

***EG 1-7: Storage of Vehicles and Equipment Containing Chemicals***

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**I. Activity Description:**

The activity of storing vehicles and equipment containing chemicals, such as de-icing fluids and fuels

**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. Leaking fuels
  2. Leaking oil
  3. Leaking chemicals
  4. Leaking pressurized gasses (such as Freon)
- 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. Disposal of any chemicals contained in the vehicles or equipment, or that may have leaked or spilled onto surfaces within the storage area, into any sort of drain, is prohibited. This includes wash water that may be generated during any cleaning of the storage area. These liquids must be collected and disposed of appropriately. Prohibited discharges include the following:
    - a. Any oils or grease
    - b. Pesticides, insecticides or herbicides
    - c. Solvents and Fuels
  2. Any solid chemicals or residues contained in vehicles or equipment, or that may have leaked or spilled onto surfaces in the storage area, must be disposed of offsite unless alternate disposal practices are approved by the CCDOA, EHS office

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A. Required Activities

1. Tenants shall not store equipment in areas where it impedes operations or other tenants
2. Tenants shall implement measures to prevent or reduce the discharge of pollutants to the environment
3. Immediate response to spills or releases is required
4. Compliance with spill reporting requirements. Environmental Guideline EG 6-1, Spill Response

B. General Considerations

1. Each operator and tenant conducting storage 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. Perform routine Preventative Maintenance on equipment in an effort to reduce the probability of leaks
3. Do not allow equipment to leak. Such leaks should be contained in drip pans or onto absorbent materials, checked regularly and disposed of properly
4. Dispose of materials used from cleanup of spills or leaks in accordance with all applicable regulations and requirements

D. Training Requirements

1. Each operator/tenant is responsible for informing their personnel of CCDOA spill reporting requirements
2. Employee training programs shall inform personnel at all levels of responsibility who are involved in vehicle and equipment storage 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
3. As applicable, training will support the applicable Storm Water Pollution Prevention Plan (SWPPP) requirements for the facility, and address topics spill response, good housekeeping and material management practices. Training should cover the following items:
  - a. All applicable product Safety Data Sheets (SDSs)
  - b. Waste management practices
  - c. Spill response procedures

E. Storage and Materials Management Requirements

1. Locate storage areas away from storm drains. Do not allow any waste materials or contaminated water to enter any storm drains
2. Dispose of any used spill response materials in accordance with all regulations and requirements
3. All containers/tanks must be properly labeled per the HAZCOM standard, including the tenant's name

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#### **IV. Planning Requirements**

- A. Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur
- B. Review Environmental Guideline EG 1-5, Maintenance of Aircraft, Vehicles and Equipment prior to performing any maintenance of equipment within the vehicle and equipment storage areas

#### **V. Critical Tasks**

None

#### **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 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. Utilize drip pans and absorbent materials at maintenance areas where incidental spillage is possible
- G. Spills of any kind shall not be washed into any sewer or waterway, or onto any soil areas
- H. Containerize all collected wastes and evaluate for proper labeling, storage and disposal
- I. 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 the pavement surface in vehicle and equipment storage areas for the presence of fuel, oil, etc., leakage. Immediately report and clean up any spills
- B. Routinely inspect spill response equipment to ensure adequate supplies are available

- C. Routinely inspect the sumps, pretreatment devices and other collection/treatment systems in the storage and maintenance areas. Clean and maintain, as necessary, as per Environmental Guideline EG 2-3, Maintenance of Pretreatment Devices

## VIII. Expected Records and Outputs

- A. Waste Management/ Disposal Documentation
  - 1. 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, special and universal wastes)
  - 2. Operator must maintain appropriate documentation for disposed wastes at the facility
  - 3. Operator must maintain waste management records at the facility for a minimum of three (3) years
  - 4. See Environmental Guideline EG 7-1 for additional information on waste classification and disposal requirements
- B. Maintenance Log
  - 1. Operator/tenant should maintain maintenance records at the storage area, documenting maintenance and waste management activities
- C. Evidence of training on Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasure Plan and operator's SOPs, as applicable
  - 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
- D. SPCC Plan, if required, and compliance records, as applicable (i.e., monthly inspections, fueling and defueling operations, witnessing)
  - 1. Operator must maintain SPCC Plan and related inspection and compliance records at the facility
  - 2. A copy of the SPCC Plan must be submitted to the CCDOA EHS office
- E. Spill and release for any spills
  - 1. Spill/release must immediately be called in to 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

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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. CCDOA Storm Water Pollution Prevention Plan
  - 2. NDEP Storm Water Discharge Permit (NPDES)
  - 3. CCDOA Tenant Bulletins
  - 4. Product Safety Data Sheets (SDSs)
  - 5. Storage area drainage design and storm water plans (as-builts)
- C. Training Materials (list is not limited to the following)
  - 1. Operational procedures training (on-the-job)
- D. Related Environmental Documents (list is not limited to the following)
  - 1. Environmental Guideline EG 1-1, Washing of 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 1-6, Aircraft Deicing
  - 6. Environmental Guideline EG 1-7 Storage of Vehicles and Equipment Containing Chemicals
  - 7. Environmental Guideline EG 2-1 Painting and Paint Removal
  - 8. Environmental Guideline EG 2-2 Cleaning Washing - Indoor Industrial Surfaces
  - 9. Environmental Guideline EG 2-3 Maintenance of Pretreatment Devices
  - 10. Environmental Guideline EG 2-4 Janitorial
  - 11. Environmental Guideline EG 3-1 Ozone Depleting Compound Management
  - 12. Environmental Guideline EG 3-2 Heating, Ventilation, and Air Conditioning (HVAC) Operations
  - 13. Environmental Guideline EG 3-4 Metal Finishing, Coating, Machining, and Cooling
  - 14. Environmental Guideline EG 3-5 Parts Washing
  - 15. Environmental Guideline EG 4-3 Procurement
  - 16. Environmental Guideline EG 4-4 Tenant Operating Guidance
  - 17. Environmental Guideline EG 4-5 Tenant Relocation or Closeout

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18. Environmental Guideline EG 5-2 Management of Petroleum Products (SPCC Plan)
  19. Environmental Guideline EG 5-3 Storage, Handling and Management of Hazardous Materials
  20. Environmental Guideline EG 6-1 Spill Response
  21. Environmental Guideline EG 6-2 Abandoned Material Response
  22. Environmental Guideline EG 7-1 General Waste Management
  23. Environmental Guideline EG 7-2 Management of Recyclable and Reusable Materials
  24. Environmental Guideline EG 7-3 Management of Hazardous Wastes
  25. Environmental Guideline EG 7-4 Management of Universal Wastes
  26. Environmental Guideline EG 7-5 Management of Special Wastes
  27. 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 444A.005-444A.470/NRS 444A.010-444A.110 Recycling
  3. NAC 445A Water Controls
  4. NAC 445B Air Controls
  5. NAC 486A/NRS 486A Fleets: Use of Alternative Fuels
  6. NAC 590 Motor Vehicle Fuel, Petroleum Products and Antifreeze
  7. NAC 459/NRS 459 Hazardous Materials
  8. 29 CFR 1910 Occupational Safety and Health Standards
  9. 40 CFR Protection of the Environment
  10. 49 CFR Transportation
  11. Uniform Fire Code/NFPA
- F. Other Documents (list is not limited to the following)
1. Permit Applications
  2. Permits & Licenses
  3. SPCC Plan
  4. Land Disposal Restrictions (LDRs) for waste materials
  5. Manifests
  6. CCDOA Spill Reports
  7. NFPA Requirements
  8. The Globally Harmonized System (GHS) of classification and labeling of chemicals

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