

***EG 7-6: Management of Materials***

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CCDOA Environmental Specialist

**I. Activity Description:**

Activities associated with but not limited to:

1. General storage of chemicals and other materials
2. Site soils excavated during routine construction and/or maintenance activities
3. Recyclable construction debris-related materials (e.g., asphalt and concrete)
4. Sweeper Residues
5. Removed runway rubber, dust and debris
6. Concrete truck rinsate and concrete saw cutting accretions
7. Storm water collected in secondary containment systems, vaults or other such structures during precipitation events
8. Wastes generated in the clean-up of aircraft lavatory material spills
9. Asbestos containing building materials

**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. Contamination of soils, groundwater or surface water
  2. Improper use of re-usable/recyclable materials (e.g., concrete and asphalt)
  3. Contamination of receiving waters
  4. Improper disposal of wastes at CCDOA facilities
  5. Employee exposure to disturbed asbestos containing materials
- B. Potential consequences from performing the activity incorrectly:
  1. Property Damage
  2. Personal Injury
  3. Long term damage to the environment
  4. Regulatory fines and related penalties
  5. Expensive clean-up costs

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### **III. Critical Operating Requirements**

#### **A. Chemical and Material Storage**

1. Chemicals and petroleum products must be properly stored and labeled. This includes storing chemicals on spill pallets and in flammable materials lockers, where appropriate. All containers must remain in good condition and must be closed when not in use. Spill kits are required in all chemical and petroleum product storage locations. Follow best management practices (BMPs) outlined in the Storm Water Pollution Prevention Plan (SWPPP) for your facility

#### **B. Excavated Site Soils**

2. Media soil and other materials that are removed or moved during routine construction and/or maintenance activities that are clearly outside of the area where industrial activities are conducted and show no visual or olfactory evidence of contamination will be considered “clean” soil
3. The project manager associated with a project is responsible for notifying CCDOA, EHS office if soils being managed could be impacted by industrial activities conducted at any CCDOA facility
  - a. Process knowledge pertaining to previous use and/or impact for the location(s) under construction and/or maintenance can be used to determine whether impacted soils are probable
  - b. Common indices such as soil staining and odor can be used as a determining factor as well
4. At any time, when soil exhibits signs of possible contamination, all work must cease. The project manager must notify CCDOA, EHS, and a sampling and analysis approach must be determined and implemented by the proper responder.
5. All contaminated soil excavation must have the oversight of a Nevada Division of Environmental Protection Certified Environmental Manager
6. All soil removed from an area of “suspected contamination” must be placed on 6mm polyethylene liner or in a container (e.g., roll off box and drums) while awaiting analytical data. Care must be taken to ensure that the site is managed in a manner that will prevent contaminated storm water runoff and dust generation

#### **B. Concrete and Asphalt Spoils**

1. Concrete or asphalt excavated and removed from a CCDOA construction site may be stockpiled at a recycling area approved by CCDOA. Approved recycling areas are determined per project

#### **C. Sweeping Residues and Runaway Rubber Dust and Debris**

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1. Based upon generator knowledge, wastes derived from the following processes are considered non-hazardous and clean in accordance with regulatory standards
    - a. Sweepings disbursed or collected from airside roads and ramps outside of the industrial activity areas. Such areas are external to gate drainages and aircraft and vehicle maintenance area drainages
    - b. Sweepings disbursed or collected from streets, ramps and parking lots landside
  2. Any unusual conditions requiring CCDOA to reconsider the generator knowledge must result in the application of the evaluation process described below (IV, B. Sampling & Characterization Process)
  3. Removed runway rubber dust and debris must follow the Sampling and Characterization Process annually and submit copies of the results to CCDOA, EHS office
- D. Concrete Truck Rinsate and Concrete Saw Cutting Latents
1. Recognizing the inherent innocuous nature of reacted concrete, the standard practice in industry is to rinse concrete trucks into shallow ground depressions that allow seepage of the rinsate and retainage of the particulates. Latent particulates from saw cutting of concrete pavements are also placed in the same areas. CCDOA allows these practices as long as the depressions are designed and placed so that runoff will not flow through storm drainages or creeks and seepage will not impact any surface or groundwater
  2. Any unusual conditions requiring CCDOA to reconsider the generator knowledge must result in the application of the evaluation process described below (IV, B. Sampling & Characterization Process)
- E. Storm Water Collected in Secondary Containment Structures
1. In the event that removal of fluids from a containment structure is required to ensure proper operation or to conduct maintenance, the materials must be inspected for field observations of contamination (i.e., sheen, odor and discoloration). If such area shows possible signs of contamination, the fluids may need to be analyzed before potential management options can be identified. For CCDOA owned containment structures, notify CCDOA, EHS prior to removal of fluids
  2. If no contamination is observed, storm water may be discharged onto the ground or pavement in the immediate vicinity of the containment after approval by CCDOA, EHS

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- a. Care must be taken to ensure that the water is released at a rate to prohibit overland flow and scouring of soils into any drain or storm channel

F. Wastes Generated in the Clean-up of Aircraft Lavatory Material Spills

1. In order to minimize potential storm water impacts and biological hazards, aircraft lavatory spills will be contained and cleaned up as soon as possible using either manual or mechanical means. Care must be taken to prevent wastes from reaching any drains
  - a. 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 to report any spilled material
2. Solids and liquids, to the extent possible, will be collected, returned to the lavatory truck and transported to the CCDOA triturators for disposal
3. Bagged absorbent materials used for containment and/or clean-up of any residual liquids can be placed in the commercial dumpsters for disposal at the municipal solid waste landfill
4. For effective environmental management of suspected infectious agents, general disinfection of contaminated surfaces must be performed using a sanitizer/biocide solution to neutralize any remaining organisms

G. Asbestos Containing Building Materials

1. In order to prevent the release of asbestos fibers into the ambient air, contact CCDOA, EHS to verify that the area has been surveyed prior to disturbing and building material that is not constructed of wood, metal, or glass
2. The age of the structure is not a determining factor in the identification of asbestos
3. Contractors should verify that no asbestos is present with their CCDOA Project Coordinator prior to conducting any work
4. Only properly trained and certified individuals are permitted to conduct any asbestos-related work at any CCDOA property

#### IV. **Sampling & Characterization Process**

- A. The Project Manager or responsible Supervisor will provide qualified personnel who will conduct inspections and provide an overview of all activities conducted for waste determination. CCDOA, EHS may provide oversight during the sampling and analysis and the determination/ categorization process

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- B. If warranted by process knowledge and/or visual olfactory observations, materials suspected of containing petroleum products must be sampled and characterized under the direction of a Nevada Division of Environmental Protection Certified Environmental Manager. CCDOA, EHS must be notified when suspected materials are encountered and prior to sample collection

## **V. Field Management Procedure**

- A. An impacted project must modify its operations to include a segregation area where potentially impacted materials can be placed, stored and sampled for characterization
- B. Should any materials be determined to exceed applicable standards for the anticipated reuse or disposal method, the Project Manager or responsible party is accountable for the proper disposal of the materials
- C. Materials that are determined to contain contamination levels below the applicable standards can be considered clean soils/ fill and handled per the project specifications

## **VI. Expected Records and Outputs**

- A. Locations of suspected release or impacts, (if applicable)
  - 1. For all records, the Project Manager will be responsible for keeping records and supplying a copy of all records to the CCDOA, EHS office
- B. Description of the activities taking place in the area, (if applicable)
  - 1. Project manager will document in daily logs. These logs will be available to CCDOA upon request
- C. Date and volume of segregated materials, (if applicable)
  - 1. Project manager will document in daily logs. These logs will be available to CCDOA upon request
- D. Method of containment of materials
  - 1. Project manager will document in daily logs. These logs will be available to CCDOA, EHS upon request
- E. Description of subsurface condition, (if applicable)
  - 1. Project Manager will document in daily logs. These logs will be available to CODA, EHS upon request

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- F. Rationale and justification for sampling and the constituents of concern, (if applicable)
  - 1. Project Manager will document in daily logs. These logs will be available to CCDOA, EHS upon request
- G. The Chain of Custody and the results of sampling, (if applicable)
  - 1. Submit copies of all analytical data and documentation to CCDOA, EHS
- H. Manifests for all materials determined to be contaminated and requiring off-site disposal, (if applicable)
  - 1. Submit copies to CCDOA, EHS. Originals must be maintained by the responsible party
- I. Photographs (if available)
  - 1. Submit copies to CCDOA, EHS
- J. Completed inspection forms (if applicable)
  - 1. Submit copies to CCDOA, EHS

## VII. 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. Airport Storm Water Pollution Prevention Plan
  - 2. Project Waste Management Plan (if required)
  - 3. Project Storm Water Management Plan (if required)
  - 4. Facility Storm Water Pollution Prevention Plan (SWPPP) – (if applicable)
  - 5. Product Safety Data Sheets (SDSs)
- C. Training Materials (list is not limited to the following)
  - 1. Site-Specific Waste Management Guidance Materials (if any)
- D. Related Environmental Documents (list is not limited to the following)
  - 1. Environmental Guideline EG 1-1, Fueling Aircraft\_Vehicles and Auxiliary Equipment

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2. Environmental Guideline EG 1-2, Cleaning Washing - Aircraft \_Vehicles and Equipment
  3. Environmental Guideline EG 1-4, Management of Aircraft Lavatory Water and Waste
  4. Environmental Guideline EG 1-5, Maintenance of Aircraft, Vehicles and Equipment
  5. Environmental Guideline EG 1-7, Storage of Vehicles and Equipment Containing Chemicals
  6. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
  7. Environmental Guideline EG 2-4, Janitorial Activities
  8. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
  9. Environmental Guideline EG 3-5, Parts Washing
  10. Environmental Guideline EG 4-1, Construction
  11. Environmental Guideline EG 4-2, Planning and Design
  12. Environmental Guideline EG 4-3, Procurement
  13. Environmental Guideline EG 4-4, Tenant Operating Guidance
  14. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
  15. Environmental Guideline EG 5-1, Remediation of Contaminated Soils
  16. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
  17. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
  18. Environmental Guideline EG 6-1, Spill Response
  19. Environmental Guideline EG 6-2, Abandoned Material Response
  20. Environmental Guideline EG 7-1, General Waste Management
  21. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
  22. Environmental Guideline EG 7-3, Management of Hazardous Wastes
  23. Environmental Guideline EG 7-4, Management of Universal Wastes
  24. Environmental Guideline EG 7-5, Management of Special Wastes
  25. 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 445A Water Controls
  3. NAC 445B Air Controls
  4. NAC 459/NRS 459 Hazardous Materials
  5. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
  6. NRS 618.750-618.850 Control of Asbestos
  7. 40 CFR Protection of the Environment

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8. 49 CFR Transportation
9. 29 CFR 1910 Occupational Safety and Health Standards
10. 29 CFR 1926 Safety and Health Regulations for Construction
11. Uniform Fire Code/ NFPA
12. CCDOA Rules and Regulations

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

1. Spill Report Form
2. Waste Disposal Manifests
3. Bill of Ladings

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