

Important Note: The following text is excerpted directly from the New York State Department of Environmental Conservation's publication, *Environmental Compliance, Pollution Prevention, and Self Assessment Guide for the Marina Industry*. New York State Department of Environmental Conservation Pollution Prevention Unit. March 2003. The only changes that have been made are the addition of links to pertinent resources or regulations and Editor's Notes, where appropriate.

Coating Operations

REGULATORY REQUIREMENTS

If your marina performs any painting or coating operations, a hazardous waste determination must be made on waste paint, solvents/thinners, paint sludge, primer waste, and spray booth filters. The paints and paint sludges may be hazardous if they contain heavy metals, such as arsenic, lead and chromium. The solvents may be characteristically hazardous due to their ignitability or they could be a listed hazardous waste. Also, many primers, lacquers, and enamels are flammable.

During metal coating operations, volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) are released into the environment. These pollutants are regulated under the Clean Air Act. To learn more about these requirements, refer to the [section on air regulations, http://www.seagrant.sunysb.edu/marinabmp/section2/pdfs/air_regs_compliance_all.pdf](http://www.seagrant.sunysb.edu/marinabmp/section2/pdfs/air_regs_compliance_all.pdf).

BEST MANAGEMENT PRACTICES

Here are some tips on minimizing the waste from coating operations:

- Train employees in paint application

techniques. Proper training in correctly applying paint can reduce your waste and VOC emissions.

- Make sure your facility uses high-volume/low-pressure (HVLP) spray guns. These spray guns have transfer efficiencies of about 60 to 80 percent compared to standard spray guns with less than 50% efficiency.
- Train employees in the proper cleaning and maintenance of equipment. This is essential for achieving a high quality finish, especially in the new spray guns.
- Perform all spray painting in an enclosed spray booth equipped with filters.
- When cleaning spray guns with solvents, use smaller diameter tubing so that you will use less solvent.
- The solvent used to clean spray guns can be reused to thin paint of the same color.
- If possible, switch to water-based paints and primers.
- Switch from lacquer to enamel-based paints. Lacquer paints may contain 70 to 90 percent solvent by volume, while enamels contain 55 to 75 percent solvent by volume.