

***EG 2-5: Cleaning/Washing - Outdoor Areas and Structures***

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Document Owner:

CCDOA Environmental Specialist

**I. Activity Description**

Routine maintenance and cleaning of outdoor pavement, structures, buildings and facilities to ensure efficient operation of this public facility as well as, to ensure public safety. This activity includes sweeping, scrubbing, power washing, etc. of building exteriors including roof tops, windows and walls, parking lots and structures, parking kiosks/enclosures, runways/taxiways and other pavement areas, concrete islands, signs, ramp areas, sidewalks, etc., both "landside" and on the "airside". These areas include any leased property or spaces

**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. Oil and grease
2. Fuels
3. Solvents
4. Soaps and detergents
5. Propylene glycol/aircraft deicing fluid
6. Ethylene glycol/radiator coolant (antifreeze)
7. Pavement deicers
8. Sediments
9. Aircraft lavatory fluid solutions (blue Juice)
10. Hydraulic fluids or other maintenance materials
11. Animal droppings
12. Improper management of refrigerant

B. Potential consequences from performing the activity incorrectly:

1. Property damage
2. Personal injury
3. Damage to the environment
4. Citations, Notices of Violation and related (financial & non-financial) penalties

**III. Critical Operating Requirements**

A. Prohibited Activities

1. Transporting waste liquids and solids contained in equipment and originating from offsite onto CCDOA, property is strictly prohibited (e.g., fluids in scrubbers, etc.)

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2. Washing spills of any kind into the stormwater collection system is strictly prohibited
  3. Washing spills of any kind into the sanitary sewer collection system is not allowed without prior approval by the CCDOA, EHS office
  4. Allowing cleaning/washing fluids of any kind into the sanitary sewer system is prohibited unless preapproved by the CCDOA, EHS office
  5. Disposal of solid waste materials into any drain is prohibited
- B. Required Activities
1. None addressed in this program
- C. General Considerations
1. Each contractor, operator or tenant conducting outdoor maintenance and/or cleaning activities within any CCDOA facility is responsible for understanding the applicable regulations and managing their activities accordingly. This Environmental Guideline is intended as guidance only and does not supersede any regulations
  2. Consolidate solid waste materials into appropriate containers (i.e., dumpsters, trash cans, tanks, drums, etc.)
    - a. Refer to Environmental Guideline EG 7-1, General Waste Management for guidance on waste management and disposal
  3. For all cleaning/maintenance activities for outdoor areas and structures, the following options exist for disposal/discharge of the effluent under the following requirements/conditions:
    - a. If chemicals are used for outdoor washing or maintenance activities, product Safety Data Sheets (SDSs) must be submitted and approved by CCDOA, EHS prior to use
    - b. Environmentally friendly (contains no toxic or hazardous constituents), should be utilized whenever possible
    - c. Collect the fluid and discharge to the sanitary sewer systems through a pretreatment device. This approach requires approval by the CCDOA, EHS office
    - d. Utilize drain covers, straw bales, etc., to protect the storm sewer system from discharges from washing activities
    - e. Offsite disposal in appropriately permitted facility
    - f. If cleaning an area with visible animal droppings/waste, apply Best Management Practices (BMPs) to prevent or control the presence of solids in the discharge through sweeping, berming, filtering, etc.
- D. Training Requirements
1. All employees engaged in cleaning activities must be trained on the OSHA Hazard Communication Standard 29 CFR 1910.1200
  2. Staff performing such outdoor cleaning/washing activities must be trained in appropriate disposal/discharge procedures for the wastes generated

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3. As applicable, training will support the applicable Storm Water Pollution Prevention Plan (SWPPP) requirements for the facility and address topics spill response, good housekeeping and material management practices
4. Each operator/tenant is responsible for informing their personnel of CCDOA spill reporting requirements

E. **Storage and Materials Management Requirements**

1. Store chemicals used for washing in containers that are in good condition and utilize secondary containment when appropriate (e.g., if stored indoors and in close proximity to a drain; if stored outdoors, containers must be in/on secondary containment and covered)
2. Labels, markings and other required signage must be legible, in good condition and follow the standards of the Global Harmonized System (GHS) of classification and labeling of chemicals
3. The tenant's/operator's (owner's) name must be present on all containers and tanks
4. Ensure that secondary containment and other equipment are adequate and in good operating condition. This includes storage units, receiving units, dispensing units and ancillary monitoring and safety equipment

IV. **Planning Requirements**

- A. All products used must be pre-approved in advance by the CCDOA EHS office

V. **Critical Tasks**

- A. Contact CCDOA EHS prior to conducting outdoor cleaning operations to ensure compliance with the Industrial Storm Water Permit for the proposed activity, that proper disposal will occur and if collection of discharge data is required

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 for spot cleaning of small spills. Place used materials in an appropriate container and dispose off-site in an approved, permitted facility
- D. Spills of any kind shall not be washed into any sewer or waterway, or onto any soil area

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

- A. Routinely inspect chemical storage areas for proper labeling, including owner's name, and for leaks
- B. Routinely inspect pretreatment devices and sumps regularly and maintain, as necessary
  - 1. Refer to Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices Spill Response

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

- A. Waste Management Records (profiles, manifests, sample results, etc.)
  - 1. If off-site disposal of wash water occurs, a profile of the material will be required by the disposal facility prior to transport
  - 2. Based on disposal profile, manifests and related, forms may be required. Manifests and profile forms can be obtained from the disposal facility for off-site disposal activities (manifests are required for hazardous wastes)
  - 3. Operators must maintain waste management records on-site for a minimum of three (3) years
- B. Evidence of Training
  - 1. Formal certifications are not always necessary. However, some form of "proof of training" (such as sign-in sheets and handouts) is expected to be available and signed by the attendee and should be maintained on file by operator
- C. Review the facility Storm Water Pollution Prevention Plan
  - 1. These documents are available through the CCDOA, EHS office
  - 2. If applicable, the operator will need to decide whether to utilize the existing CCDOA generated SWPPP, or complete their own plan for approval by CCDOA EHS

### **D. 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. NDEP Storm Water Discharge Permit (NPDES)

3. Global Harmonized System (GHS) of classification and labeling of chemicals
- C. Training Materials (list is not limited to the following)
1. Company Standard Operating Procedures training (On-the-job)
  2. SWPPP training (to include discussion of pertinent portions of applicable “Guidance Materials” and all appropriate applications, equipment and practices)
- D. Related Environmental Documents (list is not limited to the following)
1. Environmental Guideline EG 1-2, Cleaning Washing - Aircraft \_ Vehicles and Equipment
  2. Environmental Guideline EG 2-1, Painting and Paint Removal
  3. Environmental Guideline EG 2-2, Cleaning Washing - Indoor Industrial Surfaces
  4. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
  5. Environmental Guideline EG 2-4, Janitorial Activities
  6. Environmental Guideline EG 2-5, Cleaning Washing - Outdoor Areas and Structures
  7. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations
  8. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
  9. Environmental Guideline EG 4-1, Construction
  10. Environmental Guideline EG 4-2, Planning and Design
  11. Environmental Guideline EG 4-3, Procurement
  12. Environmental Guideline EG 4-4, Tenant Operating Guidance
  13. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
  14. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
  15. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
  16. Environmental Guideline EG 6-1, Spill Response
  17. Environmental Guideline EG 6-2, Abandoned Material Response
  18. Environmental Guideline EG 7-1, General Waste Management
  19. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
  20. Environmental Guideline EG 7-3, Management of Hazardous Wastes
  21. Environmental Guideline EG 7-4, Management of Universal Wastes
  22. Environmental Guideline EG 7-5, Management of Special Wastes

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- E. Applicable Regulations (list is not limited to the following)
  - 1. NAC 444/NRS 444 Sanitation
  - 2. NAC 445A Water Controls
  - 3. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
  - 4. NAC 459 Hazardous Materials
  - 5. 14 CFR 139.321 Handling and Storing of Hazardous Substances and 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
  
- F. Other Documents (list is not limited to the following)
  - 1. CCDOA Industrial Storm Water Permit
  - 2. Waste Disposal Manifest
  - 3. Emergency Response Information and Training Requirements

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