

PART 180 - ENVIRONMENTAL MANAGEMENT

180.01 Introduction

Activities associated with operations at DEN can result in adverse or beneficial environmental impacts. Proactive environmental management can reduce environmental risks and leverage environmental opportunities. DEN's Environmental Policy, found at <https://www.flydenver.com/business-and-community/sustainability/ems/>, illustrates the Department of Aviation's commitment to environmental protection, continual improvement, and sustainability in all areas of airport business and operations. The provisions of this Part 180 of the Airport Rules and Regulations must be followed by all DEN Business Partners (as defined below) during any operations and activities at DEN.

DEN's Environmental Management System (EMS) provides a systematic approach to identifying, prioritizing, and managing significant environmental aspects. The EMS helps ensure that those aspects of operations at DEN with the potential to cause significant environmental impacts are proactively and aggressively managed. Through the EMS, DEN has designed and implemented procedures to promote compliance with environmental requirements, evaluate waste minimization and pollution prevention opportunities, incorporate sustainability principles, and continually improve environmental programs through a cycle of "plan, do, check, feedback." Furthermore, the EMS reaffirms the responsibility of each person working at the Airport to conduct their activities in a manner that will promote protection of employees, the environment, and DEN property.

DEN's Business Partners are required by statute, regulation, and agreements with the City and County of Denver to comply with all federal, state, and local environmental regulations and requirements, and in some cases participate in environmental and sustainability initiatives. The ISO 14001-certified EMS requires that all entities doing business at DEN or on behalf of the airport conform to certain elements of the standard. More specifically, all DEN Business Partners must be aware of the DEN Environmental Policy, identify the significant environmental aspects associated with their operations, develop programs to manage these aspects in a manner that complies with environmental requirements, and further, must ensure the competency of their staff with respect to environmental responsibilities. DEN Business Partners retain operational control over the environmental aspect or impact and generally have discretion on the means and methods used to meet environmental requirements and voluntary commitments. EMS documents provide guidance and communicate expectations to DEN Business Partners.

180.02 Definitions

As used in this Part 180, unless the context clearly indicates otherwise:

180.02-1 DEN Business Partner

"DEN Business Partner" means any person or legal entity which operates a business or not-for-profit activity at the Airport under a lease, concession agreement, operating agreement, permit, contract, use and lease agreement, purchase order, license, or other legal authority, and includes subcontractors, sub-lessees, and vendors. Acts or

omissions of a DEN Business Partner’s employees, officers, contractors, and other representatives are attributed to the DEN Business Partner for purposes of application and enforcement of this Part 180 of the Airport Rules and Regulations.

180.02-2 Environmental Aspect

“Environmental Aspect” means an element of an organization’s activities, products, or services that can result in positive or negative environmental impacts.

180.02-3 Environmental Impact

“Environmental Impact” means any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization’s environmental aspects.

180.02-4 Significant Environmental Aspects at DEN

“Significant Environmental Aspects at DEN,” as determined by the Department of Aviation, are ones that have or can have one or more significant environmental impact(s). DEN maintains environmental guidelines for significant environmental aspects. If there is a change to significant aspects or environmental guidelines, the list maintained on <https://www.flydenver.com/business-and-community/sustainability/ems/> will be updated.

180.02-5 DEN Environmental Guidelines (EGs)

“DEN Environmental Guidelines,” also known as “EGs,” refers to the environmental guidelines that describe procedures that, when followed, would meet DEN’s expectations for compliance with environmental requirements and voluntary commitments. The EGs are adopted by the Department of Aviation and are available at <https://www.flydenver.com/business-and-community/sustainability/ems/>.

180.03 Compliance with Laws, Regulations, and Environmental Guidelines

Each DEN Business Partner shall conduct all of its activities at DEN in compliance with federal, state, and local laws, rules, regulations, ordinances, and statutes, and with the following:

- DEN’s EGs that are applicable to a Business Partner’s Significant Environmental Aspects, unless the DEN Business Partner has developed and implemented their own programs adequate to meet environmental requirements (or compliance obligations, and has provided documentation that it has designed and implemented such programs);
- Applicable DEN permits and plans; and
- DEN Tenant Development Guidelines (TDGs) for all applicable development,

improvement, and rehabilitation projects.

180.04 Spill or Release Notification and Cleanup

180.04-1 Immediate Notification of Spill or Release

DEN's Business Partners must immediately report all spills to the DEN Communications Center at 303-342-4200.

180.04-2 Responsibility for containment and cleanup

Upon notification of a spill or release, the DEN Communications Center will mobilize the DEN-based division of the Denver Fire Department and other emergency responders, as necessary and appropriate, to ensure that any imminent hazard is mitigated, ensure that the release is contained, and make necessary notifications to DEN personnel in accordance with internal operational procedures. However, it is the ultimate responsibility of the DEN Business Partner to contain and clean up the spill or release.

180.04-3 Additional notification and coordination

All external notifications to regulatory agencies shall be coordinated through DEN Environmental Services via the DEN Communications Center; however, all DEN Business Partners are responsible for making all notifications required by federal, state, and local regulations for releases resulting from their operations

180.05 Environmental Representative

Each DEN Business Partner shall designate a person or persons who will be the point of contact for environmental issues to DEN Environmental Services. The name, phone number, and email address of the designated local and corporate environmental person(s) shall be submitted to DEN Business and Environmental staff and updated upon personnel changes. This person(s) shall be able to represent the DEN Business Partner in providing information as may be requested by DEN and should be knowledgeable about the partner's environmental aspects and impacts. Upon request from DEN Environmental Services, Business Partners shall provide requested information about that Business Partner's Significant Environmental Aspects or Environmental Impacts at DEN.

180.06 Restoration of Contaminated Areas

Each DEN Business Partner shall restore any area on the Airport which becomes contaminated as a result of its operations. Restoration shall be either to applicable standards under federal and state law or to such other levels as may be required by the CEO, at the CEO's sole discretion. Such restoration shall be completed at the earliest possible time, and the DEN Business Partner's restoration shall be subject to inspection and approval by the DEN CEO or his/her duly authorized representative.

No Business Partner shall conduct land-disturbing activities at DEN without prior review for the potential to encounter PFAS-impacted materials. Business Partners must provide information to DEN Environmental Services regarding proposed boundaries and extent of land-disturbing activities to facilitate such a review, and supplemental information if changes are later contemplated. When such potential exists, environmental materials must be managed in accordance with DEN's PFAS Materials Management Plan (MMP) located at <https://www.flydenver.com/business-and-community/sustainability/ems/>.

180.07 Sustainability Initiatives

DEN's EMS includes specific objectives for reducing adverse environmental impacts through the implementation of projects and programs designed to mitigate these impacts. In addition, DEN's EMS, in concert with the City's Executive Orders, and other requirements and initiatives, establishes specific targets and goals for reducing and preventing pollution, conserving energy, and minimizing waste. Not only will these practices reduce environmental risks and leverage environmental opportunities, but will also generally reduce operational costs and provide opportunities for social benefits. Moreover, DEN offers a wide variety of environmental and sustainability opportunities for our business partners. For more information on environmental sustainability initiatives including points of contact, go to <https://www.flydenver.com/business-and-community/sustainability/ems/>.