

**EG 2-3: Maintenance of Pretreatment Devices**

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CCDOA Environmental Specialist

**I. Activity Description:**

Maintenance of pretreatment devices -- includes all devices used to alter the characteristics of water prior to discharge to either the sanitary or storm sewer systems. These devices include oil water separators, grease interceptors, grit chambers and sand filters. Operators/tenants are responsible for providing maintenance and documenting maintenance activities for devices treating water connected with their operations. CCDOA is responsible for providing maintenance and documentation for CCDOA-owned devices treating common-use areas (e.g., terminals, airfield, parking structures)

**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 spills
2. Air pollution and odors
3. Improper or inappropriate disposal of waste
4. Sanitary sewer backups and overflows from improper maintenance
5. Disposal of contaminated spill response media
6. Contamination of soils, surface water and groundwater
7. Collection of wash water

B. Potential consequences from performing the activity incorrectly:

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

**III. Critical Operating Requirements**

A. Prohibited Activities

1. Sand/oil/grease and other waste material removed from the trap/interceptor or plumbing should not be introduced into any drain, sewer, storm drain or natural body of water
2. Do not decant wastewater back into the trap/interceptor after removing the waste material
3. Do not use hot water, acids, caustics, solvents or emulsifying agents when cleaning grease traps and interceptors
4. Do not utilize biological agents for grease remediation

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A. General Considerations

1. Each contractor, operator or tenant conducting pretreatment device maintenance is responsible for understanding the applicable regulations and managing their activities accordingly. This Environmental Guideline is meant as a guide to regulatory requirements; however, it does not supersede any regulations
2. All pretreatment devices must be inspected on a periodic basis and maintained at least annually to ensure protection of the sewer systems and receiving waters. Improper operation as a result of poor maintenance can lead to sanitary sewer overflows or other discharges to the clean water system
3. The frequency of cleaning is based on inspection of each individual pretreatment device, and is dependent upon the capacity of the device and loading rate of sand, oil or grease in the effluent
4. Schedule cleanout of the pretreatment devices using contractors approved by the CCDOA

C. Training Requirements

1. All employees engaged in maintenance activities must be aware of the proper techniques, requirements and pollution prevention aspects of the pretreatment device
2. 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
3. Each operator/tenant is responsible for informing their personnel of CCDOA spill reporting requirements

D. Storage and Materials Management Requirements

1. Operators, tenants and contractors must dispose of all wastes collected from pretreatment devices according to all applicable local, state and federal regulations
2. All containers and tanks shall be in good condition with no evidence of leaks or corrosion
3. 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
4. Ensure adequate secondary containment for all bulk storage containers and that equipment and containers are adequate and in good operating condition

#### IV. Planning Requirements

- A. Maintain adequate supplies of spill response equipment and materials in locations where spills of paint and solvent materials are likely to occur

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- B. Schedule clean-out of pretreatment devices by appropriate, approved licensed contractors
- C. Operators/tenants should have an on-call contract in place with a licensed contractor that can provide 24-hour response in the event of a backup or overflow emergency that could impact facility operations

**V. Critical Tasks**

- A. A CCDOA representative should be present when any pumping is being performed so that proper clean-out procedures by the contractor are ensured and any damage to the pretreatment device is properly documented for repair
- B. All fluids and sludge removed should be properly disposed of at an appropriately permitted facility
- C. If the operator/tenant fails to respond in timely manner to a backup of the system and overflow emergency that could impact facility operations, the CCDOA will utilize an environmental response contractor to remediate the spill and clogged system. Cost and additional fines, if applicable, will be charged to the responsible operator(s) and/or tenant(s), as applicable

**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 or overflows
- C. Use absorbent materials to manage the release. Contain used materials and dispose offsite at a permitted disposal facility if necessary
- 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. For large sewer backup events, an outside emergency response contractor must be used

**VII. Inspection and Maintenance Requirements**

- A. Pretreatment devices and sumps should be included in a routine inspection and maintenance program. An operator, tenant or owner representative should be present when any pumping is being performed, so that proper clean-out procedures by the contractor are ensured and the device is not damaged. All fluids and sludge materials must be disposed of appropriately off-site at an appropriately permitted facility
- B. Visually inspect pretreatment devices on a routine basis and do not allow the equipment to backup or overflow. Arrange for device clean-out as per the agreed schedule with CCDOA or when device meets the following criteria:
  - 1. Pump out the grease interceptor at least every three (3) months, or when it accumulates a 12" cap of fat, oil, grease, and/or 9" of solids on the bottom of the trap
  - 2. Pump out the sand/oil separator at least every six (6) months, or when 9" plus of solids accumulate on the bottom of the trap or 4" or more of oil is observed in the trap
  - 3. Pump out any pretreatment device when there may be a problem with performance, clogging, odors or if petroleum and/or hazardous materials have entered the system
- C. Visually inspect pretreatment devices after clean-out for any damage to the system. If any damage is noted, notify a CCDOA plumbing department representative via the Airport Control Center or appropriate Customer Service Desk immediately
- D. Tenants must complete disposal manifests for hazardous waste shipments. Manifests are signed by the receiving facility and must be returned to you within 30 days. If waste is shipped out of state, send a copy of the returned manifests to NDEP

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

- A. Waste Generation Inspection Reports Mentation
  - 1. Based on the 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, special and universal wastes)
  - 2. For operator and tenant facilities, invoices should be maintained on file at the operator/tenant site and available for review by the CCDOA
  - 3. Waste management records must be maintained 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
  - 1. Formal certifications are not always necessary; however, proof of training such as sign-in sheets are expected to be available and signed by the attendees and should be maintained on file by the operator/tenant

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## 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. CCDOA Storm Water Pollution Prevention Plan
- 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 1-2, Washing of Aircraft, Vehicles, and Equipment
  - 2. Environmental Guideline EG 1-4, Management of Aircraft Lavatory Water and Waste
  - 3. Environmental Guideline EG 1-5, Maintenance of Aircraft, Vehicles and Equipment
  - 4. Environmental Guideline EG 1-7, Storage of Vehicle and Equipment Containing Chemicals
  - 5. Environmental Guideline EG 2-1, Painting and Paint Removal
  - 6. Environmental Guideline EG 2-2, Cleaning/Washing Indoor Industrial Surfaces
  - 7. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
  - 8. Environmental Guideline EG 2-4, Janitorial Activities
  - 9. Environmental Guideline EG 2-5, Cleaning/Washing - Outdoor Areas and Structures
  - 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 5-2, Management of Petroleum Products (SPCC Plan)
  - 19. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
  - 20. Environmental Guideline EG 6-1, Spill Response
  - 21. Environmental Guideline EG 6-2, Abandoned Material Response

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22. Environmental Guideline EG 7-1, General Waste Management
  23. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
  24. Environmental Guideline EG 7-3, Management of Hazardous Wastes
  25. Environmental Guideline EG 7-4, Management of Universal Wastes
  26. Environmental Guideline EG 7-5, Management of Special Wastes
  27. Environmental Guideline EG 7-6, Management of Materials
- E. Applicable Regulations (list is not limited to the following)
1. NAC 444/NRS 444 Sanitation
  2. NAC 445A Water Controls
  3. NAC 459/NRS 459 Hazardous Materials
  4. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
  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. Manufacturer specification information

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