



Best Management Practices – Graving Dock

As of 05/26/10

The following Best Management Practices (BMPs) should be used in the Graving Dock to ensure compliance with facility operating permits.

When work is being done in the graving dock, all precautions should be taken to prevent particulate matter, paint, wastewater, and oil from contaminating the environment.

Before flooding the graving dock, the dock floor should be cleaned of all debris, and cleaned again before work is to begin once the dock is emptied. Drains and trenches should be covered as appropriate depending on the type of work to be done. Containment curtains/units shall be hung, as necessary. Absorbent boom should be deployed as a preventative measure and as appropriate in the trenches in the dock.

Abrasive Blasting:

If blasting is to be performed in the graving dock, the activity should be managed to prevent or minimize emissions of abrasive and spent material to the environment. Blasting shall not take place if high winds prevent proper containment. Abrasive and spent material should be stored, handled, and managed in a manner that prevents or minimizes it from blowing offsite or into adjacent waterways. Abrasive and spent materials should not be disposed of to air or water bodies, or to drains, drainage channels, or trenches that lead to water bodies. The tenant is responsible for containing abrasive material to prevent it from washing into the drainage trenches. Rain water contact with abrasive material shall be minimized.

Hydroblasting:

When performing hydroblasting, water jetting, or wet abrasive blasting, the wash water should be managed to prevent or minimize the discharge of abrasive and spent material to water bodies. The wash water is to be collected and solids removed prior to discharge to a sewer system in accordance with the Industrial Users Wastewater Discharge Permit. Wash water cannot be

discharged through the drainage system in the floor of the dock. Wash water must be collected for disposal.

When hydroblasting to remove paint, tenant must enclose or cover drains, trenches, or openings in the work area. If detergents or additives are added to pressure wash and/or wet blasting water, they should be biodegradable and free of phosphate.

General blasting:

In the case of both abrasive blasting and hydroblasting, if it is known that copper and/or TBT is present in the paint or coatings to be blasted on a vessel, BWI personnel must be notified before work on the vessel begins, so proper sampling measures can be implemented.

Throughout the blasting work period, the dock floor should be kept clean and free of debris to the extent practical, and the dock floor shall be broom cleaned at the end of each work day.

Shipboard cooling water and hydrostatic testing water shall be directed away from contact with spent abrasive, paint, and other debris. Shipboard cooling water and hydrostatic testing water shall not make contact with the deck of the dock during work periods other than installed drains.

Painting:

Prior to beginning painting activities, the following information on the paint to be used along with the MSDS must be submitted to BWI personnel: a copy of the paint contents, including coating type and estimated quantity to be used, VOC (volatile organic compound) content, thinning solvent type and estimated quantity to be used, and as-applied VOC content (lb/gal). Information regarding the ratio of paint to thinner must also be provided prior to beginning activities. Please see the attached example reporting form.

All paint to be used at the graving dock must comply with the standards found in Table 2 of Subpart II of Part 63 for the National Emissions Standards for Shipbuilding and Ship Repair.

Paint shall not be stored in the graving dock; only that amount which shall be used during a work day shall be in the graving dock at any time.

Procedures for clean-up for painting activities in the graving dock should be followed in accordance with permit requirements, as follows. Residual blast media should be swept up and stored in appropriate containers at the end of each work day. Spray guns should be emptied of paint prior to cleaning and should be cleaned promptly after use to reduce the solvent requirements during cleanup. Gun pressures should be lowered during cleaning, and recovered solvents used during cleaning should be stored in closed containers. Waste solvent containers should remain covered as much as practical to prevent evaporation, and solvent soaked rags from cleaning operations should be stored in sealed containers or bags for proper disposal.

Other operations at the Graving Dock:

All sewage from vessels shall be removed and disposed of by a commercial waste disposal company. Black and/or gray water from vessels cannot be discharged into the river or sewer system. Notify BWI personnel immediately upon discovery of any spill.

During the drydock period, oil, grease, or fuel spills shall be prevented from reaching State waters. Cleanup shall be carried out promptly after a spill is detected. Oil contaminated materials shall be removed from the drydock as soon as possible, and always prior to flooding.

Preventative measures, such as, but not limited to, the deployment of absorbent booms in the trenches and sump and containment around work areas, shall be implemented by the tenant.

The following discharges are expressly prohibited under the facility's National Pollution Discharge Elimination System (NPDES) permit:

- Hydroblast wastewater;
- Sanitary wastewater;
- Bilge or ship ballast water contaminated by oils, solvents, detergents, or other additives (bilge or ship ballast water with visible oil sheen shall be considered contaminated);
- Tank cleaning water;
- Gray water from vessels, either with sewage or separately;
- Water contaminated with spent abrasive material paint, oils, fuel, lubricants, solvents, or petroleum;
- Steam cleaning wastewater;
- Ship-generated process water;
- Graving dock sump water after containing hydroblast water until the sump has been purged following such use; and
- Any wastestream not explicitly authorized by this permit.