

**EG 4-5: Tenant Relocation or Closeout**

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Document Owner:

CCDOA Environmental Specialist

**I. Activity Description**

The activity consisting of the closure of tenant activities at any airport tenant site, for either of the following reasons:

- A. Relocation to another tenant site within the airport property boundary, or
- B. Cessation of activities within the airport property boundary for any reason

**II. Potential Environmental Risks**

- A. The Clark County Department of Aviation (CCDOA) - Environmental, Health & Safety (EHS) Section has identified the following environmental concerns associated with these activities:
  - 1. Improper or inappropriate abandonment of above or below ground tanks
  - 2. Incomplete removal of hazardous materials and/or hazardous or universal wastes
  - 3. Release of maintenance fluids to sewer
  - 4. Improper maintenance or closure of pretreatment device
  - 5. Contamination of site (soil, surface water, ground water)
- 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
  - 5. Costly remediation of the site
  - 6. Continued responsibility for lease payments & utilities until all environmental closeout requirements are met

**III. Critical Operating Requirements**

- A. Prohibited Activities
  - 1. Spills of any kind shall not be washed into any sewer system or waterway, or onto any soils
  - 2. Discharge of the following materials down any drain is prohibited:
    - a. Petroleum products
    - b. Pesticides, insecticides, or herbicides
    - c. Solvents
  - 3. Improper disposal of soil waste. See Environmental Guideline EG 7-1, General Waste Management

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- B. Required Activities
  - 1. Removal of all chemicals and hazardous wastes associated with activities at tenant site
  - 2. Removal of water and sludge from water pretreatment devices associated with activities at tenant site
- C. General Considerations
  - 1. Each airport tenant, contractor, and operator conducting facility closeout or relocation 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. Based on the type of activities performed at the tenant site, the CCDOA reserves the right to require that an environmental assessment be performed on the property by a third party consultant prior to final closeout. CCDOA may also require more extensive assessment(s) and/or remedial activities as warranted
  - 3. Prior to final closeout of any lease, the tenant must provide sufficient information/data to the CCDOA, EHS indicating that all environmental issues have been addressed and that there are no outstanding concerns. The tenant must arrange for the removal and disposal of all trash, empty containers, drums, stained soil, etc., at their expense.
- D. Training Requirements
  - 1. None addressed in this program
- E. Storage and Materials Management Requirements
  - 1. Materials and/or items may not be abandoned or left in the lease area without receiving prior written authorization from the CCDOA

#### IV. Planning Requirements

- A. CCDOA will require the following information to evaluate the petroleum storage system and fuel distribution systems (if any), prior to final closeout:
  - 1. All approved permit applications;
  - 2. Most recent storage tank registration system,
  - 3. All change in service forms
  - 4. SPCC Plan (if not previously provided to CCDOA, EHS)
  - 5. As-built diagrams for the petroleum storage and distribution systems
  - 6. Any release reports
  - 7. Leak detection monitoring data
  - 8. Any onsite sampling results, and

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9. Correspondence with the Nevada Division of Environmental Protection and/or the Southern Nevada District including any confirmation of site closure (if applicable)
- B. Parties interested in leasing properties will have access to any site assessment data or reports for consideration prior to leasing. Those parties may collect additional information as deemed necessary to accept responsibility for future environmental concerns. If an interested party opts to conduct additional investigation activities, a Work Plan must be prepared and submitted to CCDOA, EHS for review and approval
- C. Tenants are responsible for notifying all applicable local, state and federal agencies of the intent to vacate a CCDOA leasehold site and closing or (in the case of relocations) revising any permits or other agreements with those agencies. A list of commonly encountered permits/agreements includes, but is not limited to the following:
  1. Clark County Fire Departments Permits
  2. Tank Registrations
  3. Clark County Department of Air Quality Permits
  4. Nevada State Fire Marshal Permits
  5. Southern Nevada Health District Permits
  6. Universal and Hazardous Waste Identification Numbers
- D. Tenants are responsible for all closeout requirements contained in the CCDOA lease
- E. Tenants may be responsible for upgrading site infrastructure to meet current regulatory requirements prior to finalizing closeout or relocation to a new site
- F. Industrial tenants relinquishing a portion of an airport leasehold area or relocating to a new area on airport property must submit a SWPPP survey, which includes business activities narration and site-specific SWPPP map to CCDOA, EHS, as applicable.
- G. Tenants relocating to a new site on airport property must prepare a Spill Prevention, Control, and Countermeasure (SPCC) Plan if any petroleum products or fuels will be stored on site, per Environmental Guideline EG 5-2, Management of Petroleum Products

## V. Critical Tasks

- A. Tenant Close-out Process
  1. All spills must be immediately reported to the Airport Control Center (702-261-5125), or applicable Customer Service Desk
  2. Notify the EHS office of tenant's notice to vacate leasehold space. EHS office will prepare a preliminary list of potential environmental issues
  3. As part of close-out team, the EHS office will participate in leasehold space initial inspection and will identify any additional outstanding environmental issues and requirements

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4. The EHS office will determine if State reporting is required and will notify the tenant
5. The EHS office will review the tenant remediation work plan and will monitor the described work
6. The EHS office will review the close-out documentation related to tenant activities
7. The EHS office will participate in the final inspection conducted by the close-out team to ensure that all environmental issues have been addressed
8. The EHS office will determine if state closure is required to transfer property. If so, the ES&RM office will assist tenant with closure actions
9. If "No Further Action" from the state is warranted, the tenant must submit a copy to the EHS office
10. Tenant must close out all active permits
11. Tenant must conduct a final cleaning of pretreatment devices, (if applicable)
12. Once the premises is accepted, it will be turned over to the Business Office for final lease closeout

## **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 at (702) 261-5125
- A. Use absorbent materials to manage spills. Contain used materials and dispose offsite at permitted disposal facility.
- B. Prevent contamination from entering any sewer, storm drain, drainage waterway, or soil area using whatever means available (i.e. barriers, blocking devices, etc.)
- C. Control spills to eliminate risk to human health and the environment and to minimize property damage
- D. Utilize drip pans and absorbent materials at maintenance areas where incidental spillage is possible
- E. Spills 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.

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

- A. Perform and document all CCDOA, NDEP, SNHD and other required inspections

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

- A. Tenant SWPPP Survey, which includes business activities narration and a site-specific SWPPP map, as applicable
  - 1. Return CCDOA's SWPPP(s) if vacating airport  
If relocating or relinquishing only a portion of leasehold area at airport, submit a SWPPP survey as noted below
  - 2. Complete a SWPPP Survey and return to CCDOA, EHS along with revised business activities narration and site-specific SWPPP map
  - 3. Maintain all site-specific SWPPP information on file after review by CCDOA, EHS
- B. Spill Prevention, Control and Countermeasure (SPCC) Plan
  - 1. Only required if the facility stores petroleum products above thresholds on lease properties or in containers greater than 55 gallons outside of leased area
  - 2. Maintain all inspection, testing and monitoring data pursuant to the facility's SPCC Plan
  - 3. Refer to Environmental Guideline EG 5-2, Management of Petroleum Products for guidance
  - 4. Contact CCDOA EHS for additional guidance on SPCC planning
- C. Closeout documentation, (if required)
  - 1. Submit cancellation or transfer of ownership to applicable regulators and CCDOA, EHS
  - 2. Submit storage tank closure documentation to the NDEP, SNHD and CCDOA,
  - 3. EHS
- D. Waste disposal records (profiles, LDR forms, manifests, sample results, etc.).
  - 1. Manifests, LDRs & profile forms can be obtained from the disposal facility
  - 2. Operator must maintain waste management records at the facility for a minimum of three (3) years
- E. Site Assessment Data/Reports, including "No Further Action" (NFA) notification, (if required)
  - 1. Request site access from CCDOA, EHS and the CCDOA Business Office to conduct assessment
  - 2. Submit all data/reports to CCDOA, EHS upon completion of site assessment
  - 3. If any contamination is encountered, tenant/operator must obtain a NFA from NDEP and provide a copy to CCDOA, EHS

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## 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. Storm Water Pollution Prevention Plan (SWPPP)
2. DOT Labeling and Placarding Guidance
3. SPCC Plan

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

1. Operator site-specific training materials for handling hazardous wastes

### 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. NAC 444/NRS 444 Sanitation
2. NAC 445A Water Controls
3. NAC 445B Air Controls
4. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
5. NRS 459.748-459.773 Oil or Hazardous Material Spills, Accidents and Incidents
6. 40 CFR Protection of the Environment
7. 29 CFR 1910 Occupational Safety and Health Standards
8. 29 CFR 1926 Safety and Health Regulations for Construction
9. Clark County DAQEM Air Quality Regulations
10. CCDOA Rules and Regulations
11. Nevada Fire Department Regulations (Uniform Fire Code)

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

1. None at this time

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