

EG 7-5: Management of Special Wastes

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CCDOA Environmental Specialist

I. Activity Description:

The activity of properly identifying, storing, handling, transporting and disposing of Special Wastes. Special Wastes are wastes that the receiving non-hazardous landfill may require specific profiles for prior to acceptance. Special Wastes include, but are not limited to:

1. Construction debris, which does not need to be manifested
2. Non-hazardous contaminated spill response media and/or soils and other agglomerations of atypical solids for which receiving landfill acceptance does not exist and the receiving landfill requires a profile
3. Sand/oil interceptor wastes and spills
4. Asbestos containing materials
5. Non-hazardous clean-out wastes from drums, vaults, containments, tanks and other containers
6. Large quantities of dead animals
7. Medical waste (sharps)
8. Biohazardous/infectious wastes
9. Aerosol can waste
10. International trash and regulated garbage
11. Sanitary sewer spills and grease interceptor overflows
12. A characteristic hazardous waste treated or stabilized to be non-hazardous
13. A delisted hazardous waste
14. Any other material upon which a receiving landfill sets receiving quality control standards
15. Generally, any waste that is different from normal landfill refuse

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. Segregation, inventory and profiling of specific special wastes for disposal
 2. Improper or inappropriate management and disposal of fire and health hazards
- 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 Special Wastes. Use Environmental Guideline EG 7-1, General Waste Management to facilitate waste classification

III. Critical Operating Requirements

A. Prohibited Activities

1. Special wastes, per Resource Conservation & Recovery Act (RCRA), “Subtitle C Landfill Permit Requirements”, must be managed according to requirements set by the receiving landfills and may require special recordkeeping, analysis, characterization, handling, control and disposal. They should not be managed and disposed in non-compliance with these requirements

B. Required Activities

1. Each operator, tenant or contractor conducting special waste management 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

C. General Considerations

1. All waste generators must properly identify and characterize all special wastes using generator process knowledge
2. Generator must maintain an approved profile with the disposal facility for all special wastes as needed
3. Residual propellants in aerosol cans pose a safety hazard. Cans need to be emptied of propellants before disposal. If product remains, the can may need to be disposed of as a hazardous waste in accordance with Environmental Guideline EG 7-3. The product safety data sheet (SDS) should be consulted when making this determination. Only punctured and completely emptied aerosol cans, free of products and propellants, can be disposed of in municipal waste receptacles or metal recycling containers
4. Small amounts of spill cleanup materials (less than approximately 5 gallons) of lavatory waste, oils, antifreeze, deicers, firefighting agents, etc., can be placed in the commercial general waste landfill dumpster. **THIS IS NOT APPLICABLE** for any types of fuels including gasoline, AVGAS, diesel and jet fuel. Cleanup of any types of fuels or other potentially hazardous material must be handled in

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accordance with Environmental Guideline EG 7-3, Management of Hazardous Wastes

5. Occasional small deceased animals may also be placed in commercial waste dumpster unless there is evidence of disease. The proper disposal of large or diseased animals must be coordinated with the Nevada Department of Agriculture, Southern Nevada Health District or Clark County Animal Control Services. Discovery of any deceased animals should be reported to the Airport Control Center (702) 261-5125 or the appropriate Customer Service Desk for the area (see phone numbers in Section IX below)
6. Wastes that are excessively wet must be properly bagged (leak-free) before being placed into waste receptacles to preclude leakage of waste liquids
7. Handling and disposal of potentially biohazardous/infectious wastes or other potentially infectious material (OPIM) must be coordinated with regulations and requirements established by regulatory authorities, as well as any Infectious Disease Preparedness and Response Plans developed for the circumstances.
8. At a minimum, potentially biohazardous/infectious waste materials, other than contaminated sharps, must be placed in containers which are:
 - a) Closable;
 - b) Constructed to contain all contents and prevent leakage of fluids during handling, storage, transport or shipping;
 - c) Labeled or color-coded if required;
 - d) Closed prior to removal to prevent spillage or protrusion of contents during handling, storage, transport, or shipping.

D. Training Requirements

1. All employees involved in handling and shipping special waste should receive training to a basic level of awareness regarding the origin, handling and disposal of special wastes
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, personal protective equipment requirements, waste handling and material management practices. Contractor or temporary personnel shall be informed of all facility operation and design features in order to prevent discharges or spills from occurring

E. Storage and Materials Management Requirements

1. Maintain appropriate storage for special wastes including considerations for access, segregation, control and pickup for disposal

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2. Maintain legible labels and markings on all containers and tanks in accordance with the Globally Harmonized System (GHS) of classification and labeling of chemicals

IV. Planning Requirements

- A. Consider the preparation of a Waste Management Plan. This document is not required, but highly recommended for fully understanding the waste production, control, storage and disposal implications for special wastes generated in the operator's activities

V. Critical Tasks

- A. Retain all records related to special waste collection and disposal. These records should be maintained on file by the operator for three (3) years and commonly consist of:
 1. Waste profiles and disposal facility acceptance forms or letters
 2. Shipping and disposal papers (waste manifests)
 3. Invoices from the disposal facility

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 a permitted disposal 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. 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

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VII. Inspection and Maintenance Requirements

- A. Maintain good housekeeping practices in waste collection areas. Area supervision should inspect containments for proper materials

VIII. Expected Records and Outputs

- A. Disposal profile, manifests and shipping records
 - 1. A disposal profile may be required by the disposal facility prior to shipping
 - 2. Manifest forms can be obtained from the disposal facility
 - 3. Shipping records should be maintained on site by the operator for at least three (3) years.
- B. Evidence of training
 - 1. While formal certifications are not always necessary; however, “proof of training” (such as attendee sign-in sheets, signed by the attendees, and handouts) are expected and should be maintained on file by the operator/tenant
- C. Product Safety Data Sheets (SDSs)
 - 1. Manufacturers will supply these documents on demand. SDSs should be made available to all employees and maintained on file by the operator at the facility

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 safety data sheets for raw materials
 - 2. Facility Storm Water Pollution Prevention Plan (SWPPP)
 - 3. 40 CFR Subtitle “C” and “D”
 - 4. Disposal Site limitations and conditional acceptances
 - 5. The Globally Harmonized System (GHS) of classification and labelling of chemicals
- C. Training Materials (list is not limited to the following)

1. Southern Nevada Health District Waste Management 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
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

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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
- 32.

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. NRS 618.750-618.850 Control of Asbestos
6. 40 CFR Protection of the Environment
7. 40 CFR Subtitle "C" and "D" Landfill Regulations
8. 49 CFR Transportation
9. 14 CFR 139.321 Handling and Storing of Hazardous Substances and Materials
10. 29 CFR 1910 Occupational Safety and Health Standards
11. 29 CFR 1926 Safety and Health Regulations for Construction
12. Uniform Fire Code/ NFPA
13. Nevada State Fire Marshal requirements
14. Clark County Fire Department Hazardous Materials requirements
15. 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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