



# MCB Camp Pendleton Environmental Standard Operating Procedure

17 October 2017

## Coating and Adhesive Applications

Applications of coatings and adhesives within San Diego County are regulated by the San Diego Air Pollution Control District (SDAPCD) due to the potential for these activities to emit particulate matter and/or volatile organic compounds (VOCs).

On Camp Pendleton, all coating and adhesive activities that generate particulate matter or VOC emissions require an air quality permit to operate, issued by the SDAPCD, unless one of the following permitting exemptions applies.

### Permitting Exemptions

1. Powder coating operations that apply less than 0.5 gallons per day of any surface preparation or cleaning material containing VOCs.
2. Application equipment and processes used exclusively to apply coatings and/or adhesive materials to stationary structures and/or their appurtenances at the site of installation, portable buildings including mobile homes at the site of installation, pavement, and curbs. This exemption does not apply to application equipment and processes where coatings or adhesive materials are applied in off-site shops or to non-stationary structures such as airplanes, ships, boats, railcars, and automobiles.
3. Any coating or adhesive material application operation (portable or stationary) that apply 20 gallons or less of liquid coatings or adhesive materials per consecutive 12-month period.
4. Any coating or adhesive material application operation at a stationary source, where the VOC emissions from such operation are 150 pounds or less per consecutive 12-month period, excluding surface preparation and cleanup solvents.
5. Coating operations that exclusively use non-refillable handheld aerosol spray containers.

### Definitions

*“Coatings”* are materials that can be applied as a thin layer to a substrate and which either dries or cures to form a continuous solid film or impregnates a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealers, lacquers, and stains.

*“Particulate matter”* is a complex mixture of very tiny solid or liquid particles, composed of chemicals, soot, and dust. Particulate matter emissions can be generated from paint overspray during coating application processes.

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“VOCs” are compounds in paints, solvents, and adhesives that readily vaporize from the liquid phase at ambient temperatures.

## Procedures and Requirements

1. Contact the Environmental Security (ENVSEC) Department’s Air Quality Section at 760-725-9756 to determine whether any of the aforementioned exemptions to permitting apply.

2. If a permit is not required:

a. Use only approved paint and painting products that are on the unit’s Hazardous Material Authorization Use List (AUL).

b. Maintain a current list of coatings, strippers, thinners, additives, surface preparation, and cleaning materials in order to verify VOC compliance. Update the material inventory as necessary to ensure accuracy; at a minimum, review the inventory quarterly. Contact ENVSEC (Air Quality) for assistance and examples on how to properly maintain these inventories.

c. Maintain, and retain on site for no less than three years, daily usage logs to record the daily use and VOC content of coatings and/or adhesives applied as well as monthly purchase records for all coatings/adhesives.

3. If a permit is required:

a. Obtain a permit through ENVSEC (Air Quality) **before conducting any coating or adhesive activities**. The permitting process generally requires at least 90 days.

b. Strictly comply with all conditions specified in the permit acquired through ENVSEC.

c. Post a copy of the air permit within 25 feet of the coating and/or adhesive application equipment.

d. Air permits specify approved paints, coatings, and adhesives authorized for use, as well as the quantity and methods in which they may be applied. Any changes in application process may require a new or modified permit. For any instances where new materials or processes are necessary, contact ENVSEC (Air Quality) at 760-725-9756.

e. Only apply coatings and adhesives at locations sites specifically designated in the permit. Multiple types of coatings (i.e. metal parts and wood products) may occur under a single permit as long as the multiple processes are expressly mentioned in the permit.

f. Appoint a Paint Site Officer responsible for daily compliance with recordkeeping and proper equipment operation. This person is often the unit’s Environmental Compliance Coordinator or an individual appointed by the Environmental Compliance Coordinator.

g. Maintain a current list of coatings, strippers, thinners, additives, surface preparation, and cleaning material in order to demonstrate VOC compliance. Update the material inventory as necessary

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to ensure accuracy; at a minimum, review the inventory quarterly. Contact ENVSEC (Air Quality) for assistance, and examples on how to properly maintain these inventories.

h. Maintain, and retain on site for no less than three years, daily usage logs to record the daily use and VOC content of coatings and/or adhesives applied. Each type of coating/adhesive operation requires a usage log; additionally, each application site designated in the permit requires a separate log as well, regardless if performing the same type of coating and/or adhesive application.

## 4. Paint Gun cleaning

a. Wood Coatings (Rule 67.11). Use a closed container that minimizes evaporation of cleaning solvents to the atmosphere or use a cleaning material that contains 25 grams or less of VOC per liter.

b. Metal Parts & Products (Rule 67.3), Marine Coatings (Rule 67.18), and Motor Vehicle/Mobile Equipment Coatings (Rule 67.20.1). Use a closed container that minimizes evaporation of cleaning solvents to the atmosphere. If a closed container cannot be used, use a cleaning material such as acetone that contains less than 200 grams/liter VOC, has an initial boiling point of 374 degrees Fahrenheit or greater, or has a total VOC vapor pressure of 20 mm Hg or less at 68 degrees Fahrenheit.

## References

1. SDAPCD Rule 11 – Exemptions from Rule 10 Permit Requirements
2. SDAPCD Rule 67.3 – Metal Parts & Products Coating Operations
3. SDAPCD Rule 67.11 – Wood Products Coating Operations
4. SDAPCD Rule 67.18 – Marine Coating Operations
5. SDAPCD Rule 67.20.1 – Motor Vehicle and Mobile Equipment Coating Operations

Use and Version Control: Camp Pendleton uses Environmental Standard Operating Procedures (ESOPs) to augment instructions contained in official orders and directives and, where necessary, to provide for sufficient control of the installation's significant practices. Camp Pendleton maintains the authoritative, current version of this and other ESOPs on the Camp Pendleton website at:

<http://www.pendleton.marines.mil/Staff-Agencies/Environmental-Security/Document-Library/Environmental-Standard-Operating-Procedures/>