

***EG 2-2: Cleaning / Washing - Indoor Industrial Surfaces***

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**I. Activity Description:**

The cleaning and washing of indoor industrial surfaces (i.e., floors, walls, etc.) in places such as maintenance areas, etc. and management of materials associated with the activity including storage, handling and disposal

**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. Improper or inappropriate disposal of cleaning/washing fluids
2. Improper or inappropriate discharge of contaminants in cleaning/washing fluids
3. Odors

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. Discharge of cleaning/washing water from indoor industrial surfaces to the storm water system is prohibited. These discharges must go to the sanitary sewer, typically after going through a pretreatment device, whenever possible
2. Do not wash any solids/grease/oils/etc., into the drain. Clean up all spills before discharging any wash water into the sanitary sewer system. Floor and sink drains typically discharge to a waste-waste pretreatment device. Avoid discharges of chemicals and excessive solids, oils, grease, etc., in to this system, as not all pretreatment systems are intended to collect these types of contaminants
3. Do not dispose of hazardous, universal and special waste in the municipal solid waste dumpsters. Hazardous, universal and special wastes must be disposed of in accordance with Environmental Guidelines EG 7-3, Hazardous Waste and Guideline EG 7-5, Special Wastes

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A. Required Activities

1. Clark County Department of Air Quality Operating Permits may be required depending on the painting activities. A copy of the permit must be supplied to the CCDOA, EHS office prior to work being conducted

B. General Considerations

1. Each operator and tenant conducting cleaning/washing 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. Ensure proper disposal of materials generated

D. Training Requirements

1. All employees engaged in cleaning activities must be aware of the proper techniques, requirements and pollution prevention aspects of cleaning/washing indoor industrial areas

E. Storage and Materials Management Requirements

1. Store chemicals and other cleaning products in appropriate containers that are in good condition (i.e., original containers that are labeled and do not pose a risk for leakage) and utilize secondary containment when appropriate
2. All containers must be labeled per the guidelines established by the Globally Harmonized System (GHS) of classification and labeling of chemicals

**IV. Planning Requirements**

- A. Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur
- B. A dry method of cleaning floors is preferred (i.e., vacuuming or sweeping) and should always be used prior to any wet methods
- C. Confirm that the drains connect to the sanitary sewer system prior to allowing the discharge
- D. Fluids generated in the cleaning and washing of indoor industrial surfaces should drain into a pretreatment device (such as an oil/water separator and/or sand filter), or be collected for transfer to a pretreatment device prior to discharge to the sanitary sewer system
- E. Good housekeeping procedures should be followed to keep the washing area clean and free of debris

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## **V. Critical Tasks**

- A. Use granular absorbents to remove bulk liquid materials from floor prior to cleaning. Remove all other residue using vacuum or sweeping methods before cleaning with liquids. Dispose of granular absorbents, based on the material being absorbed, in accordance with applicable guidelines and regulations

## **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. Control spills to eliminate risk to human health and the environment and to minimize property damage
- D. Prevent contamination from entering any sewer, drainage, waterway or soil area
- E. Containerize all collected wastes and evaluate for labeling, storage and disposal. The waste producer is responsible for characterization and disposal of wastes in accordance with applicable regulations

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

- A. Floor surfaces and chemical storage areas should be included in a routine inspection and maintenance program
- B. Pretreatment devices and sumps utilized in the collection of wash fluids should be included in a routine inspection and maintenance program
  - 1. Refer to Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices

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

- A. Waste Management Records (profile, manifests, sample results, etc.)
  - 1. Based on the disposal profile, manifests and related, forms may be required
  - 2. Manifests and profile forms can be obtained from the disposal facility for off-site disposal activities (manifests are required for hazardous, special and universal wastes)
  - 3. Operator must maintain appropriate documentation for disposed wastes at the facility for a minimum of three (3) years
- B. Evidence of training on Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasure Plan and operator's SOPS

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- C. Formal certifications are not always necessary; however, “proof of training” such as sign-in sheets, signed by the attendees and/or handouts is expected to be available and should be maintained on file by the operator/tenant

## 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. Building and site drainage design (as-built)
2. Product Safety Data Sheets (SDSs)

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

1. Operational procedures training (on-the-job)

### D. Related Environmental Documents (list is not limited to the following)

1. Environmental Guideline EG 1-3, Cargo Loading and Offloading
2. Environmental Guideline EG 1-4, Management of Aircraft Lavatory Water and Waste
3. Environmental Guideline EG 1-7, Storage of Vehicles and Equipment Containing Chemicals
4. Environmental Guideline EG 2-1, Painting and Paint Removal
5. Environmental Guideline EG 2-2, Cleaning Washing - Indoor Industrial Surfaces
6. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
7. Environmental Guideline EG 2-4, Janitorial Activities
8. Environmental Guideline EG 2-5, Cleaning Washing - Outdoor Areas and Structures
9. Environmental Guideline EG 3-1, Ozone Depleting Compound Management
10. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations
11. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
12. Environmental Guideline EG 3-5, Parts Washing
13. Environmental Guideline EG 4-1, Construction
14. Environmental Guideline EG 4-2, Planning and Design
15. Environmental Guideline EG 4-3, Procurement
16. Environmental Guideline EG 4-4, Tenant Operating Guidance
17. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
18. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
19. Environmental Guideline EG 6-1, Spill Response
20. Environmental Guideline EG 6-2, Abandoned Material Response

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21. Environmental Guideline EG 7-1, General Waste Management
  22. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
  23. Environmental Guideline EG 7-3, Management of Hazardous Wastes
  24. Environmental Guideline EG 7-4, Management of Universal Wastes
  25. Environmental Guideline EG 7-5, Management of Special Wastes
- 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. NAC 459/NRS 459 Hazardous Materials
  6. 29 CFR 1910 Occupational Safety and Health Standards
  7. 40 CFR Protection of the Environment
  8. 49 CFR Transportation
  9. Uniform Fire Code/NFPA Emergency Response Information and Training Requirements
- F. Other Documents (list is not limited to the following)
1. CCDOA Rules and Regulations
  2. Product Safety Data Sheet documents and other manufacturer specification information
  3. The Globally Harmonized System (GHS) of classification and labeling of chemicals

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