

ABANDONED MATERIAL RESPONSE

EMS ELEMENT: OPERATION



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ACTIVITY DESCRIPTION

The following outlines response guidelines for abandoned materials located at DEN, including notification, identification, collection, disposal, and reporting/recordkeeping.

POTENTIAL ENVIRONMENTAL RISKS

- Abandoned material response
- Improper or inappropriate disposal of hazardous materials
- Hazardous materials spills/releases
- Environmental compliance risk

Potential consequences from performing the activity incorrectly:

- Personal injury, property damage, or long-term damage to the environment
- Possible regulatory noncompliance, Notices of Violation, and related [financial & non-financial] penalties

RECOMMENDED OPERATING CONTROLS

Prohibited Activities

- Abandonment of material on DEN property is prohibited.
- Opening of unknown or suspicious containers and packages to inspect or determine the contents without appropriate response training is prohibited.

General Considerations

- Report abandoned materials to the Airport Communications Center at 303-342-4200 immediately.
- The Airport Communications Center will coordinate response resources and notification requirements.
- Each owner and operator is responsible for understanding applicable regulations and managing their materials accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations. See <u>General Waste Management</u> for more information.

Training Requirements

- Personnel involved in actual handling of <u>unknown</u> materials must be properly trained for hazardous material response. See OSHA regulation 29 CFR 1910.120.
- Employee training programs shall inform personnel at all levels of responsibility who are involved in abandoned material response activities that may impact the environment. This training shall address topics such as spill response, 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.

CRITICAL TASKS

• Report abandoned materials to the Airport Communications Center at 303-342-4200 immediately.



- Airport Security Considerations If you suspect there may be a security threat from the abandoned material, immediately notify the Airport Communications Center at 303-342-4200. Personnel safety is of primary importance in dealing with an unknown or abandoned material. Consider the possible linkage to terrorism in approaching and dealing with an abandoned material.
- If feasible and safe to do so, identify and assess material(s) and ownership.
- Inspect external markings or labeling on the material/package
- Note the location relative to potential waste generators in the area (i.e. tenants/contractors)
- Interview nearby personnel
- Note signage in the immediate vicinity
- Use the Abandoned Materials Incident Report (Appendix A) as a guide
- If the material is suspected to be dangerous or can't be identified, notify Emergency Response Teams (i.e., Fire department) via the Airport Communications Center.
- Properly contain, manage and dispose of the material (if possible).
- Control spills or releases of materials, limit access and maintain security in the area. If a spill occurs, see Environmental Guideline Spill Response
- Handle material properly; assume a conservative approach in managing the material until it is positively identified.
- Owner, if identified, shall submit an Abandoned Materials Incident Report (See Appendix A) to DEN Environmental Services (ES) (<u>#DIA-Environmental@flydenver.com</u>), as well as DEN Operations and be responsible for disposal of materials.
- If the material owner is not identified, DEN (ES) will arrange for the proper disposal of the abandoned materials using one of the cities approved HAZMAT contractors. Call ES for additional information at 303-342-2730.
- Completed shipping and disposal papers/records shall be maintained by material owner and be available for DEN upon request.
- Place all collected wastes in appropriately labeled containers for proper storage and disposal. The Maintenance Stockroom and Grainger have 55 gallon steel drums. Materials can be stored in the locked 90 day storage locker at the Maintenance Center Paint Building (Appendix B). Key is available in the Maintenance Control Center.

EMERGENCY RESPONSE

If a spill occurs, refer to Environmental Guideline Spill Response.

Call DEN Communications Center immediately at 303-342-4200 for all spills.

Denver Fire Department/DEN Emergency Response Plan

- If object is verified as no hazard, turn over to Incident Commander (IC)/Ops.
- If substance in question is in a sealed container which poses no hazard in its current condition, DFD will turn over to IC/Ops after it is no longer deemed to be a hazard. (I.C. should decide and document disposition of product, ie. disposal, send to law enforcement, send to lab for identification, turn over to airline for disposal, etc...)
- If there is an identified hazard, DFD will mitigate the immediate life-safety hazard, then turn over to IC/Ops for oversight or delegation of investigation and clean-up.



INSPECTION AND MAINTENANCE REQUIREMENTS

Once stored, abandoned materials will be inspected and maintained by ES to prevent release and assure compliance with environmental, health and safety regulations. Containers must have legible labels and markings with the name of the owner, contact telephone number, and container contents. Containers will be labeled by DEN ES and labels can be found in the 180 day storage locker (Appendix C).

EXPECTED RECORDS AND OUTPUTS

Incident Report

• The Incident Report for (Appendix A) will be completed by owner/custodian and maintained on file by DEN Environmental Services.

Waste management records (profiles, manifests, LDRs, analytical results, etc.).

- 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).
- DEN ES will maintain waste management records at the facility for a minimum of 3 years.
- See DEN EMS Guidance General Waste Management

REFERENCES

Contacts

- DEN Communications Center (for spill reporting): 303-342-4200
- DEN Environmental Services (Main Line): 303-342-2730; <u>DIA.Environmental@flydenver.com</u>
- David Fridland, DEN Environmental Sustainability: 303-342-2630; <u>David.Fridland@flydenver.com</u>
- Kim Ohlson, DEN Environmental Sustainability: 303-342-2637; <u>Kim.Ohlson@flydenver.com</u>

Guidance Materials

- MSDSs/Safety Data Sheets (SDS)
- NIOSH Pocket Guide to Chemical Hazards (NPG)
- DOT Emergency Response Guidebook
- EPA Office of Solid Waste and Emergency Response
- OSHA Emergency Preparedness and Response guidance

Related Environmental Guidelines

- Spill Response
- General Waste Management
- http://business.flydenver.com/community/enviro/documents/es301.pdf For a complete list of DEN Environmental Guidelines.



Other Documents

- Abandoned Materials Incident Report
- Spill Notification Document
- Disposal Manifests
- DEN Environmental Services and Operations Closure Documents
- DEN Operations Reports
- DEN Rules and Regulations