



BUSINESS PARTNERS – OPERATIONAL ENVIRONMENTAL COMPLIANCE

ENVIRONMENTAL GUIDELINES



| | |
|---------------------------|---|
| Activity Definition..... | 3 |
| Expectations..... | 3 |
| Best Practices: | 3 |
| Shall Not: | 5 |
| References..... | 6 |
| Contacts..... | 6 |
| Additional Resources..... | 6 |



PURPOSE

The purpose of the guideline is to provide guidance on what DEN's expectations are for Tenants Operations. This Environmental Guideline outlines the fundamental environmental requirements for tenant operations at DEN in order to prevent air emissions, improper disposal of waste, improper storage of material, sanitary overflows, release of material to sewer and stormwater systems, and contamination to soil, surface water and groundwater. This document is connected to DEN's Business Partner's compliance obligations. Each tenant operating at DEN 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 nor is it encompassing of all regulatory requirements.

ACTIVITY DEFINITION

Operational Environmental Compliance involves meeting all federal, state, and local environmental laws while complying with DEN's lease requirements. This includes Rule & Regulation Part 180 which details each Business Partner's obligation to participate in DEN's environmental standards.

EXPECTATIONS

Best Practices:

- Comply with all federal, state, and local environmental laws, regulations, and guidance.
- Comply with all lease requirements.
- Comply with the TDGs for any alteration to the facility.
- All development of DEN properties require review by DEN Sustainability Division prior to being initiated. Refer to Planning and Design Document for additional guidance. In addition, all new development or alterations to existing facilities shall comply with DEN's Tenant Development Guidelines (TDGs).
- DEN tenants are required to acquire all required permits from local or state regulatory agencies in support of their activities prior to operating the regulated units or conducting the permissible activities (e.g., stationary air sources, construction stormwater permits).
- Tenant is responsible for ensuring compliance with all permits and plans prepared for the facility. The tenant is responsible for conducting the inspections defined in the SWMP, hazardous waste generator requirements, Sewer Use and Drainage Permits, Construction SWMPs and permits, and/or SPCC plan for the site.
- Ensure that Safety Data Sheets (SDSs) are available for all chemicals used by employees. SDSs for materials no longer in use should be routinely removed and placed in an archive.
- Maintain legible labels and markings on all containers and tanks.
- Ensure all containers are in good condition and sealed appropriately.



- Ensure adequate secondary containment for all bulk storage containers, and that all containers and containment are in good operating condition.
- Properly characterize and dispose of all wastes.
- Tenants that generate hazardous wastes in excess of 220 pounds are required to obtain an EPA Hazardous Waste Activity Identification Number and prepare a contingency plan in accordance with RCRA Generator Requirements. Tenants must track hazardous waste generation quantities in order to determine generator status.
- Welding for maintenance purposes, parking lot striping, battery recharging areas, and truck and carwash units are exempt from reporting and permitting under Colorado Air Quality Regulations (5 CCR 1001-5)
- All DEN tenants are required to submit a Pretreatment Device Maintenance Plan, if required.
- Properly maintain all pretreatment devices (e.g., oil/water separators; grease traps; sand, oil and grease traps; grit chambers).
- Painting activities may require air permitting. Tenant shall contact CDPHE APCD if any indoor painting is being contemplated. Outdoor painting of vehicles is prohibited. Any other outdoor painting activities shall be approved by DEN.
- Do not block or otherwise restrict the flow of air through any ventilation equipment.
- All tenant operations must be conducted in strict accordance with the environmental provisions and requirements set forth in their lease agreement(s) with DEN.
- Each tenant shall comply with Metro Water Recovery Rules and Regulations. This includes the completion of the Industrial Waste Questionnaire upon request by Metro and/or DEN Sustainability Division.
- Tenants are responsible for all hazardous chemical inventory tracking and reporting as required by SARA Title III for tenant-operated facilities.
- Tenants conducting industrial activities at DEN that are regulated under DEN's Industrial Stormwater Permit must comply with DEN's Stormwater Management Plan (SWMP). Alternatively, tenants that conduct industrial activities can opt to prepare their own SWMP. These plans must be submitted to DEN ES and must be at least as stringent as DEN's Plan.
- Tenants that have onsite petroleum storage are responsible for demonstrating compliance with Spill Prevention Control and Countermeasure (SPCC) Plan regulations pursuant to 40 CFR Part 112.
- Tenants shall comply with all CDPHE APCD regulations with respect to Air Permitting, CFCs, APENs, etc.
- DEN implements an extensive recycling program. Tenants are encouraged to participate in this program to reduce the waste disposed in landfills and to reduce overall airport operating costs. DEN can assess charges pursuant to Rule and Regulation 40 for waste services if recycling is not performed.
- Any person(s) performing tasks for DEN or on its behalf that have the potential to cause an environmental impact must be aware of DEN's Environmental Policy and know what, if any, significant environmental aspects are related to the products, goods, and/or services they will be providing.
- Persons performing maintenance on Motor Vehicle Air Conditioning Systems or HVAC systems must do so in accordance with Colorado APCD regulatory requirements.
- All tenant activities shall be conducted in compliance with DEN Rules and Regulations and federal, state, and local laws and regulations.
- Training expectations:
- All operators of fueling equipment must be adequately trained in the proper fueling procedures and their SPCC Plan.



- Individuals that handle or manage hazardous wastes should receive site-specific training in accordance with all applicable state and federal requirements.
- Employee training programs shall inform personnel at all levels of responsibility involved in industrial activities that may impact stormwater runoff. Stormwater training shall address topics such as spill response, good housekeeping, and material management practices. Contractors or temporary personnel shall be informed of facility operation and design features to prevent discharges or spills from occurring.
- Call DEN Communications Center immediately at 303-342-4200 for all spills.
- Control spills to minimize property damage and eliminate imminent risk to human health and the environment.
- Containerize all collected waste and evaluate for labeling, storage, and disposal.
- Documents to retain onsite:
 - Completed SWMP survey/matrix, if tenant is covered under DEN's Industrial Stormwater Permit
 - Waste management records (profiles, LDR forms, manifests, sample results, etc.)
 - Tenants that generate sufficient hazardous waste to be classified as a Small Quantity Generator (220 pounds in a month) are required to obtain an EPA Hazardous Waste Identification Number. The EPA designation must be submitted to DEN Sustainability Division.
 - All manifests and supporting documentation for the generation, storage, and disposal of hazardous waste must be kept onsite at the facility for three years and made available to DEN inspectors upon request.
 - Evidence of training
 - Pretreatment Device Maintenance Records
 - Motor Vehicle Air Conditioning System Repair Records
 - SPCC inspections must be performed in accordance with the requirements and frequency identified in the individual SPCC Plan for the site. The records must be kept on file at the local facility and must be made available to DEN inspectors upon request.
 - Industrial Waste Questionnaire
 - Must be completed at the request of Metro Water Recovery or DEN ES. A copy of the completed document must be submitted to DEN Sustainability Division and a copy shall remain onsite at the facility.
 - Hazardous Materials
 - Current copies of hazardous chemical inventories must be kept onsite at all times. In the event that the tenant exceeds threshold planning quantities or reportable quantities for any chemical, the tenant shall make the required notifications to the LEPC, SERC, EPA, DFD, and DEN ES.

Shall Not:

- Discharge Spills of any kind shall not be washed into any sewer system or waterway, or onto any soils
- Discharge to State Waters (surface waters) without a permit
- Discharge of any of the following materials down any sanitary sewer system is prohibited:
 - Any oils or grease
 - Pesticides, insecticides or herbicides
 - Solvents
 - Low pH fluids
 - Sediments/solids



- Generally prohibited discharges as specified by Metro Water Recovery permit
- Improper disposal of solid waste (includes hazardous, special, and municipal wastes).
- List activities that are not allowed followed by the environmental risks associated with the disallowed action. Ex: Shall not dump hazardous wastewater down storm drain to avoid stormwater contamination and violation of stormwater permit.

REFERENCES

Contacts

- DEN Environmental Services (Main Line): 303-342-2730; DENEnvironmental@flydenver.com

Additional Resources

- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
- 40 CFR Part 112 Oil Pollution Prevention (SPCC OPA/Plans)
- 6 CCR 1007-3, Parts 260-262, 273, 279 State RCRA Regulations
- 5 CCR 1001-1 through 19, State Air Pollution Control Regulations
- Particles, Smokes, Carbon Monoxide and Sulfur Oxides, Regulation No.1
- Odor Control, Regulation No.2
- Air Pollution Emission Notices-Permits, Regulation No.3
- Woodburning Controls, Regulation No.4
- Emissions Trading Program, Regulation No.5
- New Source Performance Standards, Regulation No.6
- Volatile Organic Compounds Control, Regulation No.7
- Hazardous Air Pollutants Control, Regulation No.8
- Open Burning, Prescribed Fire and Permitting, Regulation No.9
- Transportation Conformity, Regulation No. 10
- Motor Vehicle Inspection Program, Regulation No. 11
- Diesel Vehicle Inspection Program, Regulation No. 12
- Oxygenated Fuels Program, Regulating No. 13
- Reduction of Motor Vehicle Air Pollution from Alternative Fueled Vehicles, Regulation No.14
- Chlorofluorocarbons, Regulation No.15
- Street Sanding and Sweeping, Regulation No.16
- Clean Fuels Fleet Program, Regulation No.17
- Acid Rain Control, Regulation No.18
- Lead Based Paint, Regulation No.19
- CCoD Ordinances
- Denver Wastewater Management Division Rules & Regulations
- Metro Water Recovery Rules & Regulations



- DEN Rules and Regulation 180
- Denver Fire Department Regulations (International Fire Code)
- DEN Industrial Stormwater Permit
- City and County of Denver MS4 Stormwater Permit