

EG 1-3: Cargo and Loading & Offloading

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Document Owner:

CCDOA Environmental Specialist

I. Activity Description:

The following guideline outlines the general operating requirements involved in cargo loading and offloading

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 emissions
 2. Hazardous materials spills
 3. Oil & grease spills
 4. Hydraulic fluid spills
- 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. Spills of any kind shall not be washed into any sewer system, storm drain system, drainage waterway or onto any soils
- B. Required Activities
1. Maintain adequate supplies of spill response equipment and materials in accessible locations where spills are likely to occur

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C. General Considerations

1. Each operator/tenant conducting cargo loading and offloading 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. Turn off diesel or gasoline powered equipment during idle time
3. Do not block or otherwise restrict the flow of air through any ventilation equipment within the baggage/cargo handling areas, especially the tunnel

D. Training Requirements

1. Train employees to the appropriate level of protection for spill response and prevention
2. Employee training programs shall inform personnel at all levels of responsibility who are involved in cargo loading and offloading activities that may impact storm water runoff. Training shall address topics such as spill response, good housekeeping and material management practices. Contractor or temporary personnel shall be informed of facility operation and design features in order to prevent discharges or spills from occurring

E. Storage and Materials Management Requirements

1. Materials listed in Section 13 of the Emergency Planning and Community Right-to-Know Act (EPCRA), coal piles, salt piles, and formal or informal landfills must be managed to prevent exposure to storm water

IV. Planning Requirements

A. Review the facility Storm Water Pollution Prevention Plan (SWPPP)

1. These documents are available through the CCDOA, EHS office
2. If applicable, the operator will need to decide whether to operate under the CCDOA generated SWPPP or complete their own plan for approval by CCDOA, EHS

B. Maintain adequate supplies of spill response equipment and materials where activities are conducted

V. Critical Tasks

A. Follow all applicable cargo company shipping requirements

VI. Emergency Response

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- A. If a spill occurs, immediately stop the source of the spill, if possible. Refer to Environmental Guideline EG 6-1, Spill Response.
 - 1. 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
- B. Use absorbent materials to manage spills. Contain used materials in an appropriate container and dispose offsite at an approved and permitted facility
- C. Prevent contamination from entering any sewer, storm drain, drainage waterway or soil area using whatever means available (i.e., barriers, blocking devices, etc.)
- D. Control spills to eliminate risk to human health and the environment and to minimize property damage
- E. 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. Routinely inspect equipment for leaks or spills

VIII. Expected Records and Outputs

- A. Spill and release for any spills
 - 1. Spill/release must immediately be called in to the 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
 - 3. If any spill is 25 gallons or more, the tenant is responsible for contacting the Nevada Division of Environmental Protection (NDEP) at 1-888-331-6337 within the next business day following the spill. The NDEP Spill Report Number should be noted on the CCDOA Spill Report Form
- B. Evidence of training on Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasure Plan and Operator Standard Operating Procedures (SOPs)

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1. Formal certifications are not 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
- C. Waste management records (profiles, manifests, sample results, etc.)
 1. Based on the disposal profile, manifests and related forms may be required
 2. Manifests and profile forms can be obtained from the disposal facility for off-site disposal activities (manifests are required for hazardous wastes)
 3. Manifests **ARE REQUIRED** for hazardous, special and universal wastes
 4. 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 Placarding Guidance
 2. Product Safety Data Sheets (SDS)
 3. Airport Storm Water Pollution Prevention Plan (SWPPP)
 4. Spill Prevention Control and Countermeasure Plan (SPCC)
 5. NDEP Storm Water Discharge Permit (NPDES)
 6. Leak Detection System Design and Operation Information
 7. CCDOA Tenant Bulletins
 8. Ramp drainage design and storm water plans (as-builts)
- C. 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
 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 2-4, Janitorial Activities
 7. Environmental Guideline EG 3-1, Ozone Depleting Compound Management Guideline

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8. Environmental Guideline EG 3-2, Heating, Ventilation, and Air Conditioning (HVAC) Operations
 9. Environmental Guideline EG 3-4, Metal Finishing, Coating, Machining, and Cooling
 10. Environmental Guideline EG 3-5, Parts Washing
 - 11.
 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
 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
- D. Applicable Regulations (list is not limited to the following)
1. NAC 444/NRS 444 Sanitation
 2. NAC 445B Air Controls
 3. NAC 459/NRS 459 Hazardous Materials
 4. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
 5. 29 CFR 1910 Protection and Environment
 6. 40 CFR Protection of the Environment
 7. 49 CFR Transportation
 8. Uniform Fire Code/NFPA
- E. Other Documents (list is not limited to the following)
1. Permits & Licenses
 2. Incident Reports
 3. NDEP Storm Water Discharge Permit (NPDES)
 4. CCDOA Spill Reports
 5. NFPA Requirements
 6. Operator's Standard Operating Procedures (SOPS) for equipment operations, aircraft servicing and spill prevention, control and countermeasure activities
 7. The Globally Harmonized System (GHS) of classification and labeling of chemicals

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