

<b>EG 6-1: Spill Response</b>	
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**I. Activity Description:**

The activity of making correct notifications and the application of resources to prevent, detect, contain, control and manage spilled material. Eliminate or minimize the discharge of pollutants to sewers and storm water drainage systems resulting from material spills. Mitigate potential impacts by responding quickly with trained personnel and appropriate materials

**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 storage and/or disposal of used spill response media
  2. Contamination of soil
  3. Contamination of groundwater
  4. Contamination of surface water
  5. Air emissions
  6. Odors
- B. Potential consequences from performing the activity incorrectly:
1. Property damage
  2. Personal injury
  3. Long-term 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. Intentional release of pollutants onto the ground surface is prohibited.
- B. Required Activities
1. Immediate response to spills or releases is required
  2. The Airport Control Center or the appropriate Customer Service Desk must be notified immediately, regardless of the size of the spill
  3. Used absorbent materials must be stored and disposed of properly
  4. A site-specific plan must be developed and implemented by each operator that addresses spill prevention, control and response. This plan must be submitted to CCDOA, EHS for review

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5. A summary of the site-specific plan must be posted in appropriate locations, and must identify spill procedures, location(s) of spill response equipment, contact numbers and evacuation routes
6. Spill response materials must be stored in designated areas and in closed containers that are in good condition
7. Only non-sparking tools are allowed for the clean-up of flammable or combustible material spills (e.g., broom, shovel, etc.)
8. The responsible party is required, by law, to report any spill that is 25 gallons or greater to the Nevada Division Environmental Protection (NDEP) within 24-hours of release. The NDEP Spill Hotline number is 1-888-331-6337. Failure to report to NDEP may result in severe penalties
9. Airport employees only are responsible for submitting spill reports

C. General Considerations

1. Notify the Airport Control Center (702) 261-5125, or appropriate Customer Service Desk, of the spill immediately. CCDOA personnel will make the final determination regarding the size of the spill
2. Each tenant, contractor or operator conducting spill response activities, is responsible for understanding the applicable regulations and managing their activities, accordingly. This Environmental Guideline is meant as guidance and does not supersede any regulations
3. These procedures are not a substitute for sound judgement
4. Each operator and tenant is responsible for engineering controls and practices for preventing, containing and controlling spills and releases
5. Each operator and tenant is responsible for detecting and responding to spills and leaks, as rapidly as possible
6. Assess site for safety and protect personnel if a material is unknown, or known to be dangerous
7. As personnel safety allows, contain and control spill as soon as it is deemed safe to do so
8. In the event that CCDOA personnel must assist with the clean-up, the responsible party may be charged for time and materials
9. The responsible party is required to properly dispose of clean-up materials
10. The CCDOA, EHS office must be contacted for the disposal of clean-up of materials from spills in which CCDOA is the responsible party
11. Each operator/tenant is responsible for determining the appropriate notifications to regulatory agencies and for making these notifications.
12. The CCDOA, EHS office is available to assist in evaluating the need to make notifications
13. Small amounts of spill cleanup materials (less than approximately 5 gallon) of lavatory waste, oils, antifreeze, deicers, firefighting agents, etc., can be placed in the commercial general waste landfill dumpster. **THIS IS NOT APPLICABLE** for any types of fuels including gasoline, AVGAS, diesel and jet fuel. Cleanup of any types of fuels or other potentially hazardous material must be handled in accordance with Environmental Guideline EG 7-3, Management of Hazardous Wastes

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D. Training Requirements

1. Personnel involved in activities that have a reasonable possibility to result in a spill or release should be trained in proper management, operating and reporting procedures
2. Personnel that respond to spills and/or releases must be trained in proper management and provide to all fuel and oil-handling personnel, if they conduct SPCC related operations
3. Employee training programs shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact storm water runoff. Storm Water Pollution Prevention (SWPP) training shall address topics such as spill response, good housekeeping and material management practices
4. Contractor or temporary personnel shall be informed of facility operations, design features and details of this Environmental Guideline in order to properly contain discharges or spills

E. Storage and Materials Management Requirements

1. Spill response materials should be stored in areas where spills are likely, such as product or waste storage, or fueling or maintenance areas
2. Spill response materials should be stored in accessible containers with proper signage and labeling
3. Ensure that spill kits contain the appropriate resource materials (i.e., containment booms, granular absorbent, disposal bags, drain cover mats and personal protective equipment)
4. Ensure that spill response equipment is adequately stocked and maintained, and available to all employees that would assist in a response action

IV. Planning Requirements

- A. Develop site-specific spill response procedures or plans to address the prevention, control and countermeasures for spills, leaks or discharges of substances that can impact the environment
1. Train all employees on basic knowledge of spill control procedures
  2. Key personnel should receive formal training in plan execution with additional training to first responder level (29 CFR 1910.120) as required
  3. For SPCC regulated activities, provide training to all appropriate employees pursuant to 40 CFR Part 112
- B. Operators and tenants should also evaluate the need for signage/labeling on a case by case basis for identifying response procedures, spill notification phone numbers, locations of spill clean-up materials, etc.
- C. Review the facility Storm Water Pollution Prevention Plan
1. These documents are available through the CCDOA, EHS office

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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

## V. Critical Tasks

- A. Conduct training for all staff involved in industrial activities, prior to conducting work activities to plans and procedures for spill prevention and response requirements
- B. All spills, regardless of size, that have entered the storm drainage system must be reported immediately
- C. Demonstrate compliance with the on-site SPCC Plan when conducting spill response
- D. Demonstrate compliance with the SWPPP. Spills of any kind and spill materials shall not be washed into any sewer system, waterway or onto any soils
- E. Control and collect spilled materials using appropriate materials from the spill kits/spill carts
- F. A disinfectant solution must be used to treat any affected pavement/work area, from lavatory waste water spills (mixture of 90% water and 10% bleach/disinfectant). Refer to Environmental Guideline 4, Management of Lavatory Water and Waste, for proper cleanup procedures for lavatory spills
- G. Properly contain and dispose of used spill containment and clean-up materials, in accordance with applicable regulations
- H. Complete and return a Spill Report Form to the CCDOA, EHS office within 24 hours
- I. Spills of 25-gallons or greater MUST be reported to the Nevada Division of Environmental Protection (NDEP) within 24-hours. Copies of all correspondence with NDEP must be sent to the CCDOA, EHS office

## VI. Emergency Response

- A. This is the emergency response guideline. In the event of a catastrophic event, make the required notification to the McCarran Airport Control Center (702) 261-5125. The Control Center will then contact the National Response Center (NRC). The NRC is a part of the federally established National Response System and is the designated federal point of contact for reporting all major oil, chemical, radiological, and biological discharges into the environment, anywhere in the United States and its territories.
- B. Immediately stop the source of the spill if at all possible. Do not attempt to move refueling equipment, unless directed by Fire Department or CCDOA personnel. No motorized equipment is to be permitted to operate in the vicinity of a fuel spill until the

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spill is contained and controlled, and the Fire Department or Airport Operations personnel determines that a safe condition exists

- C. Evacuate passengers and flight crew if the Fire Department or Airport Operations personnel determines that the size of the spill presents a serious fire exposure hazard to the aircraft or refueling equipment
- D. ARFF units or Fire Department will act as a fire guard to establish a restricted perimeter area around the fuel spill. Access to the affected area will be restricted, from any operations by personnel or equipment, until the fuel spill has been controlled and contained to a safe level
- E. Control the spread of the fluid by diking the spill with absorbent material, with particular emphasis being placed on diking the spill in the direction the liquid is draining or flowing on the ground. The objective is first to control or stop the spread of the spill, then to contain the spill. Other requirements for storm drains in the area should include diking and placement of drain covers over affected drain inlets if possible
- F. Once the action described above has been taken, the complete clean-up and pickup of the spill is to be disposed of properly. Absorbent materials or other approved methods are to be used
- G. All fluid spills must be cleaned up until there is no residual liquid left on the ground. Procedures to accomplish this are as follows:
  - 1. Apply the absorbent material from the bag, holding it close to the surface to minimize wind loss
  - 2. Spread the absorbent material to sufficiently dike the liquid and stop its direction of flow
  - 3. Spread the absorbent material over the spill to a thickness necessary to blanket the spill, once the spill has been diked and completely contained
  - 4. Agitate the material with a broom to ensure maximum absorption of the fluid
  - 5. Collect all contaminated absorbent materials, place into appropriate containers for proper environmental disposal and retain records of disposal activities
  - 6. Proper disposal is the responsibility of the party who caused the spill
  - 7. If directed by CCDOA, EHS office, the affected area shall be cleaned by a ramp scrubbing vehicle or power washer
  - 8. If the fluid has entered the storm drain system, immediate action must be taken by the organization responsible for the spill to remove the material from the drainage system in accordance with local, State, Federal, and Airport Regulations.
  - 9. If the spill/release reaches a pretreatment device, operators/tenants must have a licensed contractor pump out the impacted fluid, as necessary, in accordance with Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices.

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

- A. Spill kits/carts should be included in a routine inspection program to ensure adequate supplies

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

- A. CCDOA Spill Report Form
  - 1. These forms must be completed and returned to the CCDOA, EHS Office within 24-hours of a spill event
- B. NDEP Correspondence
  - 1. Copies of all correspondence with regulatory agencies must be sent to the CCDOA, EHS office
- C. Waste management records (profiles, 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 wastes)
  - 3. Operator must maintain waste management records at their facility for a minimum of three (3) years
- D. Site-Specific Spill Prevention and Response Plan
  - 1. Copies must be submitted to the CCDOA, EHS office for review

## **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
  - 6. Federal National Response Center (NRC) for Catastrophic Spills..1(800) 424-8802
- B. Guidance Materials (list is not limited to the following)
  - 1. NIOSH Pocket Guide to Chemical Hazards (NPG)
  - 2. DOT Emergency Response Guidebook
  - 3. Product Safety Data Sheet documents and other manufacturer specification information
  - 4. EPA Office of Solid Waste and Emergency Response Guidance
  - 5. OSHA Emergency Preparedness and Response Guidance
  - 6. CCDOA Storm Water Pollution Prevention Plan
  - 7. Operator SWPPP (if applicable)
  - 8. Spill Prevention Control and Countermeasure (SPCC) Plan

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9. Operators SPCC Plan (if applicable)
  10. CCDOA Tenant Bulletins
  11. NDEP Storm Water Discharge Permit (NPDES)
  12. Ramp Drainage Design and Storm Water Plans (as-builts)
- C. Training Materials (list is not limited to the following)
- i) OSHA 29 CFR 1910.120 Hazardous Waste Operations and Emergency Response (HAZWOPER)
- 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
- 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. 29 CFR 1910 Occupational Safety and Health Standards
  6. 29 CFR 1926 Safety and Health Regulations for Construction
  7. 40 CFR Protection of the Environment
  8. 49 CFR Transportation
  9. Uniform Fire Code/NFPA
  10. CCDOA Rules and Regulations
- F. Other Documents (list is not limited to the following)
1. CCDOA Spill Reports
  2. Disposal Manifest
  3. Waste Shipment Manifests/Disposal Documentation
  4. Incident Reports
  5. Operator's Standard Operating Procedures (SOPS) for equipment operations, aircraft servicing and spill prevention, control and countermeasure activities
  6. The Globally Harmonized System (GHS) of classification and labeling of chemicals

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