

EG 5-1: Remediation of Contaminated Soils

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CCDOA Environmental Specialist

I. Activity Description

This guideline addresses activities to be considered prior to, during and at the conclusion of the remediation of contaminated media generated by activities or otherwise encountered on Clark County Department of Aviation (CCDOA) property

II. Potential Environmental Risks

- A. The CCDOA - Environmental, Health & Safety (EHS) office has identified the following environmental concerns associated with these activities:
 - 1. Contamination of clean soils
 - 2. Contamination of surface water
 - 3. Contamination of ground water
 - 4. Air pollution and odors
 - 5. Improper or inappropriate disposal of contaminated media
- 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. Excavating or removal of potentially impacted soils without the oversight of a Nevada Division of Environmental Protection (NDEP), Certified Environmental Manager (CEM)
 - 2. Do not place impacted soils directly on the ground surface
 - 3. Disposing of contaminated soils on CCDOA property
 - 4. Washing any soils into any drains
- B. Required Activities
 - 1. The Airport Control Center must be notified immediately upon discovery of potentially impacted soils (702) 261-5125
 - 2. Impacted soils must be properly disposed of and copies of disposal records shall be provided to the CCDOA, EHS office
 - 3. Copies of all analytical results and any associated reports must be provided to the CCDOA, EHS office

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C. General Considerations

1. Each tenant, contractor and operator that stores petroleum 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. As directed by a CEM, separate clean materials from contaminated materials to minimize the volume of material requiring treatment and/or disposal. Cover excavated or impacted materials to prevent off-site transport by wind or runoff
3. Ensure that the site is remediated in accordance with applicable regulations. It is the responsibility of the operator of the site to contact the Nevada Division of Environmental Protection (NDEP) if impacted soil exceeds action limits and to remediate the site based on NDEP guidance

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. Impacted soils must be placed on plastic sheeting or tarps and must be covered at the end of each shift; or
2. Place in drums, and drums are sealed and labeled at the end of each shift

IV. Planning Requirements

- A. Prior to conducting any remediation activities, develop a plan for identifying materials needing remediation, remediation approach to take regarding the contaminated materials, and method(s) of confirmation of remediation results
- B. Ensure that any required permits, regulatory approvals, utility clearances, access agreements, and FAA approval (if required), are obtained prior to conducting any remediation activities
- C. An Airport Access Agreement and a work plan are required for any intrusive work (other than construction projects) performed by tenants, contractors or their representatives

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on airport property. See Environmental Guideline EG 4-1, Construction; for construction related planning requirements

- D. 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

V. Critical Tasks

- A. All remediation systems and plans must be reviewed by CCDOA, EHS prior to initiation. This includes work plans, designs and permit applications. Plans and permits approved by regulatory authorities should be copied to CCDOA, EHS
- B. Properly profile, contain and dispose/remediate impacted soils and clean-up materials
- C. Complete and return a Spill Report Form to the CCDOA, EHS office if the spill was not previously reported
- D. Spills of 25-gallons or greater MUST be reported to the Nevada Division of Environmental Protection (NDEP) within 24-hours
- E. Spills impacting three (3) cubic yards or more of soil MUST be reported to the NDEP within 24 hours of confirmation
- F. Spills in or on groundwater, if revealed during ANY excavation activities, MUST be reported to the CCDOA EHS office and the NDEP within 24 hours of discovery
- G. Copies of all correspondence with NDEP must be sent to the CCDOA, EHS office

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 to manage spills. Contain used materials and dispose offsite at an approved and permitted facility
- D. Prevent contamination from entering any sewer, storm drain, drainage waterway or soil area

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- 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

VII. Inspection and Maintenance Requirements

- A. CCDOA, EHS may perform site inspections and oversight during remediation activities at their discretion

VIII. Expected Records and Outputs

- A. Remediation plan reviewed by CCDOA, EHS and approved by appropriated regulatory agency
 - 1. These plans should be submitted to CCDOA, EHS for review before submittal to the appropriate agency
 - 2. Finalized plans should be copied to CCDOA, EHS following approval by appropriate agency
- B. Disposal profile, manifests, and shipping forms
 - 1. A disposal profile will be required by the disposal facility prior to shipping
 - 2. Manifest forms can be obtained from the disposal facility
 - 3. All documents should be maintained on file by the operator for at least three (3) years
- C. Analytical results and monitoring reports
 - 1. Copies of final laboratory analyses must be provided to CCDOA EHS
- D. Clean closure certification documents
 - 1. These documents may be required by the applicable regulatory agency
 - 2. These documents may be required in the Airport Access Agreement
 - 3. These documents should be copied to CCDOA, EHS upon receipt
- E. Correspondence with regulatory agencies
 - 1. Copies of correspondence with regulators must be provided to 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. NDEP Draft Guidelines for Discovery Events
- C. Training Materials (list is not limited to the following)
 - 1. Operator site-specific training materials for handling hazardous wastes
- D. Related Environmental Documents (list is not limited to the following)
 - 1. Environmental Guideline EG 4-3, Procurement
 - 2. Environmental Guideline EG 4-4, Tenant Operating Guidance
 - 3. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
 - 4. Environmental Guideline EG 5-1, Remediation of Contaminated Soils
 - 5. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
 - 6. Environmental Guideline EG 6-1, Spill Response
 - 7. Environmental Guideline EG 6-2, Abandoned Material Response
 - 8. Environmental Guideline EG 7-1, General Waste Management
 - 9. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
 - 10. Environmental Guideline EG 7-3, Management of Hazardous Wastes
 - 11. Environmental Guideline EG 7-5, Management of Special Wastes
 - 12. 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 445B Air Controls
 - 4. NAC 459 Hazardous Materials
 - 5. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
 - 6. NRS 459.748-459.773 Oil or Hazardous Material Spills, Accidents and Incidents
 - 7. 40 CFR Protection of the Environment
 - 8. 49 CFR Transportation
 - 9. 14 CFR 139.321 Handling and Storing of Hazardous Substances and Materials
 - 10. 29 CFR 1910 Occupational Safety and Health Standards
 - 11. 29 CFR 1926 Safety and Health Regulations for Construction
 - 12. Uniform Fire Code/NFPA, Chapter 16, Construction, Alteration and Demolition Operations
 - 13. Uniform Fire Code/NFPA, Chapter 16.2.2, Construction, Alteration and Demolition Operations Waste
 - 14. Clark County DAQEM Air Quality Regulations
 - 15. CCDOA's Rules and Regulations
- F. Other Documents (list is not limited to the following)
 - 1. None at this time

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