

# Scraping and Sanding

## Potential Environmental Impacts:

Hull paints can contain heavy metals and volatile organic compounds (VOCs). Sanding chips and dust that fall onto the ground can enter a marina basin through stormwater runoff. Paint chips and sanding debris can be particularly dangerous when ingested by shellfish, as other animals, including humans, ingest shellfish.

## Legal Requirements:

- You must determine if your sanding dust is hazardous [40 CFR 262.11; RCSA §22a-449(c)-102(a)(2)(A)]. If it is hazardous, it must be managed as described in Appendix B.
- If there is a stormwater discharge from your facility, you may have to register for a *General Permit for the Discharge of Stormwater Associated with Industrial Activity* (“Stormwater General Permit”). See Appendix F for more information.

## Best Management Practices:

- ✦ Conduct sanding and scraping away from the water’s edge. Designate an upland area for debris-producing maintenance such as scraping, sanding, and sandblasting. The boat maintenance area can be a temporary structure or plastic sheeting provided to minimize the spreading of dust and windblown material. The work area should be well marked with signs.
- ✦ Place drop cloths or tarps under vessels when sanding or scraping. Weight the bottom edges of tarps and drop clothes to keep them in place.
- ✦ Consider installing an impervious pad for conducting debris-producing maintenance.
- ✦ Clean up all debris, trash, sanding dust, and paint chips immediately following any maintenance or repair activity. When sanding or grinding hulls over a paved surface, vacuuming or sweeping loose paint particles is the preferred cleanup method. Do not hose the debris away.
- ✦ Avoid scraping or sanding on windy days, unless conducting activity in an enclosed maintenance structure.
- ✦ Use dustless or vacuum sanders when sanding. These tools can collect over 98% of dust generated instead of releasing it into the air. Workers can use this equipment without full suits or respirators and have less cleanup when the job is done.
- ✦ Require customers and contractors to use dustless or vacuum sanders. Rent or loan the equipment to them.
- ✦ Post signs indicating the availability of the dustless or vacuum sanders.
- ✦ Provide a collection drum for the dust from vacuum sanders and other scraping debris.

- ⊛ Restrict or prohibit sanding and scraping boats which are in the water, to the greatest extent practicable.
- ⊛ If sanding, scraping or grinding must take place while the boat is in the water, use tarps and sheeting installed between the vessel being worked on and the floats or walking surface to prevent dust, paint chips, debris, or other materials from falling or being blown into the water. The sheeting should have a tight seal to the vessel and adjacent surfaces to prevent leakage of particulates outside the work area. Remove the sheeting carefully to prevent the loss of accumulated waste material into the water.

### Checklist for Clean Marina Certification:

- ✓ Do you put tarps or drop clothes under boats to catch chips and drips while scraping, sanding and painting boats on the upland?

YES      NO      N/A