

EG 5-2: Management of Petroleum Products (SPCC Plan)

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I. Activity Description

This environmental guideline describes the management of underground and above ground petroleum storage tanks and containers. Both underground storage tanks (USTs) and above ground storage tanks (ASTs) are utilized at Clark County Department of Aviation facilities for the storage of petroleum products related to vehicle and equipment fueling and maintenance. An underground hydrant system is utilized for transporting and transferring jet fuel to aircraft at McCarran International Airport. In addition, numerous smaller and portable containers are used to store petroleum products in support of fueling and maintenance activities for vehicles and other equipment. This guideline addresses compliance with federal regulations under 40 CFR 112 (Spill Prevention Control and Countermeasure regulation) and 40 CFR 280/281 (UST regulation) as well as, relevant of counterpart state requirements enforced by the Nevada Division of Environmental Protection (NRS 459.800 through 459.856, NAC 459.9921 through 459.9995, NAC 459.99285 and NAC 459.9931 through 459.9938), International Fire Code (IFC) requirements, and local Clark County Fire Code Amendments activity of cleaning non-industrial interiors of buildings and aircraft, including the use and storage of cleaning chemicals, waste collection and disposal/recycling

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

III. Critical Operating Requirements

- A. Prohibited Activities
1. Installing and operating an UST/AST without a state application and state registration
 2. Failing to operate an UST/AST in accordance with regulatory requirements
 3. Removal of an UST/AST without taking proper closure-related actions
 4. Installing, changing the use of, or removing a tank system at a CCDOA facility without notifying the Nevada Division of Environmental Protection (NDEP), Clark County Health District (CCHD), Southern Nevada Health District and CCDOA, EHS office

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B. Required Activities

1. A facility with specific total cumulative petroleum storage capacity in regulated containers as specified in 40 CFR 112 is required to prepare a Spill Prevention, Control, and Countermeasure (SPCC) Plan and is required to maintain spill, overfill and release controls. In addition, a Facility Response Plan (FRP) is required at facilities with a total cumulative petroleum storage capacity of 1,000,000 gallons or more with the potential for release to navigable waterways
2. Copies of facility SPCC Plan and FRP must be provided to the CCDOA, EHS office
3. Weekly inspections of any tank or container with 55-gallons or more of petroleum product
4. A minor stationary source permit from Clark County Department of Air Quality may be required prior to the installation of an AST System
5. Approval from the Southern Nevada Health District is required prior to the installation of a UST system
6. All USTs on CCDOA properties must be enrolled in the Nevada State Petroleum Fund
7. All ASTs on CCDOA properties that are used for flammable/combustible material must conform to the requirements of 29 CFR 1910.106, Flammable and Combustible Liquids and International Fire Codes
8. All ASTs on CCDOA properties must have appropriate secondary containment or other preventative systems
9. Store unopened drums or containers on pallets to keep the containers out of contact with the ground and aid with detecting leakage
10. Store open drums or containers on secondary containment, such as spill pallets

C. General Considerations

1. Each tenant, contractor and operator that stores petroleum 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. Every potentially applicable facility must be evaluated for compliance requirements. Petroleum storage facilities with containers 55 gallons and larger should be evaluated for 40 CFR 112 requirements for a Spill Prevention, Control and Countermeasure Plan or a Facility Response Plan
3. Appropriate measures should be implemented to prevent any spill, leak or discharge into the environment
4. Periodic testing and inspections of spill prevention, equipment, sumps used for release detection and overfill prevention equipment, is required at the time of installation, for new or replaced UST systems and every three (3) years thereafter. All existing UST systems must conduct initial testing no later than October 13th, 2018 and every three (3) years thereafter

D. Training Requirements

1. Training on SPCC Plan requirements is required for all oil-handling personnel at SPCC qualifying facilities if they conduct operations with SPCC regulated

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containers and activities. Refer to CCDOA SPCC Plan and/or facility SPCC plan, and/or Facility Response Plan for training

2. Employee training programs shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact storm water runoff. Storm Water Pollution Prevention Plan (SWPPP) training shall address topics such as spill response, good housekeeping, waste handling and material management practices

E. Storage and Materials Management Requirements

1. Transfer petroleum products in paved areas where feasible; areas paved in concrete should be utilized if the liquid is asphalt reactive
2. Avoid entirely or minimize the transfer of petroleum products in areas near storm drain inlets; use temporary covers on storm drains when handling petroleum products outside to prevent leaks and spills from reaching the storm water system
3. Store drums/containers on pallets or within berms or secondary containment devices to prevent leaks and spills from entering storm water runoff and to enable easier inspection and detection of leaks
4. Utilize methods to contain and absorb petroleum products from leaks, spills and hose disconnects that occur during transfers; dispose of spill cleanup residue and materials properly
5. Ensure product Safety Data Sheets (SDSs) are readily available to employees who handle, transfer or are otherwise involved in the management of petroleum products
6. Protect petroleum products stored outside from exposure that could compromise containers; use overhead cover, storage cabinets, etc.
7. Provide safeguards against accidental or intentional releases by restricting access to storage areas, implementing an inspection and maintenance program, practicing good housekeeping procedures, and using covered bins or dumpsters specifically dedicated for petroleum product spill residue and cleanup materials.
Note: Clean-up residues and materials must be handled as hazardous waste for gasoline and AVGAS spills. Refer to Environmental Guideline EG 7-3, Management of Hazardous Wastes
8. Maintain legible labels and markings on all containers and tanks. Labels on all containers must have the name of the owner of the container, an associated contact telephone number, an appropriate hazard warning and must clearly indicate the contents. In addition, the name on the product label must match the name on the corresponding SDS
9. Ensure that there is adequate secondary containment for all bulk storage containers and that all containers, secondary containment and berms are in good operating condition
 - a) Refer to the appropriate SPCC Plan for guidance on specific requirements, if applicable
10. Outdoor storage and handling of hazardous materials shall be in accordance with procedures established in any storm water permit and storm water management plan that is applicable to the facility

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IV. Planning Requirements

- A. Construct and operate tank systems pursuant to applicable regulatory requirements and industry standards
- B. Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur
- C. Install and maintain adequate secondary containment on all bulk oil storage containers. Secondary containment control design must consider precipitation impacts. A vehicle defueling operational area, where fuel is removed from a vehicle and often returned to an on-site AST or UST, is considered a "loading area" and would be subject to the general secondary containment requirements of 40 CFR 112.7(c) if the facility is an SPCC qualifying facility
- D. Fueling and fuel storage areas should be designed and operated to prevent the uncontrolled runoff of precipitation and associated contamination (e.g., berms, overhead covers, etc.). Process or procedural controls are required to prevent uncontrolled discharges to storm water or any sewer
- E. Provide protection against physical damage (e.g., traffic barriers, adequate lighting, fencing, etc.) and vandalism to petroleum transfer or storage areas
- F. Petroleum storage areas should have mechanisms or procedures in place to determine whether a spill or release from petroleum storage tank has occurred and to prevent loss of spilled or released materials
- G. Cathodic protection of coated and bare steel systems in contact with soils needs to be addressed. This pertains to buried tanks, AST bottoms in contact with soils and buried piping
- H. Evaluate container vents and dispensers for air permit requirements per Clark County Department of Air Quality programs

V. Critical Tasks

- A. Use absorbent materials and spot cleaning for small spills; collect and properly dispose of all material used to clean up a spill or leak. See Environmental Guideline EG 6-1, Spill Response
- B. Maintain records of inspections, inventories of the types of substances and quantities stored and used, testing data and leak or spill reports per federal, state and local regulations

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- C. Notify CCDOA, EHS of any petroleum tanks installed with volumes over 50 gallons. Maintain an inventory of applicable petroleum containers on site, categorized by petroleum type, volume capacity and location
- D. Do not install or remove USTs or ASTs without consultation with CCDOA, EHS
- E. Maintain active underground storage tanks in compliance with all applicable regulations
 - 1. Removal/closure shall also be conducted in compliance with state and local regulations
 - 2. Maintain records of inventories of the types of substances and quantities stored and used, leak testing results and spill reports

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 and dispose offsite at an approved and permitted facility
- D. Prevent contamination from entering any sewer, storm drain, drainage waterway or soil area using whatever means available (i.e. barriers, blocking devices, etc.)
- E. Spill of any kind shall not be washed into any sewer or waterway, or onto any soil areas
- F. Containerize all collected wastes and evaluate for proper labeling, storage and disposal
- G. Complete the CCDOA Spill Reporting Form and return the completed form to the CCDOA, EHS office within 24-hours of the release

VII. Expected Records and Outputs

- A. Periodically inspect storage tanks, connecting piping, valves, and associated pumping equipment in accordance with manufacturer's specifications. This requirement may be codified in regulation, site plans, or guidance documents
- B. Prior to releasing accumulated precipitation from a secondary containment area, the water must be inspected for signs of oil contamination (e.g., sheen). If none exists, the water can be removed from the secondary containment area and allowed to discharge to the ground surface. For SPCC regulated bulk storage AST systems, written records

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documenting this inspection and discharge procedure must be maintained at the facility

1. Petroleum Storage Tank Installation Plans
 - a. Installation applications are prepared, submitted and maintained by the installation contractor. Submit copies of plans and drawings to CCDOA, EHS for approval
2. UST Registration Records and Permits
 - a. Operators are required to maintain applicable permits and registrations on site for the life of the tank(s)
3. AST Registration Records and Permits
 - a. Operators are required to maintain applicable permits and registrations on site for the life of the tank(s)
4. Inspection Records
 - a. Inspect storage tanks in accordance with manufacturer & SPCC Plan requirements
 - b. Operators are required to maintain inspection records for (3) three years
5. Tank Inventory Records
 - a. Operators should maintain records on tank and pipe testing at all times
6. Tank and Pipe Records
 - a. Operators should maintain records on tank and pipe testing at all times
7. SPCC Plan
 - a. As applicable, operator must maintain the SPCC Plan on site
 - b. SPCC Plans must be reviewed and updated every (5) five years
 - c. Copies of SPCC plans must be submitted to the CCDOA, EHS office
8. SPCC Records
 - a. Operators should maintain records as described in their site-specific SPCC Plan
9. Cathodic Protection Records
 - a. Operator should maintain records for the life of protected systems
 - b. Installation design reports
 - c. Annual test reports
10. Facility Response Plan
 - a. Facilities with over one million gallons storage with the potential to contaminate navigable waterways
 - b. Copies of Facility Response plans must be submitted to CCDOA EHS
11. Correspondence with Regulating Agencies
 - a. Copies must be submitted to the CCDOA, EHS office
12. Evidence of training on the facility SWPPP, SPCC Plan and Operator SOPs
 - a. Formal certifications are not always necessary; however, “proof of training” such as sign-in sheets signed by the attendees, are expected and should be maintained on file by the operator/tenant

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VIII. 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. USEPA SPCC Guidance documents
 - 3. Product Safety Data Sheets (SDSs)
- C. Training Materials (list is not limited to the following)
 - 1. Operating procedures training (On-the-Job)
 - 2. Operator site-specific training materials for SPCC Plan
 - 3. SWPPP training materials
- D. Related Environmental Documents (list is not limited to the following)
 - 1. Environmental Guideline EG 1-1, Fueling Aircraft_Vehicles and Auxiliary Equipment
 - 2. Environmental Guideline EG 1-2, Cleaning Washing - Aircraft _Vehicles and Equipment
 - 3. Environmental Guideline EG 1-3, Cargo Loading and Offloading
 - 4. Environmental Guideline EG 1-4, Management of Aircraft Lavatory Water and Waste
 - 5. Environmental Guideline EG 1-5, Maintenance of Aircraft, Vehicles and Equipment
 - 6. Environmental Guideline EG 1-7, Storage of Vehicles and Equipment Containing Chemicals
 - 7. Environmental Guideline EG 2-1, Painting and Paint Removal
 - 8. Environmental Guideline EG 2-2, Cleaning Washing - Indoor Industrial Surfaces
 - 9. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
 - 10. Environmental Guideline EG 2-4, Janitorial Activities
 - 11. Environmental Guideline EG 2-5, Cleaning Washing - Outdoor Areas and Structures
 - 12. Environmental Guideline EG 3-1, Ozone Depleting Compound Management
 - 13. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations
 - 14. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling

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15. Environmental Guideline EG 3-5, Parts Washing
 16. Environmental Guideline EG 4-1, Construction
 17. Environmental Guideline EG 4-2, Planning and Design
 18. Environmental Guideline EG 4-3, Procurement
 19. Environmental Guideline EG 4-4, Tenant Operating Guidance
 20. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
 21. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
 22. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
 23. Environmental Guideline EG 6-1, Spill Response
 24. Environmental Guideline EG 6-2, Abandoned Material Response
 25. Environmental Guideline EG 7-1, General Waste Management
 26. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
 27. Environmental Guideline EG 7-3, Management of Hazardous Wastes
 28. Environmental Guideline EG 7-4, Management of Universal Wastes
 29. Environmental Guideline EG 7-5, Management of Special Wastes
 30. 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 459 Hazardous Materials
 4. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
 5. NRS 459.400-459.600 Disposal of Hazardous Waste
 6. 40 CFR Protection of the Environment
 7. 49 CFR Transportation
 8. 14 CFR 139.321 Handling and Storing of Hazardous Substances and Materials
 9. Uniform Fire Code/NFPA
 10. 29 CFR 1910 Occupational Safety and Health Standards
 11. CCDOA's Rules and Regulations
- F. Other Documents (list is not limited to the following)
1. SPCC Plan
 2. CCDOA Spill Reports
 3. The Globally Harmonized System of Classification and Labeling of Chemicals (GHS)

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