

National Park Service  
U.S. Department of the Interior  
Commercial Services Program



# Environmental Audit Exit-Brief

**FULL PARK NAME**  
**DATE**

<Insert photo of park to fill screen background taken on audit>



# Agenda

- Scope of Audit
- Reporting
- Schedule
- Review of Potential Key Audit Findings
- BMP Observations
- BMP Recommendations
- NPS Commercial Services Program – Contract Management
- Assistance Resources

< Insert photo of park with border >



# Audit Scope

## Concessioner Name

<List facilities audited, such as:>

- Food and Beverage
- Marina

<Insert photo of  
each  
concessioner>

## Concessioner Name

<List facilities audited, such as:>

- Food and Beverage
- Marina

<Insert one photo  
of each  
concessioner>

# Audit Scope (cont.)

- Other concessioners at park name were not audited.

< Include if applicable. Briefly describe why they may not have been included in the audit. >



< Insert photo of park >

# Audit Scope (cont.)



## Audit Criteria – NPS Environmental Program Areas

- Air Quality
- CFC and Halon Management
- Emergency Planning and Reporting
- Environmental Purchasing
- Fuel Storage Tanks
- Hazardous Materials Management
- Hazardous Waste
- Laboratory Chemical and Waste Management
- Oil and Gas Exploration and Production
- Pesticide Management
- Solid Waste Management
- SPCC Planning
- Storm Water Management
- Universal Waste Management
- Used Oil
- Wastewater Management

\*\*\*Not all topic areas may apply to all operations/locations.\*\*\*

# Audit Scope (cont.)



## Audit Criteria – NPSCS Environmental Program Areas

- Campgrounds and Trailer Villages
- Environmental Management Systems
- Food Service
- Gas/Service Stations
- Golf Courses
- Guide and Outfitter Services
- Horse, Mule and Animal Husbandry Operations
- Laundry, Swimming Pool, Shower and Bathhouse Operations
- Lodging Management
- Marinas and Watercraft Rental Operations
- Medical Clinics
- Photo Laboratory
- Retail Operations
- Tennis Courts
- Transportation Operations
- Water Guide Services
- Winter Sports Operations

\*\*\*Not all topic areas may apply to all operations/locations.\*\*\*

# Risk Management – Not within Audit Scope



- Concessioners are required to develop and implement a comprehensive Risk Management Plan (RMP).
- Concessioner RMPs should be appropriate to the size and nature of the concession operation.
- RMPs will adhere to OSHA regulations which may include but are not limited to Hazard Communication (HAZCOM), Respiratory Protection, and Emergency Action Planning.
- RMPs will be approved by the superintendent and reviewed through the park's Annual Operational Review Program.

# Audit Finding Priority Categories



Priority	Description	Deadline to Close Audit Finding
1	Non-conformances with laws and regulations that pose immediate actual or potential harm to human health or the environment, or the potential for significant liability exists.	Within 90 days of the Preliminary Audit Report
2	Non-conformances with laws and regulation that do not pose an immediate threat to human health or the environment.	Within 180 days of the Preliminary Audit Report
3	Non-conformances with DOI, NPS, or park policy; or the concession contract that do not pose an immediate threat to human health or the environment	Within 180 days of the Preliminary Audit Report

# Audit Finding Priorities (cont.)



All Priority 2 and Priority 3 Audit Findings may be assigned an additional ranking of 'Isolated' if the observed non-conformance is not viewed as a programmatic issue and is not pervasive throughout the concessioner operations.

- This ranking is useful in prioritizing corrective actions and assigning readily available resources to close findings with a minimal level of effort.
- Audit findings noted as Isolated will be removed from the report if they are adequately addressed prior to the Final Environmental Audit Report being distributed.

# Best Management Practice (BMP)



- Is a recommended practices from industry, regulation, or other sources;
- Is a recommendation or opportunity identified by auditors, but that is not required to be adopted or implemented;
- May not be technically or economically feasible at the time of the site visit – but may be something to consider in the future; and
- Is something the NPS Commercial Services Program strives to recognize and document in the Environmental Audit Report.

# Exceptional Practice (EP)



- Are products used or activities undertaken that are not often seen at concession operations, and which demonstrate a concessioner's commitment to environmental protection;
- Are BMPs that have been identified as "exceptional";
- Must be approved by the Environmental Audit Program Coordinator (Kat Berry) prior to awarding;
- Can not be the fulfillment of a contractual requirement;
- Serve as innovative examples to other facilities and may be implemented at other concessions;
- Are used to promote concessioners through the audit process and through the *GreenLine* blog.



# General Observations

<List general observations, such as:>

- Management and staff at all locations were helpful in answering auditor questions.
- Several BMPs/exceptional/innovative practices were observed.
- No Priority 1 findings were noted.
- Some regulatory improvements were noted.
- Opportunities for improvement always exist.

<Insert photo of park>

# Audit Opportunities – Air Quality



## Current Operations:

- <Briefly describe the activities or items observed. For example; Concessioner staff had 2 garbage incinerators.>

## Opportunities:

- <Briefly describe potential Audit Finding(s) followed by a RCA and tentative Priority Number or BMP. Include a photo if possible or insert additional slides as needed. For example: Tentative Priority 1, 2, 3 (Isolated).>
- <For example: Consider obtaining an air permit from the local regulating authority – Tentative P2.>

# Audit Opportunities – Environmental Purchasing (EP)



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Fuel Storage Tanks



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Hazardous Materials Management



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Hazardous Waste



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Pesticide Management



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Solid Waste Management



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Spill Prevention, Control, and Countermeasures (SPCC) Plan



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Storm Water Management



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Universal Waste Management



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Used Oil



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Wastewater Management



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Environmental Management Systems (EMS)



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Audit Opportunities – Concessioner-specific EnviroCheck Sheet



## Current Operations:

- <Briefly describe the activities/items observed.>

## Opportunities:

- <Briefly describe the potential Audit Finding(s) or BMP and a RCA followed by a tentative priority ranking, and picture if possible.>

# Open Issues



< Briefly describe any issues where further research or information may be required in order to determine the presence, scope, tentative priority level, and details of an audit finding or BMP. For example, if it could not be determined during the audit if the method used for oil storage had adequate or approved containers. >

- Oil Storage – storage container approved?

< Insert photo of park or concessioner item requiring additional research >

# The Environmental Audit Report – What to Expect



- In PDF format, the report will include:
  - Executive Summary
  - Priority 1, 2, and 3 regulatory audit findings in a table including information on:
    - Basis for each audit finding and the related regulatory citation;
    - Finding description;
    - Recommended corrective action;
    - Photo (if applicable); and
    - Responsible party i.e., title of person (no individual names).
  - Best Management Practices (opportunities)
  - Exceptional Practices
  - Photos
  - Assistance Resources

# Report Development Process



- The site visit concludes, audit team departs.
- The audit team will develop the Preliminary Environmental Audit Report (PEAR).
- PEAR will be distributed to park staff via internal SharePoint site to be forwarded to concessioner(s).
- Schedule both (2) follow-up comment conference calls within 2½ weeks of receiving the PEAR.
  - First call will be for the Concession Specialist and the audit team.
  - Second call will be with concessioner staff, the Concession Specialist, and the audit team.

# Report Development Process (cont.)



- Incorporate ALL comments from concessioner and park staff into the Draft Final Environmental Audit Report (EAR).
- Distribute the Draft Final EAR to park and concessioner staff for final review.
- Document any additional comments.
- Send to the Environmental Audit Coordinator for review.
- Send to NPS Commercial Services Chief for approval and signature.
- Distribute the Final Environmental Audit Report.

# Audit Report (cont.)



What	Routing	When
Preliminary Audit Report	Coordinator to Park Concession Specialist	June 26 (3 weeks after last day of site visit)
	Park Concession Specialist to Concessioner	
Comment Call on the Preliminary Audit Report	Audit Team Leader with Park Concession Specialist	August 11 (within 2.5 weeks of receiving PEAR)
	Audit Team with Park Concession Specialist and Concessioner Staff	
Final Audit Report	NPS Commercial Services Program Chief to Park Superintendent (via Coordinator)	August 27 (1.5 weeks after receiving park and concessioner comments)
	Coordinator to Park Concession Specialist	
	Park Superintendent/Park Concession Specialist to Concessioner	
Corrective Action Tracking	Park Concession Specialist to Coordinator	Annually, upon request.

# NPS Commercial Services Program Assistance Resources:



- *GreenLine* Number - (303) 987-6820
- *GreenLine* Email - [NPS\\_GreenLine@nps.gov](mailto:NPS_GreenLine@nps.gov)
- *GreenLine* News Update
- Commercial Services Program Website - <http://www.concessions.nps.gov>



# QUESTIONS?

<Insert photo of Park here.>