

***EG 2-1: Painting and Paint Removal***

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Document Owner:

CCDOA Environmental Specialist

**I. Activity Description:**

The management of any materials generated during painting, paint removal, and/or cleanup activities, including hazardous and non-hazardous wastes, solvents, pigments and debris

**II. Potential Environmental Risks**

A. The Clark County Department of Aviation (CCDOA) - Environmental, Health & Safety (EHS) office has identified the following environmental concerns associated with these activities:

1. Air pollution and odors
2. Releases to sanitary sewer and the environment
3. Improper or inappropriate disposal of waste paint
4. Improper or inappropriate disposal of paint thinners and solvents
5. Improper or inappropriate disposal of used paint materials (filters, brushes, etc.)

B. Potential consequences from performing the activity incorrectly:

1. Property damage
2. Personal injury
3. Long-term damage to the environment
4. Citations, Notices of Violation and related (financial & non-financial) penalties

**III. Critical Operating Requirements**

A. Prohibited Activities

1. Painting and paint removal activities are prohibited unless written approval from (CCDOA) is obtained, except for small scale touch-up projects
2. Disposal of hazardous paint waste is prohibited without the following:
  - a. EPA Generator Identification Number
  - b. Completed Land Disposal Restrictions (LDRs) form
  - c. Hazardous Waste Profile and receiving facility acceptance forms
  - d. Hazardous Waste Manifest
3. Disposal of used paint, booth filters, paint rags and other paint activity related wastes are restricted and prohibited to place in the trash. These materials may be considered hazardous waste and must be handled and disposed of with all proper considerations. If non-hazardous, the materials require evaluation for special disposal considerations.
4. Do not dispose of paint wastes or solvents into any drain
5. Use of volatile organic compound (VOC) or solvent based paints at CCDOA facilities is highly discouraged. Use of non-volatile or aqueous (water-based) coatings wherever possible, is expected to be used. (VOC) or solvent based

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paints are acceptable only where technical substitutions are not available or practicable

6. Vehicle and equipment painting is strictly prohibited except in areas that are approved by the CCDOA for painting activities

B. Required Activities

1. Clark County Department of Air Quality Operating Permits may be required depending on the painting activities. A copy of the permit must be supplied to the CCDOA, EHS office prior to work being conducted

C. General Considerations

1. Every entity conducting any painting activities is responsible for understanding the applicable regulations and managing their activities accordingly. This Environmental Guideline is meant as guidance only and does not supersede any regulations
2. Reasonable efforts should be made to continually increase the utility and efficiency of paint container systems and reduce waste generation volumes and toxicity:
  - a. Research available paint containers systems to increase ease of handling and management of painting materials
  - b. Use recyclable or returnable paint containers, whenever possible
  - c. Research available coating products for reduced waste and air emission characteristics
  - d. Re-use grit blast material is practical; when it is no longer usable, dispose of properly
3. When removing paint, collect and dispose of all paint debris, grit and any other related wastes properly
  - a. When removing paint outdoors, use protective barriers to control overspray, dust and particulate from unnecessarily contaminating the air and/or storm water collection system. Specify the use of non-solvent paint removal practices
4. When cleaning painting equipment, containerize and control all generated wastes for proper disposal
  - a. Strategize to segregate waste materials for cost efficient disposal
  - b. Avoid contaminating sanitary and stormwater drainages with cleanup debris, solvents and other waste materials
5. Any mobile painting operations must be approved by the CCDOA and comply with CCDAQ Air Quality Regulations, and the Federal NESHAP Regulations
  - a. All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray
  - b. Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth

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- c. Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray
    - d. Mobile painting companies must be able to obtain their own individual permit from the Clark County Department of Air Quality if necessary. Mobile painting activities by a tenant or contractor will not be added to a CCDOA facility air quality permit in any way
  - 6. Properly characterize and dispose of paint related wastes, such as paint rags and paint booth filters. See Environmental Guideline EG 7-1, General Waste Management for additional guidance
  - 7. When removing paint, airborne dust or mist generation must be controlled at all times
- D. Training Requirements
  - 1. Train employees to the appropriate level of protection for spill response and prevention
  - 2. Employee training programs shall inform personnel at all levels of responsibility who are involved in painting and paint removal activities that may impact storm water runoff. Training shall address topics such as spill response, good housekeeping and material management practices. Contractor or temporary personnel shall be informed of facility operations and design features in order to prevent discharges or spills from occurring
  - 3. OSHA Hazard Communication Standard 29 CFR 1910.1200
- E. Storage and Materials Management Requirements
  - 1. Properly label all paint and paint removal supplies in accordance with the Globally Harmonized System (GHS) of classification and labeling of chemicals and store in areas with secondary containment and proper signage and support systems

#### IV. Planning Requirements

- A. Product Safety Data Sheets (SDS) for any new paint and/or painting materials to the CCDOA, EHS office for approval prior to use
- B. Purchase and use paints without lead, chromium and other heavy metals as well as, paints with low VOC content whenever possible. Continually investigate low VOC and lower toxicity replacement coating materials
- C. Confirm that an SDS for any new paint and/or painting materials has been received and made available to employees. Periodically confirm presence of SDSs for all products in use. The formulations for specific products may change over time

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- D. Review air permitting regulations before beginning any painting operations to determine if a Minor Source Permit will be required through the Clark County Department of Air Quality
- E. Maintain adequate supplies of spill response equipment and materials in locations where spills of paint and solvent materials are likely to occur. Use good painting and coating spill prevention and control practices
- F. Painting personnel shall be trained in all environmental impact operations including waste minimization and management, materials selection and materials cleanup procedures
- G. Any entity conducting work at a CCDOA facility must obtain prior written approval from the CCDOA, EHS Office for the use of any non-aqueous paint and associated solvents or additives to be used in airfield markings or any other application. The entity shall provide in its request for use:
  - 1. The SDS for the proposed product
  - 2. Its plan for the management of all wastes to be generated from the activity and
  - 3. Proposed disposal sites for the waste

**V. Critical Tasks**

- A. Review painting operations for environmental regulatory processes with an emphasis on air permitting and waste characterization and subsequent compliance management
- B. Review material handling procedures to minimize hazardous waste generation and to determine recordkeeping requirements
- C. A waste profile must be completed and accepted by the disposal facility before any hazardous waste materials can be shipped to an appropriate facility

**VI. Emergency Response**

- A. If a spill occurs, immediately stop the source of the spill, if possible. Refer to Environmental Guideline EG 6-1, Spill Response.
- B. Call the Airport Control Center (702) 261-5125 or the appropriate Customer Service Desk for the area (see phone numbers in Section IX below), immediately, for all spills
- C. Use absorbent materials to manage spills. Contain used materials in an appropriate container and dispose offsite at an approved and permitted facility
- D. Prevent paints and other chemicals from entering any sewer, storm drain, drainage waterway or soil area using whatever means available (i.e., barriers, blocking devices, etc.)

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- E. Control spills to eliminate risk to human health and the environment and to minimize property damage
- F. Complete the CCDOA Spill Reporting Form and return the completed form to the CCDOA EHS office within 24-hours of the release

## **VII. Inspection and Maintenance Requirements**

- A. Hazardous paint waste storage areas must conform to regulatory requirements per Environmental Guideline EG 7-3, Management of Hazardous Wastes
- B. Operators are expected to inspect their procedures, operations and records for inventory quality, efficient and safe work practices, materials handling, storage and disposal to verify compliance
- C. Properly maintain equipment and employ pollution prevention operational practices

## **VIII. Expected Records and Outputs**

- A. Waste Generation Inspection Reports Mentation
  - 1. Inspections should be documented and maintained on file by the operator. This pertains to locations where products are storage, prepared, or applied, as well as cleanup areas.
- B. Waste Management/Disposal Documentation
  - 1. Waste accumulation and storage area inspections should be conducted for all waste accumulation and storage areas
  - 2. Waste producers are responsible for adequate inspection reports. Inspection forms should be maintained on site by the generator
  - 3. Based on the disposal profile, manifests and related, forms may be required. Manifests and profile forms can be obtained from the disposal facility for off-site disposal activities (manifests **are required** for hazardous, special and universal wastes)
  - 4. Operator must maintain appropriate documentation for disposed wastes at the facility
  - 5. Operator must maintain appropriate documentation for disposed wastes at the facility for a minimum of three (3) years
  - 6. See Environmental Guideline EG 7-1, General Waste Management, for additional information on waste classification and disposal requirements
- C. Safety Data Sheets (SDSs)

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1. Manufacturers of coating products will supply these documents on demand. SDSs for coating products should be made available to all employees engaged in painting activities and maintained on file by operator at the facility
- D. Air Permits (as required)
  1. A CCDOA Minor Source Permit may be required for painting operations
  2. Operators are responsible for acquiring and maintaining applicable air permits and maintaining records. Submit copies of permits to the CCDOA, EHS Office
- E. Air Emissions Reporting Data (paint usage volumes)
  1. Paint usage data from permitted paint booths must be generated on site monthly and provided to the CCDOA, EHS Office upon request
  2. Operators are responsible for maintaining applicable records as required by air quality permit(s)
  3. Operators are responsible for supplying the CCDOA, EHS Office with copies of correspondence with regulatory agencies
- F. Evidence of training on Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasure Plan and operator's SOPS as applicable and SDSs for ADF products
  1. Formal certifications are not always necessary; however, "proof of training" such as sign-in sheets, signed by the attendees, and handouts is expected to be available and signed by the attendees and should be maintained on file by the operator/tenant
- G. Waste Management Plan
  1. The CCDOA requires a Waste Management Plan for the use of any non-aqueous paints or products. The plan must be approved by the CCDOA, EHS Office prior to its use

## IX. References

- A. Phone Numbers
  1. CCDOA (Airport) Control Center (spill and release reporting).....(702) 261-5125
  2. Henderson Executive Airport Customer Service Desk.....(702) 261-4800
  3. North Las Vegas Airport Customer Service Desk.....(702) 261-3806
  4. CCDOA Environmental, Health & Safety (EHS).....(702) 261-5692
  5. NDEP Spill Reporting Hotline(for spills 25 gallons or greater)..... 1(888) 331-6337
- B. Guidance Materials (list is not limited to the following)
  1. CCDOA Storm Water Pollution Prevention Plan
  2. NDEP Storm Water Discharge Permit (NPDES)
  3. CCDOA Tenant Bulletins
- C. Training Materials (list is not limited to the following)
  1. RCRA Waste Management Training

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2. Storm Water Pollution Prevention Plan
3. Manufacturer's SDS Information and Equipment Specifications

D. Related Environmental Documents (list is not limited to the following)

1. Environmental Guideline EG 1-3, Cargo Loading and Offloading
2. Environmental Guideline EG 1-4, Management of Aircraft Lavatory Water and Waste
3. Environmental Guideline EG 1-5 Maintenance of Aircraft, Vehicles and Equipment
4. Environmental Guideline EG 2-1 Painting and Paint Removal
5. Environmental Guideline EG 2-2, Cleaning Washing - Indoor Industrial Surfaces
6. Environmental Guideline EG 2-4, Janitorial Activities
7. Environmental Guideline EG 2-4, Janitorial Activities
8. Environmental Guideline EG 3-1, Ozone Depleting Compound Management
9. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations
10. Environmental Guideline EG 3-4 Metal Finishing, Coating, Machining, and Cooling
11. Environmental Guideline EG 3-5, Parts Washing
12. Environmental Guideline EG 4-1, Construction
13. Environmental Guideline EG 4-2, Planning and Design
14. Environmental Guideline EG 4-3 Procurement
15. Environmental Guideline EG 4-4 Tenant Operating Guidance
16. Environmental Guideline EG 4-5 Tenant Relocation or Closeout
17. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
18. Environmental Guideline EG 5-3 Storage, Handling and Management of Hazardous Materials
19. Environmental Guideline EG 6-1 Spill Response
20. Environmental Guideline EG 6-2 Abandoned Material Response
21. Environmental Guideline EG 7-1 General Waste Management
22. Environmental Guideline EG 7-2 Management of Recyclable and Reusable Materials
23. Environmental Guideline EG 7-3 Management of Hazardous Wastes
24. Environmental Guideline EG 7-4 Management of Universal Wastes
25. Environmental Guideline EG 7-5 Management of Special Wastes
26. Environmental Guideline EG 7-6, Management of Materials

E. Applicable Regulations (list is not limited to the following)

1. NAC 444/NRS 444 Sanitation
2. NAC 444A.005-444A.470/NRS 444A.010-444A.110 Recycling
3. NAC 445A Water Controls
4. NAC 445B Air Controls
5. NAC 459/NRS 459 Hazardous Materials
6. 29 CFR 1910 Occupational Safety and Health Standards
7. 29 CFR 1926 Safety and Health Regulations for Construction
8. 40 CFR Protection of the Environment
9. 49 CFR Transportation
10. Uniform Fire Code/NFPA

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- 11. Clark County Department of Air Quality Regulations
- 12. CCDOA Rules and Regulations

F. Other Documents (list is not limited to the following)

- 1. Product Safety Data Sheet documents and other manufacturer specification information
- 2. Purchase Orders and Inventory reports
- 3. Inventory distribution reports and daily painting logs
- 4. Permits & Licenses
- 5. SPCC Plan
- 6. Land Disposal Restrictions (LDRs) for waste materials
- 7. Manifests
- 8. CCDOA Spill Reports
- 9. The Globally Harmonized System (GHS) of classification and labeling of chemicals

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