

<b>EG 3-3: Power Generation</b>	
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### **I. Activity Description**

The CCDOA operates a number of emergency power generators and portable power units. These generators can be either fixed (i.e., bolted to the ground) or portable (i.e., on wheels or a trailer). The generators are tested on a regular basis by CCDOA Electricians in order to ensure their proper operation in the event of a power failure. The CCDOA owns and operates generators at the following facilities:

- McCarran International Airport (5757 Wayne Newton Boulevard)
- CCDOA Administration Building (1845 East Russell Road)
- McCarran Rent-A-Car Center (7135 Gillespie Street)
- Henderson Executive Airport (3500 Executive Terminal Drive)
- North Las Vegas Airport (2730 Airport Drive)

In addition, two portable generators are also available, but are not assigned an address because they can be relocated at any time. Each of these fixed and portable generators has a fuel storage tank associated with the unit

Airport operators, tenants and contractors are authorized to operate generators such as emergency power generators or auxiliary power units (APUs)

### **II. Potential Environmental Risks**

- A. The Clark County Department of Aviation (CCDOA) - Environmental, Safety & Risk Management (ES & RM) office has identified the following environmental concerns associated with these activities:
1. Air pollution
  2. Fuel spills
  3. Contamination of soils
  4. Contamination of surface water
  5. Contamination of groundwater
  6. Contamination of sanitary sewer
- 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. The CCDOA-owned generators cannot be operated for testing & maintenance purposes more than 200-hours per year. This limit is set by the Clark County Department of Air Quality (CCDAQ) Operating Permit. There are no limits for the operation of generators for emergency power
2. Spills of any kind shall not be washed into any sewer system, storm drain system, drainage waterway or onto any soils

#### B. Required Activities

1. All tenant and operators must comply with the requirements of their individual CCDAQ Operating Permits, as applicable

#### C. General Considerations

1. Each generator operator conducting power generation operations 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. Under Clark County Air Quality regulation, stationary sources with a potential to emit that is less than the levels listed below are exempt from reporting and permitting requirements:

Type of Air Pollutant	Potential to Emit (tpy)
PM <sub>2.5</sub>	5
PM <sub>10</sub>	5
CO	25
VOC	5
NO <sub>x</sub>	5
SO <sub>2</sub>	25
Lead (Pb)	0.3
H <sub>2</sub> S	1

3. For each generator that does not meet the criteria above, each generator operator may need to obtain an Operating Permit from CCDAQ
4. Each generator operator may need to prepare a Spill Prevention, Control, and Countermeasure (SPCC) Plan if total above ground storage capacity (including generator fuel tanks) exceeds 1,320 gallons. A copy of any such SPCC Plan must be submitted to the CCDOA ES & RM office for approval
5. Installation of new underground storage tanks for petroleum products is not permitted within any CCDOA facility

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D. Training Requirements

1. Technicians who repair or service generators must be trained in lock-out/tag-out procedures
2. Train employees to the appropriate level of protection for spill response and prevention
3. Employee training programs shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact storm water runoff. Training shall address topics such as spill response, good housekeeping and material management practices. Contractor or temporary personnel shall be informed of facility operation and design features in order to prevent discharges or spills from occurring

E. Storage and Materials Management Requirements

1. For CCDOA –operated generators, the Department of Aviation stores generator fuel according to its SPCC Plan. See Environmental Guideline EG 5-2, Management of Petroleum Products

IV. **Planning Requirements**

- A. Additional generators or upgrades to existing generators will require a modification to the CCDAQ Operating Permit

V. **Critical Tasks**

- A. For CCDOA-operated generators, Department of Aviation personnel will conduct generator monitoring and recordkeeping according to the SPCC Plan and CCDAQ Operating Permit
- B. For tenant-operated generators, the tenant is responsible for conducting generator monitoring and recordkeeping in accordance with a SPCC Plan and the tenant's CCDAQ Operating Permit

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 off-site 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.). In the event

that spills enter any sewer or storm drain system, the drainage line must be accessed and contamination collected utilizing absorbent materials. If the CCDOA recommends flushing water through the system, operators/tenants must have a licensed contractor pump out free-floating product or sheen from the pretreatment device, as necessary, in accordance with Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices

- 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 ES & RM office within 24-hours of the release

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

- A. For CCDOA-operated generators, Department of Aviation personnel will conduct generator inspection and maintenance

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

- A. CCDAQ Operating Permits
  - 1. CCDOA maintains the operating permit for CCDOA-operated generators. Operators, tenants and contractors must supply copies of regulatory permits to the CCDOA ES & RM office
- B. Spill and release records for any spill
  - 1. Spill/release immediately called into Airport Control Center (702-261-5125), or applicable Customer Service Desk
  - 2. Responsible Party (for the spill) completes and submits Spill Report Form to CCDOA ES & RM office. Spill Report Forms are available from Airport Operations Coordinators or the CCDOA Environmental, Safety & Risk Management office
  - 3. If any spill is 25 gallons or more, the tenant is responsible for contacting the Nevada Division of Environmental Protection (NDEP) at 1-888-331-6337 within the next business day following the spill. The NDEP Spill Report Number should be noted on the CCDOA Spill Report Form
- C. Air permits, notifications, compliance data, reports and certifications
  - 1. Notification forms can be obtained from the Clark County Department of Air Quality (CCDAQ)
  - 2. The operator must maintain these records at their 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) 261-3803
  4. CCDOA Environmental, Safety & Risk Management (ES & RM).....(702) 261-5166
  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. Manufacturer's operating and maintenance (O&M) manuals
  2. Product Safety Data Sheets (SDS)
- C. Training Materials (list is not limited to the following)
1. NFPA regulations and requirements
  2. Operational procedures training (on-the-job)
  3. Operator Standard Operating Procedures (SOPs) for fueling activities,(if available
- D. Related Environmental Documents (list is not limited to the following)
1. Environmental Guideline EG 1-5, Maintenance of Aircraft, Vehicles, and Equipment
  2. Environmental Guideline EG 5-3, Management of Petroleum Products (SPCC Plan)
  3. Environmental Guideline EG 6-1, Spill Response
- E. Applicable Regulations (list is not limited to the following)
1. NAC 444/NRS 444 Sanitation
  2. NAC 445B Air Controls
  3. NRS 459 Hazardous Materials
  4. NAC 486A.101-486A.250/NRS 486A.010-486A.180 Use of Alternative Fuels
  5. NAC 590.700-590.790/NRS 590.700-590.920 Cleanup of Petroleum Discharges
  6. NRS 459.748-459.773 Oil or Hazardous Material Spills, Accidents and Incidents
  7. 29 CFR 1910 Occupational Safety and Health Standards
  8. 29 CFR 1926 Safety and Health Regulations for Construction
  9. 40 CFR Protection of the Environment
  10. Uniform Fire Code/NFPA
  11. Clark County Department of Air Quality
- F. Other Documents (list is not limited to the following)
1. Airport Rules and Regulations
  2. The Globally Harmonized System of Classification and Labeling of Chemicals (GHS)

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