

DEPARTMENT	OPERATING AREA
Environmental	Morenci
BMP NO.	BMP TITLE
100	Spray Painting Activities



Exposure to
Hazardous
Substances - Acute



Exposure to
Hazardous
Substances - Chronic



Fire

Purpose and Scope:

This BMP (Best Management Practice) provides general and specific spray-painting requirements for shovels, haul trucks, drill rigs, storage tanks, or outside spray painting. Spray painting using aerosol cans is allowable under all situations; please see IH for additional procedures.

Except for architectural and spot painting, all painting activities shall be conducted in an enclosed area equipped with control equipment that captures at least 96% of the overspray. Architectural painting may be performed outdoors but must adhere to the scope and procedure (defined below). For maintenance purposes, portions of large equipment can be painted outdoors under the definition of spot painting but must adhere to the procedure (defined below).

Safety:

- Fire
- Exposure to Hazardous Substances – Acute
- Exposure to Hazardous Substances - Chronic

Responsible Parties:

Spray Painting Personnel

- Environmental Services must be notified 72 hours prior to any spray-painting activities.
- At least one of the following control methods will be utilized at all times during any spray-painting activity:
 - Use of high-volume low pressure (HVLP) spray guns
 - Airless spray techniques
 - Other good modern practices

Environmental Staff

- Ensure that the paint being used in the spray-painting activity does not contain photochemically reactive solvents (PRS)¹ more than 20% of its total volume.
- Ensure that architectural coating will not be thinned or diluted with a PRS.
- Environmental Services must take a Visible Emissions Observation during spray painting activities.

Specialized Tools/Skills/Training:

All personnel shall have access to this BMP when dealing with spray painting activities on Morenci property.

Procedures:

Shovel, Haul Truck and Drill Rig Spray Painting

Shovel, haul truck and drill rig painting can be performed outdoors, but must meet the following criteria:

- Paints used in spray painting activities must adhere to the photochemically reactive reagent guidelines defined above.

- Spray painting shall be performed using equipment designed to minimize overspray.
- A drip cloth, plastic drop cloth or other barrier must be placed under the area to be painted in such a fashion as to protect ground surface and minimize overspray and drips from contacting the underlying surface or ground.
- Shovels, haul trucks and drill rigs must be in an isolated area of the pit with minimal large equipment traffic, light vehicle traffic or personnel not directly involved with the spray-painting activity.
- Sandblasting employed to clean and/or prep the area to be painted shall follow all guidelines as defined by BMP 114 – Sand & Abrasive Blasting Activities.
- Clean-up material, PPE (Personal Protective Equipment) and/or debris resulting from the preparation and/or spray-painting activity must be collected and placed into approved waste containers for proper disposal.
- The Environmental Service Department must be contacted 72 hrs. before any large equipment is spray painted and before clean-up materials and/or debris resulting from spray painting are disposed.
- Any paint, cleaning materials or products brought on site by a contractor must be pre-approved before use on Morenci property by both the Environmental Services and Industrial Hygiene Departments.
- Spent cleanup products must be captured to the extent practicable and stored in a properly labeled container(s) for disposal. Please refer to BMP - 313 for drum and container management requirements.
- To minimize evaporation, all products shall be kept in sealed containers except for short periods when product is being transferred from one container to another container. Open paint cans are not permitted to be left open to the atmosphere to evaporate and/or dry the excess paint before disposing of the can.
 - This also includes any paint trays/pans, brushes, rollers, or other utensils used while painting.
- Waste paint is defined as any used, left over or obsolete paint. Please refer to BMP 303 – Hazardous Waste Paint for waste paint management procedures.

Recordkeeping Requirements

Architectural coating and spot painting projects do not require recordkeeping, provided the project follows the spray-painting plan outlined in the Non-Point Source Monitoring Plan, which is available through the Environmental Services SharePoint® site.

A **spray-painting log** must be filled for projects that are not classified as architectural coating and spot painting.

- The spray-painting log must include how much paint and paint thinner was used through the spray gun.

Paint Disposal

Paints that would be considered hazardous waste when disposed of must be managed according to BMP 303 Hazardous Waste Paints.

QUESTIONS OR NEED HELP?

Contact your Environmental Representative or Environmental Services at (928) 865-6000

Revision Number	Revision Date	Revision Description	Reviewer	Final Approver
0	12/05/2018	Existing online format	Environmental Personnel	Environmental Personnel
1	9/13/2022	Entire Document-Revised to new BMP template	MH	KRK
2	5/29/2024	Revised BMP	CM	CLW
3	7/24/2025	Reviewed	CM	CLW