

PAINT GUN USE/PAINT GUN CLEANING

1. Version, Date. 2, 14 May 2013
2. Purpose. This Environmental Standard Operating Procedure (ESOP) summarizes the procedures for compliant paint gun use and paint gun cleaning 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. These procedures apply to all MCBQ personnel involved in paint gun usage and cleaning of paint guns. Paint guns are used to conduct painting operations at four locations on base: Larson Gym, Transportation Branch (Motor T), and two hangars (Buildings 2134 and 2133A) at the Marine Helicopter Squadron One (HMX-1).
 - b. Scope. This ESOP addresses painting operations utilizing paint guns and the cleaning of paint guns. Aerosol Painting is addressed in a separate ESOP (ESOP #26).
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. High Volume, Low Pressure (HVLP) Painting. Method and associated paint nozzle which operate at lower pressure levels than traditional air powered paint guns.
 - c. Paint Booth. An enclosure that limits the escape of paint, vapor, and residue.
 - d. Spray Painting. Painting technique where a device sprays a coating through the air onto a surface.
5. Responsible Parties. The following parties are responsible for air-operated painting activities at MCBQ:
 - a. Any shop using and/or cleaning paint guns.

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b. G-5, Natural Resources and Environmental Affairs (NREA) Branch, Environmental Compliance Section.

6. Procedures for Paint Gun Use and Paint Gun Cleaning (Instructions for Operational Control). The following procedures are implemented to minimize the potential release of volatile organic compounds (VOCs) in paint, as well as in solvent used to clean paint guns. These procedures will be discussed in two categories: paint gun use and paint gun cleaning.

a. Paint Gun Use Requirements. The following requirements are related to paint gun use at MCBQ:

(1) The only paint guns that should be used for coating operations at MCBQ are HVLP paint guns.

(2) Only conduct paint gun operations in approved, well ventilated areas.

(3) Ensure that all paints used in paint gun operations are included on the AUL for that work center. A work center that requires paint not on their current AUL should complete and submit a Hazardous Material Authorization Request Approval Form to the NREA Branch, G-5 Division for review and approval.

(4) When not in use, store all hazardous materials (HMs) associated with paint operations in flammable lockers, as applicable.

(5) Prohibit smoking in areas where paint gun operations are occurring and post "NO SMOKING" signs around approved painting areas.

(6) Discard paint in accordance with the Hazardous Waste Management Plan.

(7) When transferring HMs associated with paint operations, ensure containers are placed on level surfaces.

(8) Maintain paint usage logs and provide them to the NREA Air Program Manager on a monthly basis.

b. Paint Gun Cleaning Requirements. All units that use paint guns have also been supplied with a paint gun cleaner to remove residual paint from the paint guns following use.

(1) Paint guns will be cleaned using only the solvent cleaning unit provided for this purpose.

(2) Paint guns will be cleaned following every use.

(3) Follow all recommended procedures provided in each owner's manual.

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(4) Do not add or remove solvent from the cleaning system. Contractors will add or remove solvent as needed and manage the spent solvent.

7. Inspections and Corrective Actions. It is recommended that all HVLP paint guns and cleaning units be inspected prior to use to ensure that all equipment is in working condition.

8. Internal Communication

a. Ensure accurate records are maintained on all paint operations, 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 with 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 HMs as part of their normal duties should receive appropriate HAZCOM training.

10. Emergency Preparedness and Response. The likelihood of an accidental release from paint gun operations is minimal; the main release potential is a release from a supply container being punctured or ruptured due to improper storage or transport. Adherence to the procedures described in Section 6, above, should serve to minimize the potential for a release. In the event of an accidental release of paint, immediately notify the NREA at (703) 784-4030.

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

a. Marine Corp Base Quantico, Virginia Title V Operating Permit, 02-Sept-03.

b. MCO 4450.12, Storage and Handling of Hazardous Materials.

c. MCO P5090.2A, Environmental Compliance and Protection Manual.

d. MCBO 6240.2A, Air Pollution Episode, Standby Emission Reduction Plan and Open Air Burning Policy.

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:

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Revision Number	Date	Revision Made By	Section	Page	Summary of Change and Reason	Signature
2	5/13	JDG/AM	EMS/Air	all	Updated to match current requirements and grammar	JDG

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 Coordinator at 432-0525.

a. Document Owner. NREA Branch, Environmental Compliance Section.

b. Document Approval. Chair, E²MS Implementation Team, NREA Branch.