

EG 1-2: Cleaning / Washing- Aircraft, Vehicles and Equipment

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I. Activity Description:

The following guideline outlines aircraft, ground access vehicle (e.g., car, pickup truck, van, bus, shuttle) and ground service equipment (e.g., baggage tug, pushback tractor, belt loader, fire truck, deicer truck, catering truck, sweeper, power units) washing requirements and management of materials associated with washing and cleaning (e.g., detergents, wash water)

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
2. Fuels
3. Solvents
4. Soaps and detergents
5. Propylene glycol/aircraft de-icing fluid
6. Ethylene glycol/ radiator coolant (antifreeze)
7. Pavement deicers
8. Sediments
9. Aircraft lavatory fluid solutions (blue Juice)
10. Hydraulic fluids or other maintenance materials

B. Potential consequences from performing the activity incorrectly:

1. Property damage
2. Personal injury
3. Long-term damage to the environment
4. Citations, Notice of Violation and related (financial & non-financial) penalties

III. Critical Operating Requirements

A. Prohibited Activities

1. Washing of aircraft is prohibited, except as outlined in this document
2. Washing of vehicles and equipment is prohibited, except at wash racks or other areas designated by the CCDOA
3. Discharge of washing fluids onto the ground surface and/or storm water system without prior approval by the CCDOA is prohibited

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4. Use of new processes without prior demonstration and approval of said process by the CCDOA, EHS office is prohibited
 5. Vehicle and equipment prewash activities are not to be performed outside a wash rack or containment system
 6. Discharge of any chemical into the sanitary sewer or storm drain system, without prior approval from the CCDOA, is prohibited
- B. General Considerations
1. Use dry washing techniques, when feasible, such as sweeping, vacuuming, wiping, air blasting or using dry absorbents or cleaners
 2. Filter and recycle water where practical
 3. Ensure that applicable run off control equipment is inspected and maintained
 4. Use only cleaning solutions that comply with Clark County Water Reclamation District guidelines. Contact the CCDOA, EHS office for product approval
- C. Training Requirements
1. Employees should be trained on company aircraft particulars, vehicle and/or equipment washing/cleaning procedures as well as, spill response procedures, which may include on-the-job training
 2. As applicable, training will support the applicable Storm Water Pollution Prevention Plan (SWPPP) requirements for the facility as well as, address topics on 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. All containers and tanks shall be in good condition with no evidence of leaks or corrosion
 2. Labels, markings and other required signage must be legible, in good condition and follow the standards of the Global Harmonized System of Classification of Chemicals (GHS)
 3. The tenant's/operator's (owner's) name must be present on all containers and tanks
 4. Ensure that secondary containment and other fuel-related equipment are adequate and in good operating condition. This includes storage units, receiving units, dispensing units and ancillary monitoring and safety equipment
 5. Preferably, cleaning solutions should be stored indoors, utilizing secondary containment, if in the vicinity of a floor drain. If cleaning solutions must be store outdoors, secondary containment and cover must be used

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IV. Planning Requirements

- A. Submit product Safety Data Sheets (SDSs) for proposed cleaning chemicals to the CCDOA, EHS office for approval prior to use
- B. Maintain adequate supplies of spill response equipment and materials where washing activities and cleaning chemicals are stored and where spills are likely to occur
- C. 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 CCDOA Storm Water Pollution Prevention Plan, or complete their own plan for approval by CCDOA, EHS

V. Critical Tasks

- A. All aircraft washing activities utilizing wet methods must capture and contain wash fluids prior to disposal unless prior approval from the CCDOA, EHS office has been obtained

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 in an appropriate container and dispose of offsite at an approved and permitted facility
- 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. Complete the CCDOA Spill Reporting Form and return the completed form to the CCDOA, EHS office within 24-hours of the release

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VII. Inspection and Maintenance Requirements

- A. Inspect and maintain all run-off control measures
- B. Pretreatment devices and sumps utilized in the collection of wash fluids should be included in a routine inspection and maintenance program
 - 1. Refer to Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices

VIII. Expected Records and Outputs

- A. Spill and release for any spills
 - 1. Spill/release immediately called into Airport Control Center (702) 261-5125, or appropriate Customer Service Desk
 - 2. Responsible party (for the spill) completes and submits Spill Report Form to CCDOA, EHS office. Spill Report Forms are available from CCDOA Airport Operations Coordinators or the CCDOA EHS office
- B. Evidence of training
 - 1. Formal certifications are not necessary, some form of proof of training (such as sign-in sheets, signed by the attendees and handouts) is expected and should be maintained on file by the operator
- C. Safety Data Sheets for cleaning solutions/products
 - 1. Operator must maintain SDSs for the chemicals they use
 - 2. Copies of SDSs for cleaning products must be made available to employees engaged in cleaning/washing activities and maintained on file by the operator/tenant as per the Hazcom standard
 - 3. A copy of the SDS must be submitted to the CCDOA, EHS office for approval prior to use
- D. Approval letter for any wet method cleaning activities on aircraft
 - 1. Operator must obtain an approval letter from the CCDOA, EHS office prior to conducting wet method activities
- E. Copy of Operator's Storm Water Pollution Prevention Plan
 - 1. When applicable, a copy of the operator's SWPPP shall be provided to the CCDOA, EHS office
- F. Waste management records (profiles, manifests, sample results, etc.)

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1. If off-site disposal of wash water occurs, a profile of the material will be required by the disposal facility prior to transport
2. 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 wastes
3. Operator must maintain waste management records on-site for minimum of three (3) years

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. Product Safety Data Sheets (SDS)
3. CCDOA Storm Water Pollution Prevention Plan
4. NDEP Storm Water Discharge Permit (NPDES)
5. CCDOA Environmental Directives

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

1. Company Standard Operating Procedures training (on-the- job)
2. When applicable, make available the SWPPP procedures to employees

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

1. Environmental Guideline EG 1-2, Cleaning Washing
2. Environmental Guideline EG 1-5, Maintenance of Aircraft, Vehicles and Equipment
3. Environmental Guideline EG 1-7, Storage of Vehicle and Equipment
4. Environmental Guideline EG 2-2, Cleaning/ Washing Indoor Industrial Surfaces
5. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
6. Environmental Guideline EG 2-4, Janitorial Activities
7. Environmental Guideline EG 2-5, Cleaning/ Washing- Outdoor Areas and Structures
8. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations

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9. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
 10. Environmental Guideline EG 3-5, Parts Washing
 11. Environmental Guideline EG 4-3, Procurement
 12. Environmental Guideline EG 4-4, Tenant Operating Guidance
 13. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
 14. Environmental Guideline EG 5-2, Management of Petroleum Products
 15. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials
 16. Environmental Guideline EG 6-1, Spill Response
 17. Environmental Guideline EG 6-2, Abandoned Material Response
 18. Environmental Guideline EG 7-1, General Waste Management
 19. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
 20. Environmental Guideline EG 7-3, Management of Hazardous Wastes
 21. Environmental Guideline EG 7-5, Management of Special Wastes
 22. 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/NRS 459 Hazardous Materials
 5. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
 6. NAC 486A/NRS 486A Fleets: use of Alternative Fuels
 7. 29 CFR 1910 Protection and Environment
 8. 40 CFR Protection of the Environment
 9. 49 CFR Transportation
 10. Uniform Fire Code/NFPA
 11. Federal Pollution Prevention Act of 1990
- F. Other Documents (list is not limited to the following)
1. Incident Reports
 2. CCDOA Spill Reports
 3. The Globally Harmonized System of Classification and Labelling of Chemicals (GHS)

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