

SAMPLE TEMPLATE
FOR DEVELOPING A
BEST MANAGEMENT PRACTICES PLAN
FOR
IN-WATER HULL CLEANING SERVICES

NAME OF BUSINESS

Business Address

Date Developed

Developer Name
Address

Best Management Practices (BMP) Plan Objectives

The objective of the BMP Plan is to identify the practices and procedures that your business will use to minimize the water quality impacts from in-water hull cleaning. BMPs may include a variety of pollution control measures such as: activity schedules, prohibition of practices, process improvements and maintenance procedures that can be used to prevent a visible paint plume during hull cleaning.

As required by the In-Water Hull Cleaning Regulations recently adopted by the San Diego Unified Port District, all businesses conducting hull cleaning on Port Tidelands are required to develop and follow a BMP Plan to receive an in-water hull-cleaning permit (Permit). The BMP Plan must include a description of 1) the tools that will be used during hull cleaning activities, 2) the methods in which the tools will be used, 3) a description of the process to revise the BMP Plan if a paint plume or cloud is observed, and 4) how to meet the training requirement that is necessary to ensure that hull cleaners can clean without producing a visible paint plume or cloud.

This document serves as a sample template for the development of a BMP Plan. It identifies the minimum components that must be included in your BMP Plan to secure a Permit and also includes guidance for implementing optional practices your business may elect to use. The use of this document is intended to be representative of the practices and procedures your business will use to prevent visible paint plumes during cleaning. You will need to tailor the language within each section so that it is specific to your business. The use of this BMP template is not required, but is provided for your guidance.

Section 1 General Facility/Business Information

1.A. OWNER INFORMATION

Owner Name:

Address:

Contact Name & Phone:

1.B. FACILITY/BUSINESS DETAILS

This section is intended to provide a brief description of the business operations. Information that you may wish to provide could include: years in service, number of employees, contractors/sub-contractors, primary areas of the bay serviced, etc.

Example: Business Name has been conducting hull cleaning in San Diego Bay (Chula Vista, Harbor Island, and Shelter Island) since MM/DD/YYYY. Mr. X is the owner and operator of Business Name Business Name has XXX employees who all perform hull cleaning service. All employees are responsible for pollution prevention. However, Mr. X has the responsibility for training all staff members.

Section 2 Best Management Practices (BMPs)

BMPs help to maintain the hull paint, to prevent pollution and visible paint plumes, and to protect the environment. This section discusses several categories of BMP options to minimize pollution associated with hull-cleaning operations. The subsections provided below can be included in your business' BMP Plan; those that are required for the Permit are identified as such.

2.A. HULL CLEANING TOOLS (REQUIRED)

This section discusses the tools and materials your business will use to conduct hull-cleaning operations in a manner that will not produce a visible paint plume. Tools such as pads, brushes, and carpet vary in their abrasiveness. Understanding which tools are needed to clean specific paint types is important to ensure that hulls are cleaned properly, that the paint will remain effective for its expected life span, and that the cleaning will not damage the hull. It is important that your divers understand what tools are a part of your BMP Plan.

List and describe the tools your business will require your divers to use when cleaning. (Examples of cleaning tools: White Pad, carpet, terry cloth towel, hand mitt)

Some businesses may also elect to prohibit their divers from using specific tools or specify conditions in which certain tools can only be used. If this is the case, please list here the tools your business will restrict. (Examples: wire brush, steel wool)

2.B. HULL-CLEANING METHODS (REQUIRED)

This section should be used to describe the cleaning methods your business will use. Understanding how to clean specific paint types is important to ensure that hulls are cleaned properly, that the paint will remain effective for its expected life span, and that the cleaning will not damage the hull. Examples of cleaning methods can include

hand cleaning, cleaning by rotary brush, or spot cleaning (only clean where needed). The tools you have identified above are most effective when used properly. Proper use of each cleaning tool is essential to ensure that cleaning will not produce a visible paint plume.

The cleaning method information you provide should describe how the tool will be used, under what conditions it will be used, and for what types of paint it is most appropriate. List and describe the cleaning methods your business will require your divers to use when cleaning. Describe how the specific tools will be used and why using them in the manner described will prevent a paint plume. (For example, Business X will use only hand cleaning. Carpet will be used for cleaning copper paints. Divers should apply light pressure taking care not to remove any paint,)

If your business has elected to prohibit specific tools or to limit the use of certain tools (Section 2.A.), please list here the tools and under which conditions the tools will be restricted. (For example, Business X will not allow wire brushes to be used on abrasive paints.)

2.C. IDENTIFICATION OF DIFFERENT TYPES OF HULL PAINT (OPTIONAL)

Businesses may elect to include measures to identify different types of hull paint prior to cleaning a boat hull. In many cases, knowledge of the type of paint that is on the boat's hull can help to determine what type of cleaning tool to use. For example, what measures will be considered so that your divers understand the difference between abrasive and non-abrasive hull paints?

List and describe the processes your business will use, if any, to ensure your employees understand what type of hull paint is being cleaned. (Examples: Have divers get verification from boat owner; divers may check with boatyards; businesses may keep a log of the boats they service and the paints that are on those boats, etc.)

2.D. CLEANING SCHEDULES/FREQUENCIES (OPTIONAL)

This section identifies the cleaning schedule and frequency that may be considered as part of the BMP Plan to prevent a visible paint plume. Cleaning schedules may help businesses conduct regular inspections and clean boat hulls only when needed. It is important to have divers understand when cleaning is necessary. For example, in some cases a low level of slime is acceptable. Businesses may want to consider schedules and inspections as part of their BMP Plan.

If your business intends to use cleaning schedules or frequencies as a BMP, list and describe cleaning schedules and/or frequencies that will be used. (Examples: 3-week inspections; only clean when needed; less cleaning in colder months; etc)

Section 3 Employee Training (REQUIRED)

The permit requires training for all new and existing employees. Prior to obtaining a Permit and as part of the Permit application, each in-water hull-cleaning business must submit proof that its employees, agents, and representatives, including independent contractors conducting in-water hull cleaning have been trained.

This section should identify how employees will be trained. Training should ensure that employees: 1) have read and understood the Permit conditions; 2) will adhere to the BMPs in this BMP Plan; and 3) will conduct cleaning activities in a manner that does not produce a visible paint plume or cloud.

List and describe the processes 1) your business will use to train employees, and 2) how you will document their training. The required proof of training includes dates of training, names of persons trained, topics covered, printed name, and signature of employee and trainer, and the written materials used for the training (A Training Log example is provided below).

Example Training Log

Date (DD/MM/YY)	Employee Name	New Employee (Y/N)	Topics Covered	Materials Used	Trainer Signature	Employee Signature
			<i>Ex: Cleaning tools, paints, etc.</i>	<i>Ex: Handout, booklets, etc.</i>		

Section 4 Review/Modification of BMPs (REQUIRED)

This section describes how the BMP Plan will be modified if a paint plume becomes visible during in-water hull-cleaning activities. For example, if a paint plume becomes visible during cleaning, what will the procedure be:

- 1) to stop the activity
- 2) modify cleaning tools
- 3) revise the BMP Plan, if necessary
- 4) train (or retrain) the employees, if necessary

In this section, describe the process that your business will use to modify the cleaning activity to stop the paint plume from continuing. It should also include a description of the steps that will be taken to change BMPs and modify the BMP Plan to ensure a plume will not happen again in the future.

Section 5 Record of Review and Amendments

An important part of maintaining a BMP Plan is to regularly review and revise BMPs if they do not appear to be working. All reviews and amendments to the BMP Plan should be summarized and documented. The tables in this section can be used to track revisions made to the BMP Plan. The Water Quality Manager is responsible for maintaining a current copy of this BMP Plan.

RECORD OF REVIEW (ANNUALLY)

Date	Reviewed By	Comments

RECORD OF AMENDMENTS (AS NEEDED)

Date	Reviewed By	Comments