

EG 4-2: Planning and Design

Date:	January 1, 2024
Document Owner:	CCDOA Environmental Specialist

I. Activity Description

New development, redevelopment and expansion projects at Clark County Department of Aviation (CCDOA) may include Capital Improvement Program (CIP) projects, tenant projects and maintenance projects. For each of these types of projects, it is important to consider environmental issues during the planning and design phases in order to minimize potential environmental impact, minimize potential regulatory liabilities, obtain federal funding, prevent increases to project cost and prevent delays to the project schedule

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. Non-compliance with new development design requirements
 - 2. Increased operation and/or maintenance cost
- 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
 - 5. Legal action from outside parties
 - 6. Negative public image
 - 7. Delays to project schedule
 - 8. Increases to project cost
 - 9. Inability to obtain federal funding
 - 10. Increases to lifetime maintenance and operating costs

III. Critical Operating Requirements

- A. Prohibited Activities
 - 1. Failure to comply with the CCDOA Standards, Specifications and Tenant Improvement Manual requirements
- B. Required Activities
 - 1. Planning and design must comply with the CCDOA Tenant Improvement Manual
 - 2. All projects must complete the Project Concept Approval process through the CCDOA Construction & Engineering Department

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

3. All projects on CCDOA properties or within their facilities must follow the CCDOA's Standard Construction Specifications
4. Exceptions and/or deviations must be approved by the CCDOA Construction & Engineering and Planning departments

C. General Considerations

1. Each tenant, contractor or operator conducting planning and design 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. Environmental permitting requirements are identified in the planning and design phases of a project so that permits can be secured in a timely and cost-effective manner. Some environmental permits and approvals can be secured in a matter of days, while others may take months to obtain
3. For many projects, the Federal Aviation Administration (FAA) must approve the environmental review (and associated environmental analyses) before the FAA can commit federal funding. The National Environmental Policy Act (NEPA) requires federal agencies, such as the FAA, to integrate environmental values into their decision-making processes by considering the environmental impacts of their proposed actions. One way the FAA considers environmental impacts is through the use of the Categorical Exclusion Form, which is submitted by the CCDOA Planning Department. To prevent any delays in the construction process, the FAA suggests the Categorical Exclusion Form be submitted one (1) year prior to the planned construction start date. If the proposed project requires a Categorical Exclusion, as determined by the Planning Department, it will be noted on the approved Project Concept Approval Form. Please contact the Planner designated on the Project Concept Approval Form to begin the Categorical Exclusion Process. Early design plans and a construction schedule, as a minimum, are required to complete the Categorical Exclusion Form. Other information typically needed is numbers and types of construction equipment to be used for the project
4. Asbestos containing building materials may be present. However, building materials must always be tested for asbestos prior to any demolition or renovation activities. Check with the CCDOA, EHS office prior to work starting to ensure that a survey has been conducted. The contractor shall ensure that no asbestos or asbestos-containing materials are installed during construction and/or tenant improvement projects. In addition, Safety Data Sheets (SDS) for all materials must be submitted to the CCDOA, EHS office for approval prior to use. If the Clark County Department of Aviation suspects, or has reason to believe that asbestos-containing materials are being installed as part of the new construction, samples of the suspect materials may be collected to be tested by a certified laboratory. If the test results are positive, the contractor/tenant will be responsible for abatement of the asbestos-containing materials within 30 days of confirmation by an analytical lab test report and notification of the violation

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

5. The Nevada Division of Environmental Protection (NDEP) requires a Construction Storm Water Discharge Permit for each development or redevelopment of 1.0 acre or more
 6. The NDEP and Southern Nevada Health District must be notified 30-days prior to permanently closing any underground storage tank (UST), per 40 CFR 280.71. Contractors should refer to "Closure of Underground Petroleum Storage Tanks," API Recommended Practice 1604 (1996)
 7. Clark County Department of Air Quality requires a Dust Control Permit for projects where the disturbed acreage will exceed 0.25 acres, 100 feet of trenching or demolition of 1,000 square feet
 8. "Piece-mealing" of projects (the division of a larger project into tasks, phases or "mini projects"), should be avoided with regard to environmental planning. This practice is not lawful for federally funded projects and is not recommended for other projects. "Piece-mealing" can lead to delays and errors in the environmental permitting process, which can lead to schedule delays and cost increases
- D. Training Requirements
1. Training requirements will vary depending on the project. Project Managers should review this document
- E. Storage and Materials Management Requirements
1. Refer to other environmental guidelines, (see below) for guidance, on management of petroleum storage tanks, hazardous materials (e.g., gasoline cans), constructed-derived waste, and asphalt & concrete spoils

IV. Planning Requirements

- A. Identify projects or activities that need environmental review, permits and/or surveys
- B. Assemble relevant project information, including:
1. Project purpose and need
 2. Project description/scope of work
 3. Project location
 4. Project schedule
 5. Basic project drawings or sketches
- C. Suggested Items for review include:
1. Best management practices
 2. Water quality pretreatment devices
 3. Facility Storm Water Pollution Prevention Plan (SWPPP)

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

V. Critical Tasks

- A. Consider the environmental benefits (reduced toxicity, composition of recycled materials, reduced packaging, disposal requirements, future liability, etc., of each product being evaluated as heavily as other “value added” factors, such as cost and performance
- B. Include suitable environmental provisions for constituents of concern and desired attributes in procurement and contract documents, where appropriate

VI. Emergency Response

- A. Ensure precautions are taken to prevent releases of contaminants into the environment

VII. Inspection and Maintenance Requirements

- A. CCDOA inspectors may be required to perform inspections to ensure compliance with applicable regulations

VIII. Expected Records and Outputs

- A. Project information (purpose and need, description and scope of work, drawings, etc.)
 - 1. Send to CCDOA Project Manager
 - 2. CCDOA Project Manager files in their own project file
- B. Required submittals (such as copies of applications and permits)
 - 1. Project Manager will send hard copies of all submittals, including correspondence to CCDOA, EHS office
 - 2. CCDOA Project Manager files in their own project file

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. Materials of Selection Safety Data Sheet (SDS) documents and other manufacturer specification information
 7. CCDOA Construction Standard Specifications
 8. CCDOA Tenant Improvement Manual
 9. NFPA requirements
- C. Training Materials (list is not limited to the following)
1. None at this time
- D. Related Environmental Documents (list is not limited to the following)
1. Environmental Guideline EG 2-1, Painting and Paint Removal
 2. Environmental Guideline EG 2-2, Cleaning Washing - Indoor Industrial Surfaces
 3. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
 4. Environmental Guideline EG 2-4, Janitorial Activities
 5. Environmental Guideline EG 2-5, Cleaning Washing - Outdoor Areas and Structures
 6. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations
 7. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
 8. Environmental Guideline EG 4-1, Construction
 9. Environmental Guideline EG 4-2, Planning and Design
 10. Environmental Guideline EG 4-3, Procurement
 11. Environmental Guideline EG 4-4, Tenant Operating Guidance
 12. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
 13. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
 14. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
 15. Environmental Guideline EG 6-1, Spill Response
 16. Environmental Guideline EG 6-2, Abandoned Material Response
 17. Environmental Guideline EG 7-1, General Waste Management
 18. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
 19. Environmental Guideline EG 7-3, Management of Hazardous Wastes
 20. Environmental Guideline EG 7-4, Management of Universal Wastes
 21. Environmental Guideline EG 7-5, Management of Special Wastes
 22. Environmental Guideline EG 7-6, Management of Materials
 23. FAA Order 1050.1 F, Desk Reference

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED. Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy

- 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 459.748-459.773 Responding to Spills, Accidents and Incidents
 - 6. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
 - 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. 40 CFR 81.1-81.437 Designation of Areas for Air Quality Planning Purposes
 - 11. 49 CFR Transportation
 - 12. Uniform Fire Code/NFPA
- F. Other Documents (list is not limited to the following)
 - 1. National Environmental Policy Act (NEPA), Implementing Instructions for Airport Actions

Unless otherwise specified at the beginning of the document, printed copies of this document are UNCONTROLLED.
Always refer to the online CCDOA EMS document library prior to use to ensure you are using the most current copy