

EG 3-5: Parts Washing

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CCDOA Environmental Specialist

I. Activity Description

The washing of machine parts to remove grease and oils using closed system equipment provided by Clark County Department of Aviation (CCDOA) staff, contractors, and tenants; including the coordination of fluid replacement

II. Potential Environmental Risks

- A. The CCDOA - Environmental, Health & Safety (EHS) office has identified the following environmental concerns associated with these activities:
 - 1. Improper or inappropriate handling of hazardous chemicals or materials
 - 2. Employee exposure to hazardous chemicals or materials
 - 3. Spills of hazardous chemicals & materials
 - 4. Contamination of waste water discharged to the municipal sewer system
- 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. Removal or discharge of the fluids from self-contained parts washing equipment is prohibited. These fluids must be routinely replaced by the contractor and should never be removed from the closed parts washing system for any reason
- B. Required Activities
 - 1. Parts washer lid must be closed when not in use to prevent the escape of volatile organic compounds
 - 2. Those that use a service to replace the waste solvent/solutions must ensure that the contracted company disposes of the wastes appropriately
- C. General Considerations
 - 1. Each operator and tenant conducting activities utilizing parts washing equipment and fluids 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

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2. CCDOA facilities use closed systems in which the contracted vendor warrants to process and reuse the contaminated solvent. This type of process is highly recommended for operators and tenants
3. Wear proper Personal Protective Equipment (PPE) when utilizing parts washing equipment, per OSHA regulation
4. The contractor is responsible for maintenance to the parts washing equipment and changing the parts washing fluid regularly
5. Place spill pans or secondary containment devices under containers in active use
6. Spent solvent/solutions should be recycled to the maximum extent practical
7. Environmentally friendly aqueous or bioremediation parts washers should be considered as an alternative to solvent-based systems

D. Training Requirements

1. Employee training programs shall inform personnel at all levels of responsibility who are involved in construction activities that may affect storm water runoff. Storm Water Pollution Prevention (SWPP) training shall address topics such as spill response, good housekeeping and material management practices
2. Training on Spill Prevention, Control and Countermeasure (SPCC) Plan requirements will be provided to all fuel and oil-handling personnel if they conduct SPCC-related operations
3. Each operator/tenant is responsible for informing their personnel of CCDOA spill reporting requirements. Refer to Environmental Guideline EG 6-1, Spill Response.
4. Contractor or temporary personnel shall be informed of facility operations, design features and details of this Environmental Guideline in order to prevent discharges or spills from occurring

E. Storage and Materials Management Requirements

1. Place spill pans under containers in active use. Containers of cleaning solvents/solutions must be properly labeled, including the owner's name
2. Container lids and bungs must be secure when not in use

IV. Planning Requirements

- A. Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur
- B. The contractor is responsible for maintaining parts washing equipment and replacing the parts washing fluid regularly. If an increased frequency is required to change the parts washing fluid, the contractor must be contacted

V. Critical Tasks

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- A. Maintain a receipt fluid change-out log to document contractor visits and the replacement of parts washing fluids

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. Control spills to minimize property damage and eliminate imminent risk to human health and the environment
- D. Spills of any kind shall not be washed into any sewer or waterway or onto any soil area
- E. Containerize all collected wastes and evaluate for labeling, storage and disposal
- 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. Inspect part washing areas regularly, paying attention to drum / container integrity. Plug any leaks & clean up spills immediately. Notify the contractor or owner if equipment is damaged

VIII. Expected Records and Outputs

- A. Maintenance and fluid change-out log
 - 1. A log of parts washing equipment contractor visits should be maintained on site by the Owner, Tenant or Operator contracting the equipment use
 - 2. Receipts of contractor visits should also be maintained onsite, documenting the removal and replacement of parts washing fluids
- B. Product Safety Data Sheets (SDSs)
 - 1. Manufacturers of products will supply these documents on demand. SDSs for all products in use should be made available to all employees engaged in handling and management activities and maintained on file by the Tenant, Operator or Owner at the facility
- C. Certification of Reuse and Recycle

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1. Obtain a letter from the equipment service contractor certifying that they recover, reuse, and recycle the cleaning fluids. Otherwise the shipping weight of the contaminated fluids must be counted against the hazardous waste generation by the user/shipper if the fluids qualify as hazardous listed or characteristic wastes

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. Product Safety Data Sheet (SDS) documents and other manufacturer specification
- C. Training Materials (list is not limited to the following)
 1. Operator site specific training materials for handling Hazardous Wastes
 2. Hazard Communication training
- 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 1-3, Cargo Loading and Offloading
 3. Environmental Guideline EG 1-4, Management of Aircraft Lavatory Water and Waste
 4. Environmental Guideline EG 1-5, Maintenance of Aircraft, Vehicles and Equipment
 5. Environmental Guideline EG 1-7, Storage of Vehicles and Equipment Containing Chemicals
 6. Environmental Guideline EG 2-1, Painting and Paint Removal
 7. Environmental Guideline EG 2-2, Cleaning Washing - Indoor Industrial Surfaces
 8. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
 9. Environmental Guideline EG 2-4, Janitorial Activities
 10. Environmental Guideline EG 3-1, Ozone Depleting Compound Management
 11. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations

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12. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
 13. Environmental Guideline EG 3-5, Parts Washing
 14. Environmental Guideline EG 4-3, Procurement
 15. Environmental Guideline EG 4-4, Tenant Operating Guidance
 16. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
 17. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
 18. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
 19. Environmental Guideline EG 6-1, Spill Response
 20. Environmental Guideline EG 6-2, Abandoned Material Response
 21. Environmental Guideline EG 7-1, General Waste Management
 22. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
 23. Environmental Guideline EG 7-3, Management of Hazardous Wastes
 24. Environmental Guideline EG 7-4, Management of Universal Wastes
 25. Environmental Guideline EG 7-5, Management of Special Wastes
 26. 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. NRS 459 Hazardous Materials
 4. NAC 459/NRS 459 Hazardous Materials
 5. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
 6. 40 CFR Protection of the Environment
 7. Uniform Fire Code/NFPA
 8. 29 CFR 1910 Occupational Safety and Health Standards
 9. 29 CFR 1926 Safety and Health Regulations for Construction
- F. Other Documents (list is not limited to the following)
1. Waste Disposal Manifest
 2. CCDOA Spill Reports
 3. The Globally Harmonized System of Classification and Labelling of Chemicals (GHS)

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