



Title	ES-301-3.04 Tenant Operating Guidance
Document Owner:	Kim Ohlson
Revision Date:	April 2, 2019

Always refer to the on-line DEN EMS document library prior to use to ensure you are using the most current copy. All other versions are UNCONTROLLED.

1) Activity Description:

This Environmental Guideline outlines the fundamental environmental requirements for tenant operations at DEN.

2) Potential Environmental Risks

- A. The following environmental concerns are associated with these activities:
 - i) Air pollution and odors
 - ii) Improper or inappropriate disposal of wastes
 - iii) Improper storage of products and/or wastes
 - iv) Sanitary Sewer overflow
 - v) Release of maintenance fluids to sewer or stormwater system
 - vi) Sediment and erosion control
 - vii) Contamination of soil
 - viii) Contamination of surface water
 - ix) Contamination of groundwater

- B. Potential consequences from performing the activity incorrectly:
 - i) Property damage, personal injury or damage to the environment
 - ii) Possible regulatory non-compliance, Notices of Violation, and related [financial & non-financial] penalties

3) Critical Operating Requirements

- A. Prohibited Activities
 - i) Discharge Spills of any kind shall not be washed into any sewer system or waterway, or onto any soils without Environmental Services approval.
 - ii) Discharge to State Waters without a permit
 - iii) Discharge of any of the following materials down any sanitary sewer system is prohibited:
 - o Any oils or grease
 - o Pesticides, insecticides or herbicides
 - o Solvents
 - o Sediments/solids
 - o Generally prohibited discharges as specified by Metro Wastewater & Denver Wastewater Management Division
 - iv) Improper disposal of solid waste (includes hazardous, special, and municipal wastes). See Environmental Guideline ES-301-6.01 General Waste Management.

- B. General Considerations
 - i) 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.
 - ii) 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.

Always refer to the on-line DEN EMS document library prior to use to ensure you are using the most current copy. All other versions are UNCONTROLLED.

- iii) Properly characterize and dispose of all wastes. See ES-301-6.01 General Waste Management for additional guidance.
- iv) 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)
- v) Properly maintain all pretreatment devices (e.g., oil/water separators; grease traps; sand, oil and grease traps; grit chambers).
- vi) 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.
- vii) Do not block or otherwise restrict the flow of air through any ventilation equipment.
- viii) All tenant operations must be conducted in strict accordance with the environmental provisions and requirements set forth in their lease agreement(s) with DEN.
- ix) Each tenant shall comply with Metro Wastewater Reclamation District Rules and Regulations. This includes the completion of the Industrial Waste Questionnaire upon request by Metro and/or DEN Environmental Services (ES).
- x) Tenants are responsible for all hazardous chemical inventory tracking and reporting as required by SARA Title III for tenant-operated facilities.
- xi) 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.
- xii) 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.
- xiii) Tenants shall comply with all CDPHE APCD regulations with respect to Air Permitting, CFCs, APENs, etc.
- xiv) DEN implements an extensive recycling program. Tenants are encouraged to participate in this program to reduce the wastes 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.
- xv) 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.
- xvi) Persons performing maintenance on Motor Vehicle Air Conditioning Systems or HVAC systems must do so in accordance with Colorado APCD regulatory requirements.
- xvii) All tenant activities shall be conducted in compliance with DEN Rules and Regulations and federal, state, and local laws and regulations.

C. Training Requirements

- i) All operators of fueling equipment must be adequately trained in the proper fueling procedures and their SPCC Plan.
- ii) Individuals that handle or manage hazardous wastes should receive site-specific training in accordance with all applicable state and federal requirements.
- iii) Employee training programs shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact stormwater runoff. Stormwater 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.

D. Storage and Materials Management Requirements

- i) Maintain legible labels and markings on all containers and tanks.
- ii) Ensure adequate secondary containment for all bulk storage containers, and that all containers and containment are in good operating condition.
 - o Refer to the appropriate SPCC Plan for guidance on specific requirements

4) Planning Requirements

- A. All development of DEN properties requires review by DEN ES prior to being initiated. Refer to ES-301-3.02 Planning and Design for additional guidance. In addition, all new development or alterations to existing facilities shall comply with DEN's Tenant Development Guidelines (TDGs).
- B. Tenants that generate hazardous wastes in excess of certain monthly limits 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.
- C. Tenant relocation and closeout is subject to the requirements of ES-301-3.05 Tenant Relocation or Closeout. Refer to that Environmental Guideline for further guidance.
- D. All DEN tenants are required to complete a SWMP Survey/Matrix prior to commencing operations. Contact DEN ES if this has not been completed.
- E. 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).
- F. All DEN tenants are required to submit a Pretreatment Device Maintenance Plan, if required. Refer to ES-301-2.07 Maintenance of Pretreatment Devices for additional guidance.

5) Critical Tasks

- A. Comply with all federal, state, and local environmental laws, regulations, and guidance.
- B. Comply with all lease requirements.
- C. Comply with the TDGs for any alteration to the facility.

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.

Always refer to the on-line DEN EMS document library prior to use to ensure you are using the most current copy. All other versions are UNCONTROLLED.

- iii) Spills of any kind shall not be washed into any sewer or any waterway, or onto any soil.
- iv) Containerize all collected wastes and evaluate for labeling, storage, and disposal.

7) Inspection and Maintenance Requirements

- A. 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.

8) Expected Records and Outputs

- A. Completed SWMP survey/matrix
 - i) Obtain a copy of this document on line at <http://www.flydenver.com/sites/default/files/environmental/stormWaterMP.pdf>
 - ii) Maintain survey/matrix on file after review by DEN Environmental Services
- B. Waste management records (profiles, LDR forms, manifests, sample results, etc.)
 - i) Manifests, LDRs & profile forms can be obtained from the disposal facility.
 - ii) Operator must maintain waste management records at the facility for a minimum of 3 years.
- C. Evidence of training
 - i) While formal certifications are not always necessary, some “proof of training” (such as sign-in sheets and handouts) is expected and should be maintained on file by the operator.
- D. Pretreatment Device Maintenance Records
 - i) Tenants must complete a Pretreatment Device Update Form detailing monitoring and maintenance requirements. The Pretreatment Device Measurement Record Form can be used to record measurement results. These forms are included in EG ES-301-2.07. Completed forms shall be filed on site and made available to DEN inspectors upon request.
 - ii) Copies of all maintenance records for each device must be kept in your files and completed in accordance with the approved schedule provided in the monitoring form.
- E. Motor Vehicle Air Conditioning System Repair Records
 - i) Records for air conditioning system repair must be kept on site and made available to DEN inspectors upon request.
- F. Hazardous waste documents
 - i) 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 ES.
 - ii) All manifests and supporting documentation for the generation, storage, and disposal of hazardous waste must be kept onsite at the facility and made available to DEN inspectors upon request.

Always refer to the on-line DEN EMS document library prior to use to ensure you are using the most current copy. All other versions are UNCONTROLLED.

G. Inspections

- i) 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.

H. Industrial Waste Questionnaire

- i) Must be completed at the request of Metro Wastewater Reclamation District or DEN ES. A copy of the completed document must be submitted to DEN ES and a copy shall remain onsite at the facility.

I. Hazardous Materials

- i) 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.

9) References

A. Phone Numbers

- i) DEN Communications Center (for spill reporting) (303) 342-4200
- ii) John Hambright (DEN Environmental Services) (303) 342-2759
- iii) Kim Ohlson (DEN Environmental Services) (303) 342-22637
- iv) DEN Environmental Services (Main Line) (303) 342-2730

B. Guidance Materials (list is not limited to the following)

- i) SDSs
- ii) DEN Stormwater Management Plan (SWMP)
- iii) SPCC Plan for the facility

C. Training Materials (list is not limited to the following)

- i) Operating procedures training (On-the-Job)
- ii) Operator site-specific training materials for handling hazardous wastes
- iii) Operator site-specific training materials for SPCC Plan
- iv) SWMP training materials

D. Related Environmental Documents (list is not limited to the following)

- i) Environmental Guidelines (EGs) apply to DEN tenants, if the tenant is conducting the activities described in the Guideline. Tenants can access the EGs at <http://business.flydenver.com/environmental>.

E. Applicable Regulations (list is not limited to the following)

- i) 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- ii) 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
- iii) 40 CFR Part 112 Oil Pollution Prevention (SPCC OPA/Plans)
- iv) 6 CCR 1007-3, Parts 260-262, 273, 279 State RCRA Regulations
- v) 5 CCR 1001-1 through 19, State Air Pollution Control Regulations

Always refer to the on-line DEN EMS document library prior to use to ensure you are using the most current copy. All other versions are UNCONTROLLED.

- 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
- vi) CCoD Ordinances
- vii) Denver Wastewater Management Division Rules & Regulations
- viii) Metro Wastewater Reclamation District Rules & Regulations
- ix) DEN Rules and Regulations
- x) Denver Fire Department Regulations (International Fire Code)

F. Other Documents (list is not limited to the following)

- i) SWMP Industrial Activities Survey/Matrix & instructions
- ii) Air Pollution Emission Notification (APEN) forms
- iii) DEN Managers Bulletins
- iv) CCoD Executive Orders