



# OPERATIONS – GENERATORS & FIRE PUMPS

**ENVIRONMENTAL GUIDELINE**



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## PURPOSE

This guideline provides information and resources on power generation by emergency generators and auxiliary fire pump power units at the airport. The purpose of this guidance is to minimize environmental risks associated with generator operation, including air pollution, fuel spills, and contamination of soils, surface water, groundwater, and sewer systems. Adherence to these guidelines ensures compliance with DEN's air permit requirements.

## ACTIVITY DEFINITION

The Department of Aviation operates several emergency power generators and auxiliary fire pump power units at the airport. These generators can be either fixed (i.e., bolted to the ground) or portable (i.e., on wheels or a trailer) and are considered a stationary source if located in an area for greater than 12 months. The generators are tested on a regular basis by DEN Life Safety, DEN Electrical, and DEN Fleet staff to ensure their proper operation in the event of a power failure.

The Department of Aviation owns and operates stationary generators at the following locations:

- West Airfield Electrical Vault (8529 Irvington Way);
- East Airfield Electrical Vault (8732 Allium Street);
- Taxiway WC Electrical Vault (9775 Kewaunee Street);
- Maintenance Support Center, Building A (27500 E. 80<sup>th</sup> Avenue, Building A);
- Data Centers 1 and 2;
- Vehicle Maintenance Building;
- A Concourse North and West External;
- All ARFF Stations – One diesel and two natural gas (NG);
- Paint Vehicle Storage Building (NG);
- Airport Office Building (AOB) (8500 Peña Boulevard), outside the loading dock on the west side;
- Antenna Farm, Tower No. 1 (8713 Quincy Street);
- Antenna Farm, Tower No. 2 (8877 Shawnee Street);
- Pikes Peak Parking Lot (3 units);
- Fire pump auxiliary power units in AOB, Terminal, and at each Concourse;
- North Recycle Yard

Portable generators are also present throughout DEN but are not assigned an address, because they can be relocated at any time. Each of the diesel-powered fixed and portable (stationary) generators has a fuel storage container associated with the generator. Airport operators,



tenants, and contractors may also operate generators such as emergency power generators or auxiliary power units (APUs).

## EXPECTATIONS

### Best Practices:

- Understand State of Colorado air quality regulations and exemptions for certain types of generators.
- Exempt: emergency power generators that operate no more than 250 hours per year, engines with manufacturer's site rated horsepower, of less than 50, engines powering portable drilling rigs, and nonroad engines located less than 12 months at one location
- For any generator that does not meet the criteria above, the generator's operator should contact DEN Environmental Services and may be required to prepare and submit an Air Pollutant Emissions Notice (APEN) to the state Air Pollution Control Division.
- Each generator operator must submit a tank registration to the State Division of Oil and Public Safety for each generator fuel tank that has a capacity between 660 gallons and 39,999 gallons (see Management of Petroleum Storage Tanks & Containers).
- Each generator operator must prepare a Spill Prevention, Control, and Countermeasure (SPCC) Plan if total petroleum aboveground storage capacity (including generator fuel tanks) exceeds 1,320 gallons at the facility.
- For City-operated generators, the Department of Aviation will conduct generator monitoring and recordkeeping according to Section 4 of the state air quality Operating and Maintenance (O&M) Plan.
- For City-operated generator tanks, the Department of Aviation will conduct generator monitoring, inspections, and recordkeeping according to the SPCC Plan.
- If a spill occurs, refer to Environmental Guideline Spill Response.
  - Call DEN Communications Center immediately at 303-342-4200 for all spills.

### Shall Not:

- Wash spills of any kind into sewer system, waterway, or onto any soils.

## REFERENCES

### Contacts

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

### Additional Resources

- State air quality permit (Permit No. 99DE0142)
- State air quality regulations (5 CCR 1001-2, -3, and -5)



- State air quality Operating and Maintenance (O&M) Plan, Section 4 (Emergency Generators)
- Local air quality regulations (D.R.M.C. Title II, Chapter 4 (Air Pollution Control), Article III)
- DEN rules and regulation 180