



Title	ES-301-1.07 Storage of Vehicles and Equipment Containing Chemicals
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### **1) Activity Description: Storage of Vehicles and Equipment Containing Chemicals**

The activity of storing vehicles and equipment containing chemicals, such as deicing fluids and fuels.

### **2) Potential Environmental Risks**

- A. The following environmental concerns are associated with these activities:
  - i) Leaking fuels
  - ii) Leaking oil
  - iii) Air pollution and odors
  - iv) Leaking chemicals
  - v) Leaking pressurized gasses (such as Freon)
  
- B. Potential consequences from performing the activity incorrectly:
  - i) Property damage, personal injury or damage to the environment
  - ii) Regulatory and judicial enforcement actions and related [financial & non-financial] penalties

### **3) Critical Operating Requirements**

- A. Prohibited Activities
  - i) Disposal of any chemicals contained in vehicles or equipment, or that may have leaked or spilled onto surfaces within a storage area, into any sort of drain is prohibited. This includes wash water that may have been generated during any cleaning of the storage area. These liquids must be collected and disposed of appropriately. Prohibited discharges include, but are not limited to, the following:
    - a) Any oils and greases
    - b) Pesticides, insecticides, and herbicides
    - c) Solvents and fuels
    - d) Deicing fluids
  - ii) Disposal of 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 off-site unless alternate disposal practices are approved by DEN ES.
  - iii) Disposal of out-of-spec Aircraft Deicing Fluid (ADF) through the airport's glycol recycling facility is permitted, but only when coordinated with the recycling facility's operator.
  
- B. General Considerations
  - i) Each operator and tenant conducting chemical 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.
  - ii) Perform routine preventative maintenance on equipment in an effort to reduce the probability of leaks.
  - iii) Do not allow equipment to leak onto outdoor pavements. Such leaks should be contained in drip pans or onto absorbent materials and disposed of appropriately.
  - iv) Dispose of materials used for clean-up of spills or leaks in accordance with all regulations and requirements.

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C. Training Requirements

- i) Employee training programs shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact Stormwater runoff. Training shall address topics such as spill response, good housekeeping, and material management practices. Contractor or temporary personnel shall be informed of plant operation and design features in order to prevent discharges or spills from occurring.
- ii) All applicable personnel should complete general environmental awareness training, either in the new employee orientation training, from the Environmental Focal Point, or from their appropriate company representative. Training should cover the following items:
  - a) All applicable MSDSs
  - b) Waste management practices
  - c) Spill response for chemicals handled in this activity

D. Storage and Materials Management Requirements

- i) Locate storage areas away from storm drains. Do not allow any waste materials or contaminated water to enter storm drains.
- ii) Dispose of any used spill response materials in accordance with all regulations and requirements.

**4) Planning Requirements**

- A. Maintain adequate supplies of spill response equipment and materials in accessible locations where spills are likely to occur.
- B. Review Environmental Guideline ES-301-1.05 Maintenance of Aircraft, Vehicles and Equipment prior to performing any maintenance on equipment within the storage areas.
- C. Complete the Stormwater Management Plan (SWMP) survey/matrix to assist in determining if a SWMP is required for the activity.
  - i) This document is available at <http://business.flydenver.com/environmental>.
  - ii) If applicable, the operator will need to decide whether to use the DEN SWMP or generate their own SWMP for review by DEN ES

**5) Critical Tasks**

None

**6) Emergency Response**

- A. If a spill occurs, refer to Environmental Guideline ES-301-5.02 Spill Response.
  - i) Call DEN Communications Center immediately at 303-342-4200 for all spills.
  - ii) Control spills to minimize property damage and eliminate imminent risk to human health and the environment.
  - iii) Spills of any kind shall not be washed into any sewer or waterway, or onto any soils.
  - iv) Containerize all collected wastes and evaluate for proper labeling, storage, and disposal. Refer to ES-301-6.01 through 6.06 for guidance on waste management.

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## 7) Inspection and Maintenance Requirements

- A. Routinely inspect pavement in maintenance and storage areas for the presence of spills and leaks. Immediately clean up any spills.
- B. Routinely inspect sumps, pretreatment devices, and other collection/treatment systems in the maintenance area. Clean and maintain as necessary as per ES-301-2.07 Maintenance of Pretreatment Devices.
- C. Conduct inspections in accordance with SPCC (if an SPCC plan is required).

## 8) Expected Records and Outputs

- A. Waste management records (profiles, manifests, sample results, etc.)
  - i) Based on the disposal profile, manifests and related forms may be required. Manifests & profile forms can be obtained from the disposal facility for off-site disposal activities (manifests **are required** for hazardous, special and universal waste).
  - ii) Operator must maintain waste management records at the facility for a minimum of 3 years.
  - iii) Operator must maintain appropriate documentation for disposed wastes at the facility.
  - iv) See ES-301-6.01 for additional guidance on waste classification and disposal requirements.
- B. Evidence of training on SWMP, SPCC Plan, and Operator SOPs, as applicable
  - i) While formal certifications are not always necessary, some form of “proof of training” (such as sign-in sheets and handouts) is expected and should be maintained on file by the operator.
- C. DEN Stormwater Management Plan (SWMP) survey/matrix.
  - i) Obtain a copy of this document at <http://business.flydenver.com/environmental>.
  - ii) Complete form and return to DEN ES for evaluation.
  - iii) Maintain survey/matrix on file after review by DEN ES.
- D. Spill and release records for any spills
  - i) Responsible party (for the spill) notifies DEN Communications Center at (303) 342-4200.

## 9) References

- A. Phone Numbers
  - i) DEN Communications Center (for spill reporting) (303) 342-4200
  - ii) DEN Environmental Services (Main Line) (303) 342-2730
  - iii) Kimberly Ohlson (DEN Environmental Services) (303) 342-2637
- B. Related Environmental Documents (list is not limited to the following)
  - i) ES-301-1.05 Maintenance of Aircraft, Vehicles and Equipment
  - ii) ES-301-2.07 Maintenance of Pretreatment Devices
  - iii) ES-301-5.02 Spill Response
  - iv) ES-301-6.01 General Waste Management

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- C. Guidance Materials (list is not limited to the following)
  - i) Industrial Wastewater Discharge Permit
  - ii) CDPS Permit / Stormwater Management Plan
  - iii) DEN Managers Bulletins
  
- D. Training Materials (list is not limited to the following)
  - i) Operational procedures training (On-the-Job)
  
- E. Applicable Regulations (list is not limited to the following)
  - ii) 40 CFR 110.3 Discharge of Oil
  - iii) 40 CFR 261-282 Federal RCRA Regulations
  - iv) 40 CFR 401 Effluent Limitation Guidelines
  - v) 6 CCR 1007-3, Part 261 State RCRA Regulations
  - vi) DEN Rules and Regulations

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