

EG 1-4: Management of Aircraft Lavatory Water and Waste

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I. Activity Description:

The following guideline outlines the management of “blue water” and “blue juice” waste from aircraft lavatory servicing activities (i.e., sanitary sewage and associated rinse water produced during servicing)

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 disposal of aircraft lavatory wastes
 2. Nuisance odors
 3. Sanitary system spills
- B. Potential consequences from performing the activity incorrectly:
1. Property damage
 2. Personal injury
 3. Damage to the environment
 4. Citations, Notices of Violation and related (financial & non-financial) penalties

III. Critical Operating Requirements

- A. Prohibited Activities
1. Do not discharge lavatory waste to sanitary sewer connections other than triturator (pulverizing) facilities unless authorized to do so by the CCDOA
 2. Do not discharge lavatory waste into storm water system
 3. Do not perform lavatory truck clean out/back flushing at any location other than triturator facilities unless authorized to do so by the CCDOA
 4. Untreated lavatory fluid spills of any type or size shall not be washed into any sewer system, storm drain system, drainage waterway or onto any soil areas
 5. Do not dispose of used absorbent in the triturator facilities (See Emergency Response Section below)
 6. Do not co-mingle lavatory equipment with potable water servicing equipment
 7. Do not dispose of trash or any other foreign materials in the triturator grinder

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8. Under no circumstances is any spill, regardless of size, to be left on the surface to evaporate or to be flushed into a storm drain

B. Required Activities

1. Lavatory fluid solutions must be stored off of the ground (such as on shelving or pallets) and away from storm water systems
2. Leaking equipment must be taken out of service until repaired
3. Lavatory truck tank discharge valve (dump valve) must be checked to ensure that it is closed prior to leaving triturator area

C. General Considerations

1. Each operator/tenant conducting aircraft lavatory 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. Blue water and associated rinse water produced during lavatory servicing must be collected and disposed of properly in a triturator facility
3. Practice good housekeeping and follow company lavatory service and triturator procedures
4. Keep the equipment in good working order through preventative maintenance and replace worn equipment before leaks develop
5. Product Safety Data Sheets (SDS) for surfactant/disinfectant solutions should be readily available
6. Carry absorbent and other containment equipment on the lavatory truck for spill response
7. Properly secure all hoses, valves and equipment when transporting wastes to eliminate leakage or spills
8. Ensure that regular inspections of hoses and fittings are conducted
9. Utilize buckets or pans to capture drippings from aircraft lavatory access fittings
10. Operators/tenants are responsible for the cleanup of any spilled or leaked lavatory fluids within and outside of the triturator area

D. Training Requirements

1. Employees must receive Storm Water Pollution Prevention (SWPPP) training on an annual basis
2. Employees should be trained in company lavatory service and triturator use procedures as well as, training on spill response, which may include on the job training
3. Employees must be trained on the proper use and disposal of applicable PPE

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4. An employee training program for all levels of personnel who are involved in lavatory service activities where these activities could impact storm water runoff. SWPPP training shall address topics such as spill response, good housekeeping and material management practices. Contractor or temporary personnel shall be informed of facility operations and design features in order to prevent discharges or spills from occurring

E. **Storage and Materials Management Requirements**

1. Lavatory service equipment should be emptied of waste prior to parking for any extended period of time
2. Use of drip pans is encouraged in case leaks develop while equipment is parked for an extended period of time
3. Perform surfactant/disinfectant mixing and transfers in the triturator areas only. This will allow the rinsing of minor spills and splashes from such activities to enter the sanitary sewer system
4. Lavatory fluid solutions must be stored off of the ground (such as on shelving or pallets) and away from storm water drains

IV. Planning Requirements

A. **Review the airport 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. Follow all applicable lavatory service and triturator use procedures
- B. Drain the aircraft connecting hose as completely as possible into the storage tank after servicing an aircraft. Properly secure all hoses, valves and equipment when transporting or transferring to eliminate leakage or spill
- C. Ensure that all valves, hoses and fittings on the lavatory truck are in the closed position and secure prior to mobilizing the equipment

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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
- C. Lavatory spills should be contained and cleaned up as soon as possible using either manual (i.e., absorbents, shovel) or mechanical (i.e., vacuum, sweeper) as a means to minimize potential storm water impacts and biological hazards
- D. Caution must be taken to prevent wastes from reaching any drains at any location other than a triturator
- E. Solids and liquids, to the extent possible, should be collected, returned to the lavatory truck and transported to the airport triturators for disposal. Small amounts of absorbent materials (approximately 5 gallons or less) used for containment and cleanup of any residual liquids can be placed in a dumpster for disposal at the municipal solid waste landfill. Large volumes of lavatory waste spill cleanup materials (greater than approximately 5 gallons) are classified as special waste and must be segregated, profiled and manifested for disposal. Responsible party for the spill is responsible for completing these documents and arranging for disposal
- F. Disinfectants must be used to treat the affected pavement/work area. The affected area(s) should be treated with a biocide or mixture of 90% water and 10% bleach/disinfectant. Prior to any disinfectant product being used, the product safety data sheet (SDS) must be provided to the CCDOA, EHS office for product approval
- G. All spills must be cleaned up until there is no residual spill left on the ground
- H. All spills, regardless of size, must be promptly cleaned up and disposed of. Proper disposal is the responsibility of the party who caused the spill
- I. If the spill has entered the storm drain system, immediate action must be taken by the organization responsible for the spill to remove the material from the system in accordance with local, State, Federal, and Airport Regulations

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- J. 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. Perform routine preventative maintenance of equipment, including hoses and fittings used for transferring lavatory waste, as necessary
- B. Lavatory service equipment should be inspected daily for evidence of leaking fluids. Where evidence of a leak is observed, use a drip pan, report the leak to a supervisor and remove the equipment from service and repair prior to putting equipment back into service

VIII. Expected Records and Outputs

- A. Spill and release records for any spills
 - 1. Spill/release are immediately called in to the Airport Control Center (702) 261-5125
 - 2. Responsible party for the spill shall complete and submit the Spill Report Form to CCDOA, EHS office. Spill Report Forms are available from Airport Operation Coordinators or the CCDOA, EHS office
- B. Evidence of training
 - 1. Formal certifications are not always necessary; however, proof of training such as sign-in sheets signed by the attendees, and handouts is expected to be available and should be maintained on file by the operator/tenant
- F. Product Safety Data Sheets
 - 1. Operator must maintain product SDS for the chemicals they use
 - 2. Copies of product SDSs for cleaning products must be made available to employees engaged in aircraft lavatory activities and maintained on file by the operator/tenant, as per the Hazcom standard. Manufacturers of products will supply these documents to you on demand
 - 3. A copy of the product SDS must be submitted to the CCDOA, EHS office for approval prior to its use

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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. DOT Labeling and Placard Guidance
2. CCDOA Storm Water Pollution Prevention Plan
3. NDEP Storm Water Discharge Permit (NPDES)
4. Product Safety Data Sheets (SDSs)

C. Training Materials (list is not limited to the following)

1. Operational procedures training (on-the-job)
2. Operator's Standard Operating Procedures (SOPs) for lavatory service activities

D. Related Environmental Documents (list is not limited to the following)

1. Environmental Guideline EG 1-3, Cargo Loading and Offloading
2. Environmental Guideline EG 1-4 Management of Aircraft Lavatory Water and Waste
3. Environmental Guideline EG 1-7 Storage of Vehicles and Equipment Containing Chemicals
4. Environmental Guideline EG 2-1, Painting and Paint Removal
5. Environmental Guideline EG 2-2, Cleaning Washing - Indoor Industrial Surfaces
6. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
7. Environmental Guideline EG 2-4, Janitorial Activities
8. Environmental Guideline EG 3-1, Ozone Depleting Compound Management
9. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations
10. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
11. Environmental Guideline EG 3-5, Parts Washing
12. Environmental Guideline EG 4-3 Procurement
13. Environmental Guideline EG 4-4 Tenant Operating Guidance
14. Environmental Guideline EG 4-5 Tenant Relocation or Closeout

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15. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
 16. Environmental Guideline EG 5-3 Storage, Handling and Management of Hazardous Materials
 17. Environmental Guideline EG 6-1 Spill Response
 18. Environmental Guideline EG 6-2 Abandoned Material Response
 19. Environmental Guideline EG 7-1 General Waste Management
 20. Environmental Guideline EG 7-2 Management of Recyclable and Reusable Materials
 21. Environmental Guideline EG 7-3, Management of Hazardous Wastes
 22. Environmental Guideline EG 7-4, Management of Universal Wastes
 23. Environmental Guideline EG 7-5 Management of Special Wastes
 24. 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 486A/NRS 486A Fleets: Use of Alternative Fuels
 5. 29 CFR 1910 Protection and Environment
 6. 40 CFR Protection of the Environment
 7. 49 CFR Transportation
 8. Uniform Fire Code/NFPA
- F. Other Documents (list is not limited to the following)
1. Incident Reports
 2. CCDOA Spill Reports
 3. Operator's Standard Operating Procedures (SOPs) for equipment operations, aircraft servicing and spill prevention, and control and countermeasure activities
 4. The Globally Harmonized System of Classification and Labeling of Chemicals (GHS)

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