis.

7. Inspections and Corrective Actions. Currently, the only inspection associated with this practice is to check the filters associated with the aerosol can puncture device on an annual basis. If the filter needs to be replaced, contact NREA at (703)784-4030 for disposal assistance prior to removal. The used filter must be managed as hazardous waste.

8. Internal Communication

a. Ensure accurate records are maintained on all aerosol painting activities conducted in a paint booth, including the amount of paint used. These records must be provided to the NREA Air Program Manager.

b. In the event of a release of paint, immediately notify the NREA at (703) 784-4030.

9. Training/Awareness. Hazard Communication (HAZCOM) training provides workers awareness training relevant to the properties and potential health and safety hazards associated with the materials they are exposed to in the workplace. All individuals working with aerosol paint as part of their normal duties should receive appropriate HAZCOM training.

10. Emergency Preparedness and Response. The likelihood of a release of aerosol paint from cans is minimal; the main release potential is a release from a can being punctured or ruptured due to exposure to high heat or open flame. Following the procedures listed in Section 6 above should serve to minimize the potential for a release.

11. References and Related Documents. The following references are relevant to this procedure:

- a. Marine Corp Base Quantico, Virginia Title V Operating Permit, 2 September 2003.
- b. MCO 4450.12, Storage and Handling of Hazardous Materials.
- c. MCO P5090.2A, Environmental Compliance and Protection Manual.
- d. MCBO 6240.2, Air Pollution Episodes.
- e. MCBO 6280.1B, Handling, Transfer, and Disposal of Hazardous Materials and Hazardous Waste.
- f. MCBO 6280.4, Hazardous Material Management Program.

12. Document Revision History. The following provides a history of revisions of this ESOP:

| Revision Number | Date | Revision Made By | Section | Page | Summary of Change and Reason | Signature |
|-----------------|-------|------------------|---------|------|------------------------------|------------|
| 2 | 11/12 | AM | Air | 1&2 | Paragraphs 6.e & 7 updated | electronic |
| 3 | 5/13 | DG | EMS | 1 | Def. Para 4.b removed & 13.b | JDG |
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13. Document Owner. This document has been reviewed and approved by the practice owners. Should the practice change, resulting in a need to modify this ESOP, practice owners will notify the NREA Branch, EMS Section at 432-0536.

- a. Document Owner. NREA Branch, Environmental Compliance Section.
- b. Document Approval. Chair, E²MS Implementation Team, NREA Branch