

SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

2010 MAR 16 A 10:10

**KNIGHT
& CARVER**
YACHTCENTER
SAN DIEGO BAY

Supporting Document No. 4
Item No. 8
August 11, 2010

Giovanni LoCoco
VP Operations
Knight & Carver YachtCenter
1313 Bay Marina Drive
National City, CA, 91950
Cell: (619) 778-7120

Vincente Rodriguez
California Environmental Protection Agency
California Regional Water Quality Control Board

Tuesday, March 16, 2010

AMMENDMENT TO EXISTING KNIGHT & CARVER YACHTCENTER WASTE WATER

FLOW SCHEMATIC TO INCLUDE DRY DOCK

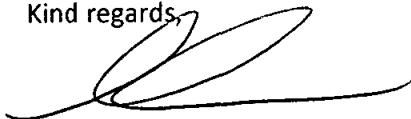
Order # R9-2005-0149

NPDES Permit # CA0109088

Dear Mr. Rodriguez,

Knight & Carver YachtCenter wish to amend its current NPDES permit to include a 4000 ton dry dock which will be moored adjacent the main work @ the Knight and Carver YachtCenter facility. The dry dock is equipped with a burm/curb system to contain rain/wash down water, the water will then be pumped land side via a transfer pump and hose to two 3,000 gallon containment tanks, the water will then be discharged from the tanks to the existing hydro wash sump which is connected to the existing waste water system. Please see attached revised site map indicating the addition of dry dock and associated system.

Kind regards,



Giovanni LoCoco

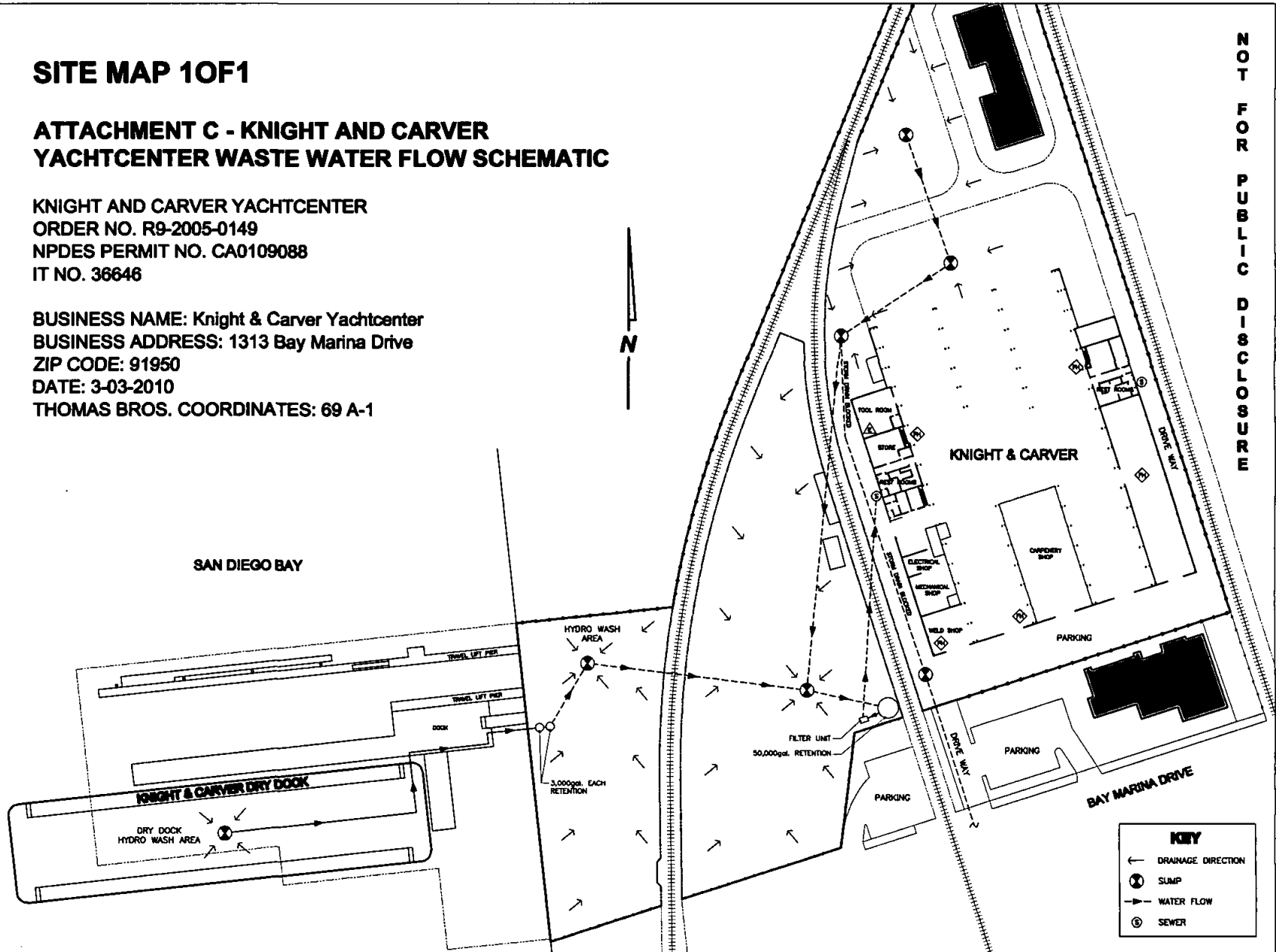
Attachment D

SITE MAP 10F1

ATTACHMENT C - KNIGHT AND CARVER YACHTCENTER WASTE WATER FLOW SCHEMATIC

KNIGHT AND CARVER YACHTCENTER
ORDER NO. R9-2005-0149
NPDES PERMIT NO. CA0109088
IT NO. 36646

BUSINESS NAME: Knight & Carver Yachtcenter
BUSINESS ADDRESS: 1313 Bay Marina Drive
ZIP CODE: 91950
DATE: 3-03-2010
THOMAS BROS. COORDINATES: 69 A-1



NOT FOR PUBLIC DISCLOSURE



**APPLICATION/REPORT OF WASTE DISCHARGE
GENERAL INFORMATION FORM FOR
WASTE DISCHARGE REQUIREMENTS OR NPDES PERMIT**



I. FACILITY INFORMATION

A. Facility:

| | | | |
|--|----------------------|---|--------------------|
| Name: Knight & Carver YachtCenter, Inc. | | | |
| Address: 1313 Bay Marina Drive | | | |
| City: National City | County: San Diego | State: CA | Zip Code: 91950 |
| Contact Person: Giovanni LoCoco | | Telephone Number: 619-336-4141 ext.140 | |

B. Facility Owner:

| | | | | |
|--|--------------|-----------------------------------|---|--|
| Name: Knight & Carver YachtCenter, Inc. | | | Owner Type (Check One) | |
| Address: 1313 Bay Marina Drive | | | 1. <input type="checkbox"/> Individual | 2. <input checked="" type="checkbox"/> Corporation |
| City: National City | State: CA | Zip Code: 91950 | 3. <input type="checkbox"/> Governmental Agency | 4. <input type="checkbox"/> Partnership Agency |
| Contact Person: Sampson Brown | | Telephone Number: 619-336-4141 | 5. <input type="checkbox"/> Other: _____ | |
| | | | Federal Tax ID: 33-0307529 | |

C. Facility Operator (The agency or business, not the person):

| | | | | |
|--|--------------|---|---|--|
| Name: Knight & Carver YachtCenter, Inc. | | | Operator Type (Check One) | |
| Address: 1313 Bay Marina Drive | | | 1. <input type="checkbox"/> Individual | 2. <input checked="" type="checkbox"/> Corporation |
| City: National City | State: CA | Zip Code: 91950 | 3. <input type="checkbox"/> Governmental Agency | 4. <input type="checkbox"/> Partnership Agency |
| Contact Person: Giovanni LoCoco | | Telephone Number: 619-336-4141 ext.140 | 5. <input type="checkbox"/> Other: _____ | |

D. Owner of the Land:

| | | | | |
|--|--------------|-----------------------------------|--|--|
| Name: San Diego Unified Port District | | | Owner Type (Check One) | |
| Address: Post Office Box 120488 | | | 1. <input type="checkbox"/> Individual | 2. <input type="checkbox"/> Corporation |
| City: San Diego | State: CA | Zip Code: 92101 | 3. <input checked="" type="checkbox"/> Governmental Agency | 4. <input type="checkbox"/> Partnership Agency |
| Contact Person: Jeffrey Gabriel | | Telephone Number: 619-686-6505 | 5. <input type="checkbox"/> Other: _____ | |

E. Address Where Legal Notice May Be Served:

| | | | |
|------------------------------------|--------------|---|--|
| Address: 1313 Bay Marina Drive | | | |
| City: National City | State: CA | Zip Code: 91950 | |
| Contact Person: Giovanni LoCoco | | Telephone Number: 619-336-4141 ext.140 | |

F. Billing Address:

| | | | |
|-----------------------------------|--------------|---|--|
| Address: 1313 Bay Marina Drive | | | |
| City: National City | State: CA | Zip Code: 91950 | |
| Contact Person: James Ivcevic | | Telephone Number: 619-336-4141 ext.110 | |



State of California
Regional Water Quality Control Board
**APPLICATION/REPORT OF WASTE DISCHARGE
GENERAL INFORMATION FORM FOR
WASTE DISCHARGE REQUIREMENTS OR NPDES PERMIT**



II. TYPE OF DISCHARGE

Check Type of Discharge(s) Described in this Application (A or B):

- A. WASTE DISCHARGE TO LAND B. WASTE DISCHARGE TO SURFACE WATER

Check all that apply:

| | | |
|--|--|---|
| <input type="checkbox"/> Domestic/Municipal Wastewater Treatment and Disposal | <input type="checkbox"/> Animal Waste Solids | <input type="checkbox"/> Animal or Aquacultural Wastewater |
| <input type="checkbox"/> Cooling Water | <input type="checkbox"/> Land Treatment Unit | <input type="checkbox"/> Biosolids/Residual |
| <input type="checkbox"/> Mining | <input type="checkbox"/> Dredge Material Disposal | <input type="checkbox"/> Hazardous Waste (see instructions) |
| <input type="checkbox"/> Waste Pile | <input type="checkbox"/> Surface Impoundment | <input type="checkbox"/> Landfill (see instructions) |
| <input type="checkbox"/> Wastewater Reclamation | <input type="checkbox"/> Industrial Process Wastewater | <input type="checkbox"/> Storm Water |
| <input checked="" type="checkbox"/> Other, please describe: <u>Boat Yard Operation</u> | | |

III. LOCATION OF THE FACILITY

Describe the physical location of the facility.

| | | |
|--|--|---|
| <p>1. Assessor's Parcel Number(s) Facility: 026-022; 026-023 Discharge Point: 026-022</p> | <p>2. Latitude Facility: 032-39-33 Discharge Point: 032-39-33</p> | <p>3. Longitude Facility: 117-07-01 Discharge Point: 117-07-01</p> |
|--|--|---|

IV. REASON FOR FILING

New Discharge or Facility Changes in Ownership/Operator (see instructions)

Change in Design or Operation Waste Discharge Requirements Update or NPDES Permit Reissuance

Change in Quantity/Type of Discharge Other: _____

V. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Name of Lead Agency: State Water Resources Control Board (SWRCB)

Has a public agency determined that the proposed project is exempt from CEQA? Yes No

If Yes, state the basis for the exemption and the name of the agency supplying the exemption on the line below.
Basis for Exemption/Agency: California Water Code (CWC) 13389/SWRCB

Has a "Notice of Determination" been filed under CEQA? Yes No

If Yes, enclose a copy of the CEQA document, Environmental Impact Report, or Negative Declaration. If no, identify the expected type of CEQA document and expected date of completion.

Expected CEQA Documents:

| | | |
|------------------------------|---|---|
| <input type="checkbox"/> EIR | <input type="checkbox"/> Negative Declaration | Expected CEQA Completion Date: <u>N/A</u> |
|------------------------------|---|---|

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY



State of California
Regional Water Quality Control Board

**APPLICATION/REPORT OF WASTE DISCHARGE
GENERAL INFORMATION FORM FOR
WASTE DISCHARGE REQUIREMENTS OR NPDES PERMIT**



VI. OTHER REQUIRED INFORMATION

Please provide a COMPLETE characterization of your discharge. A complete characterization includes, but is not limited to, design and actual flows, a list of constituents and the discharge concentration of each constituent, a list of other appropriate waste discharge characteristics, a description and schematic drawing of all treatment processes, a description of any Best Management Practices (BMPs) used, and a description of disposal methods.

Also include a site map showing the location of the facility and, if you are submitting this application for an NPDES permit, identify the surface water to which you propose to discharge. Please try to limit your maps to a scale of 1:24,000 (7.5' USGS Quadrangle) or a street map, if more appropriate.

VII. OTHER

Attach additional sheets to explain any responses which need clarification. List attachments with titles and dates below:

Attachment C. Knight & Carver Yacht Center flow schematic and attachment D. amendment to existing Knight & Carver Yacht Center waste water flow schematic to include dry dock.

You will be notified by a representative of the RWQCB within 30 days of receipt of your application. The notice will state if your application is complete or if there is additional information you must submit to complete your Application/Report of Waste Discharge, pursuant to Division 7, Section 13260 of the California Water Code.

VIII. CERTIFICATION

"I certify under penalty of law that this document, including all attachments and supplemental information, were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Print Name: Giovanni LoCoco
Signature: [Handwritten Signature]

Title: V.P. Operations
Date: March 16, 2010

FOR OFFICE USE ONLY

| | | | |
|-------------------------|-----------------------|----------------------|----------|
| Date Form 200 Received: | Letter to Discharger: | Fee Amount Received: | Check #: |
|-------------------------|-----------------------|----------------------|----------|

Please print or type in the unshaded areas only.

Form Approved. OMB No. 2040-0086.

| | | | | | | | |
|--|--|---|--|---|--|----------------------|--|
| FORM 1 GENERAL | | U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i> | | | I. EPA I.D. NUMBER CAR000014647 | | |
| LABEL ITEMS | | PLEASE PLACE LABEL IN THIS SPACE | | | GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected. | | |
| I. EPA I.D. NUMBER | | | | | | | |
| III. FACILITY NAME | | | | | | | |
| V. FACILITY MAILING ADDRESS | | | | | | | |
| VI. FACILITY LOCATION | | | | | | | |
| II. POLLUTANT CHARACTERISTICS INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms. | | | | | | | |
| SPECIFIC QUESTIONS | | | | SPECIFIC QUESTIONS | | | |
| A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A) | | | | B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B) | | | |
| C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C) | | | | D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D) | | | |
| E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3) | | | | F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4) | | | |
| G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4) | | | | H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4) | | | |
| I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) | | | | J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) | | | |
| III. NAME OF FACILITY KNIGHT & CARVER YACHTCENTER, INC. | | | | | | | |
| IV. FACILITY CONTACT A. NAME & TITLE (last, first, & title) LOCOCO, GIOVANNI V.P. OPERATIONS | | | | B. PHONE (area code & no.) (619) 336-4141 | | | |
| V. FACILITY MAILING ADDRESS A. STREET OR P.O. BOX 1313 BAY MARINA DRIVE | | | | | | | |
| B. CITY OR TOWN NATIONAL CITY | | | | C. STATE CA | | D. ZIP CODE 91950 | |
| VI. FACILITY LOCATION A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 1313 BAY MARINA DRIVE | | | | | | | |
| B. COUNTY NAME SAN DIEGO | | | | | | | |
| C. CITY OR TOWN NATIONAL CITY | | | | D. STATE CA | | E. ZIP CODE 91950 | |

CONTINUED FROM THE FRONT

| VII. SIC CODES (4-digit, in order of priority) | | | |
|--|-------------------------------|-----------|-----------|
| A. FIRST | | B. SECOND | |
| E 7 | 3732 (specify) BOAT REPAIRING | C 7 | (specify) |
| 15 16 19 | | 15 16 19 | |
| C. THIRD | | D. FOURTH | |
| E 7 | (specify) | C 7 | (specify) |
| 15 16 19 | | 15 16 19 | |

| VIII. OPERATOR INFORMATION | | | |
|--|---|---|---|
| A. NAME | | | B. Is the name listed in Item VIII-A also the owner? |
| B Giovanni LoCoco | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other," specify.) | | | D. PHONE (area code & no.) |
| F = FEDERAL S = STATE P = PRIVATE | M = PUBLIC (other than federal or state) O = OTHER (specify) | P (specify) | A (619) 336-4141 |
| E. STREET OR P.O. BOX | | 55 56 | |
| 1313 BAY MARINA DRIVE | | | |
| F. CITY OR TOWN | | G. STATE | H. ZIP CODE |
| B NATIONAL CITY | | CA | 91950 |
| 15 16 40 41 42 47 61 | | IX. INDIAN LAND | |
| | | Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | |

| X. EXISTING ENVIRONMENTAL PERMITS | | | |
|--|-----------|--|-----------|
| A. NPDES (Discharges to Surface Water) | | D. PSD (Air Emissions from Proposed Sources) | |
| C T I 9 N | CA0109088 | C T I 9 P | |
| 15 16 17 18 30 | | 15 16 17 18 30 | |
| B. UIC (Underground Injection of Fluids) | | E. OTHER (specify) | |
| C T I 9 U | | C T I 9 | (specify) |
| 15 16 17 18 30 | | 15 16 17 18 30 | |
| C. RCRA (Hazardous Wastes) | | E. OTHER (specify) | |
| C T I 9 R | | C T I 9 | (specify) |
| 15 16 17 18 30 | | 15 16 17 18 30 | |

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers, and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

| XIII. CERTIFICATION (see instructions) | | |
|--|--------------|----------------|
| I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. | | |
| A. NAME & OFFICIAL TITLE (type or print) | B. SIGNATURE | C. DATE SIGNED |
| GIOVANNI LoCoco V.P. Operations | | 3/16/2010 |

| COMMENTS FOR OFFICIAL USE ONLY | |
|--------------------------------|----|
| C | |
| 15 16 | 55 |

**KNIGHT
CARVER**
YACHT CENTER
SAN DIEGO BAY

Best Management Practices Plan (BMPs)

&

Storm Water Pollution Prevention Plan (SWPPP)

**KNIGHT
& CARVER**
YACHT CENTER
SAN DIEGO BAY

BEST MANAGEMENT PRACTICES PLAN

Knight & Carver YachtCenter relies on its senior operational managers under the direction of the Chief Executive Officer for BMP Plan review, awareness and implementation. These managers are responsible for recognizing, eliminating or remediating all actual or potential waste discharges resulting from all activities at Knight & Carver. We recognize that pollutants could enter San Diego Bay from a variety of pathways.

It is our policy to identify, control and prevent possible discharges of waste by use of safe storage and transfer of all materials, good housekeeping, preventive maintenance, regular inspections, security measures, employee information and awareness training.

Our objective is the prevention or minimization of all solid, liquid, and airborne waste discharges from our facilities and particularly those that could contact the surface water of San Diego Bay.

Specific Best Management Practices are incorporated into this Plan as attachments.

BMP MANAGERS RESPONSIBILITIES

Direct responsibility for the review and implementation of the BMP Plan rests with Sampson Brown, CEO.

All BMP managers are responsible for the implementation, maintenance and updating of the Plan. The managers' activities and responsibilities include all aspects of the BMP Plan, as follows:

- Identification of toxic and hazardous materials handled on the premises
- Identification of potential spill sources
- Coordination of plant, incident response, cleanup, and reporting procedures
- Procedures for cleanup of spills
- Development of regular inspection and record keeping procedures
- Review of environmental incidents, new procedures, and facility modifications to determine and implement any necessary changes to the BMP Plan
- Establishment of BMP awareness training of all employees and contractors
- Interdepartmental coordination of BMP Plan
- Evaluation of effectiveness of the BMP Plan

BMP RESPONSIBLE MANAGERS

| NAME | TITLE | CONTACT NUMBER |
|-----------------|---------------------|----------------|
| Miguel Alvarez | Repair Yard Manager | (619) 247-6408 |
| Giovanni LoCoco | Production Manager | (619) 778-7120 |
| Nino Zizzo | Materials Manager | (619) 250-9209 |
| Security Guard | Security Guard | (619) 274-2625 |
| Steve Chavez | Safety Manager | (619) 955-2489 |
| | | |

**IDENTIFICATION AND MANAGEMENT OF TOXIC OR HAZARDOUS MATERIAL
ASSESSMENT OF POSSIBLE SOURCES OF SPILLS**

Primary BMP review is accomplished through weekly inspections of the facility by the Environmental Manager.

These inspections, and subsequent reports, focus on all safety, environmental, housekeeping and facility maintenance issues to ensure compliance with all Knight & Carver policies, safety criteria and environmental regulations and permits.

The materials used at Knight & Carver are stored in their original containers until used according to the manufacturers' specifications. The containers are stored according to the Fire Marshall's specifications (based on yearly inspections). Our solvent, oil, dust, and sludge wastes are stored in containers designed and inspected for their particular uses.

In the interest of good housekeeping, there are various methods which are routinely employed to prevent, mitigate or contain solid, liquid, and airborne release of pollutants.

1. Solid wastes

The areas where the boats are being worked on are swept daily and the trash is removed.

2. Liquid

Liquids may only be used in designated work areas. Waste oil, antifreeze, and hydraulic fluids are stored at the north end of the building. The wastes are periodically removed by a licensed contractor. All work areas are sloped towards the drainage system, which is isolated from the storm water system.

All solvent wastes are collected in a bermed waste drum in the building which is removed by a licensed contractor.

No washing down of boats is permitted in any area of the yard where waste water will not drain into the catch basin system.

Any boat with oil or other contaminants in the bilges when entering the yard for repairs or maintenance must have the bilges pumped dry into an empty drum or transferred to the large waste oil container.

When a boat hull requires wet or dry sandblasting, adequate protective covers are draped about the boat prior to the sandblasting. The area is swept and residue placed in special containers for removal by the contractor.

Every precaution is taken to avoid oil, fuel or paint from entering the bay while work is in progress on boats at the piers.

3. Airborne

Work performed on boats that results in airborne release of pollutants is inside protective covers which knock down the pollutant for sweeping. (Please see Attachment #106 for further information on work over the waters of the bay)

All hazardous materials stored at the facility are either in an enclosed area or in sealed drums to isolate them from storm water or other miscellaneous water flows from work areas.

While work is in process at the docks, we regularly tent and drape areas to prevent trash, paint chips and other debris from entering the bay (again see Attachment #106). All waste oil from smaller containers is transferred to the 300 gallon designated waste tanks.

YARD INCIDENT RESPONSE, CLEAN UP AND INCIDENT REPORTING

California Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92124-1324

Reporting of BMP incidents will be reported by the Production Manager or the Environmental Manager to all pertinent government and environmental agencies.

The Production Manager and/or Environmental Manager are required to report all BMP incidents to the Regional Board orally if the incident results in the discharge or threatened discharge of waste to San Diego Bay. This notification must be within 24 hours from the time Knight & Carver personnel become aware of the incident.

Should an incident occur that requires notification or evaluation, an announcement to all employees will be made over our loudspeakers as well as informing individual yard supervisors via cell phones.

In the event of a power failure, the announcement via cell phones or personal contact would suffice due to the small size of our yard and the number of personnel.

All incidents will also be recorded in writing, in a log, for future analysis and review.

After the initial notification, a written BMP Incident Report will be submitted to the Regional Board within five days of the time Knight & Carver personnel first became aware of the incident. The incidence report will include the following:

1. Date and time of notification to Knight & Carver employee in charge
2. A description of the incident and its cause
3. The period of discharge or threatened discharge, including exact dates and times
4. Expected time it will continue if the incident has not been corrected
5. List the steps taken or planned to reduce, eliminate, and prevent re-occurrence.

After a BMP Incident has been corrected, the Incident Report will be reviewed by the Environmental Manager followed by BMP modifications, if necessary.

SECURITY

Our facility is enclosed by 8' to 10' high chain link fence with periodic openings for RR easement. Only authorized/emergency personnel have access keys. The facility has 24 hour security provided by Knight & Carver security guards. An hourly check of the facility is done at night.

REVIEW AND AMENDMENTS TO BMP PLAN

Whenever a change in facility design, construction, operation or maintenance affects the potential of pollutants into San Diego Bay, this BMP Plan requires that Knight & Carver amend the Plan.

Annual inspections of the facility will be conducted to evaluate the effectiveness of the BMP Plan. If the current Plan proves to be ineffective in achieving the objective of preventing the discharge of pollutants to San Diego Bay, then Knight & Carver will modify the BMP Plan in a timely manner.

Any modification will be submitted to the Regional Board for review and approval before implementation.

BMP 101: Container Labeling

In the event of a spill of a hazardous or non-hazardous substance, it is imperative that the emergency coordinator knows the chemical involved in the spill. Therefore all containers must be labeled as to their content.

In order to ensure that all containers of hazardous and non-hazardous substances are labeled, the following rules should be followed.

- As a minimum, a label must contain:
 - Chemical Name
 - Hazard Warning
 - Date
 - User Department
- All labels must be legible and written with a permanent marker.
- If a label has been damaged or removed, then the container must be relabeled.
- If a chemical is being transferred to a portable container, then that container must also have a label.
- If a chemical is flammable, an additional "FLAMMABLE" label is required.
- Flammable labels, chemical labels, and replacement product safety labels are available through the VOC Manager.

BMP 102: Paint and Solvent Container Management

All containers used to store, transfer or apply paint or solvents must be closed when not in use.

All containers used to store paint waste, solvent waste, or rags contaminated with paint or solvent must be closed when not in use. All containers used to clean spray equipment, rollers or brushes must be closed when not in use. This includes paint or solvent drums that use funnels.

"In use" means that a container is being accessed, filled, emptied or cleaned.

- The painter who is using a brush or roller must be **in sight** of the container for it to be considered in use.

- The pot tender must be **in sight** of the paint pot for it to be considered in use.

- The spray painter does not have to be **in sight** of the paint pot, but must be using the spray gun for the container to be considered in use.

- The painter who is cleaning spray equipment, rollers or brushes must be **in sight** of the spray equipment, rollers or brushes for it to be considered in use.

"Closed" means that a container has a lid or cover on it that completely covers the container and has no holes or openings in the lid or cover.

- If you can lift the lid or cover with your finger, then the container is not closed.

- A plastic cap, saran wrap, tape or plastic bag can be used to temporarily close a container during breaks, such as lunch.

- All plastic caps, saran wraps or plastic bags **must be removed at the end of a shift** and replaced with a lid or cover.

- Paint cans with liners must have the liner placed inside the can before the lid or cover is placed on the can.

- Paint or solvent rags may be stored in closed plastic bags during the shift but must be placed in a closed hazwaste drum **at the end of the shift**.

- Hazwaste paint or solvent drums must have the funnel closed when not in use.

"Empty" means that the container had a liner in it and no material was placed directly into the container. These are the only containers that do not need to be covered when not in use.

No Drip Rule – A paint can tipped upside down and does not drip for two minutes is considered empty and may be air dried. Cans containing residue must be brushed out until the above rule applies.

BMP 103: No Dumping

Pouring, dumping, or otherwise allowing pollutants into storm drains, surface waters, sinks, and toilets, or onto the ground is not acceptable and illegal. Pollutants are paints, spray cans, solvents, oils, bilge water, trash, abrasive blast materials, and detergents of any kind.

Anything dumped into the storm drains ends up in the Storm Water Diversion System (SWDS). If you dump pollutants on the ground, storm water runoff or other water release can carry them to the SWDS, and from there to the San Diego Sewer.

Liquid spills that are not cleaned up immediately may enter the soil and could eventually reach the surface waters or ground water.

Report illegal dumping in the shipyard to the Environmental Manager. Illegal dumping means the discharging of pollutants into storm drains, surface waters, sinks, toilets, trash dumpsters, or on the ground.

You are asked to be committed to preserve the environment by not illegally dumping pollutants. Please follow these simple rules:

- There shall be no dumping into storm drains.
- Never dump onto facility grounds.
- Report ALL spills immediately to the Environmental Manager.
- Never dump pollutants into sinks or toilets.
- Never dump hazardous materials or wastes into trash dumpsters.

c

BMP 104: Storm Drain Protection

Storm water runoff refers to the flow of surface water resulting from rain. In most cases storm water runoff is directed to storm drain inlets that are present throughout the yard. Storm water has the potential of becoming polluted due to its coming in contact with certain manufacturing processes.

Currently, all stormwater captured on the yard is sent to the San Diego Metropolitan Wastewater District by way of Knight & Carver's Storm Water Diversion System (SWDS).

Storm drains that are not plugged are routed to SWDS storage tanks. All SWDS storm drains within the yard should be fitted with grate screens that help stop pollutants such as trash and construction materials from entering into the SWDS. If the grate is damaged, it must be repaired or replaced as soon as possible. All storm drains within the yard shall be cleaned on a monthly preventative maintenance schedule.

- **NO DUMPING** – Do not utilize storm drains for disposal of paints, solvents, oils, trash, abrasive grit blast, debris, or any other hazardous waste or material. Illegal dumping to storm drains or surface waters is unacceptable and unlawful.
- Hazardous wastes or hazardous material should not be stored near any storm drain, unless the material or waste is held within secondary containment.
- Storm Drain Control Valves should be installed on all storm drains where there is the potential for pollutants to enter the drain.
- If a spill of a hazardous pollutant occurs near a storm drain, immediately use absorbent material or pads to construct a curb or berm to prevent the pollutant from entering the drain.

BMP 105: General Yard Clean-Up

Keeping Knight & Carver clean and well organized greatly reduces the possibility for pollutants to enter the groundwater or the Bay. To reach this goal and comply with all environmental protection guidelines, follow these procedures:

- All trash including: paper, cans, bottles, wood, steel and other debris are to be removed and properly disposed of.
- All grit blast material is to be swept up and immediately placed in skip tubs, vacuum boxes, or roll-offs labeled "Excluded Recyclable Material, Grit Blast Only, No Trash."
- Maintenance personnel shall periodically clean up and properly dispose of trash and debris at the shoreline.
- All roadways shall be kept "sweep clean" at all times; this will prevent possible contaminated materials from entering the Bay.
- Standard methods used for general yard cleanup range from broom sweeping and hand pick-up to using heavy equipment, sweepers and loaders.

BMP 106: Over Water Protection

The repair of boats and yachts is sometimes done while they are alongside the pier. Work is usually performed with the use of floats, lighters, pontoons, or working barges. These are used while performing chipping, grinding, spray painting, welding/burning and other hull repair operations. This work generates trash and pollutants which could possibly fall onto the water.

Here are some simple rules to follow to ensure that nothing falls into the water:

- Install a shrouding system that will keep trash, overspray and grit blast from falling into the water.
- Position floats, tarps, and shrink wrap around the ships hull prior to starting work.
- Make sure that the shrouding is correctly designed, constructed, positioned and erected.
- Clean the floats and pier of all trash and potential pollutants at the end of each shift.
- Place floating containment booms around the ship and floats before any hull work begins.
- Keep a close eye on the weather, it is hard to keep trash, paint spray and grit blast under control in high winds, and it might get blown into the water.

BMP 107: Shrouding

Ship repair activities often include abrasive blasting and painting. Blasting and painting of ships generates a lot of waste material that could possibly get into the Bay. To ensure that this does not happen, shrouding is installed.

Here are some simple rules to follow when using shrouds to keep abrasive blast material, paint overspray, and other pollutants from getting into the bay:

- Shrouds should be large enough to keep the working area isolated from the Bay.
- Support structures and/or scaffolding will be used with shrouding to make it strong enough to survive high winds.
- Occasionally check under the shroud for trapped abrasive blast. This must be swept up so that it does not build up and fall unto the Bay.
- Shrouding must be properly designed, constructed, and positioned to be effective.
- When the work is complete, all shrouding material and equipment shall be properly cleaned and disposed of.
- Spent abrasive, paint dust and paint chips must be cleaned up and placed in a proper container as soon as possible. Work areas must be cleaned up if work is discontinued for any length of time.

BMP 108: SPCC Practices for Oil Drum Storage and Transfers

All oil drums within the shipyard are managed under Knight & Carver's Spill Prevention Control and Countermeasure (SPCC) Plan. Within this Plan, there are a number of sites where bulk oil, oily waste, or petroleum products are stored or temporarily accumulated (for disposal) in 55-gallon drums. The following rules apply to oil drums and transfers:

- Overfill prevention measure shall be used by monitoring the level in the drum during any transfer to a storage drum. A level stick is commonly used to measure the level within the drum during a transfer.
- A secondary containment system will be required for any oil drum storage areas that are within 100 feet of a yard drain or the Bay and exceed the 72 hour storage time limit for this location.
- Containment systems may consist of bermed areas, containment pallets, or sandbags lined with impervious plastic. The containment capacity should be equal to or greater than the volume of the largest container within the area.
- All secondary containment systems will be maintained empty. Secondary containment system will be covered with plastic to prevent rainwater from entering the secondary containment. Any spills within the secondary containment will be removed by the Environmental Manager's supervision.
- Most spills are most likely to occur while transferring contents to or from drums. Use proper transfer procedures when transferring content to other containers.
- Damaged containers shall not be used and all lids must fit securely with a ring bolt for proper transportation. All bung openings must be closed completely.
- Review the products MSDS to identify any special handling instructions (PPE, flammability) prior to a transfer operation.

BMP 109: Bilge and Contaminated Ballast Water

Vessels berthed or dry docked for repairs generally are carrying bilge and ballast water that must be disposed of properly.

Ballast water is typically seawater which has been pumped into the ship's ballast tanks to provide necessary stability.

Bilge water collects in the lower compartments of the ship and is most often contaminated with solvents, oils, and heavy lubricants. Contaminated bilge water is caused by leaking, pipes, valves, pumps, and fittings. Bilge water and contaminated ballast water discharge points must be connected to a land-based vessel (barge) or a barge tank. The bilge and contaminated ballast water must be treated to remove the potential pollutants.

- Prevent the discharge of bilge and contaminated ballast water to the Bay and also unauthorized discharges to the sewer by following these guidelines:
 - Bilge and contaminated ballast water shall not be discharged to the Bay or to storm drains.
 - All piping, hoses, pumps and equipment must be inspected routinely for leaks. Repair or remove from service all defective equipment immediately when discovered.
 - Bilge and contaminated ballast water should be removed as soon as practical to minimize accidental discharge or mixing of the waste with other materials.
 - Sufficient site storage must be made available to contain the anticipated volumes of bilge and contaminated ballast water.
 - Secondary containment must be in place around all storage tanks.
 - Booms shall be placed around all berthed vessels and barges to maximize containment of potential spills.

BMP 110: Lead/Acid Battery Handling

Lead/acid batteries are used in the shipyard to power forklifts, trucks, carts, and other industrial equipment, as well as aboard ships in various applications. By nature, lead/acid batteries have a limited life and must be serviced and replaced from time to time. Both lead and acid contained in the batteries are dangerous to humans and the environment.

It is important that lead/acid batteries are handled, stored, and disposed of in a way that will eliminate the risk of exposing humans to lead/acid and eliminate the risk of releasing lead/acid into the environment. Therefore it is important that the following steps are taken:

- Lead/acid batteries should have all caps installed while in service, storage, or in transit.
- Any battery that is missing a cap(s) is cracked, damaged, or otherwise seeping/leaking must have secondary containment installed around it.
- Hydrogen gas emitted from the batteries is explosive. Sparks and open flames must not be generated anywhere near lead/acid batteries.
- Many lead/acid batteries require that water or electrolyte be added from time to time. Batteries are not to be overfilled at any time. Personnel responsible for filling batteries must wear the proper PPE and have cleanup supplies such as rags and absorbent readily at hand.
- Battery charging stations must be placed in well-ventilated areas with cleanup supplies such as rags and absorbent readily available. Batteries must not be overcharged to prevent boil over.
- Some batteries are delivered to us "dry" with the acid delivered in a separate container. When storage is required, battery acid containers must have secondary containment. Acids must not be stored with other flammable or combustible liquids.
- Spent lead/acid batteries are to be recycled by suppliers licensed to handle them through the Maintenance Department.
- Cleanup materials contaminated with battery acid must be disposed of as hazardous waste.