

EG 6-2: Abandoned Material Response

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Document Owner:

CCDOA Environmental Specialist

I. Activity Description:

The following outlines response guidelines to abandoned materials located on CCDOA property, including identification, notification, collection, disposal and reporting/recordkeeping

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. Personnel exposure to unknown hazards associated to abandoned chemicals
2. Improper or inappropriate disposal of hazardous wastes
3. Hazardous material spills and/or releases
4. Contamination of drainages, sewers, groundwater and soil

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. Abandonment of material on CCDOA property is prohibited
2. Opening containers or packages to inspect or determine the contents without appropriate response training is prohibited

B. Required Activities

1. Maintain personnel safety
2. Immediately report abandoned materials to CCDOA Control Center at (702) 261-5125 or appropriate Customer Service Desk for the area (see phone numbers in Section IX below)
3. The CCDOA will coordinate response resources and notification requirements

C. General Considerations

1. If feasible and safe to do so, attempt to identify the original owner of the material, such as:
 - a. Inspecting external markings or labeling on the material
 - b. Location relative to potential generators and access to location
 - c. Asking other personnel working in the area

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- d. Other signage in the immediate vicinity
2. Airport Security Considerations requires immediate notification to the Airport Control Center at (702) 261-5125
3. Personnel safety is a primary importance in dealing with an unknown or abandoned material. Consider the possible linkage to terrorism in approaching and dealing with an abandoned material which could be Chemical, Biological, Radiological, Nuclear or Explosive (CBRNE) in nature
4. Control spills or releases of materials, if safe to do so, and limit access and maintain security of the area. If responding to a spill, refer to Environmental Guideline EG 6-1, Spill Response
5. Each owner and operator conducting material management 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
6. Owner, if identified, shall submit an Incident Report to CCDOA, EHS and Airside Operations and be responsible for disposal of materials. The incident report must be submitted in a timely manner and include:
 - a. Name of responsible party and/or owner of material
 - b. Material characterization data
 - c. Completed shipping and disposal records
7. If the material owner is not identified; CCDOA, ES &RM and Security will coordinate with the Las Vegas Metropolitan Police Department - All Regional Multi-Agency Operations Response (ARMOR) Unit
8. Any material that is verified as "non-Hazard" will be handled as abandoned property. Use recyclable or disposable paint containers whenever possible
9. If the material is suspected to be dangerous or cannot be identified, immediately notify the CCDOA Control Center directly. CCDOA, EHS and Security will coordinate with the Las Vegas Metropolitan Police Department - ARMOR Unit to take custody of the potentially dangerous material

D. Training Requirements

1. Personnel involved in actual handling of unknown materials must be trained for hazardous material response. Refer to OSHA 1910.120
2. Employees' training programs shall inform personnel at all levels of responsibility who are involved in abandoned material response activities that may impact the environment. This training shall address topics such as health risks, exposure controls, spill response, good housekeeping and material management practices. Contractor or temporary personnel shall be informed of facility operation and design features in order to minimize discharges, releases and/or exposures

E. Storage and Materials Management Requirements

1. Recovered abandoned materials must be properly labeled, stored and properly disposed
2. Store drums/containers on pallets for easier inspection and detection of leaks
3. Store materials indoors or cover when stored outdoors

4. Ensure adequate spill clean-up supplies are stocked in the areas when transfers take place
5. Protect materials stored outside from exposure that could compromise containers; use overhead cover, storage cabinets, etc.
6. 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 specially dedicated to hazardous materials
7. Maintain legible labels and markings on all containers and tanks

IV. Planning Requirements

- A. The CCDOA Control Center will maintain awareness of response resources and notification requirements
- B. CCDOA Property Monitoring will respond to materials that are abandoned at vacant properties owned by the CCDOA

V. Critical Tasks

- A. Assess situation then contact the CCDOA Control Center directly at (702) 261-5125. Note containment, integrity of containment, local drainage, odors and any other important situational aspects of abandoned material
 1. Do not attempt to handle or move the material without proper guidance or training
 2. Follow the instructions provided by the CCDOA Control Center
- B. If feasible, safely identify and assess material and ownership. If suspected dangerous, notify the CCDOA Control Center immediately at (702) 261-5125
 1. Immediate human and/or environmental protection concerns should be addressed first
 2. Contact probable owners and advise the CCDOA Control Center
- C. Notify the CCDOA, EHS office
 1. The CCDOA Control Center will make the required notification to EHS
- D. Properly Contain, Manage and Dispose
 1. Control potential for spills or release of materials. Assure containment and limit access and security at the release area
 2. Assure proper handling Assume the most conservative safety and management of the materials into consideration
 3. Relax considerations only on the basis of analytical and operational findings. Use highest level of trained personnel based on site knowledge
 4. Owners will be given the reasonable opportunity to claim their material for response
- E. If necessary, notify the EHS Administrator directly (702) 219-0942

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1. EHS Administrator will assist in determining what, if any, reporting is necessary
2. Owner of material is responsible for notifications
3. Reporting will be coordinated with EHS and Airside Operations
4. Lack of response will require EHS to implement proper procedures with cost recovery from owner

IV. Emergency Response

- A. Abandoned material creates an unknown hazard potential
 1. Contact the CCDOA Control Center at (702) 261-5125 and describe the situation
- C. If a spill occurs, refer to Environmental Guideline EG 6-1, Spill Response
 1. All spills must be immediately reported to the CCDOA Control Center at (702) 261-5125 or the appropriate Customer Service Desk for the area (see phone numbers in Section IX below)
 2. In the case of abandoned, unknown material spills, keep all unauthorized personnel out of the immediate vicinity of the spill

V. Inspection and Maintenance Requirements

- D. Stored abandoned waste will be inspected and maintained to prevent release and assure compliance with safety and environmental guidance and regulations

VI. Expected Records and Outputs

- A. Incident Report
 1. These forms will be completed by owner/custodian and maintained on file by the CCDOA Airport Operations office

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. Product Safety Data Sheets (SDSs)
 2. NIOSH Pocket Guide to Chemical Hazards (NPG)
 3. DOT Emergency Response Guidebook
 4. EPA Office of Solid Waste and Emergency Response
 5. OSHA Emergency Preparedness and Response Guidance

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- C. Training Materials (list is not limited to the following)
 - 1. FEMA Emergency Response
 - 2. OSHA 40-Hour Hazwopper
- D. Related Environmental Documents (list is not limited to the following)
 - 1. All Environmental Guidelines apply to airport tenants and others who may be conducting the activities described in each Guideline
- E. Applicable Regulations (list is not limited to the following)
 - 1. 40 CFR 110.3 Discharge of Oil
 - 2. 40 CFR Protection of the Environment
 - 3. Uniform Fire Code/NFPA
 - 4. NAC 444/NRS 444 Sanitation
 - 5. NRS 459.400-459.600 Disposal of Hazardous Waste
 - 6. NAC 459/ NRS 459 Hazardous Materials
 - 7. Nevada State Fire Marshal Requirements
 - 8. Clark County Fire Department Hazardous Materials Requirements
 - 9. CCDOA Rules and Regulations
- F. Other Documents (list is not limited to the following)
 - 1. Spill Report Form
 - 2. Waste Shipment Manifests/Disposal Documentation
 - 3. The Globally Harmonized System (GHS) of classification and labeling of chemicals

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