

**EG 7-3: Management of Hazardous Wastes**

Date:

January 1, 2024

Document Owner:

CCDOA Environmental Specialist

**I. Activity Description:**

The activity of properly identifying, storing, handling and offering transportation, and disposal of waste items or materials that poses substantial or potential threats to public health or the environment

**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. Illegal management of hazardous wastes
2. Improper handling and disposal of Hazardous Wastes, both listed and characteristic
3. Improper identification, handling and disposal of unknown potentially Hazardous Waste
4. Damage to or contamination of airport property

B. Potential consequences from performing the activity incorrectly:

1. Property Damage
2. Personal Injury
3. Long term damage to the environment
4. Regulatory and judicial enforcement actions and related (financial & non-financial) penalties

**Note: The following guidance applies only to Hazardous Waste. Use Environmental Guideline EG 7-1, General Waste Management to facilitate waste classification**

**III. Critical Operating Requirements**

A. Prohibited Activities

1. Individuals are not allowed to handle or manage hazardous wastes without appropriate training and personal protective equipment (PPE)
2. Hazardous waste cannot be left unidentified, unclassified or inadequately managed due to lack of knowledge of regulatory requirements
3. Employees shall not stand upon or work from waste drums or containers

4. Disposal of any unused chemicals in the storm sewer system or anywhere on CCDOA property, is strictly prohibited

B. Required Activities

1. Hazardous waste storage areas must be kept clean
2. Documented weekly inspections of the hazardous waste storage areas must be conducted
3. Managers of facilities who manage hazardous wastes shall obtain a United States Environmental Protection Agency (USEPA) Hazardous Waste Generator Identification Number
4. All wastes must be stored in a manner that does not result in adverse impacts to the environment
5. All wastes are to be stored, transported and disposed of in accordance with Department of Transportation (DOT), Resource Conservation & Recovery Act (RCRA), State of Nevada, and local environmental regulations
6. All CCDOA personnel must contact the CCDOA Environmental Specialist for disposal procedures
7. Generator status must be tracked at all times and appropriate generator status regulations followed
8. Companies that produce hazardous waste (Generators) must prepare and implement a Preparedness and Prevention Plan for dealing with hazardous waste related emergencies
9. Hazardous waste containers must be in good condition, be compatible with the waste, be kept closed and handled so that they will not rupture or leak
10. Waste generators must comply with accumulation time and quantity limitations based on their current generator status (e.g., ≤90 days, ≤180 days)
11. It is the generator's responsibility to verify that transporters and disposal facilities are licensed to accept hazardous waste streams

C. General Considerations

1. Hazardous waste must be properly managed in accordance with all legal requirements
2. In general, waste generated from the cleanup of spills are considered non-hazardous (diesel, jet fuel, deicers, lavatory wastes). However, cleanup materials from spills of gasoline or aviation gasoline must be handled as hazardous waste until such time as they are determined to be non-hazardous (i.e., sampled for toxicity and/or exempt from regulation as a hazardous waste due to regulated UST release source)

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

3. The waste generator must be aware of the generator status (i.e., large, small or conditionally exempt)
4. The waste generator must know the hazardous waste codes and amounts of all generated hazardous wastes
5. It is highly recommended that each waste generator prepare a waste management plan that identifies each waste stream and its management practice. Each generator of waste is specifically responsible for understanding waste management regulations and managing their waste accordingly. This Environmental Guideline is meant as guidance only and does not supersede any regulations
6. All waste generators shall properly identify and characterize hazardous waste using generator process knowledge and available regulatory guidance
7. Segregate, handle, store and track inventory of hazardous waste as per regulatory guidance
8. Containerize, label and transport hazardous waste according to DOT, RCRA, State of Nevada and local regulations
9. Generate and maintain a profile with the disposal facility for all hazardous waste
10. The USEPA has delegated responsibility for implementing RCRA regulations to the Southern Nevada Health District (SNHD) Solid Waste and Compliance Division

D. Training Requirements

1. Occupational Safety and Health Act (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) training for companies/employees subject to OSHA regulations
2. Personnel who handle or manage hazardous wastes are required to receive site-specific training in accordance with all applicable State and Federal requirements. This includes the following:
  - a. Discussion of waste characteristics and safe handling practices
  - b. Describing methods of containment
  - c. Generation and storage requirements
  - d. Safety and spill response

E. Storage & Materials Management Requirements

1. Store the hazardous wastes according to all RCRA and Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requirements
2. Per OSHA, DOT, RCRA, Local, State and Federal requirements
  - a. Inspect and maintain hazardous waste generation, satellite accumulation and waste storage areas

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

- b. Provide appropriate secondary containment and spill control
- c. Label hazardous wastes appropriately
- d. Place appropriate signage in groups and temporary storage areas
- e. Record amounts of materials along with dates and locations

#### IV. Planning Requirements

- A. Maintain adequate resources to ensure correct management of hazardous wastes, including physical resources and management and training resources. This includes, but is not limited to, containers, transfer of equipment, personnel safety equipment and emergency response equipment
- B. When appropriate, implement hazardous waste source control programs that divert applicable materials to recyclable and universal waste streams, and then demonstrate compliance with hazardous waste regulations
- C. Comply with all emergency response requirements of applicable hazardous waste requirements including, maintaining a communication and response plan to protect human health and the environment during emergencies
- D. Review the facility Storm Water Pollution Prevention Plan
  - 1. These documents are available through the CCDOA, EHS office
  - 2. If applicable, the operator will need to decide whether to utilize the existing CCDOA generated facility Storm Water Pollution Prevention Plan (SWPPP), or complete their own plan for approval by CCDOA EHS
- E. Consider the preparation of a Waste Management Plan. This document is not required, but highly recommended for fully understanding the generating, controlling and storing implications for hazardous wastes generated in the operator's activities. Use the plan to avoid co-mingling wastes and the generator knowledge for waste determinations

#### V. Critical Tasks

- A. Records must be kept on waste identification and determinations. This includes analytical results, product safety data sheets (SDSs) and any other records used in waste characterization. Any process knowledge determinations, to include or exclude, a waste as hazardous should be kept as long as the waste is being generated or managed

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

- B. Hazardous waste generators are required to maintain all records for a minimum of three (3) years related to hazardous waste storage, area inspections, waste shipping and disposal. These requirements can be extended if the records are under investigation
- C. Storage locations require rigorous supervision for compliance of cleanliness, access, emergency response secondary containment and spill control as well as, time limitations
- D. Generators of hazardous waste must label all hazardous wastes appropriately, per DOT guidance, before shipping. Waste must be offered for shipping and disposal in compliance with RCRA and state regulations. Special care should be taken in preparation of manifests, Land Disposal Restrictions (LDRs) and receipt of disposal site notification
- E. Transporters of hazardous waste and generators of greater than 100 kg (220 lbs.) per month of hazardous waste are required to obtain a permanent EPA Identification Number. A permanent EPA Identification Number is obtained by completing and submitting an EPA Form 8700-12 "Notification of Regulated Waste Activity" application to the Nevada Division of Environmental Protection. Application forms and instructions are provided from the USEPA website
- F. Violations of this guideline may result in CCDOA citations, Notices of Violation and/or monetary penalties up to \$1,000 a day per violation

## 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. Containerize all collected spillage and cross contaminated wastes and evaluate for proper labeling, storage and disposal

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

- D. Prevent contamination from entering any sewer, storm drain, drainage waterway, or soil area using whatever means available (i.e., barriers, blocking devices, etc.). In the event that a spill enters any sewer or storm drain system, the drainage line must be accessed and contamination collected utilizing whatever means necessary. Releases to the environment that are not properly handled will be remediated by the CCDOA on-call environmental contractor. Emergency response clean-up costs will be forwarded on to the responsible party.
- 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 & Maintenance Requirements**

- A. Hazardous waste storage areas and satellite accumulations areas must be inspected every week for RCRA-compliant containment, leaks, container condition, emergency response items, labeling and waste holding times
- B. Maintain good housekeeping practices in waste collection areas
- C. Maintain adequate aisle space between containers

**VIII. Expected Records and Outputs**

- A. Waste Management Plan (including production, locations and waste determinations)
  - 1. While this plan is not required, a Waste Management Plan is highly recommended in order to fully understand the production, control and storage of hazardous wastes
- B. Hazardous Waste EPA Generator Identification Numbers
  - 1. Tenants that generate sufficient hazardous waste to be classified as a small quantity generator (220 pounds in a month), are required to obtain an EPA Hazardous Waste Identification Number. The EPA designation must be submitted to CCDOA, EHS

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

2. Tenants that generate sufficient hazardous waste to be classified as a large quantity waste generator (2,200 pounds in a month), are required to obtain an EPA Hazardous Waste Identification Number. The EPA Waste Generator designation must be submitted to CCDOA, EHS
  3. All manifests and supporting documentation for the production, storage and disposal of hazardous waste, must be kept on site at the facility and made available to CCDOA inspectors upon request
  4. Tenants must complete disposal manifests for hazardous waste shipments. Manifests are signed by the receiving facility and must be returned to you within 35 days. If waste is shipped out of state, send a copy of the returned manifests to Nevada Division of Environmental Protection (NDEP)
- C. Waste Analysis and Profiles - SDSs and Waste Generator Knowledge
1. All hazardous wastes must be profiled by the landfill for disposal. This frequently requires laboratory analysis or equivalent
  2. SDSs should be made available to all employees and maintained on file by the generator at the facility. Manufacturers will supply these documents on demand. Generator knowledge documentation must be kept on site
- D. Disposal Manifest(s), LDR & Shipping Forms
1. Original shipping and disposal forms must be developed and kept on site
  2. Manifests and LDR forms must be obtained from the disposal facility in a timely fashion or notifications to USEPA must be made
  3. All manifests must be maintained on file by the waste generator for at least three (3) years
  4. Copies of all manifests may be required to be submitted to the NDEP, depending on generator status
  5. SDSs should be made available to all employees and maintained on file by the waste generator at the facility. Manufacturers will supply these documents on demand. Generator knowledge documentation must be kept on site
  6. Wipes and rags determined to be hazardous waste, must be managed as "other" hazardous wastes. Rags and wipes must be placed in a closed and properly labeled container after use
- E. Inspection Records
1. Waste storage area inspection records must be maintained on site by the operator for a minimum of three (3) years

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

F. Evidence of Training

1. Employees involved in the handling of hazardous wastes must receive site-specific training per RCRA guidance
2. Site-specific hazardous waste training records for employees must be maintained on site by the generator for a minimum of three (3) years

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. Product SDSs (for raw materials)
2. Waste Management Plan (if prepared)
3. SNHD Compliance Bulletins
4. Facility Storm Water Pollution Prevention Plan (SWPPP)

C. Training Materials (list is not limited to the following)

1. Site-Specific hazardous waste generation, management and shipping information
2. OSHA HAZWOPER training materials, if subject to OSHA

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

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

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
  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 5-1, Remediation of Contaminated Soils
  22. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
  23. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
  24. Environmental Guideline EG 6-1, Spill Response
  25. Environmental Guideline EG 6-2, Abandoned Material Response
  26. Environmental Guideline EG 7-1, General Waste Management
  27. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
  28. Environmental Guideline EG 7-3, Management of Hazardous Wastes
  29. Environmental Guideline EG 7-4, Management of Universal Wastes
  30. Environmental Guideline EG 7-5, Management of Special Wastes
  31. 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. 40 CFR Protection of the Environment
  7. Uniform Fire Code/NFPA
  8. 49 CFR Transportation

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED.  
Always refer to the online CDDOA EMS document library prior to use to ensure you are using the most current copy

9. 29 CFR 1910 Occupational Safety and Health Standards
  10. 29 CFR 1926 Safety and Health Regulations for Construction
  11. 14 CFR 139.21 Handling and Storing of Hazardous Substances and Materials
  12. Nevada State Fire Marshal requirements
  13. Clark County Fire Department Hazardous Materials requirements
  14. CCDOA Rules and Regulations
- F. Other Documents (list is not limited to the following)
1. CCDOA Spill Report Form
  2. Disposal Manifests

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED.  
Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy