

EG 2-4: Janitorial Activities

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Document Owner:

CCDOA Environmental Specialist

I. Activity Description:

The activity of cleaning non-industrial interiors of buildings and aircraft, including the use and storage of cleaning chemicals, waste collection and disposal/recycling

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. Air pollution and odors
2. Chemical Spills
3. Improper or inappropriate disposal of cleaning and other janitorial wastes
4. Improper or inappropriate storage of cleaning chemicals

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. Discharge of the following materials down any drain is prohibited:
 - a. Any oils or grease
 - b. Pesticides, insecticides or herbicides
 - c. Solvents
 - d. Cleaning chemicals, unless prior written authorization from CCDOA, EHS office is obtained
2. Disposal of aerosol cans require special management procedures. These items should not be disposed of in the trash. See Environmental Guideline 28, General Waste Management
3. Discharge into storm water system is prohibited, unless prior written authorization from CCDOA, EHS is obtained

B. General Considerations

1. Each tenant, contractor and operator conducting janitorial 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

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2. Ensure that product Safety Data Sheets (SDSs) are available for all chemicals used during the janitorial activities. SDSs for materials no longer in use should be routinely removed and placed in an archive

C. Training Requirements

1. All employees engaged in janitorial activities must be aware of the proper techniques, requirements and pollution prevention aspects
2. All employees engaged in janitorial activities must be trained on the OSHA Hazard Communication Standard 29 CFR 1900.1200

D. Storage and Materials Management Requirements

1. Store chemicals and other cleaning products in containers that are in good condition and utilize secondary containment when appropriate
2. Labels, markings and other required signage must be legible, in good condition and follow the standards of the Global Harmonized System (GHS) of classification and labeling of chemicals
3. The tenant's/operator's (owner's) name must be present on all containers and tanks
4. Preferably, cleaning solutions should be stored indoors, utilizing secondary containment if in the vicinity of a floor drain. If cleaning solutions must be stored outdoors, secondary containment and cover must be used

IV. Planning Requirements

- A. Ensure that janitorial carts and/or closets are stocked with appropriate spill response materials at all times
- B. Properly segregate materials for recycling where appropriate
- C. Submit SDS for proposed cleaning chemicals to the CCDOA, EHS office for approval prior to use

V. Critical Tasks

- A. Dispose of waste water from mopping activities, appropriately

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

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- C. Use absorbent materials to manage spills. Contain used materials in an appropriate container and dispose off-site 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

VII. Expected Records and Outputs

- A. Evidence of training
 - 1. Formal certifications are not always necessary; however, proof of training such as sign-in sheets are expected to be available and signed by the attendees and should be maintained on file by the operator/tenant
- B. SDSs for cleaning solutions/products
 - 1. Operator must maintain SDS 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 its use
- C. Approval letter for any product substitutions
 - 1. Operator must maintain approval from CCDOA, EHS office prior to incorporating any new or potentially hazardous cleaning chemical or product into their janitorial activities
- D. Waste Management Records (profiles, manifests, sample results, etc.)
 - 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 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 at their facility for a minimum of three (3) years

VIII. References

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- 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 information
 - 2. CCDOA Storm Water Pollution Prevention Plan
 - 3. NDEP Storm Water Discharge Permit (NPDES)
- C. Training Materials (list is not limited to the following)
 - 1. Company Standard Operational Procedures training (on-the-job)
 - 2. Facility and Operators, when applicable, SWPPP Procedures
- 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 1-7, Storage of Vehicles and Equipment Containing Chemicals
 - 5. Environmental Guideline EG 2-1, Painting and Paint Removal
 - 6. Environmental Guideline EG 2-2, Cleaning Washing - Indoor Industrial Surfaces
 - 7. Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices
 - 8. Environmental Guideline EG 2-4, Janitorial Activities
 - 9. Environmental Guideline EG 2-5, Cleaning Washing - Outdoor Areas and Structures
 - 10. Environmental Guideline EG 3-1, Ozone Depleting Compound Management
 - 11. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations
 - 12. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
 - 13. Environmental Guideline EG 3-5, Parts Washing
 - 14. Environmental Guideline EG 4-1, Construction
 - 15. Environmental Guideline EG 4-2, Planning and Design
 - 16. Environmental Guideline EG 4-3, Procurement
 - 17. Environmental Guideline EG 4-4, Tenant Operating Guidance
 - 18. Environmental Guideline EG 4-5, Tenant Relocation or Closeout
 - 19. Environmental Guideline EG 5-2, Management of Petroleum Products (SPCC Plan)
 - 20. Environmental Guideline EG 5-3, Storage, Handling and Management of Hazardous Materials

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21. Environmental Guideline EG 6-1, Spill Response
22. Environmental Guideline EG 6-2, Abandoned Material Response
23. Environmental Guideline EG 7-1, General Waste Management
24. Environmental Guideline EG 7-2, Management of Recyclable and Reusable Materials
25. Environmental Guideline EG 7-3, Management of Hazardous Wastes
26. Environmental Guideline EG 7-4, Management of Universal Wastes
27. Environmental Guideline EG 7-5, Management of Special Wastes
28. 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 Hazardous Materials
4. 40 CFR Protection of the Environment
5. Uniform Fire Code/NFPA
6. 29 CFR 1910 Occupational Safety and Health Standards

F. Other Documents (list is not limited to the following)

1. Waste Disposal Manifest
2. CCDOA Spill Reports
3. The Globally Harmonized System (GHS) of classification and labeling of chemicals

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