



Title	ES-301-3.05 Tenant Relocation or Closeout
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## **1) Activity Description**

The closure of tenant activities at any DIA tenant site, for either of the following reasons:

- i) Relocation to another tenant site within the DIA property boundary, or
- ii) Cessation of activities within the DIA property boundary.

## **2) Potential Environmental Risks**

A. The following environmental concerns are associated with these activities:

- i) Improper closure of above- or below-ground tanks
- ii) Incomplete removal of hazardous materials and/or hazardous or universal wastes
- iii) Release of maintenance or other fluids to sewer
- iv) Improper maintenance or closure of pretreatment device
- v) Contamination of site (soil, surface water, ground water) from tank operations or other facility activities

B. Potential consequences from performing the activity incorrectly:

- i) Property damage, personal injury or damage to the environment
- ii) Possible regulatory non-compliance, Notice of Violation, and related [financial & non-financial] penalties
- iii) Costly remediation of site
- iv) Continued responsibility for lease payments & utilities until all environmental closeout requirements are met.

## **3) Critical Operating Requirements**

A. General Considerations

- i) Each operator and tenant conducting facility close out or relocation activities is responsible for understanding the applicable regulations and managing their activities accordingly; this Environmental Guideline is meant only as guidance and does not supersede any regulations.
- ii) Based on the type of activities performed at the tenant site, DIA reserves the right to require that an environmental assessment be performed on the property by a third-party consultant prior to final closeout. DIA may also require more extensive assessment(s) and/or remedial activities as warranted.
- iii) Prior to the final closeout of any DIA lease, the tenant must provide sufficient information/data to the DIA Property Management Section indicating that all environmental issues have been addressed and there are no outstanding concerns. The tenant must arrange for the removal and disposal of all waste including trash, empty containers, drums, stained soil, etc. at their expense.

## **4) Planning Requirements**

A. DIA will require the following information to evaluate the petroleum storage system and fuel distribution systems (if any) prior to final closeout:

- All approved permit applications
- Most recent storage tank registration systems

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- All change in service forms
- SPCC Plan (if not previously provided to DIA)
- As-built diagrams for the petroleum storage and distribution systems
- Any release reports
- Leak detection monitoring data
- Any onsite sampling results, and
- Correspondence with OPS and/or CDPHE including any confirmation of site closure (if applicable)

B. Parties interested in leasing properties at DIA will have access to any site assessment data or reports for consideration prior to leasing. Those parties may collect additional information as deemed necessary to accept responsibility for future environmental concerns. If an interested party opts to conduct additional investigation activities, a Work Plan must be prepared and submitted to DIA Environmental Services (ES) Section for review and approval.

C. Tenants are responsible for notifying all applicable local, state and federal agencies of the intent to vacate a DIA leasehold site and closing or (in the case of relocations) revising any permits or other agreements with those agencies. A list of commonly encountered permits/agreements includes [but is not limited to] the following:

- Denver Fire Department Permits
- Tank Registrations
- Air Pollutant Emission Notices (APENs)/Permits
- Wastewater permits
- Stormwater permits
- Universal and Hazardous waste identification numbers

D. Tenants are responsible for all closeout requirements contained in the DIA lease, including a share of pond rehabilitation/maintenance costs.

E. Tenants may be responsible for upgrading site infrastructure to meet current regulatory requirements prior to finalizing closeout or relocation to a new site.

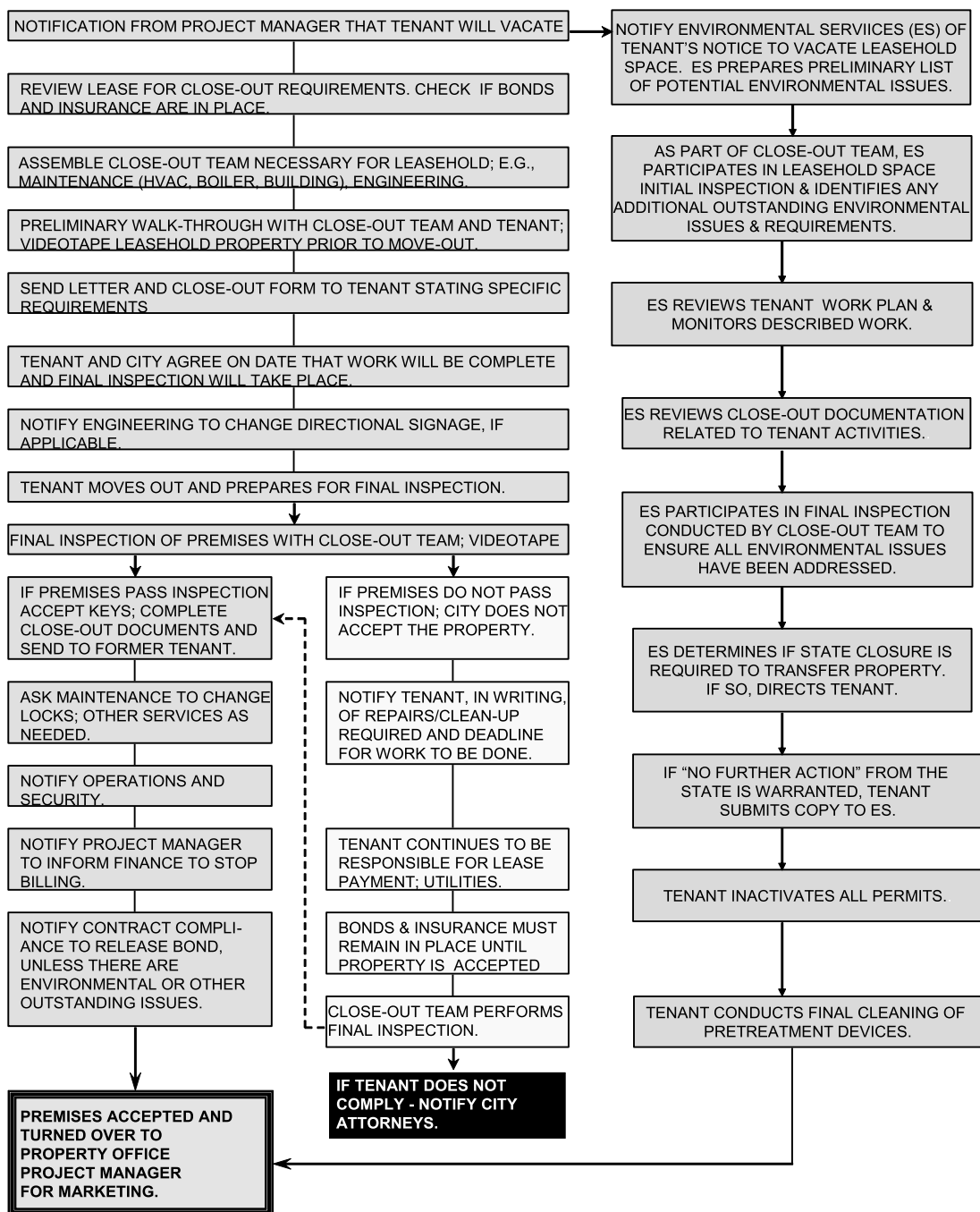
F. Industrial tenants vacating DIA must return their DIA Stormwater Management Plan(s) (SWMP) to ES. If relinquishing only a portion of DIA leasehold area or relocating to a new area on DIA property, tenant must revise and submit the SWMP survey/matrix, business activities narration and site-specific SWMP map to ES, as applicable.

G. Tenants relocating to a new site on DIA property must prepare a Spill Prevention, Control, and Countermeasure (SPCC) Plan if any petroleum products or fuels will be stored on site, per Environmental Guideline ES-301-4.09 management of Petroleum Storage Tanks & Containers.

## 5) **Critical Tasks**

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**DENVER INTERNATIONAL AIRPORT  
AIRPORT PROPERTY OFFICE  
TENANT FACILITIES CLOSE-OUT PROCESS**



**6) Emergency Response**

A. If a spill occurs, refer to Environmental guideline ES-301-5.02 Spill Response.

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- i) Call DIA Communications Center immediately at 303-342-4200 for all spills.

## **7) Inspection and Maintenance Requirements**

- A. Perform and document all DIA, EPA, OPS, and CDPHE required inspections.

## **8) Expected Records and Outputs**

- A. DIA SWMP(s) returned or revised SWMP Survey/Matrix, business activities narration and site-specific SWMP map, as applicable
  - i) Return DIA SWMP(s) if vacating DIA
  - ii) If relocating or relinquishing only a portion of leasehold area at DIA
  - iii) Obtain a blank copy of SWMP Survey/matrix from DIA Environmental Services (ES), or in Appendix B of the SWMP
  - iv) Complete form and return to ES along with revised business activities narration and site-specific SWMP map
  - v) Maintain all site-specific SWMP information on file after review by DIA Environmental Services
- B. Pretreatment Device Maintenance Plan and Records
  - i) Only required if there is a Pretreatment Device on the property to be vacated
  - ii) Consult with DIA Environmental Services for guidance on how to develop this plan
  - iii) Refer to Environmental Guideline ES-301-2.07 Maintenance of Pretreatment Devices for additional guidance
- C. Spill Prevention, Control, and Countermeasure (SPCC) Plan
  - i) Only required if the facility stores petroleum products above thresholds on lease properties or in containers greater than 55 gallons outside of leased area
  - ii) Contact DIA ES for guidance on SPCC planning
  - iii) Maintain all inspection, testing, monitoring data pursuant to the facility's SPCC plan
  - iv) Refer to Environmental Guideline ES-301-4.09 Management of Petroleum Storage Tanks and Containers for additional guidance
- D. Closeout documentation for APENs (if required)
  - i) Submit cancellation or transfer of ownership to APCD and DIA ES
- E. Closeout documentation for Tanks (if required)
  - i) Submit storage tank closure documentation to OPS and DIA ES
- F. Waste disposal records (profiles, LDR forms, manifests, sample results, etc.)
  - i) Manifests, LDRs and 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
- G. Site Assessment Data/Reports, including "No Further Action" notification (if required)
  - i) Request site access from Airport Legal Services and DIA ES to conduct assessment
  - ii) Submit all data/reports to DIA ES upon completion of site assessment

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- iii) If any contamination is encountered, tenant/operator must obtain a NFA from OPS and provide a copy to DIA ES

## 9) References

### A. Phone Numbers

- i) DIA Communications Center (for spill reporting) (303) 342-4200
- ii) DIA Environmental Services (main line) (303) 342-2730
- iii) Keith Pass (DIA Environmental Services) (303) 342-2689
- iv) Jeff Arneson (DIA Environmental Services) (303) 342-2630

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

- i) DIA Stormwater Management Plan (SWMP)
- ii) DOT Labeling and Placarding Guidance
- iii) SPCC Plan

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

- i) Not applicable

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

- i) ES-301-5.02 Spill Response
- ii) ES-301-6.01 General Waste Management
- iii) ES-301-2.07 Maintenance of Pretreatment Devices
- iv) ES-301-3.01 Construction
- v) ES-301-3.02 Planning and Design
- vi) ES-301-4.09 Management of Petroleum Storage Tanks & Containers

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

- i) 40 CFR Part 112 Oil Pollution Prevention (SPCC OPA/Plans)
- ii) 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- iii) 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
- iv) 6 CCR 1007-3, Parts 260-262 State RCRA Regulations
- v) 7 CCR 1101-14 State Storage Tank Regulation
- vi) 5 CCR 1001-3 through -23 State Air Pollution Regulations
- vii) Denver Wastewater Management Division Rules & Regulations
- viii) Metro Wastewater Reclamation District Rules & Regulations
- ix) DIA Rules & 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 Pollutant Emission Notice (APEN) forms
- iii) DIA Manager's Bulletins