

VIGOR MARINE LLC
TITLE V REQUIREMENTS FOR ALL PAINTS AND
SOLVENTS USED AT VIGOR'S HARBOR ISLAND
SHIPYARD IN SEATTLE

Rev: 9-01-16

Paint Purchases / Paint Manufacturer Vendors:

The following apply to all Purchase Orders for the purchase of coatings / paints and solvents:

SDS Sheets and VOC DATA Sheets for each batch of each coating and solvent are required with each shipment delivered to the shipyard.

Subcontractors, Customers or Business Partners:

1. This is a Title V compliant shipyard. All paint and solvent materials used at Vigor will be VOC compliant. All paint and solvent materials used at Vigor are subject to Title V regulations. Those regulations require that SDS sheets and VOC Data Certification Sheets are to be supplied with each batch of each coating. For vessels arriving into the shipyard, shipping manifests or visual inspection is required to verify that either there is no paint or solvent materials onboard or to document what paint is onboard to determine if it may be used while in the shipyard. All paint and solvent materials being brought to the shipyard by land will be routed through the Receiving Department for count and collection of documentation. All paint, solvent materials, and Data Sheets will be forwarded to Vigor's Environmental Department to verify compliance with Vigor's Title V Permit and for labeling. After labeling, all paint and solvent materials will be sent to the appropriate laydown area or job site. The first shipment of paint and / or solvent materials of each job for each user will be signed for as proof of training prior to being released to the contractor. To avoid delays to production, please provide documentation and have shipments arrive at least 48 hours in advance of when you will need product.
2. In addition, each paint crew that is working will be required to understand the information / instructions included on the Title V labeling so that such information can be followed. Training will be available and is required for all paint crews. Each paint crew will be required to fill out and hand in a Paint Crew Daily Usage Form (format supplied by the Environmental Department) to the Vigor Environmental Department.

The Daily Usage Form is an important requirement. Please ensure that the Environmental Department receives these forms each week if not more regularly. Failure to provide these forms in a timely and complete fashion may result in back charges to the subcontractor for our time to chase these down.

3. Title V of the Clean Air Act requires that all paint and solvent containers are kept closed except, when pouring from, to prevent evaporation of solvents. Title V requires daily checks of all containers, transfer equipment, and application equipment for leaking, spilling, etc. If and when these conditions are found, full cooperation from each subcontractor to repair or contain the problem is required.
4. Separation and labeling of waste components generated by the coatings operation is required. Separation is defined as collecting the waste solvents separately as an independent waste stream as compared to paint liquids and solids and as compared to solvent rags (three separate streams). Labeling is defined as tagging each load designated to the Hazardous Waste Station with the job name, item, and name of contractor.

Vigor's preference is to have waste paint and spent thinner poured into separate 55 gallon drums at the job site. These drums are available from Vigor. Ask your Superintendent as needed.

5. Our common goal is to demonstrate compliance to the Puget Sound Clean Air Agency and ultimately the EPA. There is no latitude to not comply as the fine is \$25,000 per day. The Vigor Environmental Department is available to help as needed. Email: Environmental@Vigor.net.