

**EG 4-4: Tenant Operating Guidance**

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Document Owner:

CCDOA Environmental Specialist

**I. Activity Description**

This Environmental Guideline outlines the fundamental environmental requirements for tenant operations at Clark County Department of Aviation (CCDOA)

**II. Potential Environmental Risks**

A. The CCDOA - Environmental, Health & Safety (EHS) office has identified the following environmental concerns associated with these activities:

1. Air pollution & odors
2. Improper or inappropriate disposal of wastes
3. Improper storage of products and/or wastes
4. Sanitary sewer overflow
5. Release of maintenance fluids to sewer, storm water and/or soil
6. Sediment & erosion control
7. Contamination of soil
8. Contamination of surface water
9. Contamination of 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

**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. Any oils or grease
  - b. Pesticides, insecticides or herbicides
  - c. Solvents
  - d. Sediments/solids
  - e. Generally prohibited discharges as specified in the facility Storm Water Pollution Prevention Plan (SWPPP) and the Las Vegas Municipal Separate Storm Sewer System (MS4) Permit
3. Discharge to waters of the United States without a permit
4. Polluting the air, including impacting indoor air quality

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5. Improper disposal of soil waste. See Environmental Guideline EG 7-1, General Waste Management

B. Required Activities

1. All areas are required to be kept neat, clean and orderly at all times to reduce the potential impacts to the storm water system
2. Periodic inspections of equipment and materials must be conducted
3. Store unopened drums or containers on pallets to keep the containers out of contact with the ground and aid with detecting leakage
4. Store open drums or containers on secondary containment, such as spill pallets

C. General Considerations

1. Each tenant, contractor and operator operating at CCDOA facilities 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, nor does it encompass all regulatory requirements
2. Each tenant, contractor and operator is responsible for characterizing, managing and disposing of all wastes generated as part of their operation
3. Ensure that product Safety Data Sheets (SDSs) are available for all chemicals used by employees. SDS's for materials no longer in use, should be routinely removed and placed in an archive
4. Properly characterize and dispose of all wastes. See Environmental Guideline 28, General Waste Management for additional guidance
5. Properly maintain all pretreatment devices (e.g., oil/water separators, grease traps, sand/oil separators, grit chambers, etc.) see Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices for additional guidance
6. Painting activities may require air permitting. Tenant shall contact Clark County Department of Air Quality if any indoor painting is being considered. Outdoor painting of vehicles/equipment is prohibited. Any other outdoor painting activities must be approved by the CCDOA
7. Do not block or otherwise restrict the flow of air through any ventilation equipment
8. All tenant operations must be conducted in strict accordance with the environmental provisions and requirements set forth in the lease agreements
9. Tenants are responsible for all hazardous chemical inventory tracking and reporting as required by the federal Superfund Amendments and Reauthorization Act (SARA), Title III for tenant operated facilities
10. Any tenants conducting industrial activities that are regulated under the facility's Industrial Storm Water Permit must comply with the facility SWPPP. Alternatively, tenants that conduct industrial activities can opt to prepare their own SWPPP. These plans must be submitted to CCDOA, EHS and must be at least as stringent as the CCDOA SWPPP

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11. Tenants that have onsite petroleum storage are responsible for demonstrating compliance with Spill Prevention Control and Countermeasure (SPCC) Plan regulation pursuant to 40 CFR Part 112
12. All tenant activities shall be conducted in compliance with Clark County Department of Aviation's Rules and Regulations and federal, state and local laws and regulations
13. As the CCDOA improves its sustainability initiatives, tenants are encouraged to participate in the Sustainability Program and reduce the wastes disposed in landfills and minimize overall facility operating costs

D. Training Requirements

1. All operators of fueling equipment must be adequately trained in the proper fueling procedures and their SPCC Plan
2. Employee training programs shall inform personnel at all levels of responsibility who are involved in aircraft maintenance activities that may impact storm water runoff. SWPPP 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
3. Individuals that handle or manage hazardous wastes should receive site-specific training in accordance with all applicable state and federal requirements.
4. Storm water training is required for employees conducting activities regulated under the facility's Industrial Storm Water Discharge Permit
5. Each operator/tenant is responsible for informing their personnel of DOA spill reporting requirements; refer to Environmental Guideline EG 6-1, Spill Response

E. Storage and Materials Management Requirements

1. Store chemicals and other cleaning products in containers in good condition and utilize secondary containment when appropriate
2. Labels, markings and other required signage must be legible, in good condition, and follow the standards of the Global Harmonized System of Classification of Chemicals (GHS)
3. The tenant's/operator's (owner's) name must be present on all containers and tanks
4. Preferably, cleaning solutions should be stored indoors (utilizing secondary containment if in the vicinity of a floor drain). If chemicals and other products must be stored outdoors, secondary containment and cover must be used

**IV. Planning Requirements**

- A. All development of CCDOA properties requires review through the Concept Approval process prior to being initiated. Refer to Environmental Guideline EG 4-2, Planning and Design for additional guidance. In addition, all new development or alterations to existing facilities shall comply with CCDOA's Tenant Improvement Manual

- B. Tenants that generate hazardous wastes in excess of certain monthly limits are required to obtain an EPA Hazardous Waste Activity Identification Number and prepare a contingency plan in accordance with RCRA Generator Requirements. Tenants must track hazardous waste generation quantities in order to determine generator status
- C. Tenant relocation and closeout is subject to the requirements of Environmental Guideline EG 4-5, Tenant Relocation or Closeout
- D. All tenants are required to complete a Storm Water Pollution Prevention Plan assessment prior to commencing operations and periodically, thereafter. Contact CCDOA EHS if this has not been completed
- E. All tenants that operate onsite petroleum storage systems must obtain applicable permits, and potentially comply with the Code of Federal Regulations 40 (CFR), Part 112, SPCC requirements

**V. Critical Tasks**

- A. Comply with all federal, state and local environmental laws, regulations and guidelines
- B. Comply with all lease requirements
- C. Comply with the CCDOA Tenant Improvement Manual for any alterations to the facility

**VI. Emergency Response**

- A. For emergencies, call 702-261-5911. 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 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. Tenant is responsible to ensuring compliance with all permits and plans prepared for the facility. The tenant is responsible for conducting the inspections defined in the SWPPP, Hazardous Waste Generator requirements, Construction SWPPPs and permits and/or SPCC plan for the site

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

- A. Current SWPPP documents
  - 1. Obtain a copy of this document from CCDOA EHS
  - 2. Complete internal SWPPP inspections and report any non-compliant conditions to CCDOA EHS for evaluation
  - 3. Maintain all SWPPP inspections and audits on file for a minimum of 3 years
- B. 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 3 years
- C. Evidence of training on Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasure Plan, and operator SOPs
  - 1. Formal certifications are not always necessary; however, "proof of training", such as sign-in sheets signed by the attendees are expected and should be maintained on file by the operator/tenant
- D. Pretreatment Device Maintenance
  - 1. Tenants are responsible for maintaining their pretreatment devices. Refer to Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
  - 2. Copies of all maintenance records for each device must be kept in your files and completed in the approved time schedule provided in the monitoring form
- E. Inspections
  - 1. SPCC inspections must be performed in accordance with the requirements and frequency identified in the individual SPCC Plan for the site. The records must be kept on file at the local facility and must be available to CCDOA inspectors upon request
- F. Hazardous Waste Documents
  - 1. Tenants that generate sufficient hazardous waste to be classified as a Small Quantity Generator (220 pounds in a month) or classified as a Large Quantity Generator (2,200 pounds in a month), are required to obtain an EPA Hazardous Waste Identification Number. The EPA designation must be submitted to the CCDOA EHS Office. All manifests and supporting documentation for the

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generation, storage and disposal of hazardous waste must be kept onsite at the facility and made available to CCDOA inspectors upon request

G. Hazardous Materials

1. Current copies of hazardous chemical inventories must be kept onsite at all times. In the event that the tenant exceeds threshold planning quantities or reportable quantities for any chemical, the tenant shall make the required notifications to the appropriate agencies and CCDOA EHS

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. CCDOA Storm Water Pollution Prevention Plan
2. Project Storm Water Pollution Prevention Plan
3. NDEP Storm Water Discharge Permit (NPDES)
4. Facility drainage design and storm water plans (as-built drawings)
5. SPCC Plan
6. Department of Transportation (DOT) Labeling and Placarding Guidance
7. The Globally Harmonized System of Classification and Labeling of Chemicals (GHS)
8. Materials of Selection Safety Data Sheet (SDS) documents and other manufacturer specification information
9. Airport Construction Standard Specifications
10. CCDOA Tenant Improvement Manual
11. NFPA requirements

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

1. Operating procedures training (On-the job)
2. Operator site-specific training materials for handling hazardous wastes
3. Operator site-specific training materials for SPCC Plan
4. SWPPP training materials

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

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E. Applicable Regulations (list is not limited to the following)

1. NAC 444/NRS 444 Sanitation
2. NAC 459/NRS 459 Hazardous Materials
3. NAC 445A Water Controls
4. NAC 445B Air Controls
5. NAC 486A/NRS 486A.010-486A.200 Use of Alternative Fuels
6. 14 CFR 139.321 Handling and Storing of Hazardous Substances and Materials
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. 49 CFR Transportation
11. Uniform Fire Code/NFPA
12. Clark County Department of Air Quality Regulations
13. CCDOA Rules and Regulations

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

1. None at this time

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