

Appendix 3

NATIONAL PARK SERVICE ENVIRONMENTAL AUDIT PROGRAM ENVIROCHECK SHEETS

The EnviroCheck Sheet is a tool to be used when conducting NPS Commercial Services Program environmental audits. This document does not necessarily contain all information needed to determine compliance status. It is the sole responsibility of the concessioner to understand and comply with all applicable laws and regulations.

Air Quality

Chlorofluorocarbon (CFC) and Halon Management

Emergency Planning and Reporting

Environmental Purchasing (formerly Green Procurement)

Fuel Storage Management

Hazardous Materials Management

Hazardous Waste

Laboratory Chemical and Waste Management

Pesticide Management

Solid Waste Management

Spill Prevention, Control, and Countermeasure (SPCC) Planning

Storm Water Management

Universal Waste Management

Used Oil

Waste Water Management

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NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Air Quality
2012 Update*

INTRODUCTION

Air quality issues are a significant concern in parks due to the decline in visibility and a decrease in overall air quality. Two of the most well known examples can be found at the Grand Canyon, where a reduction in visibility due to western emission sources has become a significant issue, and Yosemite, where a new transportation system has been installed partially to improve air quality in Yosemite Valley. Poor local air quality can also be a human health and safety concern. Pollutants, such as airborne asbestos, improperly vented exhaust from generators or boilers, and particulate emissions from dusty roads and woodshops, can impact the health of park employees and visitors.

Many man-made operations and naturally occurring processes at National Park Service (NPS) facilities create air emissions that are regulated on a federal, state, or local level. The following may generate emissions requiring regulation at NPS facilities:

- Surface coating operations such as painting of signs, vehicles, structures, and roadways;
- Vehicle and equipment operation and refueling;
- Combustion operations such as boilers, furnaces, and prescribed burns;
- Use of solvent in cleaning and degreasing operations;
- Dust sources such as non-paved roads, sandblasting, and woodworking;
- Waste disposal operations such as landfills, incinerators, or open burning;
- Natural sources such as dust storms and wild fires;
- Storage piles and unpaved roads; and
- Welding, air conditioning, and refrigeration system operation and servicing.

Management requirements related to these emissions may include:

- Creating an inventory of park air emission sources;
- Obtaining air permits to construct and operate certain equipment;
- Installing and properly operating air pollution control equipment;
- Monitoring air pollution equipment; and
- Preparing and implementing contingency plans to control air emissions in regions of poor air quality.

AUDITOR'S GUIDELINES

Before conducting an audit, the auditor should determine:

- What are local or regional requirements?
- Is the park located in a nonattainment area? Unless answered affirmatively during preaudit questioning, refer to <http://www.epa.gov/oar/oaqps/greenbk/>
- Is the park located in a Class I Federal Areas? Unless answered affirmatively during preaudit questioning, refer to <http://www.epa.gov/visibility/class1.html>
- For National Ambient Air Quality Standards (NAAQS) refer to <http://www.epa.gov/air/criteria.html>

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use this data to populate the regulatory findings database that will be submitted to and used by the park. These data will also be used to populate the Environmental Condition Assessment database.

Ask to review the following written records, if available:

- Air permits and other authorizations
- Chemical inventory
- Air emissions inventory
- Emission monitoring reports
- Notice of Violations from regulatory authorities



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Air Quality
2012 Update*

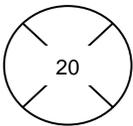
Ask to interview or plan to contact the following park personnel:

- CFC technician
- Auto mechanics
- Building and utilities staff
- Rangers involved in park air quality monitoring
- Rangers managing prescribed burning activities
- Concession specialist

During the walk-around of the park, observe the following:

- Painting operations
- Large furnaces, boilers and incinerators
- Parts washing or cleaning activities
- Road paving operations
- Welding and sandblasting units
- Wastewater treatment plants and landfills
- Pollution control devices
- Other identified air emission sources at the park
- Air quality monitoring stations

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

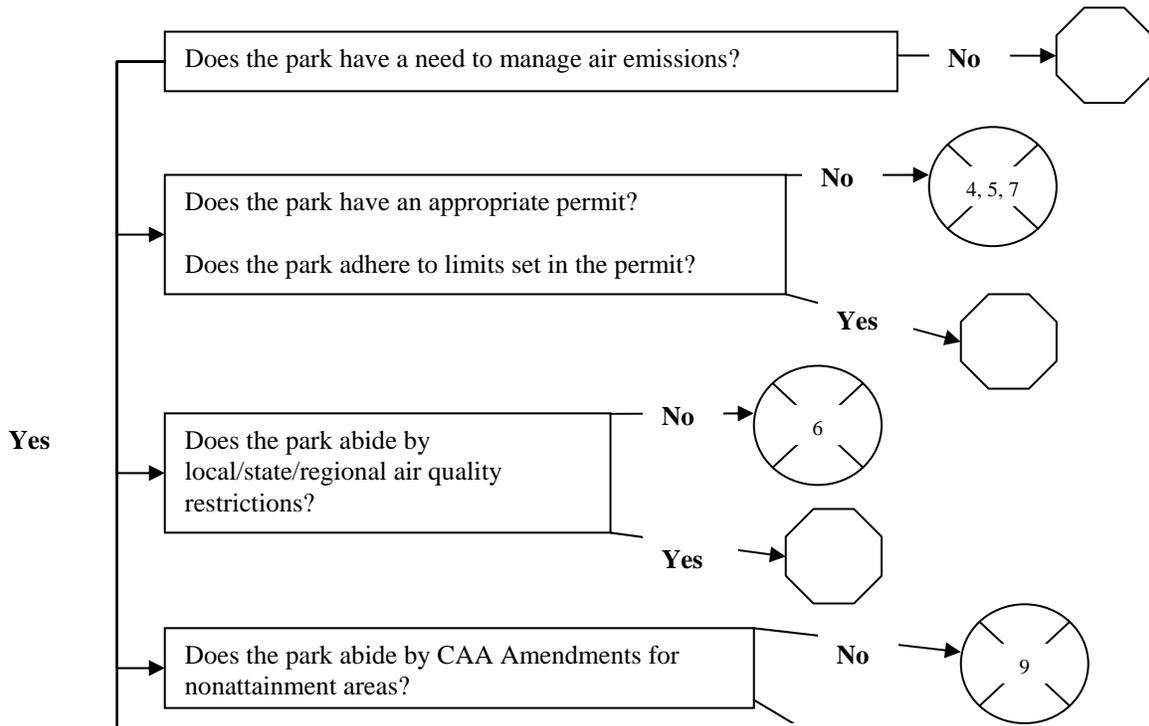


*Indicates that the regulatory
requirement has been met and that the
train of questions can stop.*

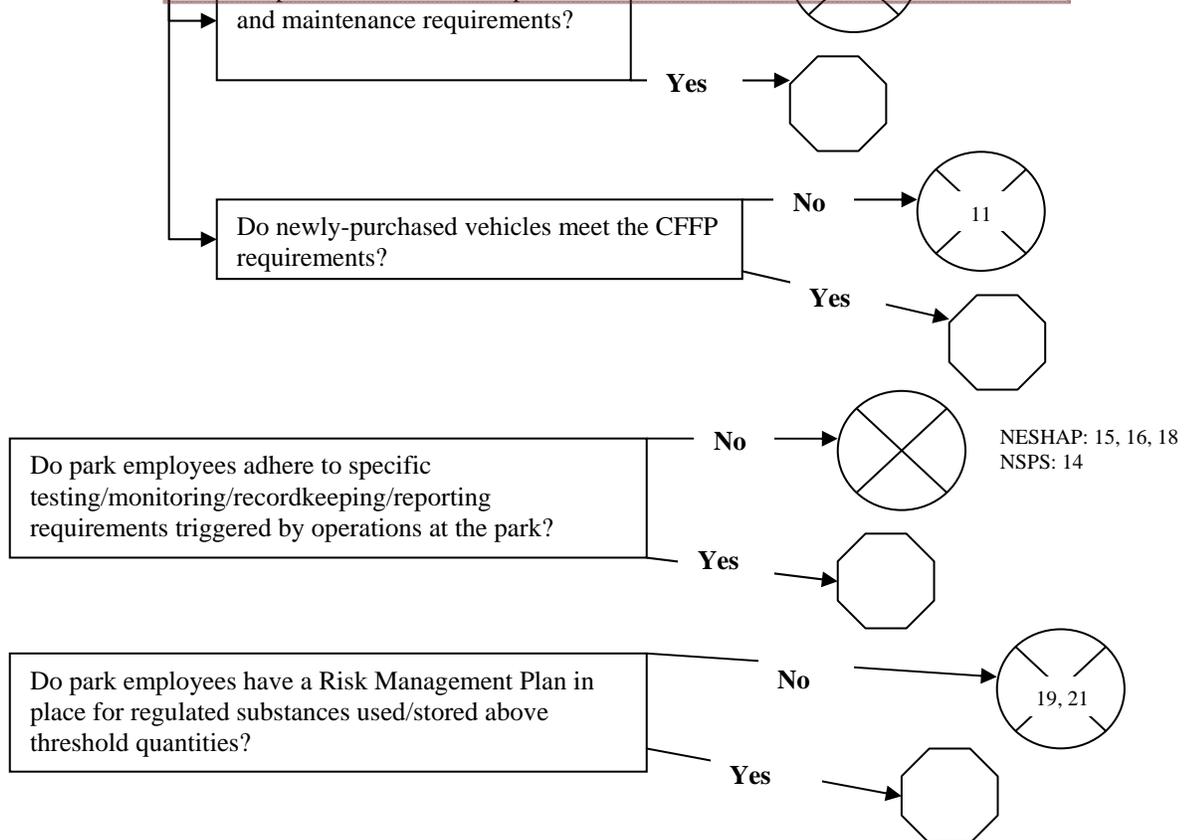


**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Air Quality
2012 Update*



DECISION-MAKING CHART IS NOT YET UPDATED





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Air Quality
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings that pose imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not pose an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>Air Emissions</i>		
4.	<p>Are park employees operating under the appropriate federal permit or a federally enforceable state operating permit? [40 CFR 70.1]</p> <p><i>AUDITORS: For all emissions findings: first determine the amount of emissions. (Certain pieces of equipment may have a placard or sticker listing the amount of emissions.) Then determine if facility needs a permit based on emissions.</i></p> <p>Note: Refer to The National Emission Standards for Hazardous Air Pollutants (NESHAPs) in 40 CFR 61 and 40 CFR 63 for limits; and applicable state regulations.</p>	2
5.	<p>Do park employees maintain state or regional permits for specific air polluting equipment or activities? [Refer to state regulations applicable to specific equipment and activities.]</p>	2
24.	<p>Does the park's fuel tanks meet state and regional vapor recovery requirements? [40 CFR 63 Subpart CCCCCC and State Implementation Plans (SIPs)]</p> <p>Note: Stage I Vapor Recovery (VR) addresses how gasoline storage tanks are filled. Gasoline Dispensing Facilities (GDF) must comply with Stage I VR requirements. Certain tank regulations are tied to GDFs with a throughput of 10,000 gallons or more per month or if specified in the SIP.</p> <p>Stage II VR addresses how gasoline is pumped from the storage tank dispenser to the vehicle. Stage II VR requirements only apply to GDFs with a monthly throughput of 10,000 gallons or more or as designated in the SIP. States in the nonattainment categories of Moderate, Severe, Serious, or Extreme must have Stage II VR requirements in their SIPs. [42 U.S.C. 7511a (b)(3)]</p> <p>The EPA is proposing to waive Stage II VR requirements beginning June 30, 2013, this should only affect retail GDFs constructed after 1/1/2011. Refer to http://www.epa.gov/glo/pdfs/20110711factsheet.pdf for more information.</p>	2
6.	<p>Do park employees abide by state or regional air quality restrictions, e.g., open burning restrictions? [State or local code applicable to specific activities.]</p>	2
7.	<p>Are park employees adhering to emission limits, monitoring and reporting requirements, and any other requirements stipulated in the park's federal, state, or regional permit? [Cite permit requirements, if applicable]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Air Quality
2012 Update*

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9.	<p>If the park is located in a nonattainment area, have park employees submitted an initial emissions inventory and statement to the state or EPA, and made subsequent updates as necessary? [42 U.S.C. §7511a and individual state regulations.]</p>	2
11.	<p>If the park is subject to Clean Fuel Fleet Program (CFFP) requirements, do newly purchased vehicles meet those requirements? [40 CFR 88]</p> <p>Note: Certain metropolitan areas are required to implement a CFFP if the region does not meet the air quality standards for ozone and carbon monoxide. Refer to http://www.epa.gov/otaq/regs/fuels/cff/cffp-imp.pdf for more information.</p> <p>If located in a compliance area, this applies to fleets with more than 10 non-exempt vehicles that are either centrally fueled or capable of being centrally fueled.</p>	2
25.	<p>If the park is subject to fleet vehicle purchasing and reporting requirements under the State Implementation Plan (SIP) or local regulations, are those requirements met? [SIP, or local regulations]</p> <p>Note: As part of the Clean Air Act, states are required to develop SIPs to address how the state is going to meet and maintain National Ambient Air Quality Standards. For states in certain nonattainment categories (severe, serious, and extreme) one of the requirements is for fleet vehicles to use clean alternative fuels.</p> <p>Fleet size is defined by the SIP or local regulations.</p>	2
26.	<p>Do park employees have a program or strategy in place to:</p> <ul style="list-style-type: none"> • Reduce the fleet’s total consumption of petroleum products by two percent annually through the end of fiscal year 2015; • Increase the total fuel consumption that is non-petroleum-based by ten percent annually; • Use plug-in hybrid (PIH) vehicles when PIH vehicles are commercially available at a cost reasonably comparable, on the basis of life-cycle cost, to non-PIH vehicles? <p>[EO 13423, Section 2(g)]</p> <p>Note: The following are some (but not all) strategies to meet this goal:</p> <ul style="list-style-type: none"> • Use of alternative fuels; • Use of vehicles with higher fuel economy; • Consolidation of vehicle trips; • Decrease in vehicle miles traveled; and • Decrease in fleet size. <p>Note: This applies to parks that have fleets with 20 or more non-exempt vehicles. Where fleets have less than 20 vehicles, this is a priority 4 finding.</p>	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Air Quality
2012 Update*

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27.	<p>Are park staff:</p> <ul style="list-style-type: none"> • Using low GHG emitting vehicles including AFVs, • Optimizing the number of vehicles in the vehicle fleet; and • Reducing, if the agency operates a fleet of at least 20 motor vehicles, the agency fleet's total consumption of petroleum products by a minimum of 2 percent annually through the end of fiscal year 2020, relative to a baseline of fiscal year 2005. <p>[EO 13514, Section 2(a)(iii)]</p> <p>Note: This applies to parks that have fleets with 20 or more non-exempt vehicles. Where fleets have less than 20 vehicles, this is a priority 4 finding.</p>	3
12.	<p>Do NPS-owned vehicles meet state or local maintenance and inspection requirements? [State or local code]</p> <p>Note: Items for auditor review may include state emissions stickers, inspection documents, maintenance records, etc.</p>	2
<i>Emission Standards and Air Pollution Controls</i>		
14.	<p>Do park employees adhere to applicable New Source Performance Standard (NSPS) requirements for stationary sources, for testing, monitoring, recordkeeping and reporting triggered by the operation? [40 CFR 60; cite specific NSPS]</p>	2
16.	<p>Do park employees adhere to the National Emission Standards for Hazardous Air Pollutants (NESHAP) testing, monitoring, recordkeeping, and reporting requirements? [40 CFR 61 and 63; cite specific NESHAP]</p> <p><i>Auditors: Determine first if park employees have triggered federal, state, or regional emission standards for Hazardous Air Pollutants (HAPs). If these standards are triggered determine if proper requirements above are met.</i></p>	2
18.	<p>Do park employees inspect the facility for the presence of asbestos prior to starting demolition/renovation activities? If asbestos is present, are asbestos NESHAP requirements met? [40 CFR 61.145 (a)]</p> <p>Note: The most important distinction with asbestos is between friable and nonfriable. Friable, when dry, can be crumbled, pulverized or reduced to powder by hand pressure. Nonfriable when dry cannot be crumbled, pulverized or reduced to powder by hand pressure. Every effort needs to be made to prevent nonfriable from becoming friable (e.g. sanding or cutting).</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Air Quality
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>Prevention of Accidental Releases</i>		
19.	<p>If park employees use or store regulated substances above threshold quantities identified in 40 CFR 68.130, then is a Risk Management Plan (RMP) in place and is there a procedure to update and make changes to the RMP? [40 CFR 68]</p> <p><i>Auditors: Determine if this question could apply to park operations before the audit site visit. While it is unlikely that parks will use or store regulated substances above RMP thresholds, it might impact parks in the form of storage or use of chlorine.</i></p> <p>Note: In the Section 112 of the Clean Air Act Amendments the regulated substances identified in 40 CFR 68.130 are referred to as Hazardous Air Pollutants.</p>	2
21.	<p>Have hazards been identified that may result from accidental releases of Extremely Hazardous Substances (EHS) and provisions been made to minimize the consequences of releases if they occur? [Section 112 (r)(1) CAA Amendments]</p> <p>Three important questions to answer are:</p> <ul style="list-style-type: none"> • Have all chemical and process* hazards associated with extremely hazardous substances been identified? • Have all necessary steps been taken to prevent releases, especially in the design and maintenance of a safe facility? • Have all necessary steps been taken to minimize the effects of releases? <p>Note: This finding references the General Duty Clause of the CAA (see http://www.epa.gov/oem/docs/chem/gdc-fact.pdf) and is not limited to a finite list of chemicals or established thresholds. For an idea of the toxic air pollutants to consider, refer to http://www.epa.gov/ceppo/pubs/title3.pdf for more information. It is helpful to know that in creating the “list of at least 100 substances which pose the greatest risk of causing death, injury, or serious adverse effects to human health or the environment from accidental releases,” the Administrator was directed to use the Extremely Hazardous Substances list under the Emergency Planning and Community Right to Know Act (EPCRA) as a basis [40 CFR 355 Appendix A and B]. The term Extremely Hazardous Substances is a carry-over from EPCRA.</p> <p>*Process is defined as any activity involving a regulated substance e.g., use, storage, handling, etc.</p>	2

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>Air Emissions</i>		
1.	<p>Are park employees aware of state regulations applicable to emissions sources throughout the park? [BMP]</p>	4
22.	<p>Do park employees maintain documentation indicating the extent to which state regulations apply to emissions sources throughout the park? [BMP]</p>	4



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Environmental Audit Program
EnviroCheck Sheet**

*Air Quality
2012 Update*

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2.	<p>Do park employees maintain a current inventory of air emission sources? Does the inventory include individual emission units, emission locations, and emission types? [BMP]</p> <p>Examples of activities or operations that may trigger federal, state, or local regulatory requirements include, but are not limited to:</p> <ul style="list-style-type: none"> • Surface coating • Paving • Welding • Boilers or incinerators • Solvent dip tanks • Sanding, sandblasting, grinding or other activities that could generate particle emissions • Open burning (e.g. of leaves, brush, and debris) <p>Note: An absence of an emissions inventory does not necessarily indicate noncompliance with air quality regulations. Auditors must first determine if the park has emission units before determining applicable federal, state and local requirements.</p>	4
3.	<p>Have park employees determined whether air pollution activities require an operating permit under Title V of the CAA Amendments, or instead under state or regional requirements? [BMP related to 40 CFR 70.3]</p>	4
8.	<p>Is there a park-wide process in place to ensure that proper authorization is obtained for non-routine emission-generating operations, e.g., prescribed burning or firefighting training? [BMP]</p>	4
23.	<p>Are park personnel aware of whether the park is located in a nonattainment area? [BMP]</p> <p>Note: Auditors must determine if the park is located in a nonattainment area prior to the site visit. Do not assume park staff will have knowledge of nonattainment areas and applicable regulations. Refer to http://www.epa.gov/oar/oaqps/greenbk/</p>	4
10.	<p>Do park employees know if the park is located in a Class I designated area? Are they aware of what a Class I Area designation is and how it is applicable to the park, (i.e., additional obligations imposed as a result of the designation)? [BMP]</p> <p>Note: Auditors must determine if the park is a designated Class I Area prior to the site visit. Refer to http://www.epa.gov/visibility/class1.html</p>	4
<i>Emission Standards and Air Pollution Controls</i>		
13.	<p>Have park employees identified air emissions that are subject to NSPS? [BMP]</p>	4
17.	<p>Have park employees investigated alternatives and substituted materials or processes to eliminate NESHAP applicability? [BMP]</p>	4



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Air Quality
2012 Update

v02	CHECKLIST ITEM	PRIORITY
<i>Prevention of Accidental Releases</i>		
20.	Have park employees investigated means to reduce or substitute regulated substances found in 40 CFR 68.130? [BMP]	4
28.	Is the park active in the Climate Friendly Parks Program? [BMP]	4



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*CFC and Halon Management
2012 Update*

INTRODUCTION

Chlorofluorocarbons (CFCs) and halons are chemicals that have been identified as stratospheric ozone layer depleting substances (ODSs). ODSs may be found in a variety of equipment at parks including:

- Chillers and window or mobile air conditioning units;
- Walk-in, household, and cold storage refrigerators and freezers;
- Water coolers;
- Halon fire extinguishing and suppressant systems; and
- Methyl chloroform and Freon 113 solvent dip tanks.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use these data to populate the regulatory findings database that will be submitted to and used by the park. These data will also be used to populate the Environmental Condition Assessment database.

Ask to review the following written records, if available:

- The park's inventory of ODS-containing materials
- Emission monitoring reports
- Notice of Violations from regulatory authorities
- Training records and certification pertaining to refrigerant reclamation/recovery

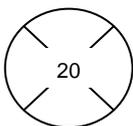
Ask to interview or plan to contact the following park personnel:

- CFC technician
- Auto mechanic
- Facilities maintenance or buildings and utilities staff
- Concession specialist

During the walk-around of the park, observe the following:

- Refrigerant reclamation/recovery units and associated certification labels
- Bone yards or equipment storage sites for old air conditioners or refrigerators

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

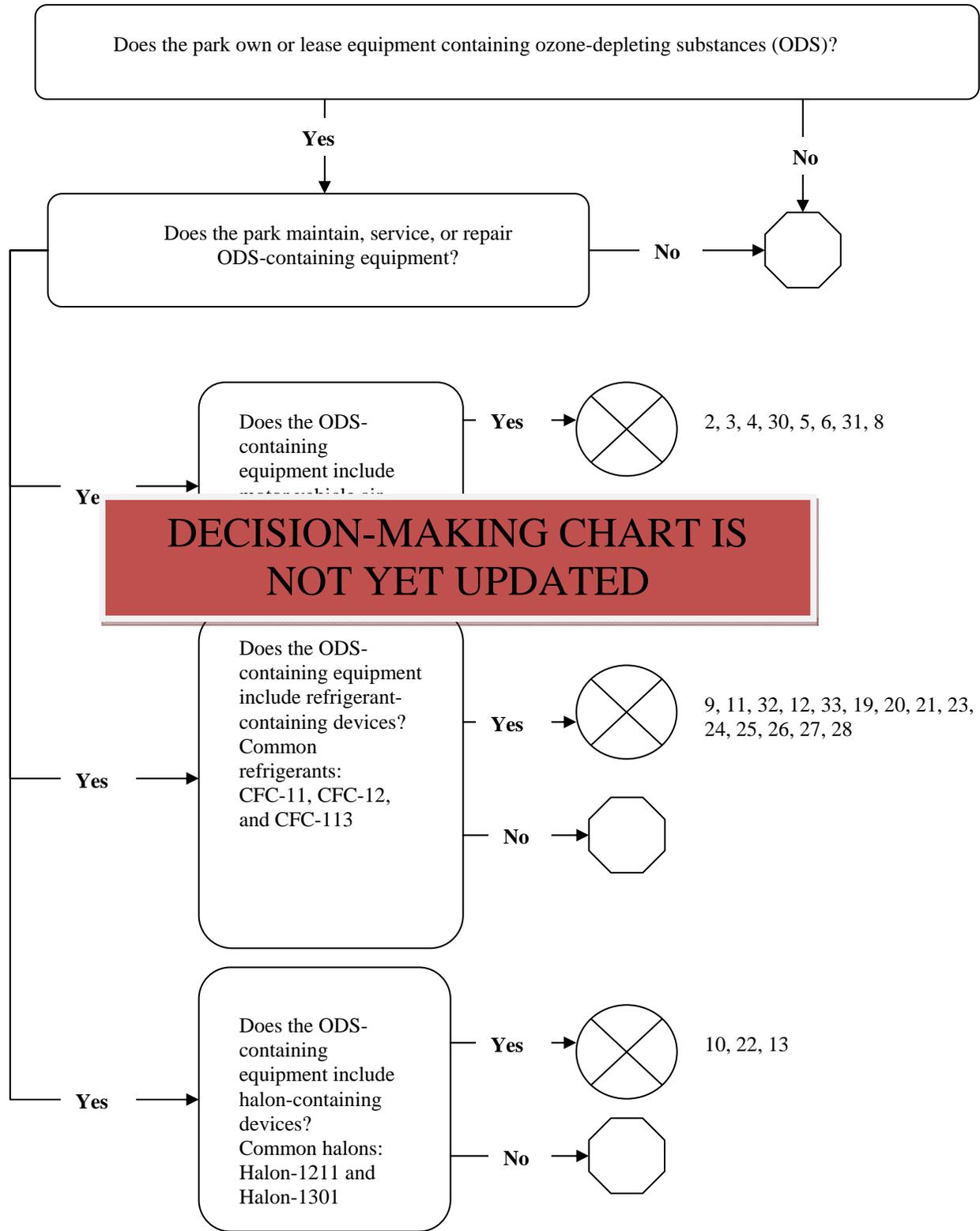


*Indicates that the regulatory
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Environmental Audit Program
EnviroCheck Sheet**

*CFC and Halon Management
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Environmental Audit Program
EnviroCheck Sheet**

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Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>Phase-Out of Ozone Depleting Substances (ODS)</i>		
1.	<p>Have park employees developed a written goals and support actions to reduce the release and use of ODS? [EO 13423, Section 2(e)]</p> <p>Note: The goals and support actions should include:</p> <ul style="list-style-type: none"> • Maximizing the use of safe alternatives to ODS approved through the EPA's Significant New Alternatives Program (SNAP) (refer to http://www.epa.gov/ozone/snap); • Eliminating ODS in new equipment and phase-out ODS applications in existing equipment as that equipment reaches its expected service life; • Maintaining equipment to fix or prevent leaks; and • Replacing leaking equipment when repair is no longer cost-effective or where it is life cycle cost-effective to replace the equipment. 	3
<i>Mobile Sources: Motor Vehicle Air Conditioners (MVAC)</i>		
2.	<p>Are park employees properly trained and certified prior to performing tasks that involve the maintenance, service, or repair of Motor Vehicle Air Conditioning (MVAC) or MVAC-like appliances?</p> <p>Are the training and certification from an EPA-approved technician certification program? [40 CFR 82.34 (a)(2)]</p>	2
3.	<p>Is refrigerant recycling equipment used at the park certified by the EPA or an EPA-approved independent standards testing organization? [40 CFR 82.36 (a)]</p> <p>Note: Certification often takes the form of a label or sticker on the MVAC equipment. "Recycling equipment" refers to equipment used for extraction and reclamation of refrigerant from motor vehicle air conditioners.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*CFC and Halon Management
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v02	CHECKLIST ITEM	PRIORITY
4.	<p>Have park employees who are using refrigerant recycling equipment sent in the MVAC Recover, Recover/Recycle Or Recover/Recycle/Recharge Equipment Certification Form to the EPA? [40 CFR 82.42 (a)(1)]</p> <p>Note: Certification takes the form of a written statement signed by the owner of the equipment that states:</p> <ul style="list-style-type: none"> • Name of the purchaser of the equipment; • Address of the establishment where the equipment is located; • Manufacturer name and equipment model number, date of manufacture, and the serial number of the equipment; • Statement that the equipment is properly used in servicing MVAC or MVAC-like appliances; • Statement that only trained and certified park personnel operate the equipment; and • Statement that all information is true and correct. <p><i>AUDITORS: This finding and finding #30 can essentially be combined as information is the same. For practical purposes, the form that park employees need to fill out is at: http://www.epa.gov/Ozone/title6/609/mvac_cert_form.pdf.</i></p>	2
30.	<p>If park employees recover refrigerant prior to disposal of small appliances, MVACs, and MVAC-like appliances, have they sent the MVAC Recover, Recover/Recycle Or Recover/Recycle/Recharge Equipment Certification Form to the EPA? [40 CFR 82.162 (c)]</p> <p>Certification takes the form of a written statement from the owner of the equipment and includes:</p> <ul style="list-style-type: none"> • Name and address of the purchaser of the equipment, including the county name; • Name and address of the establishment where each piece of equipment is, or will be, located; • Number of service trucks (or other vehicles) used to transport technicians and equipment between the establishment and job sites and the field; • Manufacturer name, the date of manufacture, and if applicable, the model and serial number of the equipment; and • Statement that the equipment will be properly used in servicing or disposing of appliances and, that the information given is true and correct. <p><i>AUDITORS: This finding and finding #4 can essentially be combined as information is the same. For practical purposes, the form that park employees need to fill out is at: http://www.epa.gov/Ozone/title6/609/mvac_cert_form.pdf.</i></p>	2
6.	<p>Are records maintained demonstrating that all park employees authorized to use MVAC equipment have been properly trained and certified? [40 CFR 82.42 (b)(2)]</p>	2
31.	<p>Do park employees maintain records demonstrating that refrigerant recycling equipment is approved, and that staff are trained and certified?</p> <p>Is this maintained for a minimum of three years? [40 CFR 82.42 (b)(4)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*CFC and Halon Management
2012 Update*

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5.	Do park employees maintain records with the names and addresses of facilities where MVAC refrigerant is sent? [40 CFR 82.42 (b)(1)]	2
8.	Do park employees recover refrigerant from small appliances, MVACs, or MVAC-like appliances prior to their disposal? If park employees recover the refrigerant, do they verify (through a signed statement) that the refrigerant has been evacuated in accordance to regulations, from the appliance? [40 CFR 82.156 (f)]	2
<i>Stationary Sources: Refrigerant-Containing Devices</i>		
9.	Are Class I or Class II ODS knowingly vented or otherwise released into the environment by park employees? Are park employees aware that venting or otherwise releasing ODS is not allowed? [40 CFR 82.154 (a)]	1
11.	Do park employees determine leak rates for air conditioning and refrigeration equipment that uses greater than 50 pounds of refrigerant? Leaks must be repaired if they result in a loss of: <ul style="list-style-type: none"> • 35 percent from commercial refrigeration equipment or industrial process refrigeration [40 CFR 82.156(i)(1)], or • 15 percent from comfort cooling appliances and all other refrigeration appliances [40 CFR 82.156(i)(5)]. Note: Leak rates are calculated as a percentage of the total charge leaked in a 12-month period.	1
32.	Do park employees repair refrigerant leaks from equipment using greater than 50 pounds of refrigerant within 30 days of the discovery of a leak? [40 CFR 82.156 (i)(6) and (9)] Note: The timeline is extended no more than one year if the park puts in place a retrofit or retirement plan for the equipment.	2
12.	Do park employees recover or recycle all refrigerant from stationary air conditioning equipment prior to disposal of the unit? [40 CFR 82.156 (a)]	2
19.	Does the park use recycling and recovery equipment certified by an EPA-approved equipment testing organization? [40 CFR 82.158 (a)] Note: Approved equipment testers include, but are not limited to, Underwriters Laboratory (UL) and the Air Conditioning and Refrigeration Institute.	2



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

CFC and Halon Management
2012 Update

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20.	<p>Is the park's recycling and recovery equipment properly labeled by an EPA-approved equipment testing organization? [40 CFR 82.158 (h)]</p> <p>Note: The label shall state: THIS EQUIPMENT HAS BEEN CERTIFIED BY [APPROVED EQUIPMENT TESTING ORGANIZATION] TO MEET EPA's MINIMUM REQUIREMENTS FOR RECYCLING OR RECOVERY EQUIPMENT INTENDED FOR USE WITH [APPROPRIATE CATEGORY OF APPLIANCE]. The label shall also show the date of manufacture and the serial number (if applicable) of the equipment.</p>	2
21.	<p>Have park employees who maintain, service, or repair stationary ODS-containing equipment, received proper training and certification from an EPA-approved technician certification program? [40 CFR 82.161 (a)]</p> <p>Note: Apprentices are exempt from this requirement provided the apprentice is closely and continually supervised by a certified technician while performing any maintenance, service, repair, or disposal that could reasonably be expected to release refrigerant from appliances into the environment. The supervising certified technician is responsible for ensuring that the apprentice complies with applicable regulations.</p>	2
23.	<p>Have park employees certified with the EPA that recycling or recovery equipment is approved and complies with applicable regulatory requirements?</p> <p>Certification takes the form of a statement signed by the owner of the equipment and includes:</p> <ul style="list-style-type: none"> • Name and address of the purchaser of the equipment, including the county name; • Name and address of the establishment where each piece of equipment is, or will be, located; • Number of service trucks (or other vehicles) used to transport technicians and equipment between the establishment and job sites and the field; • Manufacturer name, the date of manufacture, and if applicable, the model and serial number of the equipment; and • Statement that the equipment will be properly used in servicing or disposing of appliances and, that the information given is true and correct. <p>[40 CFR 82.162 (a)]</p> <p><i>AUDITORS: The form that park staff need to fill out is at http://www.epa.gov/ozone/title6/608/recoveryform.pdf</i></p>	2
24.	<p>If appliances with a charge greater than 50 pounds are worked on by non-park employees, do park employees maintain invoices or other documentation indicating the amount of refrigerant added? [40 CFR 82.166 (j)]</p>	2
25.	<p>Do park employees maintain records documenting the date and type of service and quantity of refrigerant added to appliances with a charge of greater than 50 pounds? [40 CFR 82.166 (k)]</p>	2
26.	<p>Do park employees who maintain, service, or repair refrigerant-containing equipment maintain a copy of their certificates at the park? [40 CFR 82.166 (l)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*CFC and Halon Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
27.	<p>Do park employees maintain records with information about leaking refrigerant-containing appliances that have charges of 50 pounds or more?</p> <p>Information should include:</p> <ul style="list-style-type: none"> • Identification of the facility; • Leak rate; • Method used to determine the leak rate and full charge; • Date a leak rate of greater than the allowable annual leak rate was discovered; • Location of leaks(s) to the extent determined to date; • Any repair work that has been completed to date and the date that work was completed; • A plan to complete the retrofit or retirement of the system, including dates; and • Date the EPA was notified. <p>[40 CFR 82.166 (o)]</p>	2
28.	<p>Do park employees maintain all necessary records (referenced in previous questions) for a minimum of three years?</p> <p>[40 CFR 82.166 (m)]</p> <p>Note: If park employees dispose of refrigerant-containing appliances, the records must be kept onsite.</p>	2
<i>Stationary Sources: Halon-Containing Devices</i>		
10.	<p>Is halon knowingly released or vented into the environment?</p> <p>[40 CFR 82.270 (b)]</p>	1
13.	<p>Do park employees ensure halon is recovered from equipment prior to disposal?</p> <p>[40 CFR 82.270 (d)]</p> <p>Note: Unless halon is recovered onsite, halon-containing equipment must be sent to an approved manufacturer, fire equipment dealer, or recycler for halon recovery.</p>	2
34.	<p>Do park employees recycle recovered halon?</p> <p>[40 CFR 82.270 (e)]</p> <p>Note: Disposal of halon is not permitted. Recovered halon must be sent to facilities for special recycling.</p>	2
22.	<p>If park employees perform maintenance, service, or repairs to halon-containing equipment, are they properly trained on halon emissions reduction prior to performing service and repair?</p> <p>[40 CFR 82.270 (c)]</p> <p>Note: Although 40 CFR 82.270 (c) references training in halon emissions reductions, it is interpreted to include other training regarding use and disposal of halon. The EPA recommends documenting such training. Refer to: http://www.halon.org/pdfs/epaguidance.pdf. Be aware that this training does not need to be EPA-approved.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*CFC and Halon Management
2012 Update*

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
14.	Do park employees segregate and identify containers of recovered refrigerants and refrigerant oils? [BMP]	4
34.	Are containers of recovered refrigerants and refrigerant oils to be recycled or reclaimed clearly labeled with their contents, for example, "Used CFC-12 Refrigerant Oil to be Reclaimed"? [BMP]	4
15.	Do park employees send recovered refrigerants only to EPA-approved refrigerant reclamation facilities? Do park employees maintain records of the quantity of refrigerant sent for reclamation and the reclamation facility's name and address? [BMP]	4
16.	Do park employees ensure that waste refrigerant oils are not mixed with other oils (e.g., used oils)? Are waste refrigerant oils only taken to an EPA-approved refrigerant reclamation facility and not a used oil recycler? [BMP]	4
18.	Does the park have a procedure in place to verify contractors, concessioners, and service stations maintain and repair refrigerant-containing equipment in accordance with regulatory requirements? [BMP]	4
35.	If the park uses contractors to service ODS-containing equipment, does the park maintain a copy of the contractor's certification from an EPA-approved technician certification program? [BMP]	4
33.	Does the park confirm ODS-containing appliances are evacuated by an EPA-approved reclamation facility which has certified that they comply with regulatory requirements and use approved equipment to reprocess and analyze refrigerant? [BMP related to 40 CFR 82.164 (e)]	4



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Emergency Planning and
Reporting
2012 Update*

INTRODUCTION

Despite meticulous planning, sound management, and careful daily operations, accidental spills of hazardous materials can and do occur. Because a hazardous material release can threaten both human health and environmental conditions, it is important for management to develop and implement a comprehensive response plan to deal swiftly and effectively with any and all hazardous material spills.

National Park Service (NPS) facilities store and use regulated hazardous substances in maintenance, water treatment, resource management, sanitation, laboratory operations, and many other activities. Sometimes hazardous substances are left at NPS sites or wash up on NPS shores. To ensure that any emergencies related to hazardous materials receive the most effective response, the U.S. Environmental Protection Agency (EPA) and the U.S. Occupational Safety and Health Administration (OSHA) have established requirements for planning for emergencies. The regulatory requirements are based on the types and quantities of chemicals and other hazardous substances (e.g., lead and mercury) present at an NPS facility.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use these data to populate the regulatory findings database that will be submitted to and used by the park. These data will also be used to populate the Environmental Condition Assessment database.

Ask to review the following written records, if available:

- Emergency action plan (EAP)
- Emergency response plan (ERP)
- Tier I or Tier II reports sent to state and local emergency planning agencies
- Form R reports for Toxic Release Inventory (TRI)
- Training records
- Chemical inventory
- Material safety data sheets (MSDS)
- Hazardous waste contingency plan (HWCP)
- Hazard communication (HAZCOM) plan

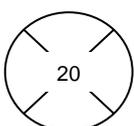
Ask to interview or plan to contact the following park personnel:

- Designated emergency coordinator
- Safety officer
- Law enforcement ranger
- Law enforcement dispatch
- Maintenance supervisor
- Laboratory staff
- Water treatment operators
- Concession specialist

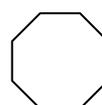
During the walk-around of the park, observe the following:

- Potential locations for hazardous situations and spills
- Chemical storage areas
- Hazardous waste storage/transfer areas
- Fuel storage areas
- Shop activities
- Laboratories
- Wastewater treatment plants (for chlorine)
- Cooling systems (for ammonia)
- Firing range

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

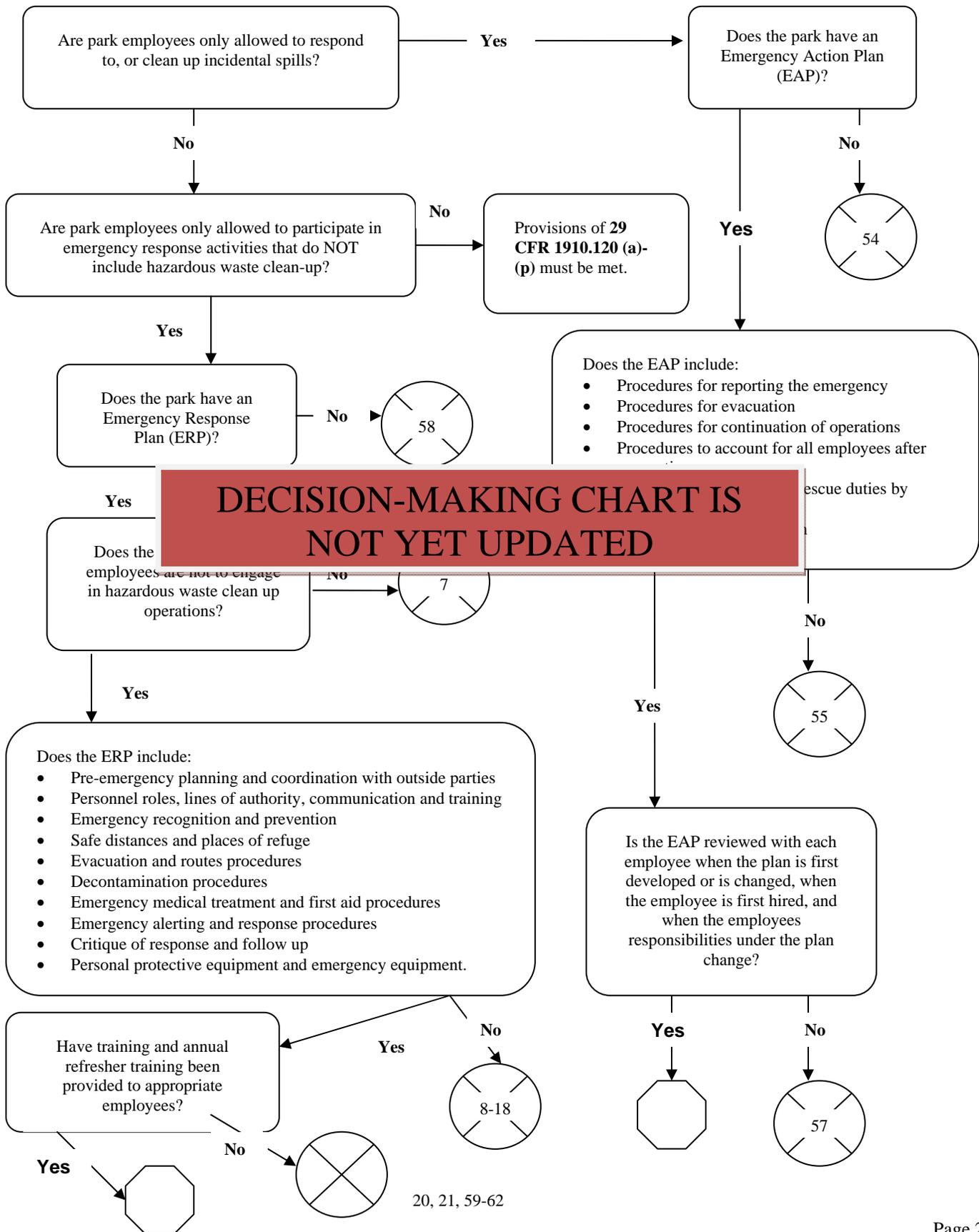


*Indicates that the regulatory
requirement has been met and that the
train of questions can stop.*



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

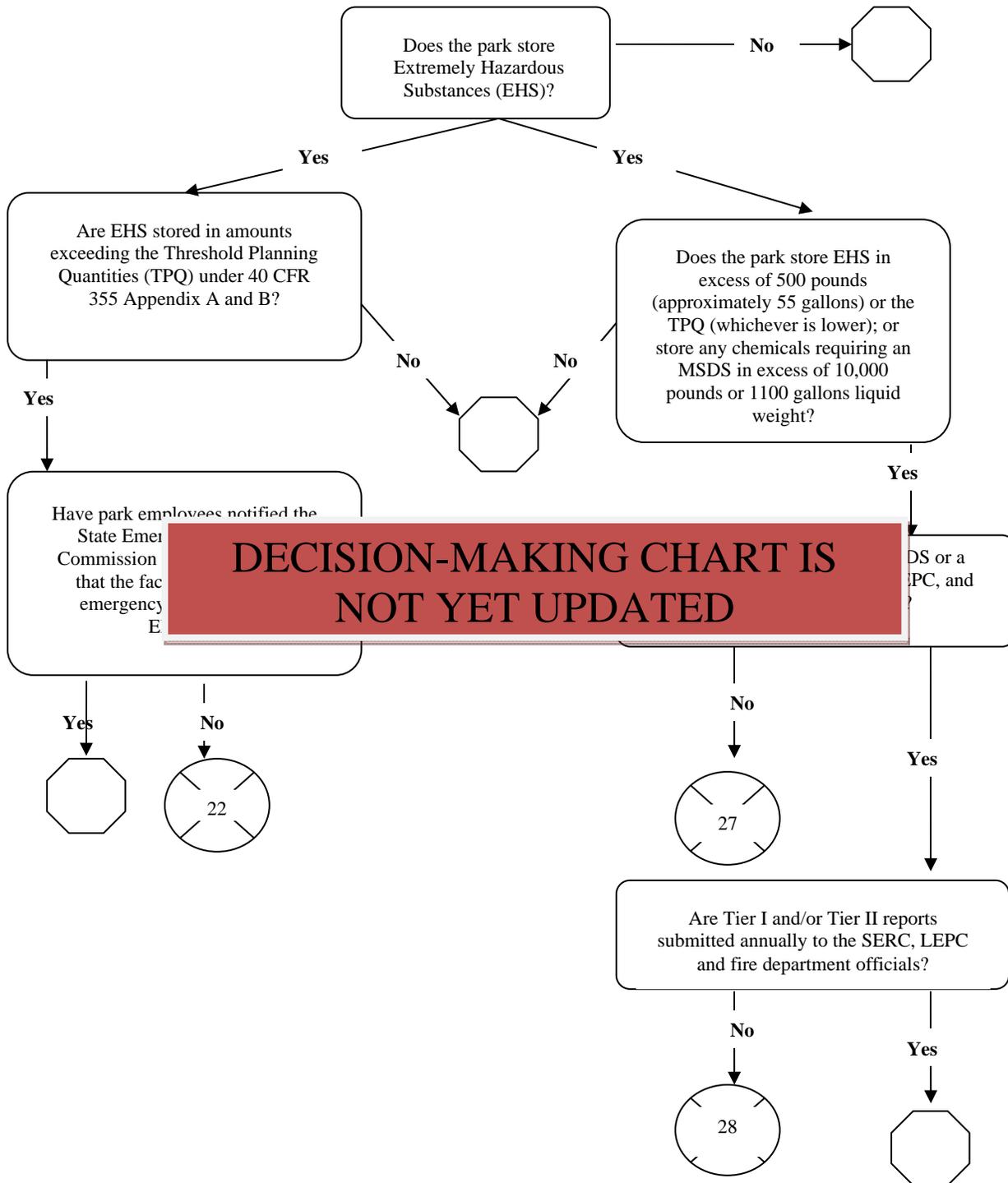
*Emergency Planning and
Reporting
2012 Update*





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

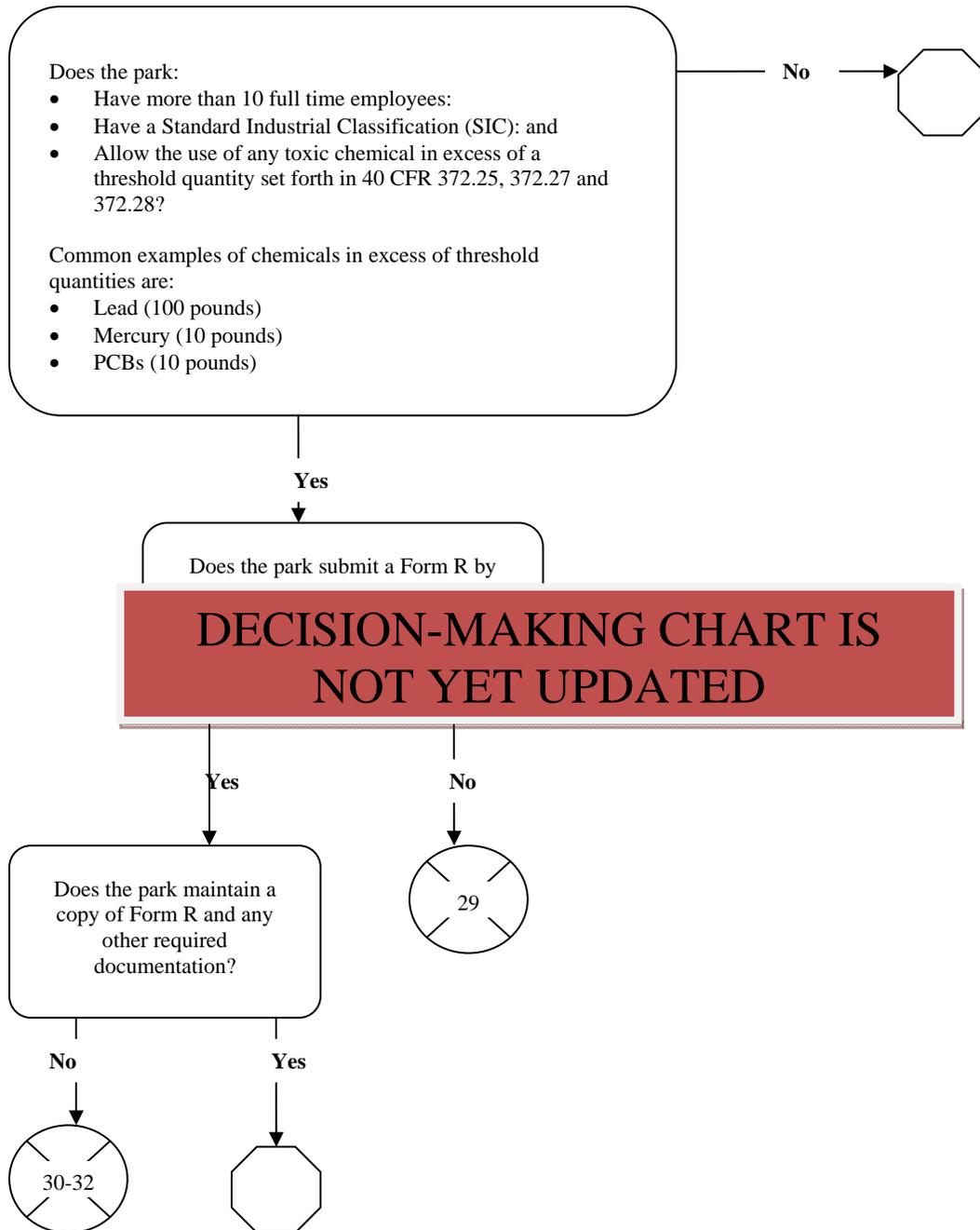
*Emergency Planning and
Reporting
2012 Update*





NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Emergency Planning and
Reporting
2012 Update*





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>Emergency Action Planning</i>		
54.	<p>If park employees are not allowed to engage in emergency response or hazardous waste clean-up operations, is a written EAP maintained in the workplace and available to employees for review? [29 CFR 1910.38 (b)]</p> <p>Note: If the park has 10 or fewer employees at any given facility (i.e., building or group of buildings where employees go back and forth within a working day), this plan may be communicated orally to employees and a written plan is not required.</p>	2
55.	<p>For parks requiring an EAP, at a minimum, does the EAP include:</p> <ul style="list-style-type: none"> (1) Procedures for reporting a fire or other emergency; (2) Procedures for emergency evacuation, including type of evacuation and exit route assignments; (3) Procedures to be followed by employees who remain to operate critical plant operations before they evacuate; (4) Procedures to account for all employees after evacuation; (5) Procedures to be followed by employees performing rescue or medical duties; and (6) The name(s) or job title(s) of the employee(s) to contact for more information? <p>[29 CFR 1910.38 (c)]</p>	2
70.	<p>Does the park have a functioning alarm system to notify employees of emergencies and does it comply with 29 CFR 1910.165? [29 CFR 1910.38 (d)]</p> <p>Note: 29 CFR 1910.165 discusses employee alarm systems – specifically warnings for necessary emergency action and/or reaction time to escape from the workplace. Alarms must be capable of being perceived above ambient noise or light levels, and be distinctive and recognizable as a signal to evacuate or perform other actions under the EAP. If the park has 10 or fewer employees, the alarm can be verbal.</p>	2
56.	<p>For parks requiring an EAP, are employees designated and trained to assist in a safe and orderly evacuation of other employees? [29 CFR 1910.38 (e)]</p>	2
57.	<p>For parks requiring an EAP, is the EAP reviewed with each employee covered by the plan:</p> <ul style="list-style-type: none"> • When the plan is developed or the employee is initially assigned to the job; • When the employees responsibilities change; and • When the plan is changed? <p>[29 CFR 1910.38 (f)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>Emergency Response Planning</i>		
58.	<p>If park employees are only allowed to participate in emergency response to a hazardous substance release and do NOT engage in post-emergency response hazardous waste clean-up, is a written ERP maintained on site and available to employees, their representatives or OSHA personnel for their review and copying? [29 CFR 1910.120 (q)(1)]</p> <p>Note: A written ERP is not required for those employees who are to be evacuated from and therefore do not respond to the hazardous substance release – as long as there is an EAP in place to cover them. This means that a park may have a separate EAP and ERP, or a park may incorporate the EAP into the ERP if that makes more sense.</p>	2
7.	<p>If park employees engage in hazardous waste cleanup operations at Uncontrolled Hazardous Waste Sites, is there an ERP to cover the cleanup? [29 CFR 1910.120 (l)(1)(ii)]</p> <p>Note: If, at Uncontrolled Hazardous Waste Sites, all employees are not allowed to engage in handling an emergency and they are instead evacuated, an ERP is not required as long as a compliant EAP is developed and implemented.</p> <p><i>“Uncontrolled hazardous waste site”</i> means an area identified as an uncontrolled hazardous waste site by a governmental body, whether Federal, state, local or other where an accumulation of hazardous substances creates a threat to the health and safety of individuals or the environment or both. Some sites are found on public lands such as those created by former municipal, county or state landfills where illegal or poorly managed waste disposal has taken place. Other sites are found on private property, often belonging to generators or former generators of hazardous substance wastes. Examples of such sites include, but are not limited to, surface impoundments, landfills, dumps, and tank or drum farms. Normal operations at TSD sites are not covered by this definition.</p>	2
8.	<p>Does the park’s ERP include the following elements:</p> <ul style="list-style-type: none"> • Pre-emergency planning and coordination with outside parties (29 CFR 1910.120 (q)(2)(i)); • Personnel roles, lines of authority, training, and communication (29 CFR 1910.120 (q)(2)(ii)); • Emergency recognition and prevention (29 CFR 1910.120 (q)(2)(iii)); • Safe distances and places of refuge (29 CFR 1910.120 (q)(2)(iv)); • Site security and control measures or procedures (29 CFR 1910.120 (q)(2)(v)); • Evacuation routes and procedures (29 CFR 1910.120 (q)(2)(vi)); • Decontamination procedures (29 CFR 1910.120 (q)(2)(vii)); • Emergency medical treatment and first aid procedures (29 CFR 1910.120 (q)(2)(viii)); • Emergency alerting and response procedures (29 CFR 1910.120 (q)(2)(ix)); • Critique of response and follow-up (29 CFR 1910.120 (q)(2)(x)); and • Personal protective equipment and emergency equipment (29 CFR 1910.120 (q)(2)(xi))? <p>[29 CFR 1910.120(q)(2)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
19.	<p>Does the park's ERP allow its own emergency response team to use the local emergency response plan or the state emergency response plan, or both, as part of the park's emergency response plan to avoid duplication? [29 CFR 1910.120 (q)(2)(xii)]</p> <p>Note: Those items of the emergency response plan that are being properly addressed by the SARA Title III plans may be substituted into their emergency plan or otherwise kept together for the employer and employee's use.</p>	2
20.	<p>Have park employees who are likely to observe or discover a hazardous materials spill and report that spill to those capable of responding to it received first responder awareness level training or have sufficient experience? [29 CFR 1910.120 (q)(6)(i)]</p> <p>Note: First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They would take no further action beyond notifying the authorities of the release.</p>	2
21.	<p>Have park employees who may respond to spills of hazardous material in a defensive fashion received at least eight (8) hours of training at the first responder operations level? Or has park management certified the employee's competency if experience is substituted for training? [29 CFR 1910.120 (q)(6)(ii)]</p> <p>Note: First responders at the operations level are individuals who respond to releases, or potential releases of hazardous substances, as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
59.	<p>Have park employees who respond to spills of hazardous materials by aggressively stopping the release received at least twenty-four (24) hours of training at the hazardous materials technician level and been certified by their employer as competent in the following areas:</p> <ul style="list-style-type: none"> • Know how to implement the employer's emergency response plan. (29 CFR 1910.120(q)(6)(iii)(A)) • Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment. (29 CFR 1910.120(q)(6)(iii)(B)) • Be able to function within an assigned role in the Incident Command System. (29 CFR 1910.120(q)(6)(iii)(C)) • Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician. (29 CFR 1910.120(q)(6)(iii)(D)) • Understand hazard and risk assessment techniques. (29 CFR 1910.120(q)(6)(iii)(E)) • Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit. (29 CFR 1910.120(q)(6)(iii)(F)) • Understand and implement decontamination procedures. (29 CFR 1910.120(q)(6)(iii)(G)) • Understand termination procedures. (29 CFR 1910.120(q)(6)(iii)(H)) • Understand basic chemical and toxicological terminology and behavior. (29 CFR 1910.120(q)(6)(iii)(I))? <p>[29 CFR 1910.120 (q)(6)(iii)]</p> <p>Note: Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
60.	<p>Have park employees who respond to spills of hazardous materials and who provide support to hazardous materials technicians received at least twenty-four (24) hours of training at the hazardous materials specialist level and been certified by their employer as competent in the following areas:</p> <ul style="list-style-type: none"> • Know how to implement the local emergency response plan. (29 CFR 1910.120(q)(6)(iv)(A)) • Understand classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment. (29 CFR 1910.120(q)(6)(iv)(B)) • Know the state emergency response plan. (29 CFR 1910.120(q)(6)(iv)(C)) • Be able to select and use proper specialized chemical personal protective equipment provided to the hazardous materials specialist. (29 CFR 1910.120(q)(6)(iv)(D)) • Understand in-depth hazard and risk techniques. (29 CFR 1910.120(q)(6)(iv)(E)) • Be able to perform specialized control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available. (29 CFR 1910.120(q)(6)(iv)(F)) • Be able to determine and implement decontamination procedures. (29 CFR 1910.120(q)(6)(iv)(G)) • Have the ability to develop a site safety and control plan. (29 CFR 1910.120(q)(6)(iv)(H)) • Understand chemical, radiological and toxicological terminology and behavior. (29 CFR 1910.120(q)(6)(iv)(I))? <p>[29 CFR 1910.120 (q)(6)(iv)]</p> <p>Note: Hazardous materials specialists are individuals who respond with and provide support to hazardous materials technicians. Their duties parallel those of the hazardous materials technician, however, those duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The hazardous materials specialist would also act as the site liaison with Federal, state, local and other government authorities in regards to site activities.</p>	2
61.	<p>Have park employees who respond to hazardous materials spills beyond the responder awareness level, and who assume control of the incident scene received at least twenty-four (24) hours of training equal to the first responder operations level and been certified by their employer as competent in the following areas:</p> <ul style="list-style-type: none"> • Know and be able to implement the employer's incident command system. (29 CFR 1910.120(q)(6)(v)(A)) • Know how to implement the employer's emergency response plan. (29 CFR 1910.120(q)(6)(v)(B)) • Know and understand the hazards and risks associated with employees working in chemical protective clothing. (29 CFR 1910.120(q)(6)(v)(C)) • Know how to implement the local emergency response plan. (29 CFR 1910.120(q)(6)(v)(D)) • Know of the state emergency response plan and of the Federal Regional Response Team. (29 CFR 1910.120(q)(6)(v)(E)) • Know and understand the importance of decontamination procedures. (29 CFR 1910.120(q)(6)(v)(F))? <p>[29 CFR 1910.120 (q)(6)(v)]</p> <p>Note: On Scene Incident commanders, are those who will assume control of the incident scene beyond the first responder awareness level.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
62.	Are park employees who respond to hazardous materials spills at any of the levels described above, provided with annual refresher training of sufficient content and duration to maintain their competencies, or required to demonstrate competency in their areas each year? [29 CFR 1910.120(q)(8)(i)]	2
68.	Is the training and demonstration of competency documented annually? [29 CFR 1910.120(q)(8)(ii)] Note: A statement needs to be made of the training or competency. If a statement of competency is made, the employer must keep a record of the methodology used to demonstrate competency. If park employees do not have the required training (per finding 62), findings 62 and 68 can be combined into one finding.	2
<i>Hazardous Waste Operations Response Planning (OSHA requirements)</i>		
63.	For parks with employees participating in hazardous waste operations involving hazardous wastes at Treatment, Storage, and Disposal (TSD) facilities, are the provisions of 29 CFR 1910.120 (p) met? [29 CFR 1910.120(a)(2)(iii)]	2
64.	For parks with employees participating in hazardous waste operations involving hazardous wastes at CERCLA clean-up sites, RCRA corrective action sites, or uncontrolled hazardous waste sites, are the provisions of 29 CFR 1910.120 (a)-(o) met? [29 CFR 1910.120 (a)(2)(ii)]	2
<i>EPCRA Reporting</i>		
<i>Emergency Planning and Notification</i>		
22.	If any Extremely Hazardous Substance (EHS) is stored in amounts equal to or exceeding the Threshold Planning Quantity (TPQ), or the park has been designated for emergency planning purposes, have the State Emergency Response Commission (SERC) and the Local Emergency Planning Committee (LEPC) received notification that the park is subject to the emergency planning requirements of the Emergency Planning and Community Right to Know Act (EPCRA)? [40 CFR 355.20 (a)] Note: Designation involves public notice and comment and is made by one of the following: the SERC, State Governor, or Tribal Chief Executive Officer.	2
23.	Has a representative been chosen to participate in the local emergency planning process as a facility emergency response coordinator and has the LEPC, (or SERC if there is no LEPC, or State Governor if there is no SERC) been notified? [40 CFR 355.20 (b)]	2
24.	Is the LEPC notified of any changes made relevant to emergency planning? [40 CFR 355.20 (c)]	2
69.	Does the park provide any information necessary for developing or implementing the local emergency plan if requested by the LEPC? [40 CFR 355.20 (d)]	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
25.	<p>In the event of a release of a Reportable Quantity (RQ) of an EHS or a CERCLA “hazardous substance,” does the park immediately notify the LEPC of any area likely to be affected by the release and the SERC of any state likely to be affected by the release? [40 CFR 355.42 (a)]</p> <p>Note: The notice shall include as much of the information [40 CFR 355.40 (a) (1-8)] known at the time of the incident. However, retrieval of this information should not cause a delay in the notification as part of the emergency response. Also, if the release occurs during transportation or from storage incident to transportation, the requirements of immediate notification can be met by notifying the 911 operator.[40 CFR 355.42 (b)]</p>	1
26.	<p>If a release has occurred, after initial notification to the appropriate parties, has a written follow-up emergency notice been distributed including information pertaining to the spill (i.e., actions taken to contain the spill, known or anticipated acute or chronic health risks, and medical advice necessary for exposed individuals)? [40 CFR 355.40 (b)]</p> <p>Note: If the release occurs during transportation or from storage incident to transportation then written follow-up notification is not required. [40 CFR 355.40 (c)]</p>	2
<i>Chemical Inventory Reporting</i>		
27.	<p>Do park employees submit MSDS (or a list of chemicals and hazard information) to the SERC, LEPC, and fire department officials for all hazardous chemicals that meet or exceed applicable thresholds?</p> <p>Do park employees also submit MSDS if requested by the LEPC for any hazardous chemical present at their facility which they have not already submitted a MSDS? [40 CFR 370.32]</p> <p>Note: The applicable thresholds are the following per 40 CFR 370.10:</p> <ul style="list-style-type: none"> • An EHS present at the facility at any one time in an amount equal to or greater than 500 pounds or the TPQ (refer to Appendices A and B of 40 CFR 355), whichever is lower. • A hazardous chemical that is not an EHS that is present at the facility at any one time in an amount equal to or greater than 10,000 pounds. (Exceptions include gasoline and diesel sold principally to the public at a retail gas station for motor vehicle use on land, where the gasoline and diesel was stored underground in compliance at all times the previous calendar year with 40 CFR 280 or an EPA-approved state UST program. In these cases, the applicable thresholds are 75,000 gallons for gasoline and 100,000 gallons for diesel.) 	2
28.	<p>Are Tier I or Tier II reports submitted by March 1 each year to the SERC, LEPC, and fire department officials, if chemicals present at facility meet or exceed the minimum applicable thresholds (see Finding #27 for the thresholds)? [40 CFR 370.40]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>Toxic Release Inventory Reporting (TRI)</i>		
29.	<p>Do park employees at covered facilities submit EPA Form R for toxic chemicals (or EPA Form R Schedule 1 for dioxin and dioxin-like compounds) by July 1 where the threshold use quantity is exceeded during the previous calendar year? [40 CFR 372.30]</p> <p>Note: Covered facilities have 10 or more full-time employees, and have a Standard Industrial Classification (SIC) or North American Industry Classification System (NAICS) listed in 40 CFR 372.22.</p> <p><i>AUDITORS: Note that the Washington Area Support Office (WASO) collects and submits information related to lead released from firing range activities to the EPA on behalf of the entire NPS. Auditors should check with park staff to ensure that this information is properly submitted through WASO.</i></p>	2
30.	<p>Do park employees maintain a copy of each Form R report submitted to EPA or the state? [40 CFR 372.10 (a)(1)]</p> <p>Note: Records must be maintained for three years.</p>	2
31.	<p>Do park employees maintain a copy of documents used to display the park's compliance status under this requirement? [40 CFR 372.10 (a)(2)]</p> <p>Note: Records must be maintained for three years.</p>	2
32.	<p>Do park employees maintain all documentation used to determine reportable chemicals? [40 CFR 372.10 (a)(3)]</p> <p>Note: Records must be maintained for three years.</p>	2
<i>Preparing for a Release of Hazardous Waste Under RCRA</i>		
<i>Large and Small Quantity Generators</i>		
33.	<p>Do maintenance and operation procedures for facilities minimize the possibility of a fire, explosion, or any release of hazardous waste or hazardous waste constituents? [40 CFR 265.31]</p>	1
34.	<p>In areas where hazardous waste is handled, is the park is equipped with all of the following:</p> <ul style="list-style-type: none"> • An internal communications or alarm system capable of providing immediate emergency instruction to NPS facility personnel; • A device, such as a telephone or radio, immediately available at the scene of operations, capable of summoning emergency assistance from local or state emergency responders; • Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and • Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems? <p>[40 CFR 265.32]</p>	1
35.	<p>Is equipment (listed in Finding 34) tested and maintained as necessary to assure its proper operation in time of emergency? [40 CFR 265.33]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
36.	When hazardous waste is being handled, do all employees involved have immediate access to an internal alarm or emergency communication device? Or if only one employee is on the premises while the facility is operating, do they have immediate access to a telephone or two-way radio capable of summoning external emergency assistance? [40 CFR 265.34]	2
37.	Is sufficient aisle space maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency? [40 CFR 265.35] Note: If aisle space is not needed for any of the aforementioned, then there is no audit finding.	2
38.	Have arrangements (appropriate for the types of hazardous waste handled at the park) been made with local authorities including: <ul style="list-style-type: none"> • Familiarizing potential emergency responders with the layout of the NPS facility, properties of hazardous waste handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes; • Establishing agreements with emergency responders, emergency response contractors, and equipment suppliers, to ensure their resources are available at all times; • Familiarizing local hospitals and other potential emergency care providers with the properties of hazardous waste handled at the location and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility; and • Where state or local authorities decline to enter into such arrangements, has the park documented the refusal in the operating record? [40 CFR 265.37]	2
<i>Small Quantity Generators Only</i>		
39.	At all times, is there at least one employee either on the premises or on call (able to reach the facility in a short amount of time) with the responsibility for coordinating all emergency response measures related to hazardous waste management? [40 CFR 262.34(d)(5)(i)] Note: This person is the emergency coordinator.	2
40.	Is the following information posted next to the telephone: <ul style="list-style-type: none"> • Name and telephone number of the emergency coordinators; • Location of fire extinguishers and spill control materials, and, if present, fire alarm; and • Telephone number of the fire department (unless facility has a direct alarm)? [40 CFR 262.34 (d)(5)(ii)]	2
41.	Are park employees thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal park operations and emergencies? [40 CFR 262.34 (d)(5)(iii)]	1
42.	Does the emergency coordinator (or their designee) respond to emergencies such as fires or hazardous waste spills? [40 CFR 262.34 (d)(5)(iv)]	1



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
43.	<p>In the event of a release which could threaten human health outside the general area in which hazardous waste is stored, or when the park has knowledge that a spill has reached surface water, is the National Response Center (NRC) contacted immediately and provided with the following information:</p> <ul style="list-style-type: none"> • Name, address and EPA identification number of the facility; • Date, time and type of incident; • Quantity and type of hazardous waste involved in the incident; • Extent of injuries if any; and • Estimated quantity and disposition of recovered materials, if any? <p>[40 CFR 262.34 (d)(5)(iv)(C)]</p>	1
	<p><i>Contingency Planning and Emergency Procedures for Large Quantity Generators</i></p>	
44.	<p>Does the park's contingency plan include a description of the actions facility personnel must take to respond to an emergency such as response to fires, explosions, or any unplanned release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?</p> <p>[40 CFR 265.52 (a)]</p>	2
45.	<p>If the park has a SPCC plan, or some other emergency or contingency plan, is that plan amended to incorporate hazardous waste management provisions sufficient to comply with regulations?</p> <p>[40 CFR 265.52 (b)]</p>	2
46.	<p>Does the park's contingency plan include a description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams, to coordinate emergency services?</p> <p>[40 CFR 265.52 (c)]</p>	2
47.	<p>Does the park's contingency plan include an up-to-date list of names, addresses, and phone numbers (office and home) of all persons qualified to act as "emergency coordinator?" Where more than one person is listed, is one person named as primary emergency coordinator and others listed in the order in which they will assume responsibility as alternates?</p> <p>[40 CFR 265.52 (d)]</p>	2
48.	<p>Does the park's contingency plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?</p> <p>[40 CFR 265.52 (e)]</p>	2
49.	<p>Does the park's contingency plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describes signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?</p> <p>[40 CFR 265.52 (f)]</p>	2
50.	<p>Are copies of the park's contingency plan maintained at the facility and submitted to all local police and fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services?</p> <p>[40 CFR 265.53]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
51.	<p>Is the contingency plan reviewed and immediately amended if:</p> <ul style="list-style-type: none"> • Applicable regulations change; • The plan fails in an emergency; • The facility changes significantly in a way that would increase the potential for a fire, explosion or release of hazardous waste; or • The list of emergency coordinators or emergency equipment changes? <p>[40 CFR 265.54]</p>	2
52.	<p>At all times, is there at least one employee either on the park premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time), with the responsibility for coordinating all emergency response measures?</p> <p>Is the emergency coordinator thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout?</p> <p>Does this person have the authority to commit the resources needed to carry out the contingency plan?</p> <p>[40 CFR 265.55]</p>	2
53.	<p>Is the individual designated as the emergency coordinator familiar with, and capable of, implementing procedures that would be required in the event of an emergency?</p> <p>[40 CFR 265.56]</p> <p>Note: Applicable responsibilities for the emergency coordinator will vary, depending on factors such as type and variety of waste(s) handled by the facility, and type and complexity of the facility. Emergency procedures may include activating alarms, notifying appropriate state or local agencies, or knowing the character and extent of hazardous waste that was released. Refer to 40 CFR 265.56 (a)-(i) for list.</p>	1

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
65.	<p>Is a clear policy in place for responding to emergencies and do staff understand this policy? For example are employees:</p> <ul style="list-style-type: none"> • Not allowed to respond to an emergency at all, and instead outside help is contacted (i.e., fire department, Coast Guard); • Allowed to respond to emergencies except those that pertain to hazardous waste; • Allowed to respond to all emergencies including those pertaining to hazardous waste but not the post emergency response hazardous waste clean-up; or • Allowed to respond to all emergencies and post emergency hazardous waste clean-ups? <p>[BMP]</p>	4
1.	<p>Is a safety specialist, or designee, designated to be responsible for development and implementation of the emergency policy and/or plan?</p> <p>[BMP]</p>	4
66.	<p>For parks requiring an EAP, when the EAP is reviewed with each employee is this review documented?</p> <p>[BMP related to 29 CFR 1910.38(f)]</p>	4



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Emergency Planning and
Reporting
2012 Update*

67.	Are park employees aware of whether the park is involved in responding to the following hazardous waste clean-up activities: <ul style="list-style-type: none">• Clean-up actions under CERCLA;• Corrective actions under RCRA;• Voluntary clean-up operations at sites recognized as uncontrolled hazardous waste sites; or <ul style="list-style-type: none">• Operations involving hazardous wastes at TSD facilities? [BMP related to 29 CFR 1910.120(a)(i-iv)]	4
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NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Environmental Purchasing
(formerly Green Procurement)
2010 Update*

INTRODUCTION

Each year National Park Service (NPS) employees purchase a vast number of goods and services. This enormous purchasing power gives NPS staff an opportunity to reduce environmental impacts and influence the market by encouraging manufacturers to produce products with environmental attributes. As the steward of the nation's most valued public lands, NPS has a special obligation to be a leader in environmental purchasing¹ initiatives.

Environmental purchasing involves the purchase of environmentally preferable or "green" products and services, which are products and services that exhibit characteristics or properties that have fewer negative impacts on human health and the environment when compared to similar products or services. Green products may contain recycled materials or be more recyclable, be less toxic or more biodegradable, have less packaging or cost less to transport, be more durable, or use less energy or natural resources over their useful life. Green products may include but are not limited to office supplies, paper, janitorial supplies and products, refurbished furniture, toner cartridges, carpeting and flooring, office equipment, paper towels, tissue, trash bags, paint, lumber, motor oil, and antifreeze. Examples of green services include:

- Construction contracts that follow sustainable building standards;
- Janitorial service contracts that specify the use of green products and practices; and
- Energy savings performance contracts to increase efficiency of facility operation.

The Environmental Protection Agency (EPA) requires that federal agencies purchase green products according to product category as outlined under the Comprehensive Procurement Guideline or (CPG). (See, www.epa.gov/cpg.) All NPS staff purchasing products, from office supplies to automotive supplies, should be aware of environmental purchasing opportunities and should document information about these purchases. In addition to the EPA regulations, federal Executive Orders (EOs) also stress the importance of the federal government's role in acting as a leader in environmental purchasing.

Similar to the CPG, The United States Department of Agriculture (USDA) through the Farm Security and Rural Investment Act of 2002, requires federal agencies establish procurement preference programs for biobased products. More information about the Federal Biobased Products Preferred Procurement Program (FB4P) is available at <http://www.biobased.ocs.usda.gov/public/index.cfm?CFID=80075&CFTOKEN=52628120>.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use these data to populate the regulatory findings database that will be submitted to and used by the park.

Ask to review the following written records, if available:

- Purchase orders
- Credit card training documentation
- Pollution Prevention or Green Procurement Program
- Standard green procurement contract language or contract-specific language
- Standard operating procedures (SOPs)

Ask to interview or plan to contact the following park personnel:

- Purchasing officers
- Auto mechanics
- Maintenance staff
- Contracting officer

¹ Different government and private organizations may use the terms "affirmative acquisition," "affirmative procurement," "green procurement," "green product preference," or "environmentally preferable purchasing" to describe the environmental purchasing approach. For the purposes of consistency, the NPS within this document will use the term "environmental purchasing" throughout.



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Environmental Purchasing
(formerly Green Procurement)
2010 Update*

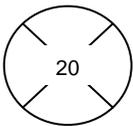
- Administrative staff
- Credit card holders

- Supervisors
- Concession specialist

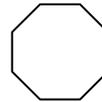
During the walk-around of the park, observe the following:

- Alternative fuels and additives
- Bio-based fuels, fluids, and lubricants
- Cleaners and degreasers (includes janitorial supplies)
- Construction materials
- Electricity and power equipment
- Energy Star products
- Fuel efficient and alternative fuel vehicles
- Heating, ventilation, and air conditioning (HVAC) equipment
- Lighting
- Non-office paper products
- Office paper products
- Office equipment
- Paint and paint products
- Pest control products
- Recycled plastic (decking, benches, walkways)
- Recycling bins
- Sustainably harvested wood
- Vehicle maintenance products
- Water treatment chemical

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

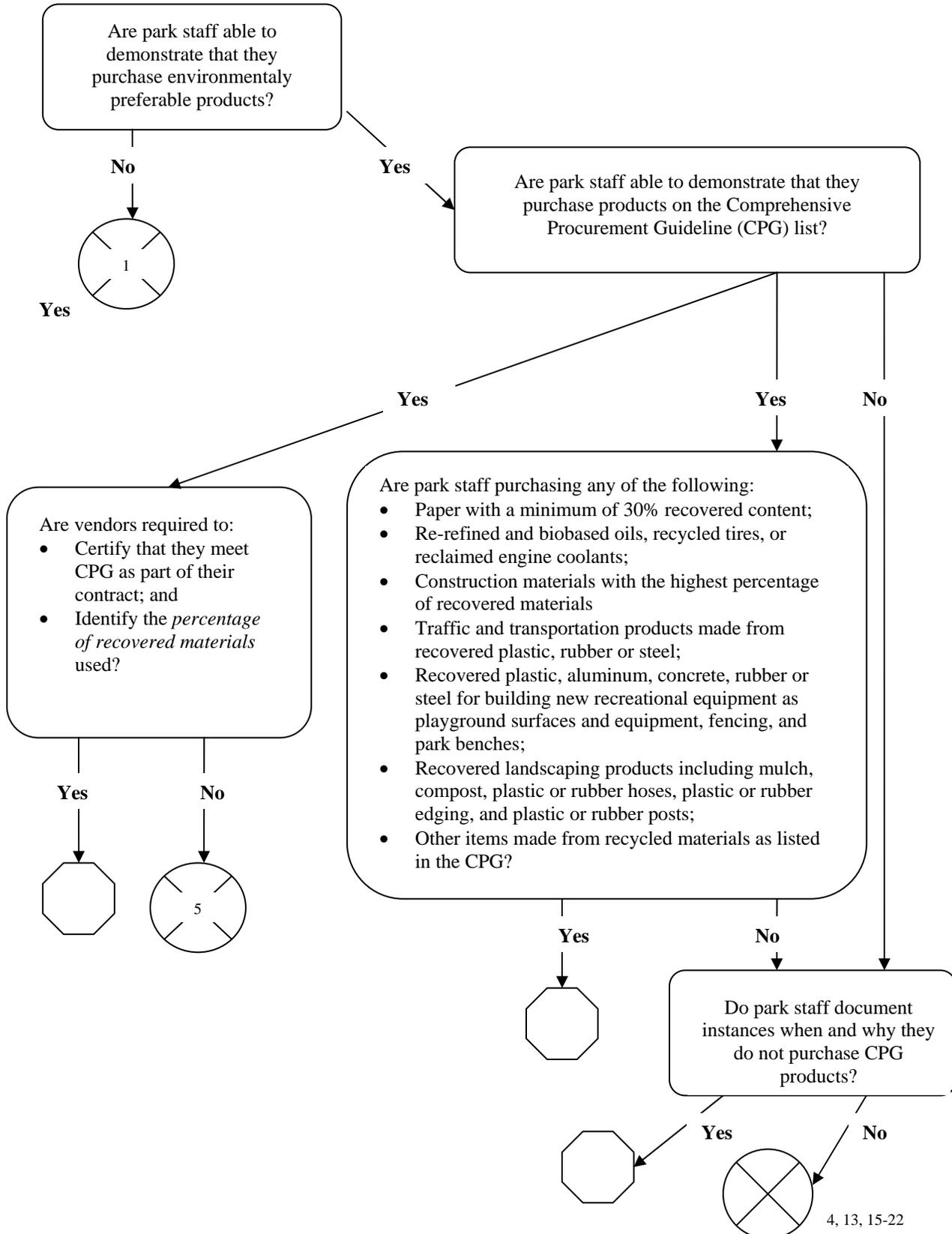


*Indicates that the regulatory
requirement has been met and that the
train of questions can stop.*



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

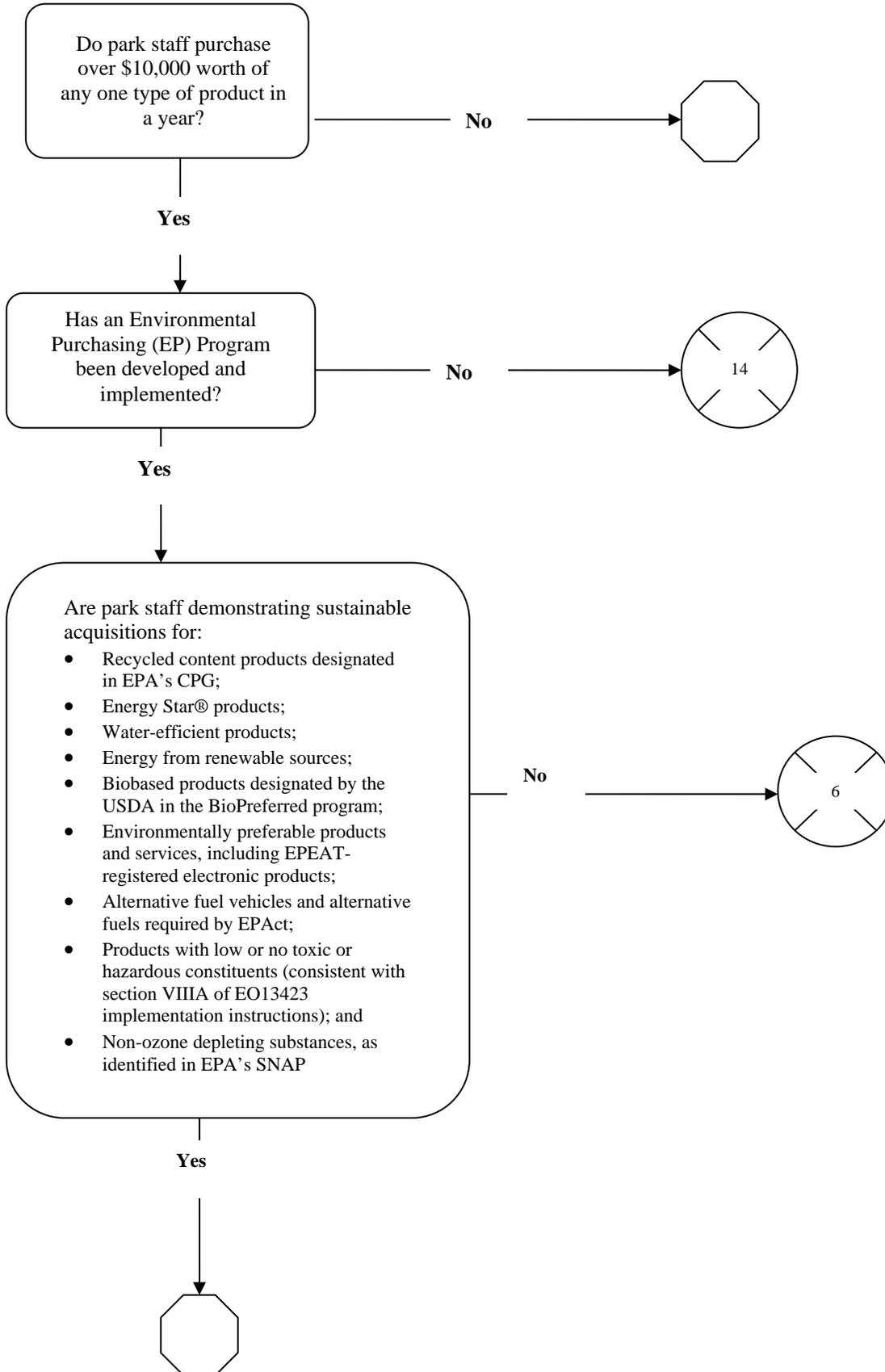
Environmental Purchasing
(formerly Green Procurement)
2010 Update





NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

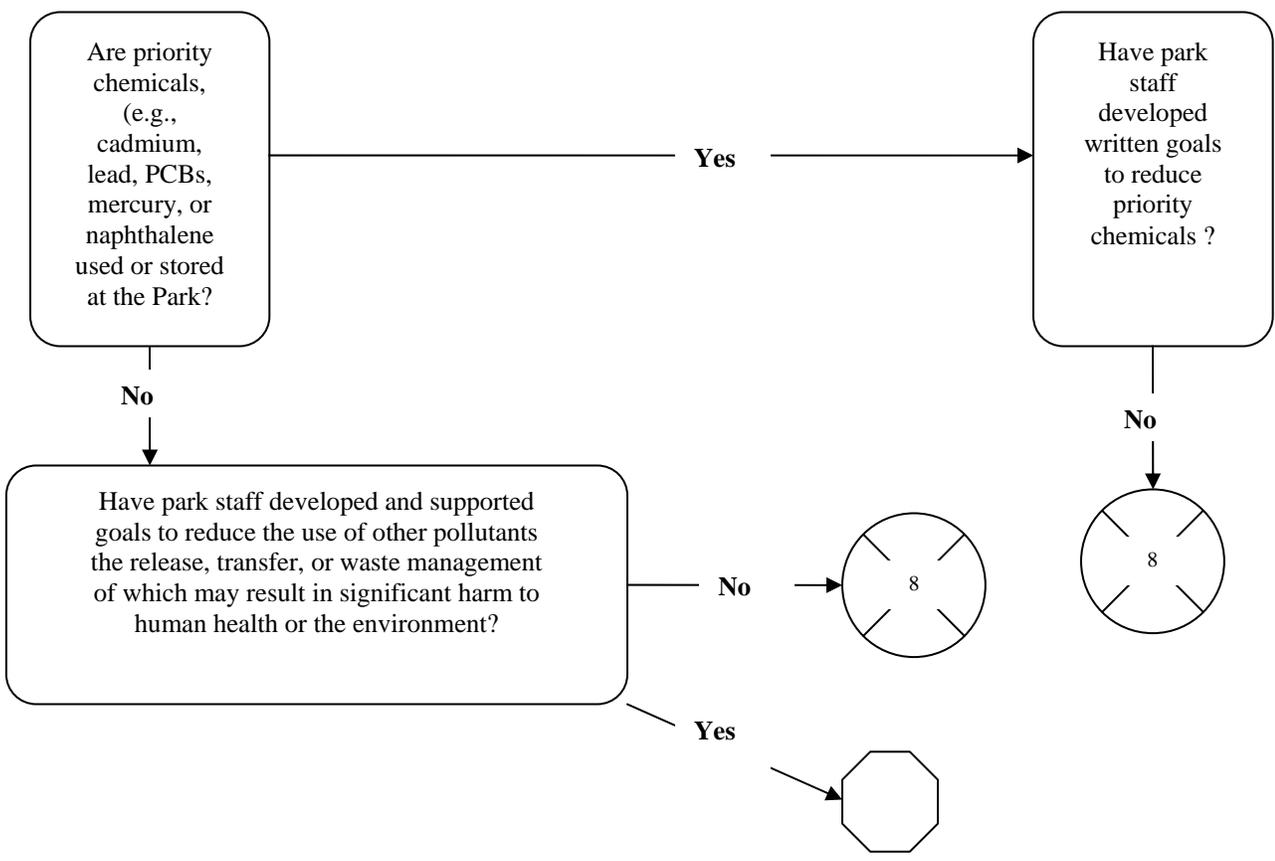
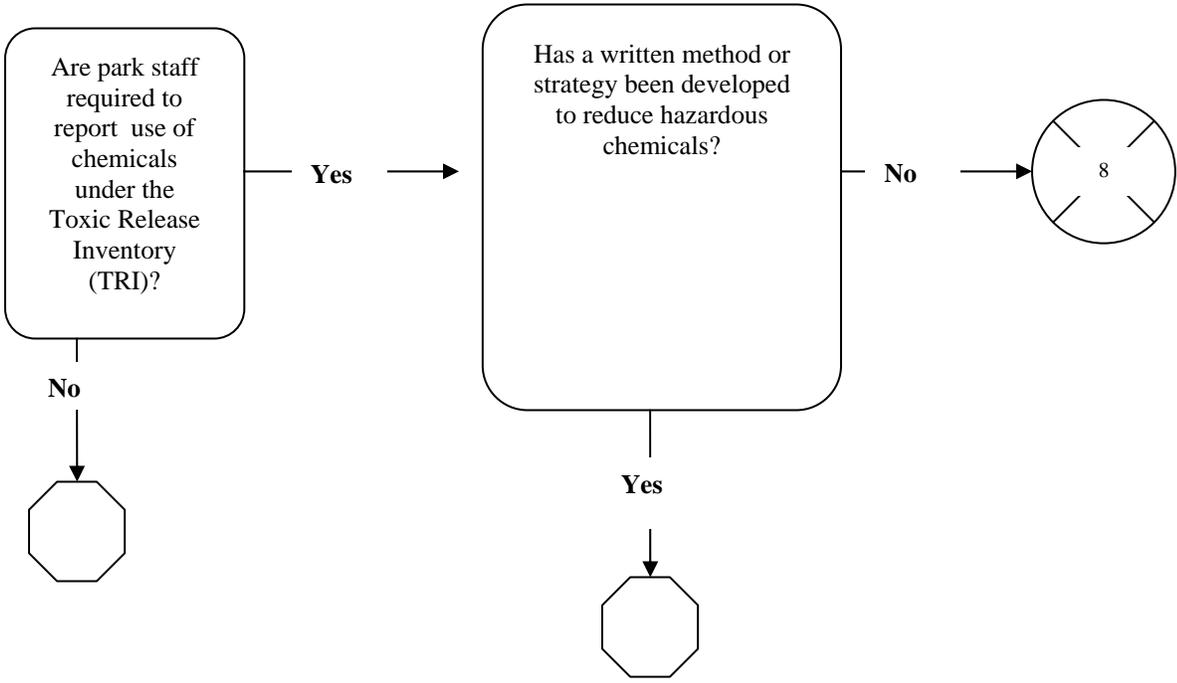
*Environmental Purchasing
(formerly Green Procurement)
2010 Update*





NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update





NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates an enumeration system that merges the question numbers from the 2002 version and accounts for any changes (new questions or deletions). The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

PRIZIM AUDITORS: EO 13514 supplements EO 13423. Where EO 13514 does not specifically speak to an issue, EO 13423 still applies and is current.

v02	CHECKLIST ITEM	PRIORITY
<i>Environmentally Preferable Products</i>		



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

v02	CHECKLIST ITEM	PRIORITY
1.	<p>Are park staff able to demonstrate that they are advancing sustainable acquisition to ensure that 95 % of new contract actions including task and delivery orders, for products and services are:</p> <ul style="list-style-type: none"> - Energy-efficient (Energy Star or Federal Energy Management Program (FEMP) designated), - Water-efficient, - Biobased, - Environmentally preferable (e.g., Electronic Product Environmental Assessment Tool (EPEAT) certified), - Non-ozone depleting, - Contain recycled content, or - Are non-toxic or less-toxic alternatives, where such products and services meet agency performance requirements? <p>[EO 13514, Section 2(h)]</p> <p>Does the park have an Environmental Purchasing (EP) Program that demonstrates that preference is given to the above listed items? [EO 13423, Section 2(d); implementing instructions]</p> <p><i>PRIZIM AUDITORS: Keep in mind that employees must be able to demonstrate that the above preferences are given. If a park is not required to have an EP (see finding #6), then park staff may demonstrate compliance with this finding by means other than having a written EP. As long as they can demonstrate the points above are being met, they would be in compliance. If a park has a written EP, it should incorporate the provisions above.</i></p> <p><i>Please compare this finding with Finding #6 as they are similar but fall under two separate regulatory drivers. Auditors can combine these findings only where appropriate.</i></p> <p><i>Keep in mind that auditors may meet the provisions of finding #6, but may not meet all the provisions of this finding as it is more detailed.</i></p> <p><i>Environmentally preferable products and services are those that have a lesser or reduced effect on human health and the environment when compared to competing products and services that serve the same purpose.</i></p> <p><i>A few product categories to look at include CPG products, biobased products, non or least toxic products, no or low volatile organic compound (VOC) products, and Energy Star products.</i></p>	3
2.	<p>Have park employees been provided with or arranged for training on the provisions of EO 13423, including initial awareness training, as well as necessary refresher training on the goals of the EO and any related instructions, including the environmental impacts of employees' actions? [EO 13423, Section 3(c)]</p>	3
<i>Comprehensive Procurement Guidelines (CPG) Requirements</i>		



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

v02	CHECKLIST ITEM	PRIORITY
13.	<p>Are park employees able to demonstrate that they are procuring products composed of the highest percentage of recovered materials practicable in accordance with the CPG? [40 CFR 247.2 (d)]</p> <p>Note: This finding should be used (as opposed to findings 15-22) when a broader observation is made that CPG items are not purchased. Where specific CPG items are observed to not be purchased it is better to use separate findings 15-22 (depending on what is missing). However, when park employees have no knowledge of the CPG, and it is apparent that many CPG items are not purchased, this finding should be used. Keep in mind that the CPG website may change over time requiring additional products to be purchased.</p>	2
4.	<p>Do park employees document those instances when they do not purchase CPG products?</p> <p>Employees must provide a reason for not purchasing CPG products, e.g., the products are not reasonably available, they fail to meet performance standards, or they are not available at a competitive price. [40 CFR 247.2 (d)]</p> <p>Note: This finding applies to products purchased over the micro-purchase threshold (\$3,000.00). If products are only purchased under the micro-purchase threshold, then this finding is a Priority 4 finding.</p>	2 or 4
5.	<p>Does the park's contracting officer (or officers) require vendors to:</p> <ul style="list-style-type: none"> • Certify that the materials to be used in the performance of the contract will meet CPG specifications; and • Estimate the <i>percentage of recovered materials</i> used to complete contract requirements? <p>[40 CFR 247.4]</p>	2
6.	<p>Does the park have an EP Program that includes:</p> <ul style="list-style-type: none"> • A preference for purchasing goods designated under EPA's CPG; • A preference for including EP requirements in contracts; • Methods of promoting the park's EP activities; • Procedures for obtaining and verifying estimates of recycled content from vendors and contractors; and • An annual review and monitoring of program effectiveness? <p>[40 CFR 247.6]</p> <p><i>PRIZIM AUDITORS: This finding is a regulatory finding that applies to the agency level. Any agency that spends over \$10,000.00 on any one item must have an affirmative procurement program (APP) otherwise known as an EP. The NPS has developed a Environmental Purchasing Guide 2006, that recommends that park employees engaging in acquisitions develop strategies and plans to meet the goals of the NPS policy, to purchase environmentally preferable products. In essence, this means that the requirement for developing an EP has fallen down to the facility level as there is no nation-wide EP program. For parks where less than \$10,000.00 was spent in a given year on any one product, this is a BMP finding.</i></p> <p><i>Keep in mind that park staff may be compliant with this finding, but not finding #14. Please read the language closely to ensure that provisions of each of these similar findings are met.</i></p>	2, 4



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

v02	CHECKLIST ITEM	PRIORITY
15.	<p>Are park employees purchasing paper with the minimum percentage of post consumer recovered materials required by the EPA (with at least a minimum of 30%)? [40 CFR 247.10]</p> <p>Is writing and printing paper uncoated? [EO 13514, Section 2 (e)(iv)]</p> <p>Note: See finding 13. Remember that this only applies when CPG items were not purchased within the period of review. So if a product has not been purchased in ten years, and the park is using a product that was purchased ten years ago, this finding will not apply unless new products were purchased within the period of review.</p>	2
16.	<p>Are park employees purchasing re-refined oils, retread tires, and reclaimed engine coolants (all with post consumer recovered materials)? [40 CFR 247.11]</p> <p>Note: See finding 13. Remember that this only applies when CPG items were not purchased within the period of review. So if a product has not been purchased in ten years, and the park is using a product that was purchased ten years ago, this finding will not apply unless new products were purchased within the period of review.</p> <p>Reclaimed engine coolants are required to be purchased by regulation. These are different than less toxic engine coolants (e.g., propylene glycol) which are a good idea for purchase, but are not required for purchase. The purchase of less toxic engine coolants is a BMP.</p>	2
17.	<p>Are park employees purchasing construction materials with the minimum percentage of post consumer recovered materials required by the EPA for typical construction products including:</p> <ul style="list-style-type: none"> • Building insulation products; • Structural fiberboard or laminated paperboard products; • Cement and concrete; • Carpet; • Floor tiles; • Shower and restroom dividers; • Paint to cover graffiti; • Roofing materials; • Nonpressure piping; • Modular threshold ramps; and • Railroad grade crossing surfaces? <p>[40 CFR 247.12]</p> <p>Note: See finding 13. Remember that this only applies when CPG items were not purchased within the period of review. So if a product has not been purchased in ten years, and the park is using a product that was purchased ten years ago, this finding will not apply unless new products were purchased within the period of review.</p>	2



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

v02	CHECKLIST ITEM	PRIORITY
18.	<p>Are park employees purchasing traffic and transportation products made from recovered plastic, rubber or steel for the following products:</p> <ul style="list-style-type: none"> • Traffic barricades; • Traffic cones; • Parking stops; • Channelizers; and/or • Delineators? <p>[40 CFR 247.13]</p> <p>Note: See finding 13. Remember that this only applies when CPG items were not purchased within the period of review. So if a product has not been purchased in ten years, and the park is using a product that was purchased ten years ago, this finding will not apply unless new products were purchased within the period of review.</p>	2
19.	<p>Are park employees purchasing and using recovered plastic, aluminum, concrete, rubber or steel for building new recreational equipment as playground surfaces and equipment, fencing, and park benches?</p> <p>[40 CFR 247.14]</p> <p>Note: See finding 13. Remember that this only applies when CPG items were not purchased within the period of review. So if a product has not been purchased in ten years, and the park is using a product that was purchased ten years ago, this finding will not apply unless new products were purchased within the period of review.</p>	2
20.	<p>Are park employees purchasing recovered landscaping products including mulch, compost, plastic or rubber hoses, plastic or rubber edging, and plastic or rubber posts?</p> <p>[40 CFR 247.15]</p> <p>Note: See finding 13. Remember that this only applies when CPG items were not purchased within the period of review. So if a product has not been purchased in ten years, and the park is using a product that was purchased ten years ago, this finding will not apply unless new products were purchased within the period of review.</p>	2
21.	<p>Are park employees purchasing the following non-paper products using recovered plastic or other materials:</p> <ul style="list-style-type: none"> • Waste receptacles; • Desktop accessories; • Toner cartridges; • Binders and clipboards; • Trash bags; • Printer ribbons; • Plastic envelopes; and • Folders, presentation binders, and portfolios? <p>[40 CFR 247.16]</p> <p>Note: See finding 13. Remember that this only applies when CPG items were not purchased within the period of review. So if a product has not been purchased in ten years, and the park is using a product that was purchased ten years ago, this finding will not apply unless new products were purchased within the period of review.</p>	2



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

v02	CHECKLIST ITEM	PRIORITY
22.	<p>Do park employees purchase any of the following products with recovered materials:</p> <ul style="list-style-type: none"> • Pallets; • Sorbents; • Industrial drums; • Awards and Plaques; • Mats; • Non-road signs and sign supports; and • Manual Grade strapping? <p>[40 CFR 247.17]</p> <p>Note: See finding 13. Remember that this only applies when CPG items were not purchased within the period of review. So if a product has not been purchased in ten years, and the park is using a product that was purchased ten years ago, this finding will not apply unless new products were purchased within the period of review.</p>	2
33.	<p>Do park employees purchase commercial or industrial products (other than food or feed), that is composed in whole or in significant part, of biological products or renewable domestic agricultural materials (including plant, animal, and marine materials) or forestry materials?</p> <p>[7 USC 8102 (c)(1)]</p>	2
45.	<p>When acquiring an electronic products are park employees ensuring a preference for Electronic Product Environmental Assessment Tool (EPEAT)-registered electronic product, unless there is no EPEAT standard for such product?</p> <p>[EO 13514, Section 2(i)(i)]</p> <p>Are park employees ensuring that it meets at least 95 percent of the requirements with an EPEAT-registered electronic product, unless there is no EPEAT standard for such product?</p> <p>[EO 13423, Section 2(h)(i)]</p>	3
46.	<p>Are park employees enabling the Energy Star feature on agency computers and monitors?</p> <p>[EO 13514, Section 2(i)(iv)]</p>	3
47.	<p>Are park employees establishing and implementing policies to extend the useful life of agency electronic equipment?</p> <p>[EO 13423, Section 2(h)(iii)]</p>	3
53.	<p>Are staff incorporating BMPs into energy efficient management of servers data centers?</p> <p>[EO 13514, Section 2 (i) (v)]</p>	3
54.	<p>Are park staff establishing and implementing policies to enable power management, duplex printing, and other energy-efficient or environmentally preferable features on all eligible agency electronic products?</p> <p>[EO 13514, Section 2(i)(ii)]</p>	3



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

v02	CHECKLIST ITEM	PRIORITY
<i>Toxics Reduction</i>		
8.	<p>Are park staff reducing and minimizing the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of? [EO 13514, Section 2 (e)(v)]</p> <p>To demonstrate this, have park employees developed written goals and support actions to identify and reduce the release and use of toxic and hazardous chemicals materials, including toxic chemicals, hazardous substances, ozone-depleting substances (ODSs), and other pollutants that may result in significant harm to human health or the environment? [BMP related to EO 13423, Section 2 (e); implementing instructions]</p> <p>In identifying the list of toxic chemicals, hazardous substances, and other pollutants, park employees should consider:</p> <ul style="list-style-type: none"> • Quantity of the chemical or material in use; • Human and/or environmental toxicity of the chemical; • Potential for human and/or environmental exposure to the chemical; • Potential harm to the environment associated with the use or release of the chemical or material, including impacts to air quality, surface water, groundwater, soils/land, and climate systems; • Persistence of the chemical in the environment; • Availability of controls to manage identifiable risks; • Impacts on mission capability and business costs; • Existing environmental hazard lists such as priority chemicals identified by EPA's Resource Conservation Challenge (http://www.epa.gov/osw/hazard/wastemin/priority.htm), and any agency-specific toxic or hazardous chemicals lists; • The available substitutes for ODSs identified by EPA's SNAP; • Contaminants identified by the USGS as part of its National Reconnaissance of Emerging Contaminants; and • Where appropriate, regional- and watershed-based environmental improvement efforts such as the Chesapeake Bay Prioritized Chemicals of Concern Program, the Great Lakes Bi-national Strategy or local watershed efforts. 	3
<i>Pollution Prevention</i>		



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

v02	CHECKLIST ITEM	PRIORITY
12.	<p>Do park employees have a program or strategy in place to:</p> <ul style="list-style-type: none"> • Reduce the fleet's total consumption of petroleum products by two percent annually through the end of fiscal year 2015; • Increase the total fuel consumption that is non-petroleum based by ten percent annually; • Use plug-in hybrid (PIH) vehicles when PIH vehicles are commercially available at a cost reasonably comparable, on the basis of life-cycle cost, to non-PIH vehicles? <p>[EO 13423, Section 2(g)]</p> <p>Note: The following are some (but not all) strategies to meet this goal:</p> <ul style="list-style-type: none"> • Use of alternative fuels; • Use of vehicles with higher fuel economy; • Consolidation of vehicle trips; • Decrease in vehicle miles traveled; and • Decrease in fleet size. <p><i>This applies to parks that have fleets with 20 or more vehicles. Where fleets have less than 20 vehicles this is a priority 4 finding.</i></p>	3
51.	<p>Are park staff:</p> <ul style="list-style-type: none"> • Using low GHG emitting vehicles including AFVs, • Optimizing the number of vehicles in the vehicle fleet; and • Reducing, if the agency operates a fleet of at least 20 motor vehicles, the agency fleet's total consumption of petroleum products by a minimum of 2 percent annually through the end of fiscal year 2020, relative to a baseline of fiscal year 2005. <p>[EO 13514, Section 2(a)(iii)]</p> <p><i>This applies to parks that have fleets with 20 or more vehicles. Where fleets have less than 20 vehicles this is a priority 4 finding.</i></p>	3
<i>Energy and Water Conservation</i>		
34.	<p>Can park employees demonstrate that they are improving energy efficiency and reducing greenhouse gas emissions through reduction of energy intensity by (i) 3 percent annually through the end of FY 2015, or (ii) 30 percent by the end of FY 2015, relative to the baseline of the agency's energy use in FY 2003?</p> <p>[EO 13423, Section 2 (a)]</p>	3
35.	<p>Can park employees demonstrate that (i) at least half of the statutorily required renewable energy consumed in a fiscal year comes from new renewable sources, and (ii) to the extent feasible, new renewable energy generation projects are being implemented for facility use?</p> <p>[EO 13423, Section 2(b)]</p>	3
36.	<p>Can park employees demonstrate that they are reducing potable water consumption intensity by two % annually through fiscal year 2020, or 26 % by the end of fiscal year 2020, relative to a baseline of the agency's water consumption in fiscal year 2007, by implementing water management strategies including water-efficient and low-flow fixtures and efficient cooling towers?</p> <p>[EO 13514, section 2 (d)(i)]</p>	3



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

v02	CHECKLIST ITEM	PRIORITY
52.	Can park employees demonstrate that they are reducing agency industrial, landscaping, and agricultural water consumption by two % annually or 20 % by the end of fiscal year 2020 relative to a baseline of the agency's industrial, landscaping, and agricultural water consumption in fiscal year 2010? [EO 13514, section 2 (d)(ii)]	3
55.	Are park staff participating in regional transportation planning to recognize existing community infrastructures? [EO 13514, Section (f)(i)]	3
<i>Building design and construction</i>		
42.	Are park staff ensuring that all new construction, major renovation, or repair and alteration of Federal buildings complies with the <i>Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings (Guiding Principles)</i> ? [EO 13514, Section 2 (g)(ii)] Are park employees meeting or exceeding statutory goals and addressing each of the five <i>Guiding Principles</i> ? [EO 13423, Section 2 (f)(i)] Note: The <i>Guiding Principles</i> are set forth in the 2006 Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding.	3
43.	Are park staff ensuring that at least 15 % of the agency's existing buildings (above 5,000 gross square feet) and building leases (above 5,000 gross square feet) meet the <i>Guiding Principles</i> by fiscal year 2015 and that the agency makes annual progress toward 100 % conformance with the <i>Guiding Principles</i> for its building inventory? [EO 13514, Section 2(g)(iii)]	3
48.	Beginning in 2020 and thereafter, are park staff ensuring that all new Federal buildings that enter the planning process are designed to achieve zero-net-energy by 2030? [EO 13514, Section 2(g)(i)]	3
49.	Are park staff managing existing building systems to reduce the consumption of energy, water, and materials, and identifying alternatives to renovation that reduce existing assets' deferred maintenance costs? [EO 13514, Section 2 (g)(v)]	3
50.	Are park staff ensuring that rehabilitation of federally owned historic buildings utilizes best practices and technologies in retrofitting to promote long-term viability of the buildings? [EO 13514, Section 2 (g)(vi)]	3
56.	Are park staff pursuing cost-effective, innovative strategies, such as highly reflective and vegetated roofs, to minimize consumption of energy, water, and materials? [EO 13514, Section 2(g)(iv)]	3

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

V02	CHECKLIST ITEM	PRIORITY
3.	Do park employees incorporate sustainable design principles in design and construction projects and policies? Do park employees consider use of recovered materials and environmentally preferable products and practices? [BMP]	4
9.	Do park employees make an effort to purchase products with fewer hazardous substances? [BMP]	4



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

11.	Are park employees able to demonstrate that they implement cost-effective, environmentally-sound landscaping practices and programs to reduce adverse impacts to the natural environment? [BMP related to former EO 13148, Section 207]	4
25.	Do park employees purchase and use propylene glycol antifreeze instead of ethylene glycol antifreeze? [BMP]	4
26.	Do park employees purchase and use “green-tip” or low mercury containing fluorescent light bulbs (where appropriate)? [BMP]	4
27.	Are park employees purchasing latex or water based paints rather than oil based paints? [BMP]	4
28.	Do park employees make an effort to purchase products that are produced locally? [BMP]	4
29.	Have park employees converted to purchasing green janitorial products and practices? [BMP]	4
30.	Are chlorine-free paper products (e.g., paper towels and paper) purchased and used by park employees? [BMP]	4
31.	Are products evaluated for reduced packaging, packaging made from recycled materials, or packaging which could be recycled? [BMP]	4
32.	Have park employees incorporated EP requirements and/or guidelines into concession contracts developed after 2000? [BMP]	4
37.	Are park employees implementing distributed generation systems in new construction or retrofit projects (including renewable systems such as solar electric, solar lighting, geo (or ground coupled) thermal, small wind turbines, as well as other generation systems such as fuel cell, cogeneration, or highly efficient alternatives)? [BMP related to EO 13423, Section 2 (a); implementing instructions]	4
38.	Are park employees installing metering devices that measure consumption of potable water, electricity, and thermal energy in Federal buildings and other facilities and grounds? Is data collected incorporated into Federal tracking systems made available to Federal facility managers? [BMP related to EO13423, Section 2(b); implementing instructions]	4
39.	Are park employees purchasing electricity and thermal energy from sources that use high efficiency and low-carbon generating technologies in order to reduce greenhouse gas intensity to the extent possible? [BMP related to EO 13423, Section 2(b); implementing instructions]	4
40.	Are park employees purchasing WaterSense (SM) labeled products and choosing irrigation contractors who are certified through a WaterSense labeled program? [BMP related to EO 13423, Section 2(c); implementing instructions] Note: EPA’s WaterSense program is a voluntary public-private partnership that identifies and promotes highperformance products and programs that help preserve the nation’s water supply. More information can be found at www.epa.gov/watersense .	4



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Environmental Purchasing
(formerly Green Procurement)
2010 Update

41.	<p>Are park staff purchasing commercially available, off-the-shelf energy-consuming products, agencies shall purchase products that use no more than one watt of standby power as defined and measured by International Electrotechnical Commission (IEC) code 62301, or otherwise meet FEMP specifications for low standby power consumption? [BMP related to EO 13423, Section 2(a); implementing instructions]</p> <p>Note: If FEMP has not specified a standby power level for a product category, agencies shall purchase products with the lowest standby power consumption available.</p>	4
44.	<p>Are park employees including a preference for buildings that meet the goals of the <i>Guiding Principles</i> in the selection criteria for acquiring leased buildings? When entering into leases for Federal occupancy, including the renegotiation or extension of existing leases, are park employees including criteria encouraging lease provisions that support the <i>Guiding Principles</i>? [BMP related to EO 13423, Section 2 (f); implementing instructions]</p>	4



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Fuel Storage Management
2012 Update*

INTRODUCTION

This EnviroCheck Sheet covers the federal regulations applicable to tanks storing liquid fuels. Underground storage tanks (USTs) are regulated under the Resource Conservation and Recovery Act (RCRA). Both USTs and aboveground storage tanks (ASTs) may be covered by the Occupational Safety and Health Administration (OSHA) and Clean Water Act requirements. Note that specific Spill Prevention Control and Countermeasure (SPCC) program requirements are included in the SPCC Planning EnviroCheck Sheet, and that storage of fuels in containers is covered under OSHA under the Hazardous Materials Management EnviroCheck Sheet.

It is estimated that the National Park Service (NPS) manages fuel in over 4,000 USTs and ASTs nationwide. While many USTs have been replaced with newer ASTs, USTs still represent a significant environmental liability for the NPS. Consider the following:

- Twenty-five percent of the federally regulated USTs in the United States may be leaking; this does not include ASTs which also pose a significant environmental threat.
- Over the last six years, over \$15 million was spent on NPS fuel-related cleanup.
- Fines for noncompliance with fuel storage regulations can be substantial: improper or lack of filing UST notifications alone can result in a fine of \$10,000 per tank and more significant issues can result in fines up to \$27,500 per violation per day.
- Additional threats to water quality are now posed from gasoline storage tanks that contain up to 15 percent by volume of the fuel additive MTBE that degrades less readily and travels more quickly than other fuel components in groundwater. MTBE dissolves in water, making it extremely costly and difficult to remediate if spilled.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use these data to populate the regulatory findings database that will be submitted to and used by the park. These data will also be used to populate the Environmental Condition Assessment database.

Ask to review the following written records, if available:

- UST and AST inventory registration records for all in-service, temporarily out-of-service, and permanently closed tanks
- Records for UST disposal, closure, and removal
- Tank inspection records or integrity tests
- Tank maintenance, leak detection, and corrosion protection activities

Ask to interview or plan to contact the following park personnel:

- Maintenance supervisor
- Ranger dispatchers and responders
- Auto mechanics
- Buildings and utilities staff.
- Engineer or other responsible for tank inventory and maintenance
- Concession specialist

During the walk-around of the park, observe the following:

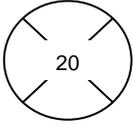
- USTs and ASTs
- Any areas storing petroleum or non-petroleum oils
- Spill cleanup equipment
- Refueling areas
- Venting
- Fill pipes
- Vehicle maintenance area
- Tank leak detection systems and alarms
- Methods of inventory control



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Fuel Storage Management
2012 Update*

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

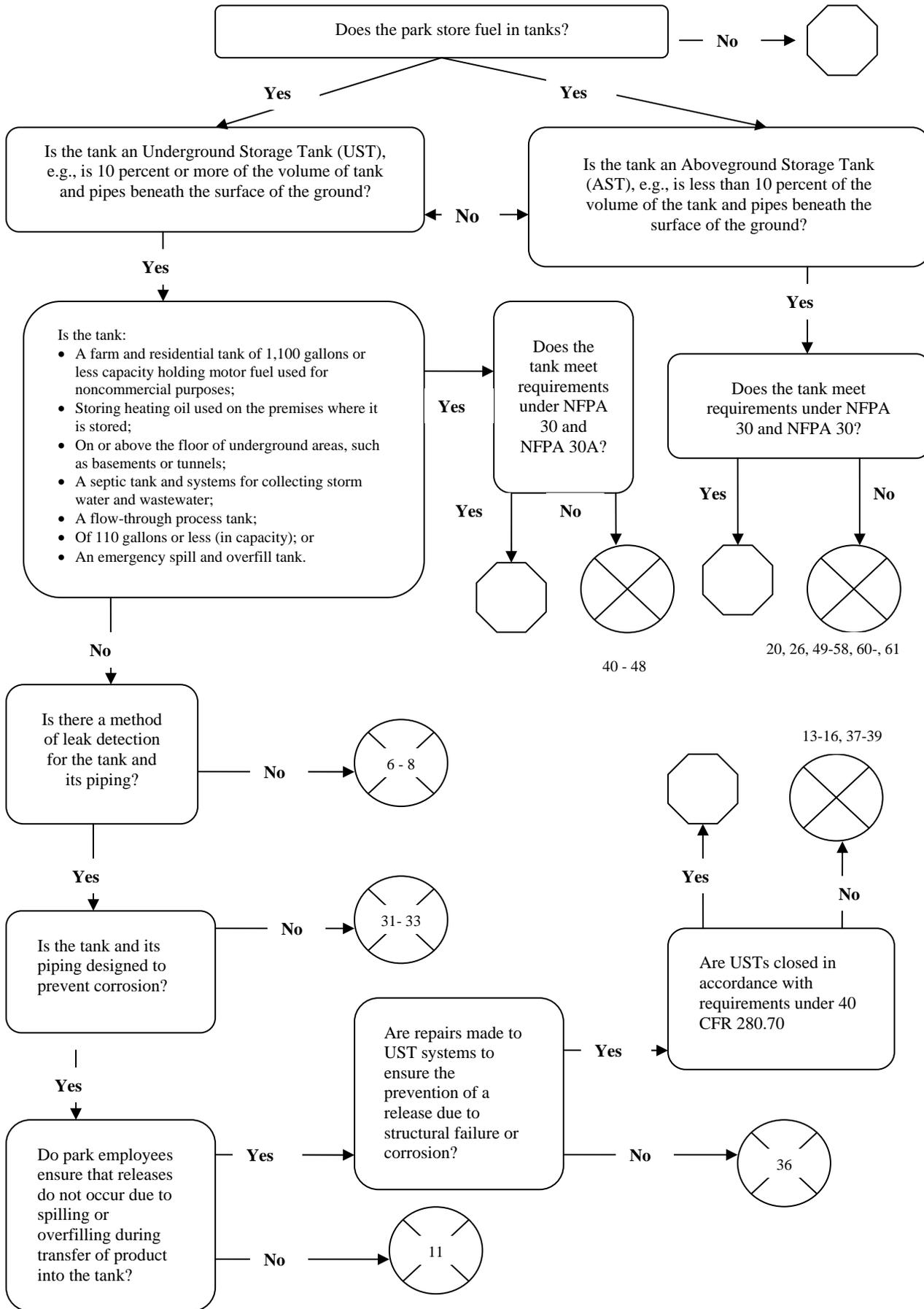


*Indicates that the regulatory
requirement has been met and that the
train of questions can stop.*



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Fuel Storage Management
2012 Update*





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., Executive Orders or NPS Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>General – ALL tanks</i>		
3.	<p>Have fuel tanks been registered with the state or local authority, or department designated in Appendix II of 40 CFR 280, in accordance with federal and state/local requirements?</p> <ul style="list-style-type: none"> • If required, are USTs properly registered? [40 CFR 280.22] • If required, are ASTs properly registered? [See State/Local Specific Rules; may not be applicable in all locations or for all ASTs] <p><i>AUDITORS: Research in advance whether state requires registration for ASTs.</i></p>	2
10.	<p>Are precautions taken to prevent ignition by eliminating or controlling sources of ignition near fuel storage areas (e.g., are “No smoking” signs placed prominently, are there no other ignition sources such as sparks or open flames)?</p> <p>[29 CFR 1910.106(b)(6); also NFPA 30, 21.6.2, and NFPA 30, 6.5.1]</p>	2
25.	<p>Is any portion of the AST/UST or its piping that comes into contact with the ground protected so that exposure to corrosion is minimized?</p> <p>[29 CFR 1910.106(c)(5) for piping 29 CFR 1910.106(b)(3)(iii) for USTs and piping 29 CFR 1910.106(b)(5)(v) for ASTs resting on foundations NFPA 30A, 4.3.8 for tanks and piping]</p> <p><i>AUDITORS: Use the most stringent requirement.</i></p>	2/3
41.	<p>Does the park require initial and routine strength and tightness testing per manufacturer specifications, and ensure the tanks are repaired and tested before they are placed into service or after they are re-located?</p> <p>[29 CFR 1910.106(b)(7); also NFPA 30, 21.5.1, NFPA 30 21.5.2, and NFPA 30, 21.5.3]</p> <p>Note: The American Society of Mechanical Engineers (ASME) code stamp, American Petroleum Institute (API) monogram, or the label of the Underwriters' Laboratories, Inc. (UL) is evidence of compliance with the initial strength test.</p> <p><i>AUDITORS: Use the most stringent requirement.</i></p>	2/3
46.	<p>Are tanks installed and designed in accordance with recognized engineering standards?</p> <p>[NFPA 30, 21.3.1]</p> <p>Note: This standard is related to the installation of the tank.</p>	3
109.	<p>Are tanks designed and built in accordance with recognized engineering standards for the material of construction being used?</p> <p>[NFPA 30, 21.3.4]</p> <p>Note: This standard is related to the construction of the tank itself.</p>	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>Underground Storage Tanks(USTs)</i>		
<i>USTs regulated under 40 CFR 280</i>		
5.	Have all existing UST systems been upgraded to meet performance standards under 40 CFR 280.20, by December 22, 1998? [40 CFR 280.21] Note: Performance standards generally include leak detection, corrosion protection, overfill protection, and other measures to ensure the integrity of USTs.	2
6.	Have all UST systems and associated piping been installed in accordance with a code of practice developed by a nationally recognized testing agency and in accordance with manufacturer's instructions? [40 CFR 280.20 (d)]	2
<i>Release Detection</i>		
7.	Has a specific method of release detection been chosen for each UST (e.g., monthly inventory control, manual or automatic tank gauging, tank tightness testing)? [40 CFR 280.43]	2
8.	Is the release detection method chosen able to detect a release from any portion of the tank and the connected underground piping that routinely contains product in the UST system? [40 CFR 280.40 (a)]	2
110.	Is the UST monitored for releases at least every 30 days? If not, does the UST meet the following criteria: <ul style="list-style-type: none"> • Meets the tank and piping construction material, spill and overfill prevention, corrosion protection, and installation performance standards in 40 CFR 280.20 or 280.21, and the monthly inventory control requirements in 40 CFR 280.43 (a) or (b), and conducts tank tightness testing every 5 years (for up to 10 years after the tank was installed or upgraded); or • Is 550 gallons or less and uses weekly manual tank gauging. [40 CFR 280.41 (a)]	2
108.	Is underground piping routinely monitored for releases in a manner that meets one of the following requirements: <ul style="list-style-type: none"> • Pressurized piping: (i) Equipped with an automatic line leak detector (ALLD); and (ii) Have an annual line tightness test. • Suction piping. A line tightness test conducted at least every three years. • Safe Suction piping: No requirements if suction piping is designed and constructed to meet the following standards: <ul style="list-style-type: none"> (i) The below-grade piping operates at less than atmospheric pressure; (ii) The below-grade piping is sloped so that the contents of the pipe will drain back into the storage tank if the suction is released; (iii) Only one check valve is included in each suction line; (iv) The check valve is located directly below and as close as practical to the suction pump; and (v) A method is provided that allows compliance of this section to be readily determined. [40 CFR 280.41 (b)]	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>Corrosion Protection</i>		
31.	<p>Is the UST and its piping designed to prevent corrosion? Specifically, is the tank:</p> <ul style="list-style-type: none"> • Constructed from Fiberglass Reinforced Plastic (FRP); • Constructed from steel and cathodically protected by having the tank coated with a dielectric material, designed by a corrosion expert if the cathodic protection system is field-installed, and operated and maintained in accordance with 40 CFR 280.31. If an impressed current system is used, it is designed to allow determination of current operating status; • Constructed from a steel FRP composite; • Constructed of metal with no other corrosion protection provided that the tank is in a place determined by a corrosion expert not to be corrosive enough to have a release due to corrosion during its operating life; or • Considered by the implementing agency to be acceptable? <p>[40 CFR 280.20 (a)]</p>	2
106.	<p>Are tank corrosion protection systems operated and maintained to continuously provide corrosion protection to the metal components of the tank and piping that routinely contain regulated substances and are in contact with the ground?</p> <p>[40 CFR 280.31 (a)]</p>	2
32.	<p>Are tanks with cathodic protection as a means of corrosion protection inspected within six months of installation and once every three years after, or another reasonable timeframe established by the implementing agency?</p> <p>[40 CFR 280.31 (b)(1)]</p>	2
33.	<p>Are tanks with an impressed current system as a means of corrosion protection inspected every 60 days?</p> <p>[40 CFR 280.31 (c)]</p>	2
107.	<p>Are records of the operation of the cathodic protection system maintained to demonstrate compliance with the performance standards? Do the records provide the following:</p> <ul style="list-style-type: none"> • The results of the last three inspections for impressed current cathodic protection systems (60-day inspections required by 40 CFR 280.31 (b)(1)); and • The results of testing from the last two inspections for all cathodic protection systems (3-year inspections required by 40 CFR 280.31 (c))? <p>[40 CFR 280.31 (d)]</p>	2
111.	<p>If repairs were made to the cathodically protected UST system, was the cathodic protection system tested within 6 months by a qualified cathodic protection tester in accordance with a code of practice developed by a nationally recognized association per 40 CFR 280.31 (b) and (c) to ensure that the cathodic protection is operating properly?</p> <p>[40 CFR 280.33 (e)]</p>	2
<i>Spill and Overfill Prevention</i>		
34.	<p>Is spill prevention equipment used that will prevent release of product to the environment when the transfer hose is detached from the fill pipe (e.g., a spill catchment basin)?</p> <p>[40 CFR 280.20 (c)(i)]</p> <p>Note: This requirement is applicable only when more than 25 gallons of fuel is transferred at one time.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
112.	<p>Is overfill prevention equipment used that will:</p> <ul style="list-style-type: none"> • Automatically shut off flow into the tank when the tank is no more than 95 percent full; • Alert the transfer operator when the tank is no more than 90 percent full by restricting the flow into the tank or triggering a high-level alarm; or • Restrict flow 30 minutes prior to overfilling, alert the operator with a high level alarm one minute before overfilling, or automatically shut off flow into the tank so that none of the fittings located on top of the tank are exposed to product due to overfilling? <p>[40 CFR 280.20 (c)(ii); also NFPA 30 21.7.1.5]</p> <p>Note: This requirement is applicable only when more than 25 gallons of fuel is transferred at one time.</p>	2
11.	<p>Do park employees ensure that releases do not occur due to spilling or overfilling by ensuring that the volume available in the tank is greater than the volume of product to be transferred to the tank before the transfer is made and that the transfer operation is monitored constantly? [40 CFR 280.30 (a)]</p> <p>Methods to ensure there are not spills or overfills may include:</p> <ul style="list-style-type: none"> • Park staff ensures that fuel delivery personnel are knowledgeable about the specific tank filling procedures for the park's tanks. • The tank is gauged prior to delivery to ensure there is sufficient space for product receipt. 	2
35.	<p>Do park employees report, investigate, and clean up any spills and overfills in accordance with 40 CFR 280.53 (regulations pertaining to the reporting and cleanup of spills and overfills). This includes:</p> <ul style="list-style-type: none"> • Containing and immediately cleaning up a spill or overfill from a UST; • Reporting the spill or overfill to the implementing agency within 24 hours or another time period specified by the implementing agency if it is a petroleum spill that exceeds 25 gallons, causes a sheen on nearby surface water, or cannot be cleaned up within 24 hours. <p>[40 CFR 280.30 (b)]</p>	2
<i>Recordkeeping and Reporting</i>		
9, 12.	<p>Is the following information maintained onsite, immediately available for inspection? [40 CFR 280.34(c)]</p> <ul style="list-style-type: none"> • Corrosion expert's analysis of site corrosion potential if corrosion protection equipment is not used; [40 CFR 280.20(a)(4) and 280.20 (b)(3)] • Documentation of operation of corrosion protection equipment; [40 CFR 280.31] • Documentation of UST system repairs; [40 CFR 280.33 (f)] • Recent compliance with release detection requirements; and [40 CFR 280.45] • Results of the site investigation conducted at any permanently closed tank [40 CFR 280.74)] 	2
36.	<p>Has the following documented information been reported to the appropriate federal, state or local implementing agency? [40 CFR 280.34 (a)]</p> <ul style="list-style-type: none"> • Notification to the proper federal, state or local agency administering the UST program, including a certification of installation for new UST systems; [40 CFR 280.22 and 40 CFR 280.20 (e)] • Reports of releases or spills; [40 CFR 280.53 and 40 CFR 280.61] • Corrective actions taken including initial abatement, site characterization, free product removal, investigation of soil and groundwater cleanup, and a corrective action plan; and [40 CFR 280.62-280.66] • Notification of permanent closure or change-in-service? [40 CFR 280.71] 	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>Tank Repairs</i>		
37.	Are repairs made to UST systems to ensure the prevention of a release due to structural failure or corrosion? Do repairs meet the requirements outlined in 40 CFR 280.33? [40 CFR 280.33]	2
<i>Tank Closure</i>		
13.	When an UST system is temporarily closed, does the park continue the operation and maintenance of corrosion protection and leak detection requirements? [40 CFR 280.70 (a)]	2
38.	When a UST system is temporarily closed for 3 months or more, does the park leave the tank vent lines open and functioning, and cap and secure all other lines, pumps, manways, and ancillary equipment? [40 CFR 280.70 (b)]	2
39.	When a UST is temporarily closed for more than 12 months does the park ensure that it meets the requirements for a permanently closed tank, or does the park obtain an extension from the implementing agency? [40 CFR 280.70(c)]	2
14.	Are UST systems closed in accordance with state and local requirements including site investigation and tank disposal? Was the closure documented with the state or local authority, at least 30 days before permanently closing the tank? [40 CFR 280.71(a)]	2
15.	Are permanently closed tanks emptied and cleaned (by removing all liquids and accumulated sludge) and are they removed from the ground or filled with an inert solid material (like sand)? [40 CFR 280.71(b)]	1
16.	If a UST systems was permanently closed or if there was a change-in-service of a tank system, was the UST system site assessed to determine the presence of a release where contamination is most likely to be present? [40 CFR 280.72]	2
40.	Are permanent closure records regarding the site assessment under 40 CFR 280.72 maintained for a period of 3 years after the tank has been closed? [40 CFR 280.74]?	2
<i>Tank Operator Training</i>		
87.	Have UST operators been provided with State UST Operator Training? [119 STAT. 1093 PUBLIC LAW 109-58; Section 9010 (c)] Note: This will be required August 8, 2012 for all states. Until that time, this is a BMP unless state requirements specify an earlier date. After that date, this becomes a Priority 2 finding.	2 or 4
<i>USTs <u>NOT</u> regulated by 40 CFR 280</i>		
42.	For USTs storing Class I liquids, are accurate inventory records or a leak detection program maintained for indication of possible leakage from the tanks or associated piping? Does the inventory include: <ul style="list-style-type: none"> • Date; • Amount delivered; and • Amount used between deliveries? [NFPA 30, 21.7.5]	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
43.	Does the park require the use of spill and overfill prevention equipment for USTs? In particular, are USTs equipped with the following: <ul style="list-style-type: none"> - Automatic shut-off of flow of liquid when the tank is no more than 95% full; - An alert to notify the transfer operator when the tank is no more than 90% full by restricting the flow of liquid into the tank or by triggering the high level alarm; or - Other approved methods. [NFPA 30, 21.7.1.5]	3
44.	Is corrosion protection provided for USTs and its piping by one of the following methods: <ul style="list-style-type: none"> • Use of protective coatings or wrappings; • Cathodic protection; or • Corrosion resistant materials of construction? [29 CFR 1910.106(b)(3)(iii)]	2
47.	When USTs are temporarily closed, do the following occur: <ul style="list-style-type: none"> • Corrosion protection and release detection systems are left operating; • Vent line is left open and functioning; • Tank is secured against tampering; and • All other lines are capped or plugged? [NFPA 30, 21.7.4.3.2]	3
48.	When USTs are temporarily closed for more than one year, does the park remove them or close them permanently? [NFPA 30, 21.7.4.3.2.1]	3
49.	Are the following requirements met when permanently closing a UST: <ul style="list-style-type: none"> • Implementing agency is notified of closure by the park; • Flammable and combustible liquids and residues are removed from the tank, piping, and appurtenances; • Potential explosive atmosphere in the tank is inerted; • Tank atmosphere is tested for safety; • Access to the tank is made by careful excavation to the top of the tank; • Tank is completely filled with inerted material; • Tank parts are removed and disposed of properly; and • Excavation is backfilled? [NFPA 30, 21.7.4.3.3]	3
<i>Aboveground Storage Tanks</i>		
<i>Storage and Construction</i>		
26.	Is a color code or other marking used to identify the product for which the tank is used? [NFPA 30, 21.7.2.1]	3
55.	Is each tank anchored and supported to meet good engineering practices and to withstand earthquakes in earthquake prone areas? [NFPA 30, 22.5.1.3]	3
113.	Is the tank foundation designed to minimize the possibility of uneven settling of the tank and to minimize corrosion in any part of the tank resting on the foundation? [NFPA 30, 22.5.2.2]	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
105.	<p>Where a tank is located in an area subject to flooding, are provisions taken to prevent the tank from floating during a rise in water level (up to the established maximum flood stage)?</p> <p>[NFPA 30, 22.5.2.5]</p> <p>Are vaulted tanks (part of dispensing systems only) anchored to resist uplifting by groundwater or flooding?</p> <p>[NFPA 30A, 4.3.3.3.2.1]</p>	3
20.	<p>Do vent pipes for normal tank venting terminate at least 12 feet above ground level for Class I liquids stored adjacent to buildings or public ways?</p> <p>Are vent outlets located so that vapors are not trapped by eaves or other obstructions, and at least five feet from building openings?</p> <p>[29 CFR 1910.106 (b)(2)(vi)(b)]</p>	2
22.	<p>Are openings for gauging provided with a vapor tight cap or cover?</p> <p>[29 CFR 1910.106 (b)(2)(viii)(d)]</p>	2
57.	<p>Does the park store ASTs containing Class I liquids in basements?</p> <p>[NFPA 30, 9.3.6]</p>	3
58.	<p>Does the park provide protection to the tank in areas where it is likely that there could be a collision with the tank from vehicular impact?</p> <p>[NFPA 30, 22.15]</p>	3
59.	<p>Is the area where a tank is stored protected from tampering or trespassing?</p> <p>[NFPA 30, 21.7.2.2]</p>	3
<i>Closure</i>		
61.	<p>Are ASTs taken out of service emptied of liquid, rendered vapor-free, and safeguarded against trespassing?</p> <p>[NFPA 30, 21.7.4.1]</p>	3
62.	<p>Are ASTs only re-used for storage of other flammable or combustible liquids when approved by the implementing agency?</p> <p>[NFPA 30, 21.7.4.2]</p>	3
<i>Fuel Dispensing Systems (this is for USTs AND ASTs unless specified)</i>		
27.	<p>Are all openings to the ASTs above the normal maximum liquid level?</p> <p>[NFPA 30A, 4.3.6.1]</p>	3
63.	<p>Is a method available to determine the liquid level in each AST, and is this method accessible to the fuel delivery operator?</p> <p>[NFPA 30A, 4.3.6.2]</p>	3
64.	<p>Is a method provided to sound an audible alarm when the liquid level in the AST reaches 90 percent of capacity?</p> <p>Is a method also provided to automatically stop the flow of liquid into the tank when the liquid level in the tank reaches 98 % capacity or restrict the flow of liquid into the tank to a maximum flow rate of 2.5 gpm (9.5 L/min) when the liquid in the tank reaches 95 % capacity?</p> <p>[NFPA 30A, 4.3.6.3]</p>	3
65.	<p>Are shutoff and check valves equipped with a pressure-relieving device that relieves the pressure generated by thermal expansion back to the tank?</p> <p>[NFPA 30A, 4.3.6.5]</p>	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
88.	Is fuel NOT dispensed from the tank by either gravity flow or pressurization of the tank? [NFPA 30A, 4.3.6.6]	3
19.	Are ASTs that are not enclosed in vaults enclosed with a chain link fence at least 6 ft. high? Is the fence separated from the AST by at least ten feet, and is the fence secured against unauthorized entry? [NFPA 30A, 4.3.7.1 or NFPA 1, 42.3.3.7] Note: ASTs are not required to be enclosed with a fence if the property on which the tanks are located has a perimeter security fence.	3
66.	Are ASTs resistant to damage from the impact of a motor vehicle using bollards or guard posts that: <ul style="list-style-type: none">• Are constructed of steel, filled with concrete, and not less than four inches in diameter;• Are spaced not more than four feet apart;• Are set not less than three feet deep in concrete footing of not less than 15 inches in diameter;• Have the top of posts set not less than three feet above ground and be located not less than five feet from the tank? [NFPA 30A, 4.3.7.2] Note: ASTs approved by UL 2085, <i>Standard for Protected Aboveground Tanks for Flammable and Combustible Liquids</i> , for protected aboveground tanks do not require additional vehicle impact protection.	3
89.	Is piping located so that it is protected from physical damage? Is piping that passes through a dike designed to prevent excessive stresses that could result from settlement or fire exposure? [NFPA 30A, 5.2.2]	3
90.	Is each fill pipe identified by color code or other marking to identify the product for which it is used? [NFPA 30A, 5.2.5] Note: The color code or marking shall be maintained in legible condition throughout the life of the installation.	3
92.	Are all piping and secondary containment piping tested before being covered, enclosed, or placed in service? [NFPA 30A, 5.4.1]	3
93.	Is the interstitial space of secondary containment-type piping tested hydrostatically or with air pressure? Note: Testing should be done at a minimum gauge pressure of 34.5 kPa (5 psi) or tested in accordance with the listing or the manufacturers' instructions. The pressure source should be closed from the system being tested to ensure that the test is being conducted on a closed system. [NFPA 30A, 5.4.2]	3
94.	On remote pressure pumping systems, does each pump have installed, on the discharge side, a listed leak detection device that provides an audible or visible indication if the piping and dispensing devices are not liquid tight? [NFPA 30A, 5.4.4]	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
96.	Do tank vents that are installed within or attached to a canopy extend a minimum five feet above the highest projection of the canopy? [NFPA 30A, 5.6.3]	3
97.	Are dispensing devices installed outside at motor fuel dispensing stations located as follows: <ul style="list-style-type: none"> • Ten feet or more from property lines; • Ten feet or more from buildings, or other than canopies having combustible exterior wall surfaces, or buildings having noncombustible exterior wall surfaces that are not a part of a one-hour fire-resistive assembly; • Such that all parts of the vehicle being served will be on the premises of the service station; and • Such that the nozzle, when the hose is fully extended, will not reach within five feet of building openings? [NFPA 30A, 6.2.1]	3
98.	Are liquids not dispensed by applying pressure to drums, barrels, and similar containers? [NFPA 30A, 6.2.2] Note: Only listed pumps taking suction through the top of the container or listed self-closing faucets shall be used.	3
114.	Are Class I and Class II liquids transferred from tanks by means of fixed pumps designed and equipped to allow control of the flow and prevent leakage or accidental discharge? [NFPA 30A, 6.3.1]	3
67.	Are dispensing devices used for Class I and II liquids listed? [NFPA 30A, 6.3.2]	3
115.	Is a control in place that will permit the pump to operate only when a dispensing nozzle is removed from its bracket and the switch on this dispensing device is manually actuated? Does the control stop the pump when the nozzle has been returned to the bracket (or normal nondispensing position)? [NFPA 30A, 6.3.3]	3
68.	Are dispensing devices mounted on a concrete island or otherwise protected against collision damage? Are dispensing devices securely bolted in place? [NFPA 30A, 6.3.4]	3
116.	Is the motor fuel dispensing facility designed to inhibit movement of vehicles that are not being fueled from passing through the dispensing area? [NFPA 30A, 6.3.7]	3
117.	Where liquid is supplied to the dispensing device under pressure, is a listed, rigidly anchored emergency shutoff valve in place for the pressurized supply line to the dispenser? [NFPA 30A, 6.3.9]	3
99.	Are only listed hose assemblies used to dispense fuel? Does the hose length at automotive motor fuel dispensing facilities not exceed 18 feet? Does the hose length at marine motor fuel dispensing facilities not exceed 18 feet, and if it does, does the hose shall be secured so as to protect it from damage? [NFPA 30A, 6.5.1] Do tank vehicle fuel delivery hoses not exceed 50 feet? [NFPA 30A, 9.6.3]	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
29.	Is a listed emergency breakaway device designed to retain liquid on both sides of the breakaway point installed on each hose dispensing Class I and Class II liquids? [NFPA 30A, 6.5.2]	3
100.	Where hoses are attached to a hose-retrieving mechanism, is the listed emergency breakaway device installed between the point of attachment of the hose-retrieving mechanism to the hose and the hose nozzle valve? [NFPA 30A, 6.5.3]	3
28.	Is a clearly identified and easily accessible switch or circuit breaker provided to shut off power to all dispensing devices in the event of an emergency? [29 CFR 1910.106 (g)(3)(iii)] Is the switch is located between 20 and 100 feet of the dispensing device? [NFPA 30A, 6.7]	3
17.	Are accurate daily inventory records kept on site for indication of possible leakage from USTs and ASTs or piping in fuel dispensing systems? Does the inventory include: <ul style="list-style-type: none"> • Date; • Amount delivered; and • Amount used between deliveries? Are the inventory records kept on the premises? Do records include sales, use, receipts, and inventory? [NFPA 30A, 9.2.1]	3
23.	Is the delivery vehicle separated from any AST containing Class I liquids by at least 25 feet? [NFPA 30A 9.2.2.2] For ASTs containing other than Class I liquids, is the delivery vehicle separated from any AST by at least 15 feet? [NFPA 30A, 9.2.2.2]	3
118.	Do tank vehicle fuel delivery hoses not exceed 50 feet? [NFPA 30A, 9.6.3] Note: This applies to the dispensing of Class I and II liquids in the open from tank vehicles to park vehicles. For example, this would apply to a portable, truck-mounted tank used for dispensing fuel to other vehicles.	3
24.	Does the park ensure that the fuel tank delivery operator determines the tank ullage (available capacity) prior to filling the tank? [NFPA 30A, 9.2.2.4]	3
119.	Does the delivery operator fill the tank using a liquidtight connection? [NFPA 30A, 9.2.2.5]	3
69.	Does the park ensure that smoking materials, including matches and lighters, are not used within 20 feet of areas used for fueling or receiving or dispensing of Class I and Class II liquids? Do park personnel shut off the motors of all equipment being fueled during the fueling operation? [NFPA 30A, 9.2.5.1]	3
120.	Is the fuel dispensing facility equipped with a fire extinguisher? [NFPA 30A, 9.2.5.2]	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
70.	<p>Are warning signs conspicuously posted in the dispensing area?</p> <p>Warning signs should state the following or equivalent wording:</p> <p style="text-align: center;">WARNING</p> <p style="text-align: center;">It is unlawful and dangerous to dispense gasoline into unapproved containers. No smoking. Stop motor.</p> <p style="text-align: center;">No filling of portable containers in or on a motorvehicle. Place container on ground before filling.</p> <p style="text-align: center;">Discharge your static electricity before fueling by touching a metal surface away from the nozzle. Do not re-enter your vehicle while gasoline is pumping. If a fire starts, do not remove nozzle — back away immediately. Do not allow individuals under licensed age to use the pump.</p> <p>[NFPA 30A, 9.2.5.4]</p>	3
71.	<p>Is the dispensing area and the area within any dike kept free of vegetation or debris that is not necessary to the proper operation of the fuel dispensing area?</p> <p>[NFPA 30A, 9.2.7]</p>	3
72.	<p>For unattended fueling stations, are operating instructions conspicuously posted in the dispensing area? Do the instructions include location of emergency controls and require that the user stay outside of his/her vehicle in view of the fueling nozzle during dispensing?</p> <p>[NFPA 30A, 9.5.2]</p>	3
73.	<p>For unattended fueling stations, are emergency instructions conspicuously posted in the dispensing area?</p> <p>The instructions should state the following or equivalent wording:</p> <p style="text-align: center;">Emergency Instructions</p> <p style="text-align: center;">In case of fire or spill:</p> <p style="text-align: center;">(1) Use emergency stop button. (2) Report accident by calling (specify local fire number). Report location.</p> <p>[NFPA 30A, 9.5.3]</p>	3
74.	<p>Are nighttime deliveries only made in areas that are adequately lighted?</p> <p>[NFPA 30A, 9.6.5]</p>	3
101.	<p>Are the tank vehicle flasher lights in operation while dispensing operations are in progress?</p> <p>[NFPA 30A, 9.6.6]</p>	3
102.	<p>Is expansion space left in each fuel tank to prevent overflows in the event of temperature increase?</p> <p>[NFPA 30A, 9.6.7]</p>	3
<i>Marine Fueling</i>		
30.	<p>At marine terminals, are smoking and open flames prohibited in areas used for fueling, fuel storage, or enclosed storage of equipment containing fuel?</p> <p>[29 CFR 1917.156(a)(4)]</p>	2
75.	<p>Are piping systems supported and protected against physical damage and stresses arising from impact, settlement, vibration, expansion, contraction, and tidal action?</p> <p>[NFPA 30A, 11.3.2]</p>	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
76.	Is a valve to shut off the liquid supply from shore provided in each pipeline at or near the approach to the pier and at the shore end of each marine pipeline adjacent to the point where each flexible hose is attached? [NFPA 30A, 11.3.5]	3
77.	Are all hoses listed? Where hose length exceeds 18 feet, is the hose secured to protect it from damage? [NFPA 30A, 11.4.1]	3
103.	Are dispensing nozzles of the automatic-closing type without a latch-open device? [NFPA 30A, 11.4.2]	3
78.	Does the park have a supervisor on duty whenever the marine fuel dispensing facility is used? [NFPA 30A, 11.4.7] Note: The supervisor's primary function is to supervise, observe, and control the dispensing of liquids.	3
79.	Are clearly identified emergency shut off switches readily accessible in case of fire or physical damage at any dispensing unit on each marine wharf? Are the disconnects interlocked to shut off power to all pump motors from any individual location and shall be manually reset only from a master switch? Is each shut off switch identified by a sign stating "EMERGENCY PUMP SHUTOFF" in two-inch red capital letters? [NFPA 30A, 11.5.3]	3
104.	Are smoking materials, including matches and lighters, not used within 20 feet of areas used for fueling, servicing fuel systems for internal combustion engines, or receiving or dispensing of Class I liquids? Are conspicuous NO SMOKING signs posted within sight of the customer being served? [NFPA 30A, 11.5.5]	3
121.	Are pipelines on piers electrically bonded and grounded? [NFPA 30A, 11.6.1] Note: Electrical bonding is the practice of electrically connecting exposed metallic non-current carrying items as protection from electric shock.	3
122.	Is the marine motor fuel dispensing facility equipped with a fire extinguisher? [NFPA 30A, 11.7.1]	3
80.	Does the park ensure that Class I or Class II liquids are not dispensed into a portable container unless the container is constructed of metal, and has a tight closure, and is fitted with a spout or is so designed that the contents can be dispensed without spilling? [NFPA 30A, 11.8.2]	3
81.	Does the park ensure that portable containers of 12 gallons capacity or less are not filled while they are in or on a marine craft? [NFPA 30A, 11.8.3]	3
82.	Does the park ensure that smoking is forbidden on board the vessel or marine craft and in the dispensing area during fueling operations? [NFPA 30A, 11.10.3]	3
83.	Does the park ensure that fueling is not undertaken at night except under well-lighted conditions? [NFPA 30A, 11.10.2]	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
70.	<p>Is a sign with 2 inch red capital letters on a white background conspicuously posted in the marine motor fuel dispensing area reading the following:</p> <p style="text-align: center;">Before Fueling:</p> <p style="text-align: center;">(1) Stop all engines and auxiliaries. (2) Shut off all electricity, open flames, and heat sources. (3) Check all bilges for fuel vapors. (4) Extinguish all smoking materials. (5) Close access fittings and openings that could allow fuel vapors to enter enclosed spaces of the vessel.</p> <p style="text-align: center;">During Fueling:</p> <p style="text-align: center;">(1) Maintain nozzle contact with fill pipe. (2) Wipe up spills immediately. (3) Avoid overfilling. (4) Fuel filling nozzle must be attended at all times.</p> <p style="text-align: center;">After Fueling:</p> <p style="text-align: center;">(1) Inspect bilges for leakage and fuel odors. (2) Ventilate until odors are removed.</p> <p>[NFPA 30A, 11.10.8]</p>	3

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
1.	<p>Does the park maintain an up-to-date inventory of all USTs and ASTs, both registered and unregistered, that includes the following information:</p> <ul style="list-style-type: none"> • Tank type (AST/UST); • Tank location; • Size (e.g., ullage capacity); • Tank status (i.e., active or closed); • Contents (e.g., No. 2 fuel oil, gasoline, etc.); • Age; • Construction; • Use (e.g., vehicle fueling, residential heating, etc.); • Leak detection method; • Corrosion protection; • Spill control; and • Overfill equipment (including secondary containment)? <p>[BMP]</p>	4
2.	<p>Have state and local environmental, health and safety agencies been contacted to determine fuel storage tank requirements applicable to UST and AST systems at federal facilities, in general, and park operations, in particular?</p> <p>[BMP]</p>	4
123.	<p>Has the park contacted the local Fire Marshal to request a courtesy inspection of the fuel storage facilities?</p> <p>[BMP]</p>	4



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Fuel Storage Management
2012 Update*

4.	Has a fuel needs analysis been conducted? Have projects been implemented to reduce fuels handling where opportunities exist, including the use of alternative energy sources and alternative fueled vehicles? [BMP]	4
84.	Does the park use spill and overfill prevention equipment to prevent releases and spills during the fuel transfer process for ASTs? [BMP]	4
85.	Are accurate inventory records maintained for indication of possible leakage from ASTs or associated piping? The inventory should include: <ul style="list-style-type: none">• Date;• Amount delivered; and• Amount used between deliveries. [BMP] Note: This finding does not apply to dispensing systems – as dispensing systems are covered under finding #17.	4



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Hazardous Materials
Management
2012 Update*

INTRODUCTION

Personnel at NPS facilities use flammable and combustible materials (e.g., fuels, paints, solvents, compressed gases, fuel-gas mixtures for welding and cutting, and laboratory chemicals) in daily work operations. To minimize the potential for emergency events, these materials must be stored properly. Common incidents associated with flammable and combustible materials include fire, explosions, reactions with high-heat potential, and spills.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use this data to populate the regulatory findings database that will be submitted to and used by the park.

Ask to review the following written records, if available:

- Hazard Communication (HAZCOM) program
- Chemical inventory
- Material Safety Data Sheet (MSDS) binders or files
- Chemical purchase order records

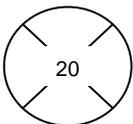
Ask to interview or plan to contact the following park personnel:

- Fire management staff
- Natural resources staff
- Maintenance staff (including painters and auto mechanics)

During the walk-around of the park, observe the following:

- Underground storage tanks (USTs)
- Aboveground storage tanks (ASTs)
- Areas storing petroleum or non-petroleum oils
- Spill cleanup equipment
- Refueling areas
- Vehicle maintenance areas
- Paint shops
- Storage cabinets
- Storage rooms
- Cleaning supply closets
- Fire caches
- Solvent parts washers

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



Indicates the need for further questioning that may lead to a finding. Numbers in the center or to the right of the circle specify the EnviroCheck Sheet question numbers.



Indicates that the regulatory requirement has been met (or does not apply) and that the train of questions can stop.

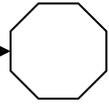


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NOT YET UPDATED

Do park employees handle or store flammable or combustible liquids?
(Flammable liquids have a flashpoint below 100F.
Combustible liquids have a flashpoint above 100F, but below 200F.)

No



Yes

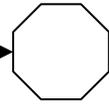
How are flammable/combustible liquids stored?

Are fire control measures in place where flammable/combustible liquids are stored?

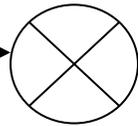
Yes

Tanks?

No



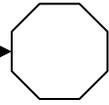
Yes



1, 2, 3

Containers or portable tanks?

No



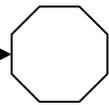
Yes



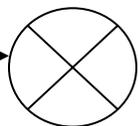
4, 5, 6

Storage cabinets?

No



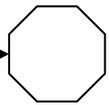
Yes



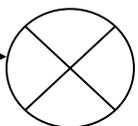
7, 8, 9

Inside storage rooms?

No



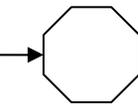
Yes



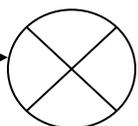
10, 11, 48, 12, 13, 14

Inside buildings?

No



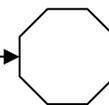
Yes



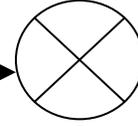
15, 16

Outside buildings?

No

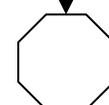


Yes

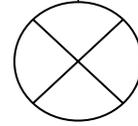


17, 18, 19

Yes



No

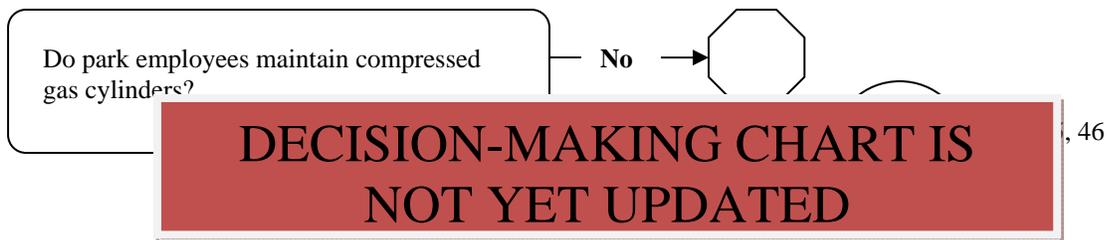
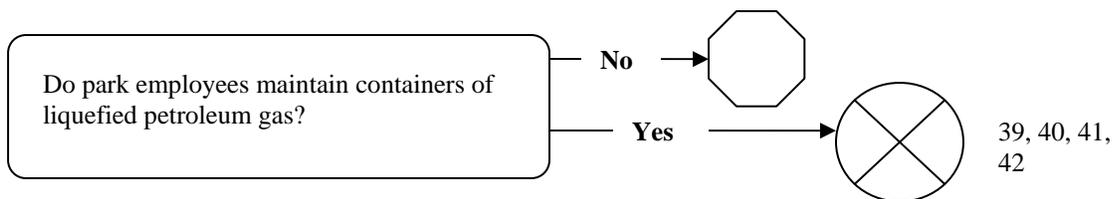
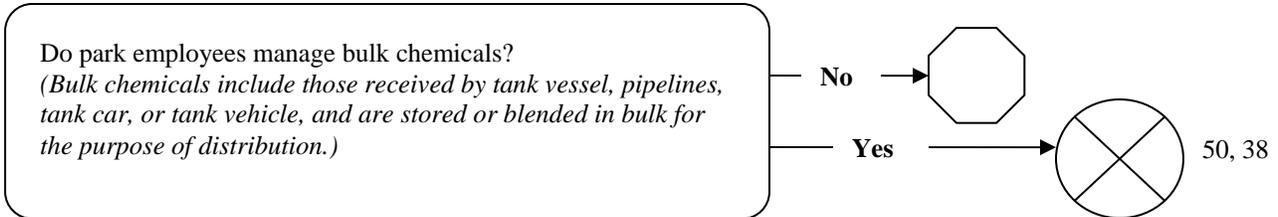


20, 21, 22, 23, 25



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Hazardous Materials
Management
2012 Update*





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<p><i>Flammable and Combustible Liquids: Tank Storage</i> <i>With the adoption of the Globally Harmonized System (GHS), the four categories of flammable liquid will be recognized and the term combustible liquid will no longer be used. A transition period exists until June 1, 2016. The NPS Envirocheck Sheets will be updated in the future to reflect the changes.</i></p>		
1.	<p>Do park employees use tanks built of steel to store flammable and combustible liquids?</p> <p>If tanks are not built of steel, are they:</p> <ul style="list-style-type: none"> • Installed underground or if required by the properties of the liquid stored; • Located above ground or inside buildings, and of noncombustible construction; or • Designed to specifications embodying principles recognized as good engineering design for the material used? <p>[29 CFR 1910.106 (b)(1)(i)]</p>	2
2.	<p>Are flammable or combustible liquid ASTs located such that the distance between the tanks is at least three feet?</p> <p>[29 CFR 1910.106 (b)(2)(ii)(a)]</p>	2
3.	<p>Have park employees made efforts to eliminate or control sources of ignition where flammable vapors may be present?</p> <p>[29 CFR 1910.106 (b)(6)]</p> <p>Note: Sources of ignition include but are not limited to open flames, lightning, smoking, cutting and welding, heat sources, friction, sparks, spontaneous ignition including heat-producing chemical reactions, and radiant heat.</p> <p>An example of a precautionary measure the park can take to eliminate or control these sources includes posting signage that reads "No Smoking" in areas where flammable vapors may be present, or moving flammable materials from an area where ignition sources are likely to be present.</p>	2
<p><i>Flammable and Combustible Liquids: Containers & Portable Tank Storage</i> <i>Containers = Under 60 gallons in capacity</i> <i>Portable tanks = No more than 660 gallons individual capacity</i></p>		
4.	<p>Do park employees use approved containers and portable tanks that meet the requirements of a nationally recognized testing organization to store flammable and combustible liquids?</p> <p>[29 CFR 1910.106 (d)(2)(i)]</p> <p>Note: Examples of nationally recognized testing organizations include Underwriters Laboratories (UL) and Factory Mutual (FM).</p>	2
5.	<p>Are portable tanks provided with one or more pressure-relief devices to allow emergency venting?</p> <p>[29 CFR 1910.106 (d)(2)(ii)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY																																															
6.	<p>Do park employees use appropriately sized containers or portable containers to store flammable and combustible liquids? [29 CFR 1910.106 (d)(2)(iii)]</p> <p>Maximum Allowable Size of Containers and Portable Tanks:</p> <table border="1" data-bbox="180 506 1292 867"> <thead> <tr> <th rowspan="2">Container Type</th> <th colspan="3">Flammable liquids</th> <th colspan="2">Combustible liquids</th> </tr> <tr> <th>Class IA</th> <th>Class IB</th> <th>Class IC</th> <th>Class II</th> <th>Class III</th> </tr> </thead> <tbody> <tr> <td>Glass</td> <td>1 pt</td> <td>1 qt</td> <td>1 gal</td> <td>1 gal</td> <td>1 gal</td> </tr> <tr> <td>Metal (other than DOT drums)</td> <td>1 gal</td> <td>5 gal</td> <td>5 gal</td> <td>5 gal</td> <td>5 gal</td> </tr> <tr> <td>Safety cans</td> <td>2 gal</td> <td>5 gal</td> <td>5 gal</td> <td>5 gal</td> <td>5 gal</td> </tr> <tr> <td>Approved plastic*</td> <td>5 gal</td> <td>5 gal</td> <td>5 gal</td> <td>5 gal</td> <td>5 gal</td> </tr> <tr> <td>Metal drums (DOT specifications)</td> <td>60 gal</td> <td>60 gal</td> <td>60 gal</td> <td>60 gal</td> <td>60 gal</td> </tr> <tr> <td>Approved portable tanks</td> <td>660 gal</td> <td>660 gal</td> <td>660 gal</td> <td>660 gal</td> <td>660 gal</td> </tr> </tbody> </table> <p>Note: Container exemptions: [a] Medicines, beverages, foodstuffs, cosmetics, and other common consumer items, when packaged according to commonly accepted practices, shall be exempt from the requirements of 1910.106(d)(2)(i) and (ii).</p> <p>*Note: According to OSHA STD 01-05-014, it is a de minimis violation to use DOT specification, nonspecification polyethylene, and nonregulated containers for storing COMBUSTIBLE and/or FLAMMABLE liquids at inside storage areas under the following conditions:</p> <ol style="list-style-type: none"> The liquid within the container has a DOT exemption in effect for shipment in polyethylene containers and is identified as meeting the requirements of the DOT exemption. The container storage area is provided with a fire detection system designed and installed to detect incipient stage fires and interconnected with an employee emergency alarm system, which will effectively alert employees when fire is detected. In locations where employees are expected to perform fire fighting, the container storage area is provided with a fixed automatic fire suppression system designed and installed to control, if not extinguish, a fire involving the stored polyethylene containers. Employees, except members on fire brigades, will be totally evacuated from the container storage area at the time of initial fire detection. Where fire brigades are provided, member employees will be trained in the specific methods for fighting fires involving polyethylene drums or containers, and in the recognition of hazards associated with fire fighting in such storage areas. In general purpose warehouses, the container storage area is provided with diking, or curbing and drainage, which will contain the volume of stored liquids and the anticipated flow of fire extinguishing agent, and drain it to a remote impounding area having no employee exposure. Employee emergency exit routes may not intersect or pass over or under open drainage paths. <p><i>As such, if auditors observe this type of situation, they should not develop a finding.</i></p>	Container Type	Flammable liquids			Combustible liquids		Class IA	Class IB	Class IC	Class II	Class III	Glass	1 pt	1 qt	1 gal	1 gal	1 gal	Metal (other than DOT drums)	1 gal	5 gal	5 gal	5 gal	5 gal	Safety cans	2 gal	5 gal	5 gal	5 gal	5 gal	Approved plastic*	5 gal	Metal drums (DOT specifications)	60 gal	Approved portable tanks	660 gal	2												
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**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>Flammable and Combustible Liquids: Design, Construction, and Capacity of Storage Cabinets</i>		
7.	<p>Do park employees ensure no more than 60 gallons of Class I or Class II liquids, or 120 gallons of Class III liquids are stored in storage cabinets? [29 CFR 1910.106 (d)(3)(i)]</p> <p>Note: NFPA 30, 9.5.1 states that the volume of Class I, Class II, and Class IIIA liquids stored in an individual flammable liquid storage cabinet shall not exceed 120 gallons.</p>	2
8.	<p>Are storage cabinets fire resistant and labeled with conspicuous lettering that reads “Flammable – Keep Fire Away”? [29 CFR 1910.106 (d)(3)(ii)]</p>	2
56.	<p>If required to use a Hazardous Materials Storage Cabinet, is it to code? [29 CFR 1910.106 (d)(3)(ii)(a)]</p> <ul style="list-style-type: none"> • Cabinets shall be constructed of metal. • The interior of cabinets shall be treated, coated, or constructed of materials that are nonreactive with the hazardous material stored, and such treatment, coating, or construction shall include the entire interior of the cabinet. • Cabinets shall be either listed as suitable for the intended storage or constructed in accordance with the following: <ul style="list-style-type: none"> ○ Cabinets shall be of steel having a thickness of not less than 0.044 in. (1.12 mm) (18 gauge). ○ The cabinet, including the door, shall be double-walled with 1 1/2 in. (38.1 mm) airspace between the walls. ○ Joints shall be riveted or welded and shall be tightfitting. ○ Doors shall be well fitted, self-closing, and equipped with a three point lock. ○ The bottoms of cabinets utilized for the storage of liquids shall be liquid tight and have a door sill at least 2 in. (50 mm) above the bottom of the cabinet. • Shelving shall be of substantial construction and adequately braced and anchored. <p>Note: Finding #27 specifies amounts that cannot be exceeded outside a flammable cabinet or inside storage room, the most relevant being 25 gallons of Class I liquids. Additionally, hazmat cabinets can be made of wood as specified in 29 CFR 1910.106(d)(3)(ii)(b).</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
9.	<p>Do park employees store incompatible hazardous materials separately? In particular, are materials which are incompatible stored in different cabinets, or enclosures?</p> <p>Are incompatible materials stored in accordance with the following guidelines:</p> <ul style="list-style-type: none"> ● Separated by a distance of not less than 20 feet (6.1 m); ● Isolated in storage by a noncombustible partition extending not less than 18 inches (46 cm) above and to the sides of the stored material; ● Liquid and solid materials are stored in approved hazardous materials storage cabinets; and ● Compressed gases are stored in gas cabinets or exhausted enclosures that comply with NFPA requirements. (For example, no more than three containers, cylinders or tanks per gas cabinet. Flammable gases are separated from oxidizers and corrosive gases by 20 ft.)? <p>[NFPA 1, 60.1.19.2]</p> <p>Note: This applies to stored materials in amounts of 5 pounds (1.89 Liters or ½ gallon) or more. As a general rule, it is useful to ensure the following:</p> <ul style="list-style-type: none"> ● Cabinets storing flammable liquids should contain flammable and combustible liquids <i>only</i>. Compatible solvents such as methylene chloride and 1,1,1-trichloroethane are allowed. ● Incompatible acids should be stored separately from each other, e.g., nitric acid, perchloric acid, acetic acid. ● Acids and bases should be stored separately. 	3
51.	<p>Are:</p> <ul style="list-style-type: none"> ● Liquids separated from incompatible materials containing more than 5% by weight of acids, caustics, or oxidizers by a minimum distance of 25 feet; ● Liquids isolated from Level 2 and Level 3 aerosols in accordance with NFPA 30B; or ● Materials that are water reactive are not stored with liquids? <p>[NFPA 30, 9.17]</p> <p>Note: Level 2 and Level 3 aerosols present a hazard from accelerated burning. Level 2 aerosols are alcohol formulated, such as bug spray and hair spray. Level 3 aerosols are hydrocarbon formulated such as carburetor cleaner or WD-40.</p> <p><i>Auditors: Check labels or MSDS for chemical components and safety information.</i></p>	3
?	<p>All cabinets that contain hazardous materials, whether approved or not, are labeled on the outside as to their contents. Letters are at least 2 inches high.</p> <p>[NFPA 30, 9.5.5]</p>	3
49.	<p>Do flammable storage cabinets have a spill containment system, such as a leakproof bottom and 2" sill, in place to prevent the flow of liquids from the structure in emergency conditions?</p> <p>[NFPA 30, 9.5.3 (2)(c)]</p>	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
52.	<p>Are maximum allowable quantities (MAQ) of flammable and combustible materials per control area exceeded?</p> <ul style="list-style-type: none"> • Ten gallons of Class I and II liquids (combined), 60 gallons of Class IIIA liquids, and 120 gallons of Class III B liquids, if not stored in flammable liquids storage cabinets. • If stored in multiple flammable liquids cabinets, then more than ten gallons of Class I and II liquids (combined), or more than 60 gallons of Class IIIA liquids is permitted as long as the total aggregate quantity does not exceed 180 gallons. <p>[NFPA 30, 9.6.2.2]</p> <p>Note: This applies to the following types of occupancies: Assembly, Ambulatory Health Care, Business, Day Care, Detention and Correctional, Educational, Health care, and Residential.</p> <p>Control areas are a space within a building where quantities of liquids that do not exceed the MAQ are stored, and are separated by each other by fire barriers, such as fire resistant rated walls and doors.</p> <p><i>Auditors: If an area such as a visitor center, gift shop, office, or similar space (that could be considered a business) has an excessive amount of flammable and combustible material stored outside of flammable lockers or there are several flammable lockers, use this finding. If a maintenance area, or other similar space seems to have an excessive amount of flammable or combustible materials stored, because it would meet OSHA's definition of an Industrial Plant, use finding #27.</i></p>	3
14.	<p>Do park employees store more than three flammable storage cabinets in any one fire area? [RM 50B]</p> <p>Note: No more than three storage cabinets may be used in one fire area. A fire area is an area of a building separated from the remainder of the building by construction having a fire resistance of at least 1 hour and having all communicating openings properly protected by an assembly having a fire resistance rating of at least 1 hour.</p> <p><i>Auditors: This finding was originally associated with NFPA 30,6.3.2 which changed with the 2006 revisions of NFPA. However, it is still referenced in RM50B. More than 3 cabinets may be stored in a fire area if a minimum separation of 100 feet is maintained between each group of cabinets.</i></p>	3
53.	<p>Are containers of Class I and Class II liquids exceeding 30 gallons in capacity not stacked more than one high in storage areas? [NFPA 30, 12.6.1.2]</p> <p>Note: Class I and II liquids in portable tanks exceeding 30 gallons in capacity can be stacked more than one high in storage areas if they are stored in a specially designed liquid and hazardous materials storage building or warehouse where they are designed to nest securely, without dunnage, and adequate materials handling equipment is available to handle tanks safely at the upper tier level (per 29 CFR 1910.106(d)(5)(vi)).</p>	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY																				
54.	<p>If a storage cabinet is ventilated, are storage cabinet vent openings ducted directly to the outdoors in such a manner that does not compromise the specified performance of the cabinet or in a manner that is acceptable to the authority having jurisdiction? [NFPA 30, 9.5.4.2]</p> <p>If not ventilated, are storage vent openings sealed with appropriate bungs? [NFPA 30, 9.5.4.1]</p>	3																				
<p><i>Flammable and Combustible Liquids: Design, Construction, and Capacity of Inside Storage Rooms</i> (This section pertains to storage rooms that are part of a building or are stand alone buildings designated to store flammable and combustible materials and that meet specific OSHA and NFPA fire protection criteria.)</p>																						
10.	<p>Are inside storage rooms constructed to meet the required fire resistive rating for their use? Do fire resistive inside storage rooms:</p> <ul style="list-style-type: none"> • Have floors with at least 4-inch noncombustible, liquid-tight raised sills or ramps, or floors that are depressed 4-inches below the surrounding floor or have an open-grated trench inside of the room which drains to a safe location; • Have approved, self-closing fire doors at all openings; and • Have a liquid-tight seal where the walls join the floor? <p>[CFR 1910.106 (d)(4)(i)]</p>	2																				
11.	<p>Does the park comply with flammable and combustible liquid storage capacity limits for inside storage rooms?</p> <p>Flammable and Combustible Liquid Quantity Specifications:</p> <table border="1" data-bbox="180 1108 1198 1318"> <thead> <tr> <th>Fire protection provided *</th> <th>Fire resistance</th> <th>Maximum size</th> <th>Total Allowable quantities (gals./sq. ft./floor area)</th> </tr> </thead> <tbody> <tr> <td>Yes</td> <td>2 hours</td> <td>500 sq. ft</td> <td>10</td> </tr> <tr> <td>No</td> <td>2 hours</td> <td>500 sq. ft</td> <td>5</td> </tr> <tr> <td>Yes</td> <td>1 hour</td> <td>150 sq. ft</td> <td>4</td> </tr> <tr> <td>No</td> <td>1 hour</td> <td>150 sq. ft</td> <td>2</td> </tr> </tbody> </table> <p>* Fire protection system shall be sprinkler, water spray, carbon dioxide, or other system.</p> <p>[29 CFR 1910.106 (d)(4)(ii)]</p>	Fire protection provided *	Fire resistance	Maximum size	Total Allowable quantities (gals./sq. ft./floor area)	Yes	2 hours	500 sq. ft	10	No	2 hours	500 sq. ft	5	Yes	1 hour	150 sq. ft	4	No	1 hour	150 sq. ft	2	2
Fire protection provided *	Fire resistance	Maximum size	Total Allowable quantities (gals./sq. ft./floor area)																			
Yes	2 hours	500 sq. ft	10																			
No	2 hours	500 sq. ft	5																			
Yes	1 hour	150 sq. ft	4																			
No	1 hour	150 sq. ft	2																			
47.	<p>Is the electrical wiring and equipment located in the inside storage room intrinsically safe and approved for use in the hazardous location? [29 CFR 1910.106 (d)(4)(iii)]</p> <p>Note: Per 29 CFR 1910.307, Class I liquids must be stored in a room where the electrical equipment will not be the source of ignition. The equipment intended for use in this type of area (Class I, Division 2) is usually nonincendive, nonsparking, purged/pressurized, and sealed (hermetically).</p> <p>Class II and Class III combustible liquids do not have the same restrictions on electrical equipment; they can be stored in a room where general use electrical wiring and equipment is installed.</p>	2																				



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
12.	<p>Is every inside storage room equipped with either a gravity or a mechanical exhaust ventilation system? [29 CFR 1910.106 (d)(4)(iv)]</p> <p>Note: A switch located outside of the door to the room should control mechanical exhaust systems. The ventilating equipment and any lighting fixtures should be operated by the same switch.</p>	2
13.	<p>Do park employees maintain adequate aisle space in every inside storage room? [29 CFR 1910.106 (d)(4)(v)]</p> <p>Note: Adequate aisle space is considered at least 3 feet in width. Containers greater than 30 gallons should not be stacked on top of one another.</p>	2
<p><i>Flammable and Combustible Liquids: Storage of Flammable and Combustible Liquids Inside Buildings</i> (This section pertains to storage inside buildings that are not specially designated "inside storage rooms" as described above. For example, this would apply to storage of flammable and combustible materials inside closets or basements inside of a building.)</p>		
15.	<p>Are containers of flammable or combustible liquids stored in locations away from exits, stairways, or areas normally used for the safe egress of people? [29 CFR 1910.106 (d)(5)(i)]</p>	2
16.	<p>Do park employees store flammable or combustible liquids in containers or portable tanks inside office space? [29 CFR 1910.106 (d)(5)(iii)]</p> <p>Note: Flammable or combustible liquids in containers or portable tanks should not be stored in office buildings, except where they are required for the maintenance and operation of the building and operation of equipment. In such cases, the chemicals should be maintained in closed metal containers stored in a storage cabinet, or in safety cans, or in an inside-storage room not having a door that opens into that portion of the building used by the public.</p>	2
55	<p>Do park employees ensure that Class I and Class II liquids are not stored in basements? [29 CFR 1910.106 (d)(5)(v)]</p> <p>Note: There are also limitations to the quantity of Class III liquid storage in basements (i.e., for indoor container storage, it is 8,250 gallons or 450 55-gallon drums; for indoor portable tank storage, it is 20,000 gallons, per Tables H-14 and H-15 of 29 CFR 1910.106).</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY																														
<i>Flammable and Combustible Liquids: Storage Outside Buildings</i> (This section pertains to flammable and combustible materials that are found outside of buildings.)																																
17.	<p>Do park employees comply with storage limitations for flammable and combustible liquids stored outside of buildings?</p> <p>Outdoor Storage Limitations:</p> <table border="1" data-bbox="180 569 1287 846"> <thead> <tr> <th>Class</th> <th>Maximum per pile (gallons)</th> <th>Distance between piles (feet)</th> <th>Distance to property line that can be built upon (feet)</th> <th>Distance to street, alley, public way (feet)</th> </tr> </thead> <tbody> <tr> <td>IA</td> <td>1,100</td> <td>5</td> <td>20</td> <td>10</td> </tr> <tr> <td>IB</td> <td>2,200</td> <td>5</td> <td>20</td> <td>10</td> </tr> <tr> <td>IC</td> <td>4,400</td> <td>5</td> <td>20</td> <td>10</td> </tr> <tr> <td>II</td> <td>8,800</td> <td>5</td> <td>10</td> <td>5</td> </tr> <tr> <td>III</td> <td>22,000</td> <td>5</td> <td>10</td> <td>5</td> </tr> </tbody> </table> <p>Note 1: When 2 or more classes of materials are stored in a single pile, the maximum gallonage in that pile shall be the smallest of the separate gallonages.</p> <p>Note 2: Within 200 ft. of each container, there shall be a 12 ft. wide access way to permit approach of fire control apparatus.</p> <p>Note 3: The distances listed apply to properties that have protection for exposures as defined. If there are exposures, and such protection for exposures does not exist, the distances in column 4 shall be doubled.</p> <p>Note 4: When total quantity stored does not exceed 50 percent of maximum per pile, the distances in columns 4 and 5 may be reduced 50 percent, but not less than 3 ft.</p> <p>[29 CFR 1910.106 (d)(6)(i)]</p>	Class	Maximum per pile (gallons)	Distance between piles (feet)	Distance to property line that can be built upon (feet)	Distance to street, alley, public way (feet)	IA	1,100	5	20	10	IB	2,200	5	20	10	IC	4,400	5	20	10	II	8,800	5	10	5	III	22,000	5	10	5	2
Class	Maximum per pile (gallons)	Distance between piles (feet)	Distance to property line that can be built upon (feet)	Distance to street, alley, public way (feet)																												
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II	8,800	5	10	5																												
III	22,000	5	10	5																												
18.	<p>Do park employees maintain outside storage areas to prevent spills of flammable or combustible materials from affecting the environment?</p> <p>[29 CFR 1910.106 (d)(6)(iii)]</p> <p>Note: Storage areas should be graded in a manner to divert possible spills away from buildings or should be surrounded by a curb at least six inches high. When curbs are used, provisions must be made for proper drainage of the curbed area such that ground water, rainwater, or spills are properly drained.</p>	2																														
19.	<p>Do park employees maintain security and housekeeping for outside storage of flammable or combustible liquids?</p> <p>[29 CFR 1910.106 (d)(6)(iv)]</p> <p>Note: Storage areas should be protected against tampering or trespassers and be kept free of weeds, debris and combustible materials not necessary to storage.</p>	2																														
<i>Flammable and Combustible Liquids: Fire control</i>																																
20.	<p>Do park employees maintain suitable fire control devices, such as a small hose or portable fire extinguishers, at locations where flammable or combustible liquids are stored?</p> <p>[29 CFR 1910.106 (d)(7)(i)]</p>	2																														



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
48.	Are “No Smoking” signs prominently posted near flammable or combustible storage areas indicating that flammable or combustible materials are located nearby? [NFPA 30, 6.5.2]	3
21.	Is at least one portable fire extinguisher located not more than 10 feet outside of the door opening into any room used for storage of flammable or combustible liquids? [29 CFR 1910.106 (d)(7)(i)(a)] Note: The fire extinguisher must have a rating of not less than 12-B units. This means that it is sized and rated for a Class B flammable or combustible material fire. Check the label or with the fire extinguisher’s manufacturer to determine if it has a rating of at least 12-B.	2
22.	Is at least one portable fire extinguisher located between 10 and 25 feet from any Class I or Class II storage area that is located outside of a storage room but inside a building? [29 CFR 1910.106 (d)(7)(i)(b)] Note: The fire extinguisher must have a rating of not less than 12-B units. This means that it is sized and rated for a Class B flammable or combustible material fire. Check the label or with the fire extinguisher’s manufacturer to determine if it has a rating of at least 12-B.	2
23.	Do park employees take action to prevent open flames or smoking in areas where flammable or combustible liquids are stored? [29 CFR 1910.106 (d)(7)(iii)]	2
25.	Do park employees ensure that water-reactive materials are not stored in the same room with flammable or combustible liquids? [29 CFR 1910.106 (d)(7)(iv)]	2
<i>Bulk Chemicals</i> <i>The questions in this section apply to areas of the facility where flammable or combustible liquids are received by tank vessel, pipelines, tank car, or tank vehicle, and are stored or blended in bulk for the purpose of distribution.</i>		
50.	Are liquids transferred by tank vessel, pipelines, tank car, or tank vehicle and stored or blended in bulk for the purpose of distribution? If so, do park employees understand and meet the provisions under OSHA 29 CFR 1910.106 (f)? [29 CFR 1910.106 (f)]	2
38.	Do park employees take precautions to prevent flammable vapors from reaching a source of ignition? [29 CFR 1910.106 (f)(6)] Note: Flammable liquids should not be handled, drawn, or dispensed where flammable vapors may reach a source of ignition. “No Smoking” signs should be prominently posted where hazard from flammable liquid vapors is normally present.	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY																																					
<i>Liquefied Petroleum (LP) Gas</i>																																							
39.	<p>Do park employees maintain containers of liquefied petroleum gas (LP-Gas) outside of buildings?</p> <p>Exceptions to outside storage include the following situations:</p> <ul style="list-style-type: none"> • In buildings used exclusively for container charging, vaporization pressure reduction, gas mixing, gas manufacturing, or distribution; • When portable use is necessary; • When LP-Gas fuel is used for stationary or portable engines; • When LP-Gas fuel is used for industrial trucks; • When LP-Gas fuel is used for garaged vehicles; or • When containers are awaiting use or resale. <p>[29 CFR 1910.110 (b)(6)(i)]</p>	2																																					
40.	<p>Are LP-Gas containers located in accordance with regulatory restrictions relating to location?</p> <p>Individual LP-Gas containers must be located with respect to the nearest building per the table below:</p> <table border="1" data-bbox="180 957 1287 1276"> <thead> <tr> <th rowspan="3">Water capacity per container</th> <th colspan="3">Minimum distances</th> </tr> <tr> <th colspan="2">Containers</th> <th rowspan="2">Between aboveground containers</th> </tr> <tr> <th>Underground</th> <th>Aboveground</th> </tr> </thead> <tbody> <tr> <td>Less than 125 gal (1)</td> <td>10 feet</td> <td>None</td> <td>None</td> </tr> <tr> <td>120 to 250 gal</td> <td>10 feet</td> <td>10 feet</td> <td>None</td> </tr> <tr> <td>251 to 500 gal</td> <td>10 feet</td> <td>10 feet</td> <td>3 feet</td> </tr> <tr> <td>501 to 2,000 gal</td> <td>25 feet (2)</td> <td>25 feet (2)</td> <td>3 feet</td> </tr> <tr> <td>2,001 to 30,000 gal</td> <td>50 feet</td> <td>50 feet</td> <td>5 feet</td> </tr> <tr> <td>30,001 to 70,000 gal</td> <td>50 feet</td> <td>75 feet (3)</td> <td></td> </tr> <tr> <td>70,001 to 90,000 gal</td> <td>50 feet</td> <td>100 feet (3)</td> <td></td> </tr> </tbody> </table> <p>(1) If the aggregate water capacity of a multi-container installation at a consumer site is 501 gallons or greater, the minimum distance shall comply with the appropriate portion of this table, applying the aggregate capacity rather than the capacity per container. If more than one installation is made, each installation shall be separated from another installation by at least 25 feet. Do not apply the minimum distances between aboveground containers to such installations.</p> <p>(2) The above distance requirements may be reduced to not less than 10 feet for a single container of 1,200 gallons water capacity or less, providing such a container is at least 25 feet from any other LP-Gas container of more than 125 gallons water capacity.</p> <p>(3) One quarter of the sum of diameters of adjacent containers.</p> <p>[29 CFR 1910.110 (b)(6)(ii)]</p>	Water capacity per container	Minimum distances			Containers		Between aboveground containers	Underground	Aboveground	Less than 125 gal (1)	10 feet	None	None	120 to 250 gal	10 feet	10 feet	None	251 to 500 gal	10 feet	10 feet	3 feet	501 to 2,000 gal	25 feet (2)	25 feet (2)	3 feet	2,001 to 30,000 gal	50 feet	50 feet	5 feet	30,001 to 70,000 gal	50 feet	75 feet (3)		70,001 to 90,000 gal	50 feet	100 feet (3)		2
Water capacity per container	Minimum distances																																						
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70,001 to 90,000 gal	50 feet	100 feet (3)																																					
<i>Liquefied Petroleum Gas: Storage of Containers Awaiting Use</i> <i>The questions in this section apply to the storage of portable containers not in excess of 1,000 pounds water capacity, filled or partially filled, at user location but not connected for use, or in storage for resale.</i>																																							
58.	<p>Are containers in storage located to minimize exposure to excessive temperature rise, physical damage, or tampering by unauthorized persons?</p> <p>[29 CFR 1910.110 (f)(2)(i)]</p>	2																																					
59.	<p>If containers are stored inside, are they located away from exits, stairways or areas normally used or intended for the safe exit of people?</p> <p>[29 CFR 1910.110 (f)(2)(ii)]</p>	2																																					



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY												
60.	Are container valves protected while in storage, for example, the valve is recessed into the container and cannot be struck if the container is dropped on a flat surface, or a ventilated cap or collar that is fastened to the container can protect the valve? [29 CFR 1910.110 (f)(2)(iii)]	2												
41.	Do park employees observe LP-Gas indoor storage limits? [29 CFR 1910.110 (f)(4)] Note: If LP-Gas is stored within buildings (not specially designed for such storage), then the quantity stored should not exceed 300 pounds or approximately 2,550 cubic feet in vapor form.	2												
42.	Do park employees observe LP-Gas outdoor storage limits? If LP-Gas is stored outside buildings, then the quantity stored should consider the nearest important building or group of buildings, and the location of busy thoroughfares. Storage Considerations: <table border="1" data-bbox="180 884 691 1129"> <thead> <tr> <th>Quantity of LP-Gas Stored</th> <th>Distance</th> </tr> </thead> <tbody> <tr> <td>500 pounds or less</td> <td>0</td> </tr> <tr> <td>501 to 2,500 pounds</td> <td>0*</td> </tr> <tr> <td>2,501 to 6,000 pounds</td> <td>10 feet</td> </tr> <tr> <td>6,001 to 10,000 pounds</td> <td>20 feet</td> </tr> <tr> <td>Over 10,000 pounds</td> <td>25 feet</td> </tr> </tbody> </table> * Container or containers shall be at least 10 feet from any building on adjoining property or any sidewalk. The containers must also be in a suitable enclosure or otherwise protected against tampering. [29 CFR 1910.110 (f)(6)]	Quantity of LP-Gas Stored	Distance	500 pounds or less	0	501 to 2,500 pounds	0*	2,501 to 6,000 pounds	10 feet	6,001 to 10,000 pounds	20 feet	Over 10,000 pounds	25 feet	2
Quantity of LP-Gas Stored	Distance													
500 pounds or less	0													
501 to 2,500 pounds	0*													
2,501 to 6,000 pounds	10 feet													
6,001 to 10,000 pounds	20 feet													
Over 10,000 pounds	25 feet													
<i>Storage and Handling of Compressed Gases</i>														
43.	Do park employees ensure compressed gas cylinders in construction locations are secured in a manner that keeps them upright and prevents them from tipping over? [29 CFR 1926.350(a)(9)]	2												
44.	Do park employees ensure compressed gas cylinder valves are appropriately capped when they are not in use? [29 CFR 1910.101(b) in accordance with Compressed Gas Association Pamphlet P-1-1965.]	2												
45.	Do park employees store compressed gas cylinders in cool, dry, well-ventilated areas? [29 CFR 1910.101(b) in accordance with Compressed Gas Association Pamphlet P-1-1965.]	2												
<i>Storage and Handling of Compressed Gases: Oxygen-Fuel Gas Welding and Cutting</i>														
46.	Do park employees manage oxygen cylinders away from highly combustible materials? Oxygen cylinders should not be stored near reserve stocks of carbide and acetylene or other fuel-gas cylinders, substances likely to cause or accelerate fire, or in an acetylene generator compartment. Oxygen cylinders should be stored separately from fuel-gas cylinders or combustible materials, especially oil or grease, by a minimum distance of 20 feet (6.1 meter) or by a noncombustible barrier at least 5 feet (1.5 meter) high having a fire-resistance rating of at least one-half hour. [29 CFR 1910.253 (b)(4)]	2												



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

Incidental Storage or Use of Flammable and Combustible Liquids

Note: In previous versions of the checksheet NPS activities were viewed as not enforceable by OSHA and findings were treated as BMPs. With the revision of the checksheet, there is nothing to indicate why NPS would be exempt from enforcement. Therefore, findings previously considered BMPs are now Priority 2 or Priority 3 findings.

Incidental Container Storage

26.	Do park employees store flammable and combustible liquids in tanks or closed containers? [29 CFR 1910.106 (e)(2)(ii)]	2
27.	Do park employees comply with quantity limits for flammable and combustible liquids stored outside of an inside storage room or cabinet? Does the quantity in a building or in any one fire area in the building exceed: <ul style="list-style-type: none"> • 25 gallons of Class IA liquids; • 120 gallons of Class IB, IC, II or III liquids; or • 660 gallons of Class IB, IC, II or III liquids in a single portable tank? [29 CFR 1910.106 (e)(2)(ii)(b)] <i>Auditors: If a maintenance area, or other similar space seems to have an excessive amount of flammable or combustible materials stored, because it would meet OSHA's definition of an Industrial Plant, use this finding. If an area such as a visitor center, gift shop, office, or similar space (that could be considered a business) has an excessive amount of flammable and combustible material stored outside of flammable lockers or there are several flammable lockers, use finding #52.</i>	2

Incidental Handling of Liquids at Point of Final Use

28.	Do park employees keep flammable liquids covered when they are not in use? [29 CFR 1910.106 (e)(2)(iv)(a)]	2
29.	Do park employees have a means to promptly and safely dispose of leakage or spills of flammable and combustible liquids? [29 CFR 1910.106 (e)(2)(iv)(b)]	2
61.	Do park employees only use Class I liquids where there are no open flames or other sources of ignition within the possible path of vapor travel? [29 CFR 1910.106(e)(2)(iv)(c)]	2
30.	Do park employees manage movement of flammable or combustible liquids through approved means? [29 CFR 1910.106 (e)(2)(iv)(d)] Note: Approved means include transferring liquids into containers within a building through a closed piping system, from safety cans, by means of a device drawing through the top or by gravity through an approved self-closing valve. Transferring by means of air pressure on the container or portable tanks shall be prohibited.	2

Sources of Ignition

31.	Do park employees take precautions to prevent ignition of flammable vapors? [NFPA 30, 6.5.1] Note: This is applicable to containers with a capacity of 119 gallons or less (e.g. 55 gallon drum, 5 gallon gas can, portable tank, etc.). Sources of ignition include but are not limited to open flames, lightning, smoking, cutting and welding, heat sources, friction, sparks, spontaneous ignition including heat-producing chemical reactions, and radiant heat.	3
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**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Materials
Management
2012 Update*

32.	Do park employees take precautions to properly electrically connect (ground) containers of Class I liquids when the liquids are dispensed from one container into a separate container? [29 CFR 1910.106 (e)(6)(ii)] Note: The nozzle of one container should be electrically interconnected with the container the liquid is being poured into. The containers are considered electrically connected if the metallic floor plate on which the container stands is electrically connected to the fill stem or if the fill stem is bonded to the container during filling operations by means of a bond wire.	2
<i>Housekeeping</i>		
33.	Do park employees maintain operating procedures to prevent or control accidental spills of flammable or combustible liquids? [29 CFR 1910.106 (e)(9)(i)] Note: Procedures should include techniques to manage spills or leaks and how to promptly and safely address them.	2
34.	Do park employees ensure that adequate aisle space is maintained in flammable or combustible liquid storage areas or unit of operation? Are liquids stored so that they do not physically obstruct egress? [NFPA 30, 9.3.3.1] Note: Aisle space is adequate if it permits unobstructed movement of personnel and fire equipment.	3
35.	Do park employees minimize combustible waste materials and residues? [29 CFR 1910.106 (e)(9)(iii)] Note: Waste and residue materials, such as rags used in vehicle maintenance shops, should be stored in covered metal containers and disposed of daily. Disposal methods may vary and may include management as hazardous waste. Refer to Hazardous Waste EnviroCheck Sheet.	2
36.	Do park employees maintain the grounds around the storage areas or operating units such that they are free of weeds, trash, and unnecessary combustible materials? [29 CFR 1910.106 (e)(9)(iv)]	2

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
57.	Are the containment systems of flammable storage cabinets sufficient to contain at least ten percent of the volume of the capacity of containers inside or the volume of the largest container (whichever is greater)? [BMP related to 40 CFR 112]	4
62.	If using a carbonated beverage system (CO2 cylinders), has a carbon dioxide detector with an alarm system been installed? [BMP related to safety alert SA-22-2011 issued by the Compressed Gas Association] Note: Refer to http://www.cganet.com/pubs/free/SA-22_1.pdf .	4
63.	Do park employees ensure compressed gas cylinders in non-construction locations are secured in a manner that keeps them upright and prevents them from tipping over? [29 USC 651(a)(1) per Compressed Gas Association Pamphlet P-1-2000]	4



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Hazardous Waste
2012 Update*

INTRODUCTION

Because hazardous waste by its nature poses a threat to human health and the environment, Congress passed several statutes aimed at identifying and safely managing hazardous waste, from the its generation until its ultimate disposal (i.e., from “cradle to grave”). These statutes and subsequent amendments have become known by the acronym RCRA (the Resource Conservation and Recovery Act). RCRA has four broad goals:

- To protect human health and the environment from hazards posed by waste disposal;
- To conserve energy and natural resources through waste recycling and recovery;
- To reduce or eliminate the amount of waste generated, including hazardous waste; and
- To ensure that wastes are managed in an environmentally safe manner.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use this data to populate the regulatory findings database that will be submitted to and used by the park. This data will also be used to populate the Environmental Condition Assessment database. Refer to last page of this EnviroCheck Sheet for more information.

Ask to review the following written records, if available:

- Hazardous waste manifests or associated shipping papers
- Certificates of destruction or recycle
- Notification of Hazardous Waste Activity
- Material safety data sheets (MSDS)
- Training records (e.g., hazardous waste, HAZWOPER)
- RCRA Contingency Plan (if applicable)
- Polychlorinated biphenyl (PCB) annual document log (if applicable)
- PCB shipping papers

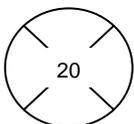
Ask to interview or plan to contact the following park personnel:

- Designated safety officer
- Maintenance supervisors
- Water and/or wastewater treatment operators

During the walk-around of the park, observe the following:

- Hazardous waste accumulation areas
- Maintenance shops (e.g., woodworking shop, paint shop, mechanic's bays)
- Laboratories
- PCB-containing equipment (e.g., ballasts, transformers)

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

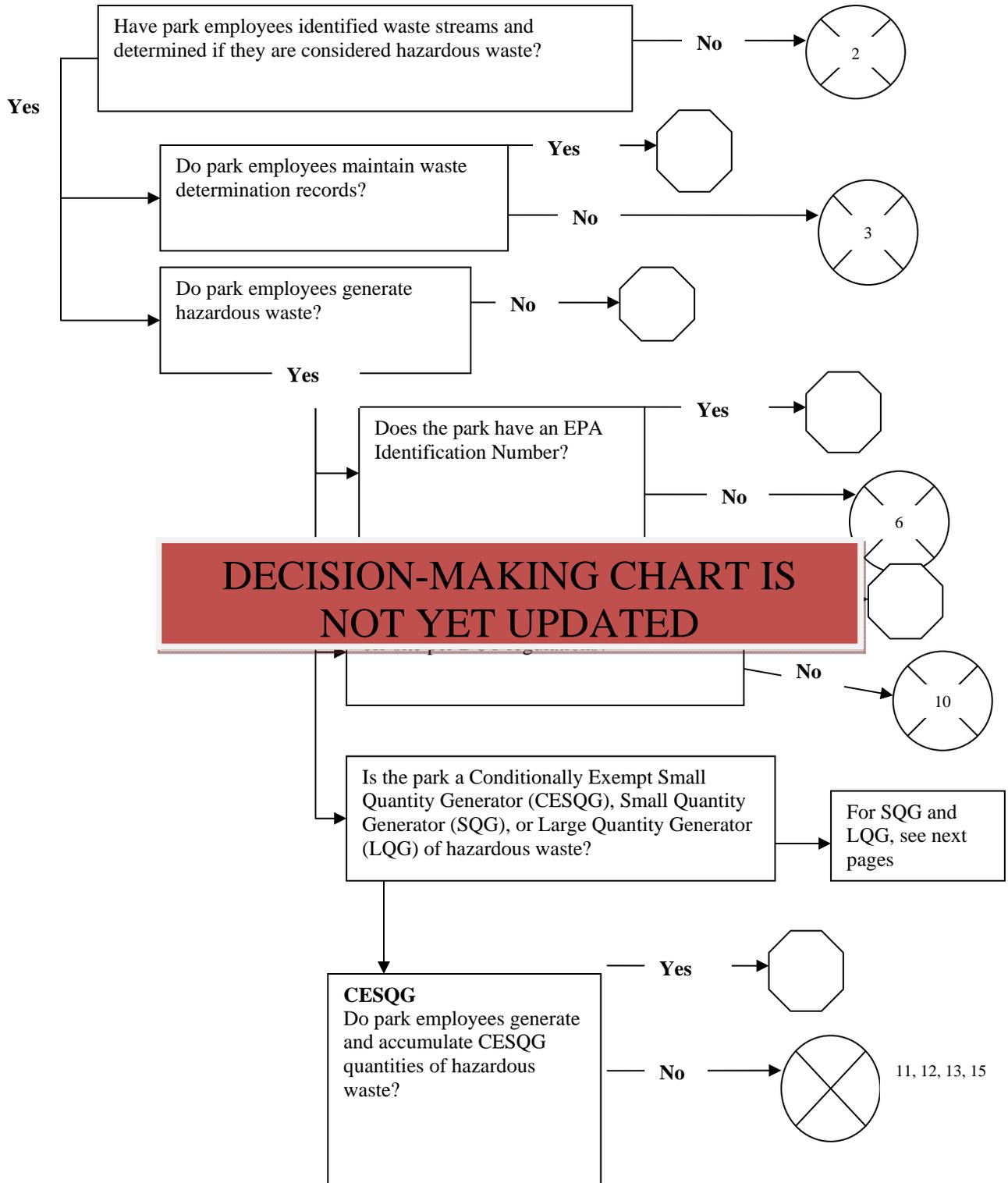


*Indicates that the regulatory
requirement has been met and that the
train of questions can stop.*



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

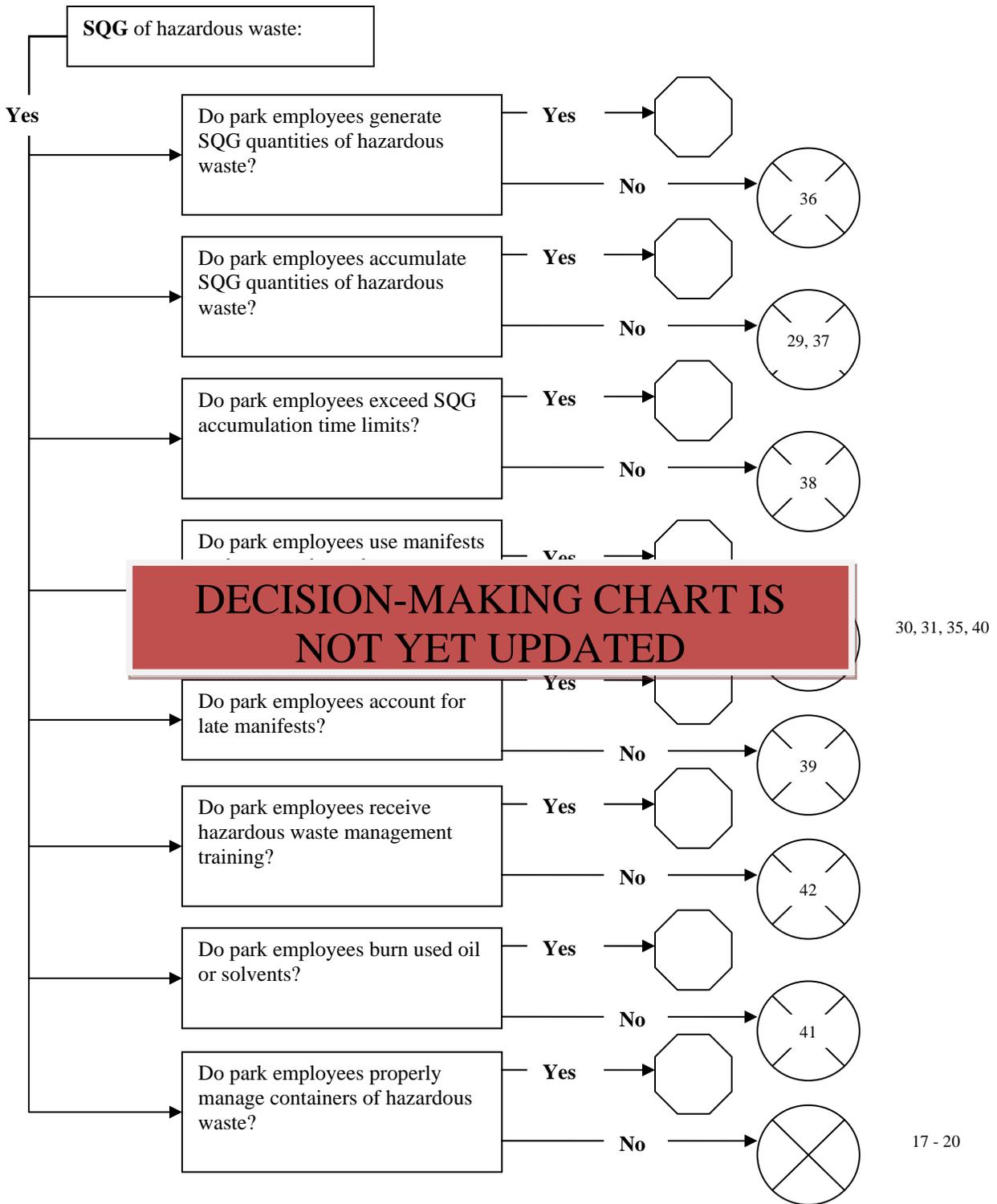
*Hazardous Waste
2012 Update*





NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

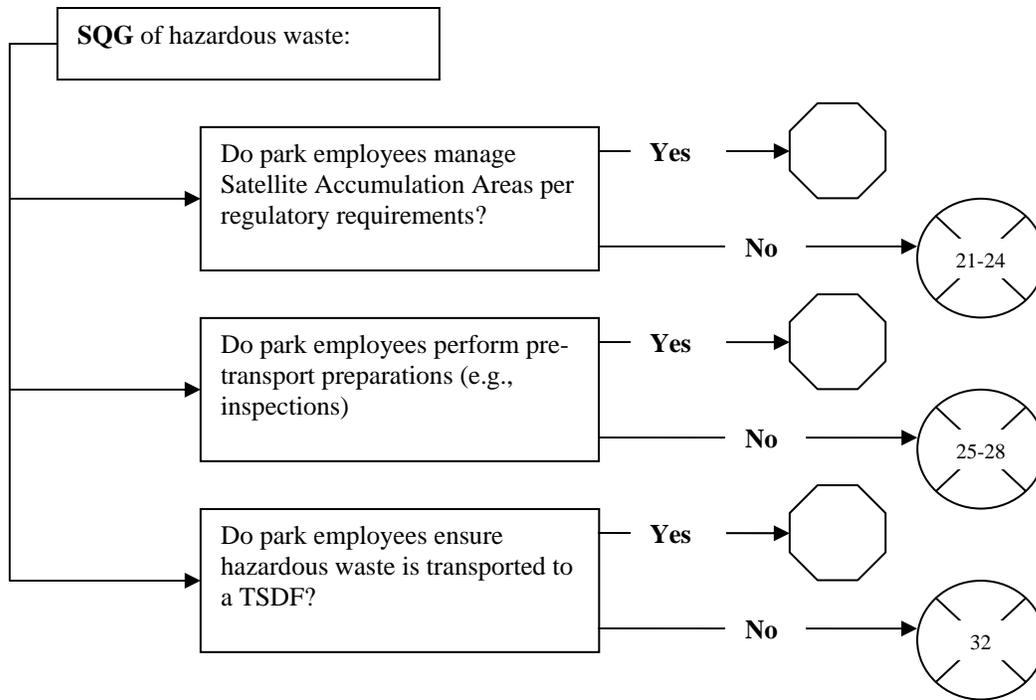
*Hazardous Waste
2012 Update*





NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Hazardous Waste
2012 Update*



**DECISION-MAKING CHART IS
NOT YET UPDATED**



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Hazardous Waste
2012 Update*

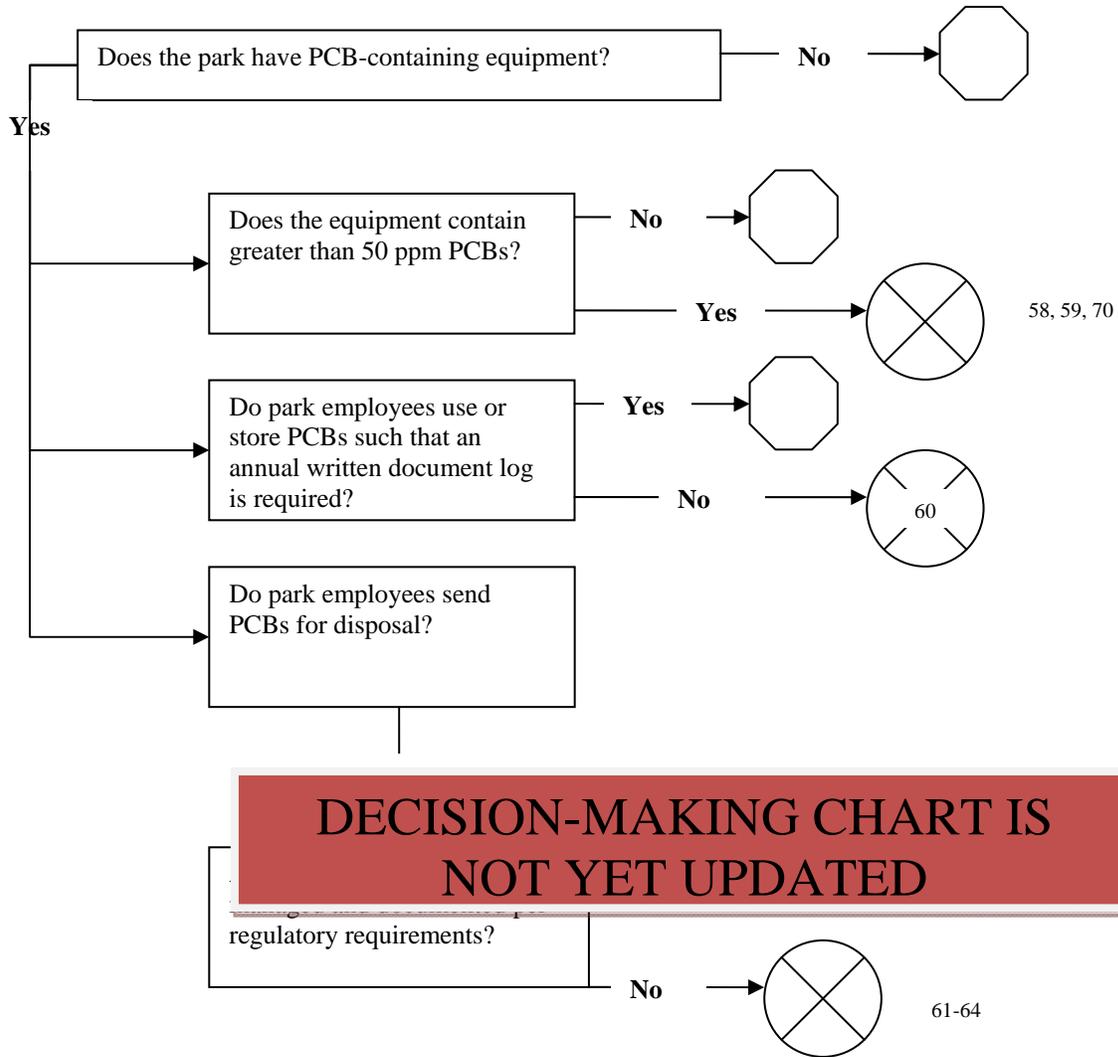
LQG of hazardous waste:

Do park employees manage hazardous waste per LQG requirements?	Yes →	No →	29, 43-46
Have park employees received hazardous waste training?	Yes →	No →	47-51
Do park employees maintain appropriate records regarding hazardous waste generation and transport?	Yes →	No →	35, 52-56
Do park employees manage Satellite Accumulation Areas per requirements?	Yes →		
DECISION-MAKING CHART IS NOT YET UPDATED			21-24
Do park employees use hazardous waste manifests?	No →		30, 31
Do park employees perform pre-transport preparations?	Yes →	No →	25, 26
Do park employees ensure hazardous waste is shipped to a TSDF?	Yes →	No →	32
Do park employees properly manage containers of hazardous waste?	Yes →	No →	17 – 20, 27, 28



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Hazardous Waste
2012 Update*





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes.. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders (EOs) or Director’s Orders (DOs). Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>General Information</i>		
2.	<p>Have park employees identified its waste streams and determined if they are considered hazardous waste? [40 CFR 262.11]</p> <p>Note: To determine if a waste is a regulated hazardous waste, generators can use either existing knowledge or testing.</p> <p><i>AUDITORS: Be sure to check state regulations on hazardous waste as most states (except Alaska and Iowa) have primacy over this program. State regulations must always be cited, even if they defer to the federal program.</i></p>	2
3.	<p>Do park employees maintain waste determination records for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal? [40 CFR 262.40 (c)]</p> <p>Note: Records to maintain include test results, waste analyses, or other determinations made based on generator knowledge or other test methods.</p>	2
6.	<p>Is an EPA or state identification number available? [SQG and LQG: 40 CFR 262.12] [CESQG: BMP]</p> <p>Note: Hazardous waste generators should submit a Notice of Hazardous Waste Generation Activity to the EPA or state and obtain a generator identification number.</p>	2 or 4
10.	<p>Do park employees properly package, label, mark, and placard shipments of hazardous waste off-site per Department of Transportation (DOT) regulations? [40 CFR 262.30 through 262.33]</p>	2
<i>CESQG (≤ 100 kg/month hazardous waste, or ≤ 1 kg/month acutely hazardous waste, or < 100 kg of acute spill residue or soil)</i>		
11.	<p>Do park employees manage hazardous waste as a CESQG only when 100 kilograms (kg) (or 220 pounds) or less of any hazardous waste is generated in any calendar month? [40 CFR 261.5 (a)]</p>	2
12.	<p>Do park employees manage hazardous waste as a CESQG only when 1 kg (2.2 pounds) or less of acutely hazardous waste is generated per calendar month? [40 CFR 261.5 (e)(1)]</p>	2
72.	<p>Do park employees manage hazardous waste as a CESQG only when 100 kg (220 pounds) or less of any residue or contaminated soil, waste, or other debris resulting from the cleanup of a spill, into or on any land or water, of any acute hazardous waste is generated? [40 CFR 261.5 (e)(2)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
13.	Do park employees manage hazardous waste as a CESQG only when 1,000 kg (2,200 pounds) or less of hazardous waste accumulates at any one time? [40 CFR 261.5 (g)(2)]	2
15.	Are hazardous wastes managed per requirements applicable to SQG if accumulation limits are exceeded for any month? [40 CFR 261.5 (g)(2)]	2
<i>SQG (>100 kg to <1,000 kg/month hazardous waste or <1 kg/month acutely hazardous waste)</i>		
36.	Do park employees manage hazardous waste as an SQG only when between 100 kg (220 pounds) and 1,000 kg (2,200 pounds) of hazardous waste is generated per calendar month or less than 1 kg (2.2 pounds) of acutely hazardous waste is generated per calendar month? [40 CFR 262.34 (d)]	2
37.	Do park employees manage hazardous waste as an SQG only when less than 6,000 kg (13,200 pounds) of hazardous waste accumulates at any one time? [40 CFR 262.34 (d)(1)]	2
38.	Have park employees requested and received accumulation time limit extensions when a one-time, unusual, or unforeseen event occurs causing hazardous waste to accumulate beyond normal time limits? [40 CFR 262.34 (f)] Note: The EPA grants up to 30-day extensions on accumulation time limits when appropriate. There are no exemptions for exceeding hazardous waste quantity limits.	2
39.	Have park employees submitted a report to the EPA Regional Administrator to account for a late return manifest? [40 CFR 262.42 (b)] Note: If a signed copy of the hazardous waste manifest is not received from the designated treatment, storage, and disposal facility (TSDF) within 60 days of the date the waste was accepted by the initial transporter, a report must be filed with the EPA. The report consists of a legible copy of the manifest and an explanation that the park has not received confirmation.	2
40.	Are hazardous wastes shipped without a manifest? [40 CFR 262.20 (e)(1) and (e)(2)] Note: The park does not need to use a manifest when: <ul style="list-style-type: none"> • The waste is sent to a reclaimer under a contractual agreement that specifies the type of waste and frequency of shipments; • The vehicle used to transport the waste to the recycling facility, and to deliver regenerated material back to the generator, is owned and operated by the waste reclaimer; • A copy of the reclamation agreement is maintained in park files for at least three years after termination or expiration of the agreement. Otherwise, a hazardous waste manifest is required.	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
41.	<p>Are used oil/solvent mixtures burned in a used oil furnace? [40 CFR 266.108]</p> <p>Note: When burning used oil/solvent mixtures in used oil furnaces, the following specifications must be achieved for exemption from regulations in this subpart:</p> <ul style="list-style-type: none"> • Volume burned is less than 210 gallons/month; • Boiler rating meets EPA minimums; • Effective stack height of boiler is greater than 4 m; • Staff maintain records of each time waste is burned in the boiler for at least 3 years; • Staff notifies EPA that the park is an SQG and is burning solvent as a method of solvent disposal; • Solvent has a minimum heating value of 5,000 Btu/lb., as generated; • Solvent does not contain F020, F021, F022, F023, F026, or F027 waste. 	2
<i>LQG (>1,000 kg/month hazardous waste or >1 kg acutely hazardous waste)</i>		
43.	<p>Have park employees submitted the most recent biennial hazardous waste report to the EPA Regional Administrator or state? [40 CFR 262.41 (a)]</p> <p>Note: The report must be submitted by March 1st of each even numbered year to document the previous year's generation of hazardous waste. State requirements for this report may be different than federal requirements.</p>	2
44.	<p>Have park employees made efforts to reduce the volume and toxicity of hazardous waste generated in the previous year and documented these efforts in the biennial report? [40 CFR 262.41 (a)(6)]</p>	2
45.	<p>Have park employees submitted an Exception Report to the EPA Regional Administrator (or state agency) to account for an overdue returned manifest? [40 CFR 262.42 (a)(2)]</p> <p>Note: The park should receive a copy of the hazardous waste manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.</p> <p>An Exception Report must include a legible copy of the initial manifest and a cover letter signed by the generator (or authorized representative) explaining efforts taken to locate the hazardous waste and results of those efforts.</p>	2
46.	<p>Have park employees maintained copies of the biennial Hazardous Waste Report and any Exception Reports for a period of not less than three years from the due date of the reports? [40 CFR 262.40 (b)]</p>	2
<i>Training</i>		
47.	<p>Have park employees successfully completed a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures compliance with hazardous waste regulations? [40 CFR 265.16 (a)(1)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
48.	<p>Is the hazardous waste training for park staff directed by a person who is trained in hazardous waste management procedures? [40 CFR 265.16 (a)(2)]</p> <p>Note: Training should be relevant to the facility and the positions in which they are employed and it should include contingency plan implementation.</p>	2
49.	<p>Is the hazardous waste training designed to ensure park employees are able to effectively respond to emergency situations? [40 CFR 265.16 (a)(3)]</p> <p>Note: Training should include information on facility specific emergency procedures, emergency equipment, and emergency systems, including:</p> <ul style="list-style-type: none"> • Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; • Key parameters for automatic waste feed cut-off systems; • Communications or alarm systems; • Response to fires or explosions; • Response to ground-water contamination incidents; and • Shutdown of operations. <p>Note: Facility employees that have received OSHA HAZWOPER training [29 CFR 1910.120(p)(8) and 1910.120(q)] do not need to have separate emergency training described above if the overall facility training meets all requirements of this section.</p>	2
50.	<p>Have employees received hazardous waste training within six months of starting their job? [40 CFR 265.16 (b)]</p>	2
51.	<p>Is hazardous waste training provided to park employees on an annual basis after initial receipt of the training? [40 CFR 265.16 (c)]</p>	2
<i>Recordkeeping</i>		
52.	<p>Are records that document the employee name and job title for each position related to hazardous waste management maintained? [40 CFR 265.16 (d)(1)]</p>	2
53.	<p>Do park employees maintain written job descriptions for each position related to hazardous waste management? [40 CFR 265.16 (d)(2)]</p> <p>Note: The description must include the requisite skill, education, or other qualifications, and duties of park employees assigned to each position.</p>	2
54.	<p>Do park employees maintain written descriptions of the type and amount of both introductory and continuing training that will be given to each position related to hazardous waste management? [40 CFR 265.16 (d)(3)]</p>	2
55.	<p>Do park employees maintain documents pertaining to hazardous waste training or relevant job experience for each position related to hazardous waste management? [40 CFR 265.16 (d)(4)]</p>	2
56.	<p>Do park employees maintain hazardous waste training records for all current staff, and on former staff, for at least three years from the date the employee last worked at the park? [40 CFR 265.16 (e)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<p><i>SQGs and LQGs</i> <i>Where citations include reference to 40 CFR 265, certain regulations applicable to hazardous waste treatment, storage, and disposal facility (TSDF) also apply to SQGs and LQGs.</i></p>		
17.	<p>Do park employees maintain containers of hazardous waste in good condition and ensure that they are compatible with the waste stored in them? [SQG: 40 CFR 262.34 (d)(2) and (d)(3), 265.172] [LQG: 40 CFR 262.34 (a)(1) and 265.172]</p> <p>Note: For example, metal containers should not be used for the storage or acidic or basic waste solutions unless the drums are properly lined.</p>	2
18.	<p>Are containers of hazardous waste maintained in a closed position, unless adding or removing waste? [SQG: 40 CFR 262.34 (d)(2) and 265.173 (a)] [LQG: 40 CFR 262.34 (a)(1) and 265.173 (a)]</p>	2
19.	<p>Are containers of hazardous waste maintained such that accumulation start date is clearly marked and visible for inspection? [40 CFR 262.34 (a)(2)]</p>	2
20.	<p>Are containers (and tanks) of hazardous waste labeled with the words 'Hazardous Waste'? [40 CFR 262.34 (a)(3)]</p> <p>Note: State labeling requirements may be different – be sure to check state-specific regulations.</p>	2
<p><i>Satellite Accumulation Areas</i></p>		
21.	<p>Do park employees maintain satellite accumulation areas such that they are under the control of the operator of the process generating the hazardous waste and are located at or near the point of generation? [40 CFR 262.34 (c)(1)]</p>	2
22.	<p>Do park employees ensure that each satellite accumulation area does not exceed 55 gallons of hazardous waste or one quart of acutely hazardous waste? [40 CFR 262.34 (c)(1)]</p> <p>Note: Accumulation may take place in a variety of containers, as long as the total volume does not exceed 55 gallons or 1 quart acutely hazardous waste.</p>	2
23.	<p>Do park employees ensure that each container in a satellite accumulation area is marked with the words 'Hazardous Waste' or with other words that identify the contents of the containers? [40 CFR 262.34 (c)(1)(ii)]</p>	2
24.	<p>Do park employees promptly transfer excess waste from satellite accumulation areas to 90- or 180-day accumulation areas? [40 CFR 262.34 (c)(2)]</p> <p>Note: When the amount of hazardous waste stored reaches 55 gallons or one quart acutely hazardous waste, containers must be labeled with the date the excess waste began accumulating and transferred to the main accumulation area within three days.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>Pre-Transport Requirements</i>		
26.	Do park employees perform weekly inspections of hazardous waste containers? [SQG: 40 CFR 262.34 (d)(2)] [LQG: 40 CFR 265.174 and 40 CFR 262.34 (a)(4)] Note: The purpose of weekly inspections is to look for leaks and deterioration caused by corrosion or other factors.	2
73.	Do park employees ensure incompatible hazardous waste, or incompatible wastes and materials, are not placed in the same container? [SQG: 40 CFR 262.34 (d)(2) and 265.177 (a)] [LQG: 40 CFR 262.34 (a)(4) and 265.177 (a)]	2
27.	Do park employees properly segregate storage containers of incompatible hazardous wastes? [SQG: 40 CFR 262.34 (d)(2) and 265.177 (c)] [LQG: 40 CFR 262.34 (a)(4) and 265.177 (c)] Note: Segregations can be accomplished through use of berms, dikes, walls, or other methods that prevent mixing of wastes in the event of a release or spill.	2
28.	Do park employees ensure containers of ignitable or reactive wastes are stored more than 15 meters (50 feet) from the facility's property line? [SQG: BMP] [LQG: 40 CFR 262.34 (a)(4) and 265.176]	2 or 4
29.	Do park employees comply with hazardous waste time accumulation limits? <ul style="list-style-type: none"> • SQG: Hazardous waste must be shipped offsite within 180 days of its generation. If the hazardous waste is being shipped greater than 200 miles, the waste must be shipped offsite within 270 days of its generation. [40 CFR 262.34 (d)-(e)] • LQG: Hazardous waste must be shipped offsite within 90 days of its generation. [40 CFR 262.34 (a)] 	2
<i>Hazardous Waste Manifests</i>		
30.	Are hazardous waste manifests used for all offsite shipments of hazardous waste? [40 CFR 262.20 (a)]	2
31.	Have park employees used the proper hazardous waste manifest to document offsite shipments? [40 CFR 262.21] Note: States may require use of their own hazardous waste manifest if either the state to which the waste is sent or the state in which the park is located issue their own hazardous waste manifests.	2
32.	Is a permitted TSDF for handling waste identified on the park's hazardous waste manifest? [40 CFR 262.20 (b)] Note: The TSDF must be permitted to handle the type of waste identified on the manifest.	2
35.	Do park employees maintain copies of hazardous waste manifests, signed by the designated TSDF, for at least three years? [40 CFR 262.40 (a)]	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<p>PCB Management</p> <p><i>Polychlorinated Biphenyls (PCBs) are not managed under the RCRA hazardous waste regulation; they are managed under the Toxic Substances Control Act (TSCA). The following questions are not intended to determine full compliance with PCB regulations, but address selected topics regarding PCB waste disposal.</i></p>		
58.	Do park employees dispose of PCB waste with PCB concentrations of 50 ppm or greater within one year of becoming a waste? [40 CFR 761.65 (a)(1)]	2
74.	Have park employees provided written notification to the EPA Regional Administrator if they have been unsuccessful in disposing of or securing disposal for their waste within one year? [40 CFR 761.65 (a)(2)] Note: The EPA automatically extends the time limit for one year if the notification is received at least 30 days before the initial one year time limit expires and the notice identifies the storer, the types, volumes, and locations of the waste and the reasons for failure in meeting the 1-year deadline; written record documenting all continuing attempts to secure disposal is maintained until the waste is disposed of and available upon request; and continuing attempts for disposal were initiated within 270 days after the time the waste was first subject to the one year time limit.	2
59.	Do park employees store PCB-containing items, with concentrations of 50 ppm or greater, in a facility that meet the regulatory requirements of a storage unit? [40 CFR 761.65 (b)] Note: Storage requirements do not apply to small capacitors, such as those found in fluorescent lamp ballasts.	2
60.	Do park employees prepare and maintain an annual written document log for each facility by July 1 covering the previous calendar year (January-December)? [40 CFR 761.180 (a)] Note: The document log must be prepared when the following is used or stored at any one time: <ul style="list-style-type: none"> • At least 45 kg (99.4 lbs.) of PCBs contained in PCB containers; • One or more PCB transformers (500 ppm or greater); or • 50 or more large PCB capacitors (high or low voltage). The log must be retained for at least 3 years after the facility ceases to use or store PCBs and PCB items in quantities described above.	2
61.	Are offsite shipments of PCB waste properly manifested when sent for disposal? [40 CFR 761.207]	2
62.	Do park employees maintain the proper Certificate of Disposal for the disposed PCBs? [40 CFR 761.218 (d)(1)]	2
63.	Do employees blend or otherwise dilute PCBs regulated for disposal to avoid disposal requirements? [40 CFR 761.20 (a)(4)]	2
64.	Are PCB items stored in DOT-approved containers? [40 CFR 761.65 (c)(6)]	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>PCB Ballasts</i>		
65.	Are ballasts that are not specifically labeled “No PCBs” managed as though they contain PCBs? [40 CFR 761.60 (b)(2)(i)] Note: Ballasts not specifically labeled “No PCBs” should be disposed of as if they contain PCBs, unless it can be documented that they were made after July 1, 1998 (the date after which, labels were no longer required) or confirmation is obtained from the manufacturer indicating they are PCB-free.	2
66.	Do park personnel dispose of leaking PCB ballasts at a TSCA-approved incinerator? [40 CFR 761.62 (a)]	2
<i>PCB Transformers</i>		
68.	Have park employees properly registered PCB transformers, with concentrations of ≥ 500 ppm PCBs, with the EPA and the local fire department (if applicable)? [40 CFR 761.30 (a)(1)(vi)]	2
69.	Are PCB transformers with ≥ 500 ppm PCBs visually inspected every three months? [40 CFR 761.30 (a)(1)(ix)] Note: The visual inspection must include investigation for any leak of dielectric fluid on or around the transformer. The extent of the visual inspections will depend on the physical constraints of each transformer installation and should not require an electrical shutdown of the transformer being inspected.	2
<i>SPCC Planning</i>		
70.	If park employees store PCB liquids at a concentration of 50 ppm or more, does the park have an SPCC plan? If the park already has an SPCC plan, are these PCB liquids included in the plan? [40 CFR 761.65 (c)(7)(ii)] Note: A facility that <i>stores</i> (for disposal or reuse) PCB liquids, at concentrations 50 ppm or greater, must have prepared and implemented an SPCC plan, regardless of the volume of oil stored onsite. (See SPCC Planning EnviroCheck Sheet for plan requirements.)	2

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
1.	Have park employees reviewed state hazardous waste requirements to determine: <ul style="list-style-type: none"> • The state’s hazardous waste generator status classifications; • The state’s hazardous waste accumulation time limits; and • If waste generated at the park is a listed state hazardous waste? [BMP]	4



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
5.	<p>Have park employees developed and maintained monthly hazardous waste generation totals?</p> <p>Waste characterizations and waste inventories can be used by the park to accurately track the quantity of waste generated per month. Generator status is based on quantity. Keeping track of quantity accumulated confirms the facility's generator status as a CESQG, SQG, or LQG.</p> <p>If the park cannot verify its generator status, the auditor should make a conservative estimate of quantity generated and audit the facility based on more stringent requirements.</p> <p>[BMP]</p>	4
7.	<p>Have park employees determined and documented whether or not hazardous waste can be disposed of down a drain that mixes the waste with domestic sewage discharged to a wastewater treatment plant?</p> <p>[BMP]</p> <p>Note: This is only legal in some instances, such as a laboratory. The park should consult with the publicly owned treatment work (POTW) or federally owned treatment work (FOTW) to gain approval for drain disposal. If the park is on a septic system, hazardous wastes may NOT be disposed of down the drain.</p>	4
9.	<p>Have park employees documented the quantity of hazardous waste generated and management methods used prior to drain disposal?</p> <p>[BMP]</p>	4
71.	<p>Have park employees determined how concessioners are managing their hazardous waste?</p> <p>[BMP]</p> <p>Note: Because of the large liability of hazardous waste generated within the park, personnel should be aware of how such wastes are managed. Additionally, there may be opportunities for collaboration on hazardous waste management.</p>	4
<i>CESQG (<100 kg/month hazardous waste and <1 kg acutely hazardous waste)</i>		
16.	<p>Are used oil/solvent mixtures burned in a used oil furnace? If so, does the park should maintain records of burning?</p> <p>[BMP]</p>	4
<i>Hazardous Waste Manifests</i>		
33.	<p>Do park employees maintain TSDF management records that indicate the TSDF is well managed and properly permitted?</p> <p>[BMP]</p>	4
34.	<p>Do park employees make efforts and document their efforts to recycle hazardous waste that is capable of being recycled?</p> <p>[BMP related to EO 13148, waste reduction requirement of 50% by 2006.]</p>	4
<i>PCB Management</i> <i>Polychlorinated Biphenyls (PCBs) are not managed under the RCRA hazardous waste regulations, they are managed under the Toxic Substances Control Act (TSCA). The following questions address selected BMP topics regarding PCB waste disposal.</i>		
57.	<p>Do park employees maintain an inventory of PCB-containing items, with >50 ppm PCBs, such as transformers?</p> <p>[BMP]</p>	4



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Hazardous Waste
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
67.	Do park employees dispose of intact, non-leaking PCB-containing ballasts by one of the following methods: <ul style="list-style-type: none">• High temperature incineration;• Recycling; or• Disposal in a chemical or hazardous waste landfill? [BMP]	4



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Laboratory Chemical and
Waste Management
2012 Update*

INTRODUCTION

Park employees may use hazardous chemicals in laboratory settings. For example, employees may perform water quality testing, wastewater quality monitoring, natural resource conservation, research, or environmental education (teaching). In such settings, a similar (but different) set of hazard communication regulations apply as compared with hazardous chemicals used by facilities maintenance personnel.

Laboratory use of hazardous chemicals is unique because laboratories typically contain a small quantity of a large variety of chemicals. The types of chemicals used and stored in laboratories may include preserved biological specimens or rare, unusual compounds used in specific research protocols. The waste produced in laboratories may vary greatly over short periods of time and the properties of the waste may be unknown or uncharacterized. The combination of these laboratory attributes makes chemical storage and waste management especially challenging.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use this data to populate the regulatory findings database that will be submitted to and used by the park.

Ask to review the following written records, if available:

- Chemical Hygiene Plan (CHP) or Hazard Communication (HAZCOM) program
(Some parks may include laboratory safety and health concerns in their HAZCOM program)
- Material safety data sheets (MSDS)
- NPDES permits and renewal applications (if permit expires within 180 days)
- Discharge monitoring reports
- HAZCOM training records for affected park personnel

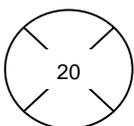
Ask to interview or plan to contact the following park personnel:

- Designated Chemical Hygiene Officer
- Laboratory technicians
- Water treatment staff
- Wastewater treatment plant operators

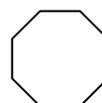
During the walk-around of the park, observe the following:

- Chemical hygiene practices (e.g., no eating/drinking in lab, organized countertops)
- Chemical storage areas (e.g., storage cabinets)
- MSDS files or binders
- Labels on containers of incoming chemicals
- Laboratory ventilation units (e.g., hoods)
- Laboratory spaces (e.g., drinking water lab, natural resources lab, wastewater plants)
- The location and condition of floor and sink drains

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

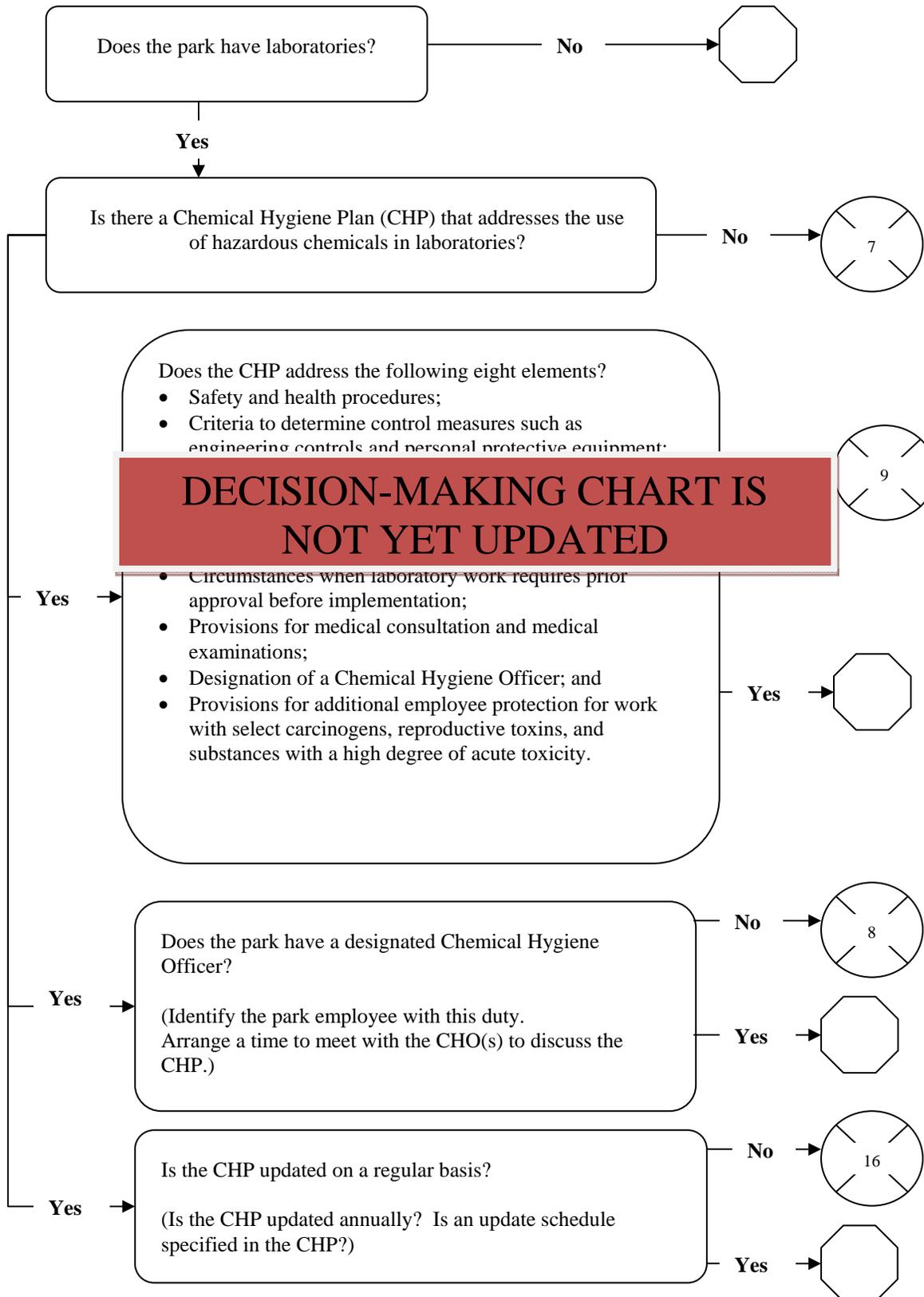


*Indicates that the regulatory
requirement has been met and that the
train of questions can stop.*



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

Laboratory Chemical and
Waste Management
2012 Update





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Laboratory Chemical and
Waste Management
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>Chemical Hygiene Plan</i>		
7.	<p>Has a comprehensive Chemical Hygiene Plan (CHP) been developed to address the use of hazardous chemicals in laboratories at the park and is it readily available to employees?</p> <p>Note: Examples of research and teaching laboratories in the NPS include environmental and monitoring, education, and conservation laboratories. Specific examples may include water quality laboratories where wastewater or drinking water is tested, spaces where biological specimens are collected and preserved, or spaces where artifacts are preserved. [29 CFR 1910.1450 (e)]</p>	2
8.	<p>Have park employees designated an employee who is responsible for implementation of the CHP?</p> <p>Typically, this person is referred to as the Chemical Hygiene Officer (CHO). [29 CFR 1910.1450 (e)(3)(vii)]</p>	2
9.	<p>Does the CHP ensure laboratory employee protection by addressing the following eight elements:</p> <ul style="list-style-type: none"> • Safety and health standard operating procedures; • Criteria to determine control measures such as engineering controls and personal protective equipment; • Performance requirements for fume hoods and protective equipment; • Provisions for employee training and dissemination of applicable information; • Circumstances when laboratory work requires prior approval before implementation; • Provisions for medical consultation and medical examinations; • Designation of a CHO; and • Provisions for additional employee protection for work with select carcinogens, reproductive toxins, and substances with a high degree of acute toxicity? <p>[29 CFR 1910.1450 (e)(3)]</p>	2
16.	<p>Is the CHP reviewed and updated at least annually by park employees to evaluate its effectiveness? [29 CFR 1910.1450 (e)(4)]</p>	2
17.	<p>Do park employees conduct employee exposure measurements for employees exposed to regulated substances? [29 CFR 1910.1450 (d)]</p> <p>Note: Monitoring measurements must be conducted when there is reason to believe exposure levels exceed the regulatory action level or permissible exposure limit.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Laboratory Chemical and
Waste Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
18.	Do park employees receive timely training on the hazards of chemicals present in their work area? Note: Training should be conducted at the time of initial assignment and prior to the assignment of tasks involving exposure to new chemicals. The training should include a review of the contents presented in the CHP. [29 CFR 1910.1450 (f)]	2
22.	Are park employees provided with medical monitoring, evaluation, and follow-up examination in the following circumstances: <ul style="list-style-type: none"> • When an employee develops signs or symptoms associated with a hazardous chemical to which the employee may have been exposed in the laboratory; • Where exposure monitoring reveals an exposure level routinely above the action level; and • Whenever an event takes place in the work area such as a spill, leak, explosion or other occurrence resulting in the likelihood of a hazardous exposure. [29 CFR 1910.1450 (g)]	2
19.	Do park employees ensure all labels of incoming containers of hazardous chemicals are not removed or defaced? [29 CFR 1910.1450 (h)(1)(i)]	2
20.	Do park employees maintain MSDS and make them readily accessible to laboratory employees? [29 CFR 1910.1450 (h)(1)(ii)]	2
21.	Do laboratory employees establish and maintain records of measurements taken relating to employee exposures, as well as any medical consultations or examinations? [29 CFR 1910.1450 (j)]	2
22.	Have laboratory employees explored efficiency opportunities in their laboratories such as the "Labs21" partnership to encourage the development of sustainable, high performance, and low-energy laboratories? [EO 13423, Section 2 (a), implementing instructions VI. A. (6)]	3

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>Handling</i>		
2.	Do park employees have control measures in place to ensure laboratory chemicals are maintained in a safe manner? [BMP] Note: Laboratory staff may conduct periodic reviews of the chemical inventory or use other methods to determine if chemicals are stored beyond their safe and useful shelf life, to ensure that chemicals are stored in structurally sound containers, and to ensure that incompatible materials are stored separately.	4
<i>Waste Management</i>		
4.	Do park employees manage contaminated glassware and empty chemical containers in a manner that protects downstream waste handlers? [BMP]	4
5.	Have park employees obtained guidance from the local solid waste authority regarding disposal of nonhazardous chemical solids? [BMP]	4
<i>Wastewater Management</i>		



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Laboratory Chemical and
Waste Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
6.	Have park employees obtained guidance from the local water authority regarding sink disposal liquid chemical solutions? [BMP]	4
15.	Have park employees developed a policy on sink disposal practices consistent with and appropriate for the wastewater treatment system? [BMP] Note: A simple method for reminding staff of the policy is by posting it above or near the affected sinks.	4
<i>Spill Preparedness and Prevention</i>		
11.	Has the laboratory been supplied with appropriate incidental spill control supplies? If spill control supplies are present, are employees aware of their location and proper use. [BMP]	4
12.	Are chemical containers stored in secondary containment? [BMP] Note: Precautions should be taken for those containers stored near sinks or drains.	4
<i>Pollution Prevention</i>		
13.	Have park employees identified pollution prevention techniques for materials used in the laboratory? [BMP] Note: Laboratory staff may set priorities for materials in the laboratory's chemical inventory and for common wastes. High priority items may be assigned to those chemicals or wastes with the greatest toxicity or largest quantity.	4
14.	Have laboratory employees implemented a mercury phase-out program for mercury-containing laboratory equipment, e.g., thermometers? [BMP]	4



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Pesticide Management
2012 Update*

INTRODUCTION

The National Park Service (NPS) is a leader among federal agencies in the implementation of its Integrated Pest Management (IPM) program. With over 80 million acres of land, 45,000 buildings and cultural landscapes ranging from croplands of cultural landscapes, wildlands, habitat for endangered species, historic structures, concessions operations, facilities, to historic rose gardens, the NPS faces every conceivable pest problem. Since implementing an IPM program in the early 1980's, the NPS has reduced risk from unnecessary pesticide use while improving the effectiveness of their pest management efforts.

The storage, use, and disposal of pesticides is regulated at the federal level, under Title 7 USC136r-1. Supplemental regulations for parks are found in the Department Manual Part 517, Integrated Pest Management, in Directors Order 77-7 (in draft), and in Management Policies 2001. However, more stringent state and/or local regulations may exist, and must be followed by pesticide applicators and considered by auditors.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use this data to populate the regulatory findings database that will be submitted to and used by the park. This data will also be used to populate the Environmental Condition Assessment database.

Ask to review the following written records, if available:

- Park's annual list of requested and approved/denied Pesticide Use Proposal (PUP) for the park including those for concessioners
- Inventory of pesticides stored onsite
- Pesticide disposal documentation
- Any emergency exemption granted to the NPS by the EPA
- Pesticide applicator, IPM, and Hazard Communication (HAZCOM) training records
- Material Safety Data Sheets (MSDSs) for pesticides stored or used on site
- State pesticide application records and PUPS
- Certification of pesticide applicators

Ask to interview or plan to contact the following park personnel:

- IPM coordinator (park, Regional, and Servicewide)
- Roads and trails crew
- Facility manager
- Concession specialist
- Purchasing officer
- Interpretation staff
- Volunteer coordinator
- Natural resources and cultural manager
- Buildings, grounds, and landscaping staff
- Risk managers and safety staff

During the walk-around of the park, observe the following:

- Use of PUPS database
- Pesticide storage areas
- Other chemical storage areas
- Pesticide labels
- MSDS files or binders

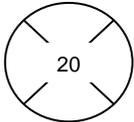


NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Pesticide Management
2012 Update*

- Pesticide application equipment
- Signs or fencing used to prevent access to areas during spraying
- Personal protective equipment

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



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Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

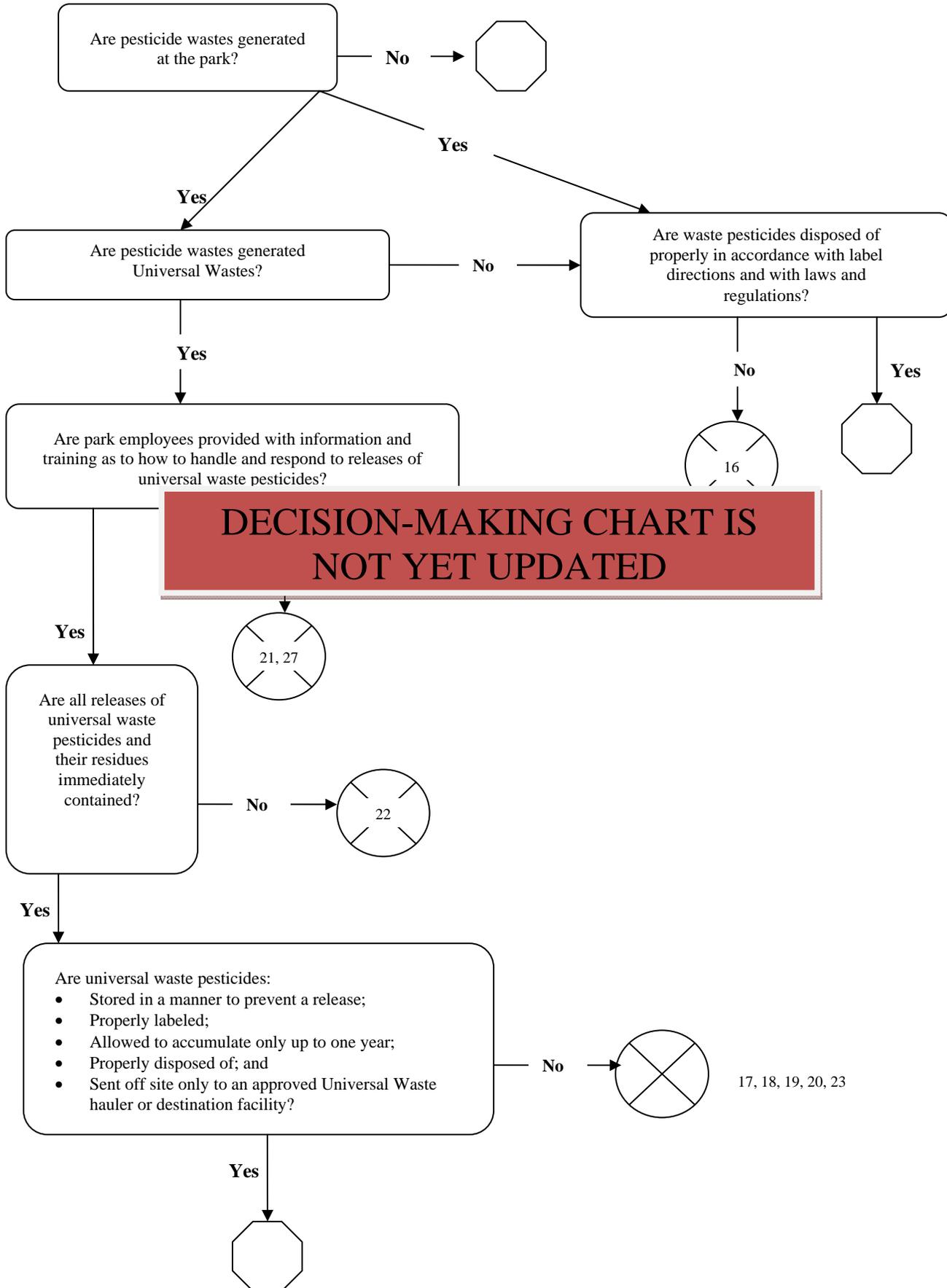


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NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Pesticide Management
2012 Update*



DECISION-MAKING CHART IS NOT YET UPDATED



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Pesticide Management
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>General Management</i>		
30.	Are park staff implementing integrated pest management and other appropriate landscape management practices? [EO 13514, Section 2 (e)(vii)]	3
<i>Approval for Pesticide Use</i>		
1.	If pesticides are proposed to be used at the park, is there a designated IPM coordinator to manage the Pesticide Use Proposal System (PUPS)? [Draft DO 77-7 IPM] <i>AUDITORS: Note that Draft DO 77-7 is still in draft format. The governing policy until it is approved is still NPS 77. Draft DO 77-7 and NPS 77 are similar with a few differences. This checksheet was put together in 2012 with consultation from the NPS National IPM Coordinator.</i>	3
2.	Does the IPM coordinator submit a PUP to the regional IPM coordinator for each pesticide project that arises, and track the project through the pesticide review process? [Draft DO 77-7 IPM]	3
3.	Is pesticide approval obtained through means other than PUPS if rapid pesticide approval is needed (e.g., phone calls, e-mail)? [Draft DO 77-7 IPM]	3
<i>Purchase and Use</i>		
4.	Does a certified pesticide applicator conduct or directly supervise application of restricted use pesticides? [40 CFR 171.6 and DO 77-7 IPM, and applicable State regulations]	2
5.	Are pesticides used in accordance with label instructions? [40 CFR 171.5 (a)(3)]	1 or 2
6.	Is all pesticide use at the park reported annually through the PUPS? Does the IPM coordinator enter the amount of pesticide used on a project by project basis at the end of the calendar year? [Draft DO 77-7 IPM]	3
7.	Do park employees only purchase the amount of pesticide authorized for usage during the year, unless the smallest amount available for purchase is larger than the amount necessary for approved projects? [Draft DO 77-7 IPM]	3
8.	Are pesticides transported inside a lockable container in the trunk or bed of a vehicle? [Draft DO 77-7 IPM]	3
9.	Are copies of the pesticide label and MSDS maintained at the site, storage location, and in transport vehicles where pesticides are being applied? [Draft DO 77-7 IPM]	3
10.	Do applicators of pesticides wear personal protective equipment as required by the pesticide label? [40 CFR 171.5]	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Pesticide Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
11.	Are pesticides applied so as not to contact non-handlers? [40 CFR 170.210 (a)]	1
12.	Are re-entry times and posting implemented as directed by the pesticide label? Is the following information posted: <ul style="list-style-type: none"> • That the area was treated with a pesticide; • When the area was treated; • When the area may be re-entered by unprotected individuals; • What materials were used; and • Name and telephone number of a contact person? [Draft DO 77-7 IPM]	3
31.	If park employees apply pesticides over water or in a way where pesticides could otherwise come in contact with waters of the United States, do they have a NPDES Pesticide General Permit (PGP)? are they required to have a NPDES Pesticide General Permit (PGP)? If so, do they have a permit? [76 FR 68753 November 7, 2011] Note: Beginning January 2012 the EPA requires pesticide applications (point source) over water or that would otherwise could come in contact with waters of the United States to have a NPDES PGP. Activities that could trigger the need for a permit are: <ul style="list-style-type: none"> • Mosquito and other flying insect pest control; • Weed and algae control; • Animal and pest control; and • Forest canopy pest control. An example of where pesticides are not applied over water but could come in contact with waters of the United States is pesticides applied alongside a river, where the pesticide residue could come in contact with the water if the river levels were to rise. Refer to http://cfpub.epa.gov/npdes/home.cfm?program_id=410 for more information.	2
Storage		
<i>Auditors: The NPS IPM Coordinator has stated that 'household use' or the amount typical for a household (e.g. one or two cans of roach spray for an office) is not subject to the storage requirement. However, a case of roach spray would be subject to the requirement.</i>		
13.	Are pesticide storage areas locked, fireproof, and ventilated, and are proper warning signs posted as stated on the label? [Draft DO 77-7 IPM]	3
14.	Are pesticides stored separately from all other substances (e.g., cleaning fluids, paint, solvents, and other chemical substances)? [Draft DO 77-7 IPM]	3
15.	Is each type of pesticide stored on separate shelves in accordance with label directions? [Draft DO 77-7 IPM]	3
Disposal		
16.	Are waste pesticides disposed of in compliance with their labels and federal, state, and local regulations? Draft DO 77-7 IPM]	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Pesticide Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
	<p style="text-align: center;">Universal Waste Disposal</p> <p><i>AUDITORS: In general only SQGs and LQGs of hazardous waste need to meet universal waste rule requirements. This is true unless the State imposes more stringent standards, or if the park's internal policy is to manage their universal wastes in accordance with the universal waste rule.</i></p> <p><i>If SQGs choose to manage universal waste according to the universal waste rule, and they accumulate less than 5,000 kg of universal waste at any time, they are classified a Small Quantity Handler (SQH) of universal waste. A Large Quantity Handler (LQH) of universal waste accumulates 5,000 kg or more total of universal waste at any time.</i></p> <p><i>CESQGs have the option to manage universal waste as hazardous waste or as universal waste. A benefit of managing universal waste according to the universal waste rule requirements is that it tends to lead to better labeling and to less accumulation of waste. If a CESQG is voluntarily managing universal waste according to the universal waste rule, then #17-20 are BMPs. Refer to the Universal Waste Checksheet for more information.</i></p>	
17.	<p>Are universal waste pesticides managed in a way that prevents releases to the environment by storing them in containers that remain closed, structurally sound, compatible with the pesticide, and lack evidence of leaks or damage that could cause leaks? [40 CFR 273.13 (b)(1) if SQH and 40 CFR 273.33 (b)(1) if LQH]</p>	2 or 4
18.	<p>Are <i>recalled</i> universal waste pesticides held in a container (or a multiple container package unit), tank, transport vehicle, or vessel, with both of the following:</p> <ul style="list-style-type: none"> • The label that accompanied the product as sold or distributed. • The words “Universal Waste - Pesticide(s)” or “Waste Pesticide(s)?” <p>[40 CFR 273.14 (b) if SQH or 40 CFR 273.34 (b) if LQH]</p>	2 or 4
19.	<p>Are <i>unused</i> universal waste pesticides held in a container (or multiple container package unit), tank, transport vehicle, or vessel, with both of the following:</p> <ul style="list-style-type: none"> • The label that was on the product when purchased. If it is illegible or unavailable, use the appropriate label as required under U.S. Department of Transportation (DOT) regulations at 49 CFR Part 172. If use of such a label is not feasible, use another label prescribed or designated by a pesticide collection program. • The words “Universal Waste - Pesticide(s)” or “Waste Pesticide(s)?” <p>[40 CFR 273.14 (c) if SQH or 40 CFR 273.34 (c) if LQH]</p>	2 or 4
20.	<p>Are universal waste pesticides accumulated for no more than one year?</p> <p>Accumulation time may be demonstrated by one of the following:</p> <ul style="list-style-type: none"> • Placing the universal wastes in a container and labeling it with the earliest date that any contents became wastes or were received; • Marking each individual item of universal waste with the date it became a waste or was received; • Maintaining an on-site inventory system that identifies the earliest date that any universal waste in a group of universal waste items or containers became a waste; • Placing the universal wastes in a specific accumulation area and identify the earliest date that any universal wastes in the area became wastes; and • Using any other method that clearly demonstrates the length of time that universal waste have been accumulated, from the date they became wastes. <p>[40 CFR 273.15 if SQH or 40 CFR 273.35 if LQH]</p>	2 or 4



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Pesticide Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
21.	For parks that are Small Quantity Handlers, (SQHs), are employees who handle or have responsibility for managing universal waste pesticides <i>provided with information</i> on the proper handling and emergency response procedures appropriate for the universal wastes handled at the facility? [40 CFR 273.16] <i>AUDITORS: Most NPS facilities are going to be SQHs.</i>	2
27.	For parks that are Large Quantity Handlers (LQHs), does the park ensure that employees who handle or have responsibility for managing universal waste pesticides are <i>thoroughly familiar</i> with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies? [40 CFR 273.36]	2
22.	Are all releases of universal waste pesticides and their residues immediately contained? [40 CFR 273.17 (a)]	2
32.	Is a hazardous waste determination completed on any material resulting from a release? If determined to be hazardous waste, is it managed as such? [40 CFR 273.17 (b)]	2
23.	Are off-site shipments of universal waste pesticides sent only to another universal waste handler, such as a community household hazardous waste collection site, or approved destination facility? [40 CFR 273.18]	2
<i>Recordkeeping</i>		
24.	Is an annual report submitted to the NPS PUPS documenting pesticide request, approval, and use? [Draft DO 77-7 IPM]	3
25.	If surplus chemicals and pesticides are donated to another federal agency, is the donation documented and are records kept for three years? [Draft DO 77-7 IPM]	3
<i>Training</i>		
26.	Has the park IPM coordinator undergone training covering the NPS IPM Principles? [Draft DO 77-7 IPM]	3

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
28.	Has the park IPM coordinator undergone a State authorized pesticide applicator certification course for the state or states in which the park is located? In some states this may be a Priority 2 finding because it may be required by state law.	4
29.	Does the park IPM coordinator have a system in place to ensure that pesticide use requests and pesticide use reports include pesticides used by concessioners, volunteers, contractors and/or other third parties?	4



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Solid Waste Management
2012 Update*

INTRODUCTION

Waste generated by visitors, employees, and concessioners comprise the solid waste generated at National Park Service (NPS) facilities. This varied waste composition includes, but is not limited to, food waste, plastics, glass, packaging and paper. In addition, because each NPS facility is unique in terms of size and amenities, the composition and quantity of waste across the NPS varies by facility. This variety of solid waste presents a challenge to the NPS in determining an effective management strategy.

NPS facilities that operate solid waste management facilities such as landfills and incinerators have the additional challenge of ensuring that these systems are managed in accordance with applicable regulations and in keeping with the charter of the NPS.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use this data to populate the regulatory findings database that will be submitted to and used by the park. This data will also be used to populate the Environmental Condition Assessment database. Refer to last page of this EnviroCheck Sheet for more information.

Ask to review the following written records, if available:

- Standard operating procedures (SOPs) for non-hazardous waste management practices
- Solid waste generation and disposal records
- State and federal inspection reports
- Pollution Prevention (P2) plan
- Integrated Solid Waste Alternatives Program (ISWAP)
- Permits for incineration and land disposal sites (active)
- Closure records for incineration and land disposal sites (inactive)

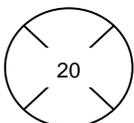
Ask to interview or plan to contact the following park personnel:

- | | |
|--|--|
| <ul style="list-style-type: none"> • Custodial staff • Maintenance staff | <ul style="list-style-type: none"> • Interpretative staff • Purchasing and contracting staff |
|--|--|

During the walk-around of the park, observe the following:

- | | |
|---|--|
| <ul style="list-style-type: none"> • Incineration and land disposal sites (active and inactive) • Construction debris areas • Waste receptacles • Solid waste vehicle storage and washing areas • Compost facilities | <ul style="list-style-type: none"> • Transfer stations • Recycling centers and containers • Bone yards • Campgrounds, picnic areas, roadside pull offs • Visitor center |
|---|--|

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

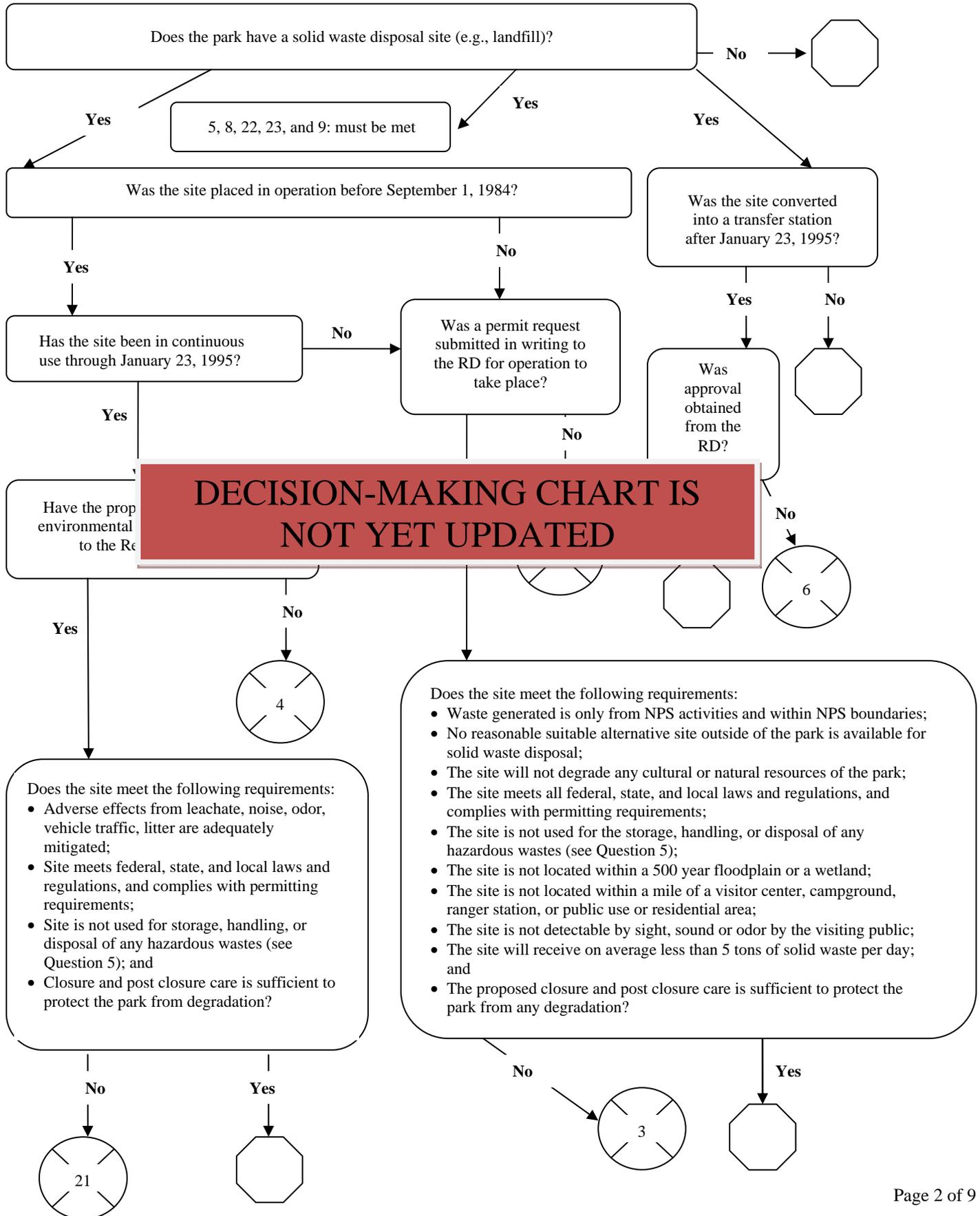


*Indicates that the regulatory
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train of questions can stop.*



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Solid Waste Management
2012 Update*





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Solid Waste Management
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
	<i>Waste Disposal Sites (e.g., onsite landfills/dumps)</i>	
20.	For a site placed in operation <i>after</i> Sept. 1, 1984, has the park submitted a permit request for operation to the NPS Regional Director for approval? [36 CFR 6.4 (b)]	2
3.	For solid waste disposal sites placed in operation <i>after</i> Sept. 1, 1984, do the sites meet the following requirements: <ul style="list-style-type: none"> • Waste generated is only from NPS activities and within NPS boundaries; • No reasonable suitable alternative site outside of the park is available for solid waste disposal; • The site will not degrade any cultural or natural resources of the park; • The site meets all federal, state, and local laws and regulations, and complies with permitting requirements; • The site is not used for the storage, handling, or disposal of any hazardous wastes (see Question 5); • The site is not located within a 500 year floodplain or a wetland; • The site is not located within a mile of a visitor center, campground, ranger station, or public use or residential area; • The site is not detectable by sight, sound or odor by the visiting public; • The site will receive on average less than 5 tons of solid waste per day; and • The proposed closure and post closure care is sufficient to protect the park from any degradation? [36 CFR 6.4 (a)]	2
4.	Do park employees maintain a solid waste disposal site placed in operation <i>before</i> September 1, 1984 that has been in continuous use through January 23, 1995? If so, are the proper permit requests, environmental reports, and approval of the NPS Regional Director on file? [36 CFR 6.5 (a)]	2
21.	For a solid waste disposal site operating <i>prior</i> to September 1, 1984, and that has been in continuous use through January 23, 1995, does the site meet the following requirements: <ul style="list-style-type: none"> • Adequately mitigates adverse effects from from leachate, noise, odor, vehicle traffic, and litter; • Site meets federal, state, and local laws and regulations, and complies with permitting requirements; • Site is not used for storage, handling, or disposal of any items listed in Question #5 (e.g., hazardous wastes); and • Closure and post closure care is sufficient to protect the park from degradation? [36 CFR 6.5(c)]	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Solid Waste Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
5.	<p>If park employees operate or maintain a solid waste disposal site, have park personnel disposed of any of the following items:</p> <ul style="list-style-type: none"> • Hazardous wastes (including Universal Wastes); • Incinerator ash; • Lead-acid batteries; • Polychlorinated Biphenyls (PCBs); • Pesticides; • Sludge from a waste treatment plant, septic system waste or domestic sewage; • Petroleum, including used crankcase oil from a motor vehicle or soil contaminated by such products; • Non-sterilized medical wastes; • Radioactive materials; or • Tires? <p>[For sites in operation prior to September 1, 1984: 36 CFR 6.5 (c)(3); for sites in operation after September 1, 1984: 36 CFR 6.4 (a)(6)]</p>	2
6.	<p>Does the park have a solid waste disposal site that was converted to a transfer station after January 23, 1995? If so did the site receive proper approval from the NPS Regional Director? [36 CFR 6.5 (f)]</p>	2
8.	<p>Is there a procedure in place to ensure that only solid wastes generated by NPS activities or within NPS boundaries are disposed of at the solid waste disposal site (i.e., no waste is accepted from a generator outside the park)? [36 CFR 6.8 (a)]</p>	2
22.	<p>Where the park operates a solid waste disposal site, has the Superintendent developed a program to collect harmful wastes from residential activities including NPS and concessioner households? [36 CFR 6.8 (b)]</p>	2
23.	<p>Have park employees obtained a five-year permit for the solid waste disposal site containing the following elements:</p> <ul style="list-style-type: none"> • Hours of operation; • Number, frequency, size and weight of vehicles used and access routes; • Type and height of perimeter fencing; • Compliance with all applicable federal, state, and local regulations; • Type and frequency of natural resources monitoring; • Right to access site by NPS and other officials for inspection; • Closure and post closure care; • Pest control methods; • Methods of excluding hazardous and other non-approved waste; • Methods of excluded non-NPS generated waste; and • Methods of litter control? <p>[36 CFR 6.9 (e)]</p>	2
9.	<p>Do park employees follow the strictest required regulations in maintaining the permit? [36 CFR 6.9 (f)]</p> <p>Note: A conflict between a requirement of a permit issued by the NPS and a requirement of state or federal law is resolved by following the most stringent requirements.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Solid Waste Management
2012 Update*

<i>Recycling and Composting</i>		
13.	<p>Do park employees recycle, reuse, or refurbish:</p> <ul style="list-style-type: none"> • Toner cartridges; • Batteries (see Universal Waste check sheet); • Scrap metal; • Fluorescent lamps and ballasts (see Universal Waste check sheet); • Paper (white paper, mixed paper, newspaper); • Cardboard; • Aluminum; • Wood pallets • Plastic; and • Glass? <p>[EO 13423, Section 2(e)]</p> <p>If not, are there barriers (e.g., lack of recycling material accepting facilities, remoteness, etc.) to recycling the above items documented?</p>	3
31.	<p>Did park staff divert at least 41 percent of non-hazardous solid waste, excluding construction and demolition debris, by the end of fiscal year 2011*?</p> <p>[Department of the Interior 2011 Strategic Sustainability Performance Plan]</p> <p>Note: Depending on the fiscal year in which the audit is taking place, the percent diversion rate must be updated according to the most recent DOI Strategic Sustainability Performance Plan (SSPP). According to the 2011 SSPP, the targets are as follows after fiscal year 2011:</p> <ul style="list-style-type: none"> • Fiscal year 2012: 44 percent • Fiscal year 2013: 46 percent • Fiscal year 2014: 48 percent • Fiscal year 2015 – 2020: 50 percent 	3
12.	<p>Can park staff demonstrate that they are striving to divert at least 50 percent of non-hazardous solid waste, excluding construction and demolition debris, by the end of fiscal year 2015?</p> <p>[EO 13514, section 2(e)(ii)]</p> <p>Note: Individual parks may be required to adhere to local and state requirements that have higher recycling standards. If this is the case, this may be a Priority 2 regulatory finding.</p>	3
32.	<p>Did park staff divert at least 30 percent of construction and demolition materials and debris by the end of fiscal year 2011*?</p> <p>[Department of the Interior 2011 Strategic Sustainability Performance Plan]</p> <p>Note: Depending on the fiscal year in which the audit is taking place, the percent diversion rate must be updated according to the most recent DOI Strategic Sustainability Performance Plan (SSPP). According to the 2011 SSPP, the targets are as follows after fiscal year 2011:</p> <ul style="list-style-type: none"> • Fiscal year 2012: 35 percent • Fiscal year 2013: 40 percent • Fiscal year 2014: 45 percent • Fiscal year 2015 – 2020: 50 percent 	3
27.	<p>Can park staff demonstrate that they are striving to divert at least 50 percent of construction and demolition materials and debris by the end of fiscal year 2015?</p> <p>[EO 13514, section 2(e)(iii)]</p>	3



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Solid Waste Management
2012 Update*

28.	Can park staff demonstrate that they are reducing printing paper use? [EO 13514, section 2(e)(iv)]	3
11.	Are park staff increasing diversion of compostable and organic material from the waste stream? [EO 13514, Section 2 (e)(vi)]	3
26.	Are park employees using environmentally sound practices with respect to disposition of electronic equipment that has reached the end of its useful life? [EO 13514, Section 2 (i)(iii)]	3
Waste Management		
14.	Are solids wastes (including materials separated for recycling) stored so they do not constitute a fire, health or safety hazard or provide food or harborage for vectors? Are they contained or bundled so there is no spillage or fly-aways? [40 CFR 243.200-1 (a)]	2
15.	Are food wastes securely stored in covered or closed containers that are nonabsorbent, leakproof, durable, easily cleanable, and designed for safe handling? [40 CFR 243.200-1 (a)]	2
29.	Are containers of adequate size and sufficient number to contain all waste between collections? [40 CFR 243.200-1 (a)]	2
16.	Are containers maintained in a clean condition so that they are not a nuisance, and retain harborage, feeding, and breeding of vectors? [40 CFR 243.200-1 (a)]	2
17.	Does the storage of bulky waste include removing all doors from large appliances and covering the items to reduce the attraction of vectors, creating a nuisance, and accumulation of solid waste and water in and around the bulky items. [40 CFR 243.200-1 (b)]	2
18.	Are vehicles used for collection and transportation of solid waste enclosed or do they provide suitable cover, so while in transit, there is no spillage or fly-aways (e.g., tied down and covered with a tarp, if a pick-up truck or trailer is used)? [40 CFR 243.202-1 (b)]	2
30.	Is the equipment used in the compaction, collection, and transportation of solid waste (or materials which have been separated for the purpose of recycling) constructed, operated, and maintained to minimize health and safety hazards? Is the equipment maintained in good condition and kept clean to prevent the propagation or attraction of vectors and the creation of nuisances? [40 CFR 243.202-1 (c)]	2
19.	Is solid waste collected in a timely manner to inhibit the attraction of vectors and creation of nuisances? Specifically: <ul style="list-style-type: none"> • Are solid wastes containing food wastes collected <i>at a minimum</i> of once during each week? • Are bulky wastes collected <i>at a minimum</i> of once every 3 months? [40 CFR 243.203-1]	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Solid Waste Management
2012 Update*

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
1.	<p>Have park employees completed a comprehensive study of their solid waste management programs to identify alternative management scenarios to divert solid waste from landfills to recycling centers? [BMP]</p> <p>Depending upon the composition and quantity of specific materials in the park’s waste stream and the available opportunities for waste diversion identified by this comprehensive study, an ISWAP may need to be developed.</p> <p><i>AUDITORS: As this finding and the ISWAP finding #2 are essentially the same, it is up to the auditor’s discretion as to whether or not it makes more sense for the facility to have an ISWAP or a study. (An ISWAP is more comprehensive in scope.)</i></p>	4
2.	<p>Has an ISWAP been developed and implemented at the park?</p> <p>Does the ISWAP promote waste reduction and management, and recycling for both park personnel and visitors and includes the following elements:</p> <ul style="list-style-type: none"> • Description of the solid waste program; • Tonnage or volume information on trash and recyclables; • Breakdown of costs associated with each element of the solid waste program; • Potential influences on the program (changes in visitation, regulatory changes); • Description of state and local waste prevention and recycling requirements; • Description and evaluation of alternative program options; • Description of resources required to help the park implement its recommendations and achieve its programmatic goals; and • An implementation schedule and a description of which individuals or units in the park are responsible for different elements of the plan? <p>[BMP related to NPS Solid Waste Handbook]</p>	4
24.	<p>Do park employees maintain its solid waste disposal site permit on-site? [BMP]</p>	4
26.	<p>Has a recycling coordinator been designated for each facility or installation that has a recycling program? [BMP based on Instructions for Implementing Executive Order 13423]</p>	4
10.	<p>Are recycling containers properly labeled and easily identifiable by park employees and visitors? Are they clearly separate from the regular trash? [BMP]</p>	4
25.	<p>Has recycling information and resources been shared with concessioners? [BMP]</p>	4
33.	<p>Are alkaline batteries recycled? [BMP]</p>	4



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Solid Waste Management
2012 Update*

34.	<p>Do park employees follow GSA guidance regarding disposal of federal electronic assets (including copiers, telephones, fax machines, communication equipment, electronic equipment components, electrical and electronic properties measuring and testing instruments, digital cameras, computers, computer monitors, displays, printers, televisions, and other items utilizing solid-state electronics technology or vacuum tubes)? [BMP related to GSA Bulletin FMR B-34]</p> <p>Note: This includes, in order of priority, looking at reuse within the NPS, transferring to other Federal agencies, donating to states and eligible nonprofit organizations, selling to the public, sending to a take-back program that uses a certified recycler, and sending to other authorized certified recyclers or refurbishers.</p>	4
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NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Universal Waste Management
2012 Update*

INTRODUCTION

The Universal Waste Rule, enacted under the Resource Conservation and Recovery Act (RCRA), allows for special management of certain hazardous wastes. Specifically, the Universal Waste Rule was designed to reduce regulatory management requirements under hazardous waste regulations to foster the environmentally sound recycling or disposal of commonly generated hazardous wastes including:

- Batteries (excluding spent lead acid batteries managed under 40 CFR 266);
- Fluorescent lamps and other mercury-containing lamps;
- Certain pesticides; and
- Mercury-containing equipment (i.e., thermostats, switches, barometers, temperature and pressure gauges, etc).

The effect of the Universal Waste Rule is to reduce regulatory requirements applicable to handling these specific wastes, which otherwise would be subject to full hazardous waste regulations under RCRA. Some advantages of handling these wastes as universal waste include:

- In most states, the universal waste volume is not included when determining the hazardous waste generator status. This may allow some parks to reduce their generator status level. For example, a Small Quantity Generator (SQG) who manages part of their hazardous waste stream as universal waste may be able to become a Conditionally Exempt Small Quantity Generator (CESQG).
- Universal waste can be accumulated for up to one year - a longer accumulation time than that allowed for an SQG or Large Quantity Generator (LQG) of hazardous waste [40 CFR 273.15 and 273.35].
- Less labeling is required [40 CFR 273.14 and 273.34].
- A hazardous waste manifest is not necessary to ship universal waste [40 CFR 273.52(a)], unless it is being shipped to, or through, another state that does not recognize it as universal waste. However, shipping papers are required for universal waste if the waste is a US Department of Transportation (US DOT) hazardous material.
- A handler may use a universal waste transporter to haul the universal waste off-site [40 CFR 273, Subpart D] or the handler may transport the waste themselves if they meet the universal waste transporter requirements. If the waste is going to or through a state that does not recognize it as universal waste, it may be necessary to use a licensed hazardous waste transporter.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use this data to populate the regulatory findings database that will be submitted to and used by the park. This data will also be used to populate the Environmental Condition Assessment database. Refer to last page of this EnviroCheck Sheet for more information.

(Note: Requirements specific to pesticide universal wastes are covered in the Pesticide Management EnviroCheck Sheet.)

Ask to review the following written records, if available:

- Transporter EPA Identification Number
- Hazardous waste manifests
- DOT shipping papers (if applicable)
- Non-hazardous waste disposal records
- Training records on handling and disposal of hazardous and universal wastes
- Recycling/exchange records
- Other disposal records



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Universal Waste Management
2012 Update*

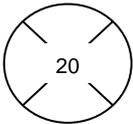
Ask to interview or plan to contact the following park personnel:

- Maintenance staff
- Buildings and utilities staff
- Auto mechanics
- Law enforcement rangers (radio batteries)
- Laboratory staff (thermometers)
- Purchasing and contracting officers
- Custodial staff

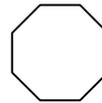
During the walk-around of the park, observe the following:

- Vehicles used for transport
- Accumulation points
- Universal waste storage areas (including pallets)
- Offices and divisions generating universal waste

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

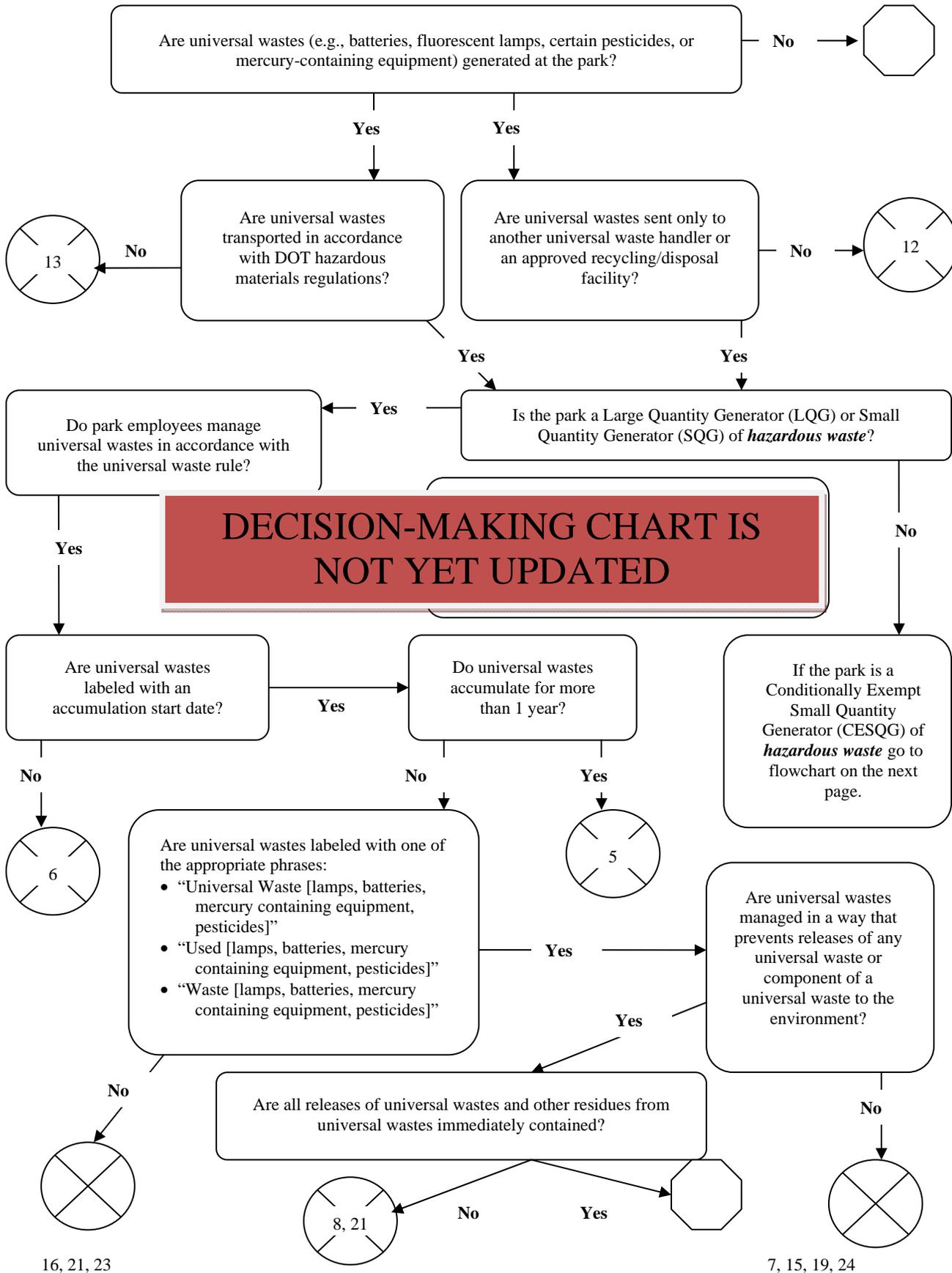


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NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

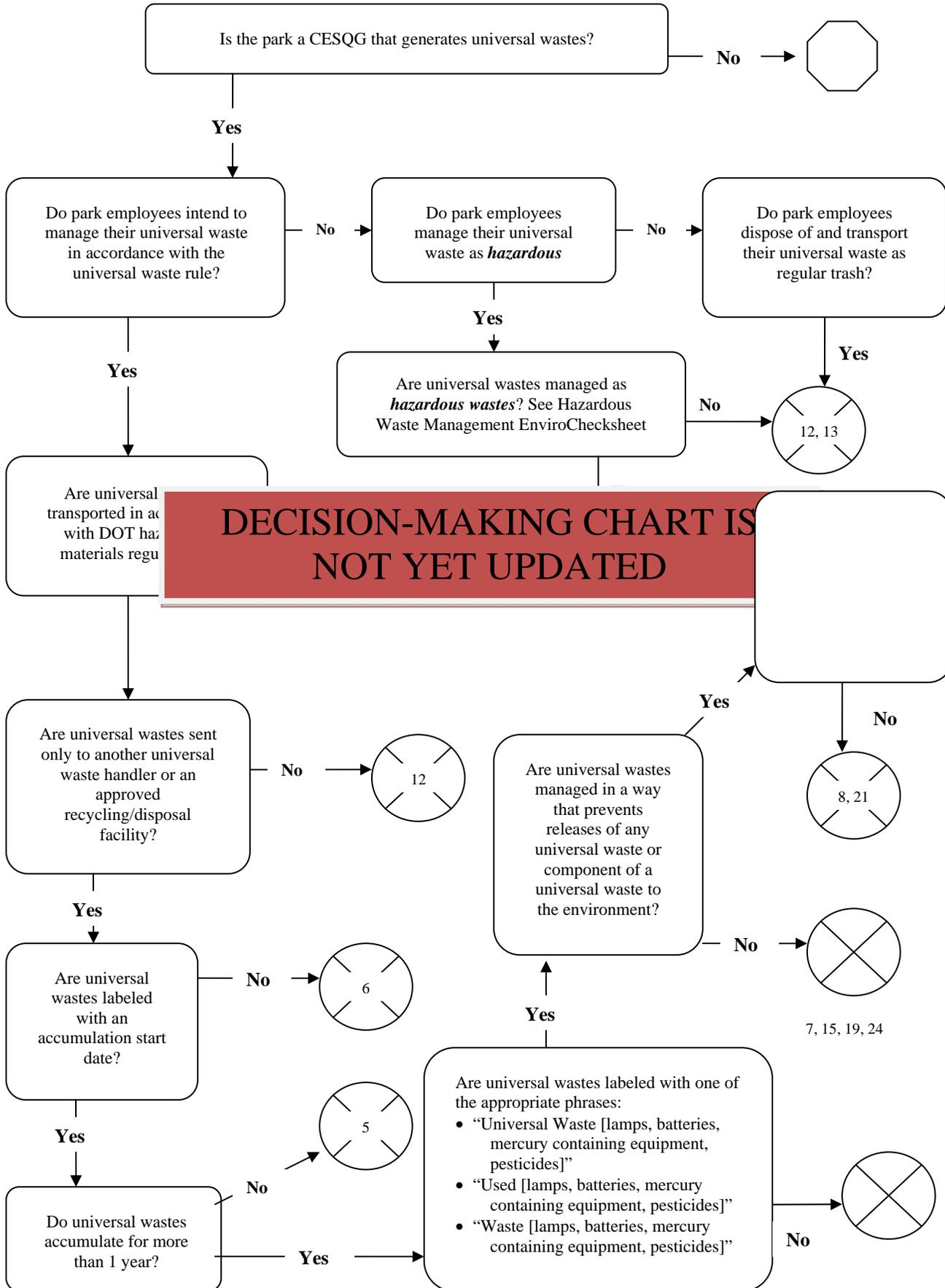
Universal Waste Management
2012 Update





NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

Universal Waste Management
2012 Update





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Universal Waste Management
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders (EOs) or Director's Orders (DOs). Priority 4 findings are Best Management Practices (BMPs).

V02	CHECKLIST ITEM	PRIORITY
<i>General</i>		
2.	<p>Do park employees recycle universal wastes in accordance with state universal waste program requirements? [40 CFR 273]</p> <p>Note: If the park is a large quantity generator (LQG) or small quantity generator (SQG) of hazardous waste, park personnel must recycle universal wastes in accordance with all state (or federal) universal waste program requirements.</p> <p>If the park is a conditionally exempt small quantity generator (CESQG) of hazardous waste, universal wastes must be taken to an approved recycling or destination facility and transported by an approved universal waste hauler. However, all other universal waste requirements are BMPs unless an individual state imposes more stringent requirements. Be sure to check with the state to determine if more stringent requirements exist for universal waste management.</p>	2
<i>Accumulation</i>		
4.	<p>Do park employees accumulate 5,000 kilograms (kg) or more of universal waste (batteries, lamps, pesticides, and mercury-containing equipment calculated collectively) at any one time? [40 CFR 273.9]</p> <p>Note: A park that accumulates less than 5,000 kg of universal waste is considered to be a Small Quantity Handler (SQH).</p> <p>A park that accumulates 5,000 kg or more of universal waste is considered to be a Large Quantity Handler (LQH).</p>	2
28.	<p>For parks that are LQHs, has the park notified the EPA of its status as an LQH before meeting or exceeding the 5,000 kg limit? [40 CFR 273.32 (a)]</p> <p>Note: An LQH who has already notified EPA of its hazardous waste activities and has received an EPA Identification Number is not required to renotify under this section.</p>	2
32.	<p>For LQHs that have exceeded the 5,000 kg limit, does the EPA notice include:</p> <ul style="list-style-type: none"> • The universal waste handlers name and mailing address; • The name and business phone of the point of contact at the facility; • The address or physical location of the universal waste management activities; • A list of all types of universal waste managed by the handler; and • A statement indicating that the handler is accumulating more than 5,000 kg of universal waste at one time. <p>[40 CFR 273.32(b)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Universal Waste Management
2012 Update*

V02	CHECKLIST ITEM	PRIORITY
5.	<p>Are universal waste batteries, lamps, pesticides, or mercury-containing equipment accumulated for longer than one year from the date they become wastes? [SQH: 40 CFR 273.15 (a)] [LQH: 40 CFR 273.35 (a)]</p> <p>If they do accumulate longer than one year, is there any specific reason for this (i.e., is storage necessary to facilitate proper recovery, treatment, or disposal)? [SQH: 40 CFR 273.15(b)] [LQH: 40 CFR 273.35(b)]</p>	2
6.	<p>Is the length of time universal wastes accumulate demonstrated by one or more of the following mechanisms:</p> <ul style="list-style-type: none"> • Placing the waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received; • Marking or labeling each individual item with the date it became a waste or was received; • Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received; • Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received; • Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or • Any other method that clearly demonstrates the length of time that the universal waste has accumulated from the date it becomes a waste or was received? <p>[SQH: 40 CFR 273.15 (c)] [LQH: 40 CFR 273.35 (c)]</p>	2
<i>Spills and Releases</i>		
8.	<p>Are all releases of universal wastes and other residues from universal wastes immediately contained? [SQH: 40 CFR 273.17 (a)] [LQH: 40 CFR 273.37 (a)]</p>	2
9.	<p>If a release does occur, is a determination made regarding whether any waste generated as a result of the release is a hazardous waste? [SQH: 40 CFR 273.17 (b)] [LQH: 40 CFR 273.37 (b)]</p> <p>If the waste is determined to be a hazardous waste, is the waste managed in compliance with all applicable requirements of 40 CFR parts 260 through 272? [See the Hazardous Waste Management Check Sheet.]</p>	2
<i>Training</i>		
10.	<p>For parks that are SQHs, are employees who handle or have responsibility for managing universal wastes <i>provided with information</i> on the proper handling and emergency response procedures appropriate for the types of universal wastes handled at the facility? [40 CFR 273.16]</p>	2
25.	<p>For parks that are LQHs, does the park ensure that employees who handle or have responsibility for managing universal wastes are <i>thoroughly familiar</i> with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies? [40 CFR 273.36]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Universal Waste Management
2012 Update*

V02	CHECKLIST ITEM	PRIORITY
<i>Recordkeeping</i>		
26.	<p>For parks that are LQHs, are records of off-site transportation of all shipments of universal wastes maintained? [40 CFR 273.39 (b)]</p> <p>Note: The records must include the following:</p> <ul style="list-style-type: none"> • Quantity of each type of universal waste shipped; • Date of shipment(s); and • Name and address of transporter, destination facility, or foreign destination where universal wastes were sent. <p>Records may be in the form of a log, invoice, manifest, bill of lading, or other shipping document. Certificates of recycling may be included if provided by destination facility.</p>	2
27.	<p>For parks that are LQHs, are records of off-site shipments retained for a minimum of three years? [40 CFR 273.39 (c)(2)]</p>	2
<i>Shipment Requirements</i>		
12.	<p>Are universal wastes sent only to another universal waste handler or an approved recycling/disposal facility (i.e. a “destination facility”)? [SQH: 40 CFR 273.18 (a)] [LQH: 40 CFR 273.38 (a)]</p>	2
14.	<p>Do park employees self-transport universal wastes off-site? If so, is the park complying with transporter requirements of subpart D of the Universal Waste Regulations (40 CFR 273.50 – 273.56)? [SQH: 40 CFR 273.18 (b)] [LQH: 40 CFR 273.38 (b)]</p>	2
13.	<p>Do universal wastes fit the description of a hazardous material as described under Department of Transportation (DOT) Hazardous Materials Regulations (HMR) 49 CFR 171.8? If so, are waste shipments packaged, labeled, marked, and placarded in accordance with the DOT HMR? [SQH: 40 CFR 273.18 (c)] [LQH: 40 CFR 273.38 (c)]</p>	2
<i>Batteries</i>		
15.	<p>Are universal waste batteries that show evidence of leakage, spillage, or damage kept in a closed, structurally sound, compatible container that will not leak under reasonable foreseeable conditions? [SQH: 40 CFR 273.13 (a)(1)] [LQH: 40 CFR 273.33 (a)(1)]</p>	2
16.	<p>Are universal waste batteries (i.e., each battery), or a container in which the batteries are contained, labeled or marked clearly with any one of the following phrases:</p> <ul style="list-style-type: none"> • “Universal Waste - Battery(ies),” or • “Waste Battery(ies),” or • “Used Battery(ies)”? <p>[SQH: 40 CFR 273.14 (a)] [LQH: 40 CFR 273.34 (a)]</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Universal Waste Management
2012 Update*

V02	CHECKLIST ITEM	PRIORITY
17.	Are batteries with hazardous constituents either <ul style="list-style-type: none"> • Reclaimed or recycled, or • Managed as hazardous waste? (See the Hazardous Waste Check Sheet.) [40 CFR 266, Subpart G]	2
<i>Universal Waste Lamps</i>		
19.	Are universal waste lamps managed in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps? Are these containers and packages closed and lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions? [SQH: 40 CFR 273.13 (d)(1)] [LQH: 40 CFR 273.33 (d)(1)]	2
20.	Are universal waste lamps that are broken, or show evidence of breakage, leakage, or damage immediately cleaned up and placed in a container? Are the containers holding broken or damaged universal waste lamps closed, structurally sound, and compatible with the contents of the lamps? Do the containers lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions? [SQH: 40 CFR 273.13 (d)(2)] [LQH: 40 CFR 273.33 (d)(2)] Note: If a universal waste lamp is broken, it is no longer considered a universal waste and must be managed as a hazardous waste. (See the Hazardous Waste CheckSheet.)	2
21.	Is each universal waste lamp or a container or package in which such universal waste lamps are contained labeled or marked clearly with one of the following phrases: <ul style="list-style-type: none"> • "Universal Waste - Lamp(s)," or • "Waste Lamp(s)," or • "Used Lamp(s)"? [SQH: 40 CFR 273.14 (e)] [LQH: 40 CFR 273.34 (e)]	2
<i>Mercury-containing Equipment (this includes thermostats but excludes lamps)</i>		
24.	Is universal waste mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage kept in a closed, structurally sound, compatible container that will not leak under reasonably foreseeable conditions placed in a container? Is the container holding damaged waste mercury-containing equipment lacking evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions? [SQH: 40 CFR 273.13 (c)(1)] [LQH: 40 CFR 273.33 (c)(1)]	2
31.	Is each piece of universal waste mercury containing equipment or container in which the equipment is contained, labeled or marked clearly with any one of the following phrases: <ul style="list-style-type: none"> • "Universal Waste - Mercury Containing Equipment," or • "Waste Mercury Containing Equipment," or • "Used Mercury Containing Equipment"? [SQH: 40 CFR 273.14 (d)(1)] [LQH: 40 CFR 273.34 (d)(1)]	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Universal Waste Management
2012 Update*

V02	CHECKLIST ITEM	PRIORITY
23.	Is each universal waste thermostat or container in which the thermostats are contained, labeled or marked clearly with any one of the following phrases: <ul style="list-style-type: none"> • “Universal Waste - Mercury Thermostat(s),” or • “Waste Mercury Thermostat(s),” or • “Used Mercury Thermostat(s)”? [SQH: 40 CFR 273.14 (d)(2)] [LQH: 40 CFR 273.34 (d)(2)]	2

Universal Waste Pesticides are discussed in the Pesticide Management EnviroCheck Sheet

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

V02	CHECKLIST ITEM	PRIORITY
1.	Do park employees know if their state’s universal waste program includes wastes beyond those required under the federal universal waste regulations? [BMP]	4
Note: For a list of state programs, visit http://www.epa.gov/osw/wyl/stateprograms.htm .		
11.	For parks that are SQHs, are records of off-site transportation of all shipments of universal wastes maintained? Note: The records may include the following: <ul style="list-style-type: none"> • Quantity of shipments; • Date of shipments; • Name of transporter and destination facility; and • Certificates of recycling, if provided by the destination facility. Records may be in the form of a log, invoice, manifest, bill of lading, or other shipping document. [BMP]	4
22.	Are low-mercury fluorescent lamps (e.g., Philips Alto bulbs) or “green tips” recycled? [BMP]	2 or 4
If the state requires recycling of low-mercury fluorescent lamps this is a priority 2 finding.		
30.	If feasible, do the park and concessioner share universal waste recycling programs or resources? [BMP]	4



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Used Oil
2012 Update*

INTRODUCTION

Parks generate used oil when maintenance of vehicles and equipment is performed. Maintenance shops that produce used oil include automotive garages, service stations, motor pools, metal working operations, and boat marinas. Once oil has been used, it can be collected, recycled, and used again. An estimated 380 million gallons of used oil are recycled each year. Recycled used oil can either be used again for the same job or for a completely different task. For example, used motor oil can be re-refined and sold as furnace fuel oil. Aluminum rolling oils also can be filtered on site and used over again. Recycling oil is good for the environment and good for business.

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use this data to populate the regulatory findings database that will be submitted to and used by the park. This data will also be used to populate the Environmental Condition Assessment database.

Ask to review the following written records, if available:

- Used oil disposal records

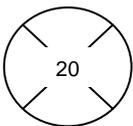
Ask to interview or plan to contact the following park personnel:

- Maintenance supervisor
- Automotive repair workers

During the walk-around of the park, observe the following:

- Automotive garages and repair shops
- Used oil accumulation containers (e.g., drums, pales)
- Maintenance sheds

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

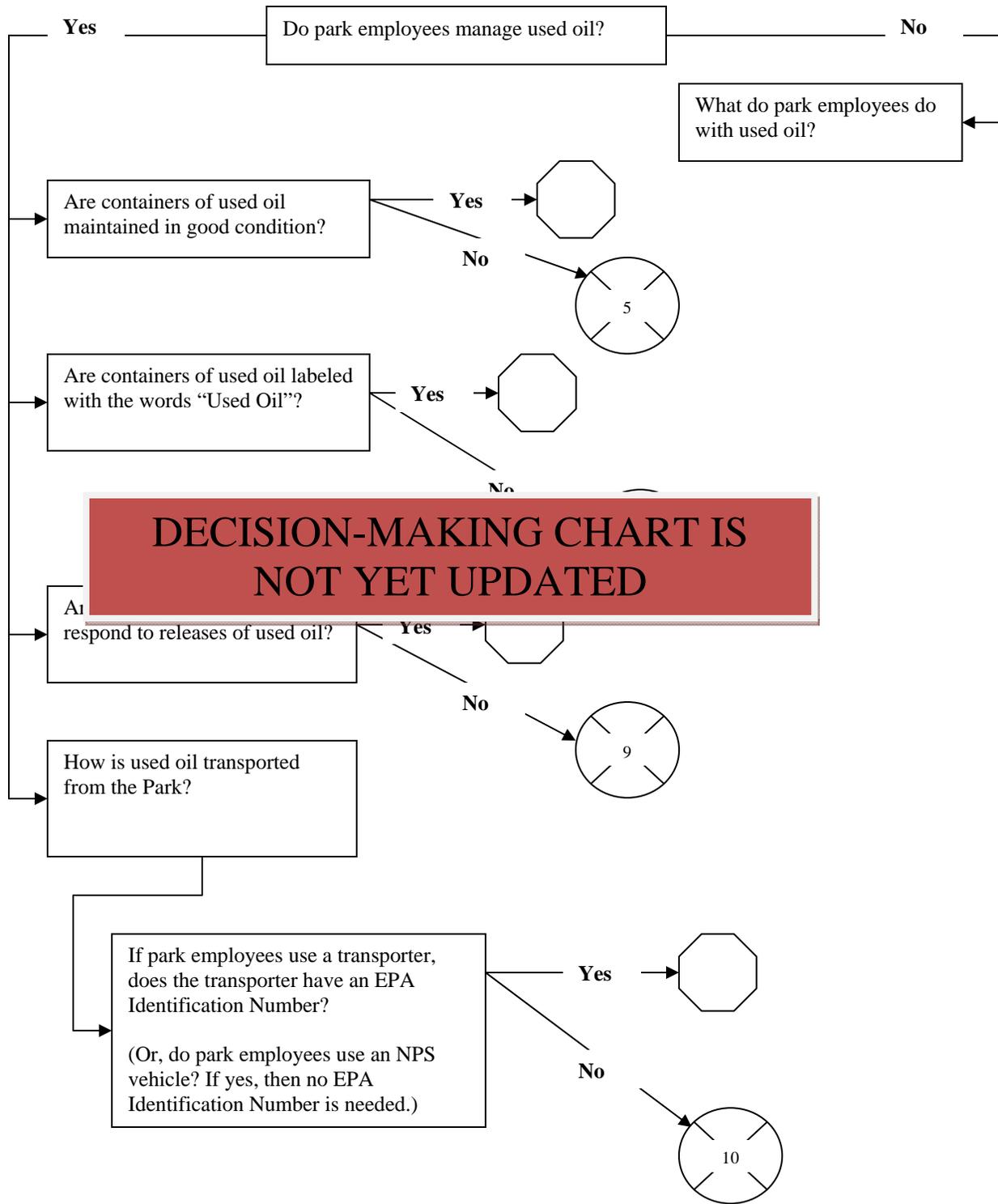


*Indicates that the regulatory
requirement has been met and that the
train of questions can stop.*



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

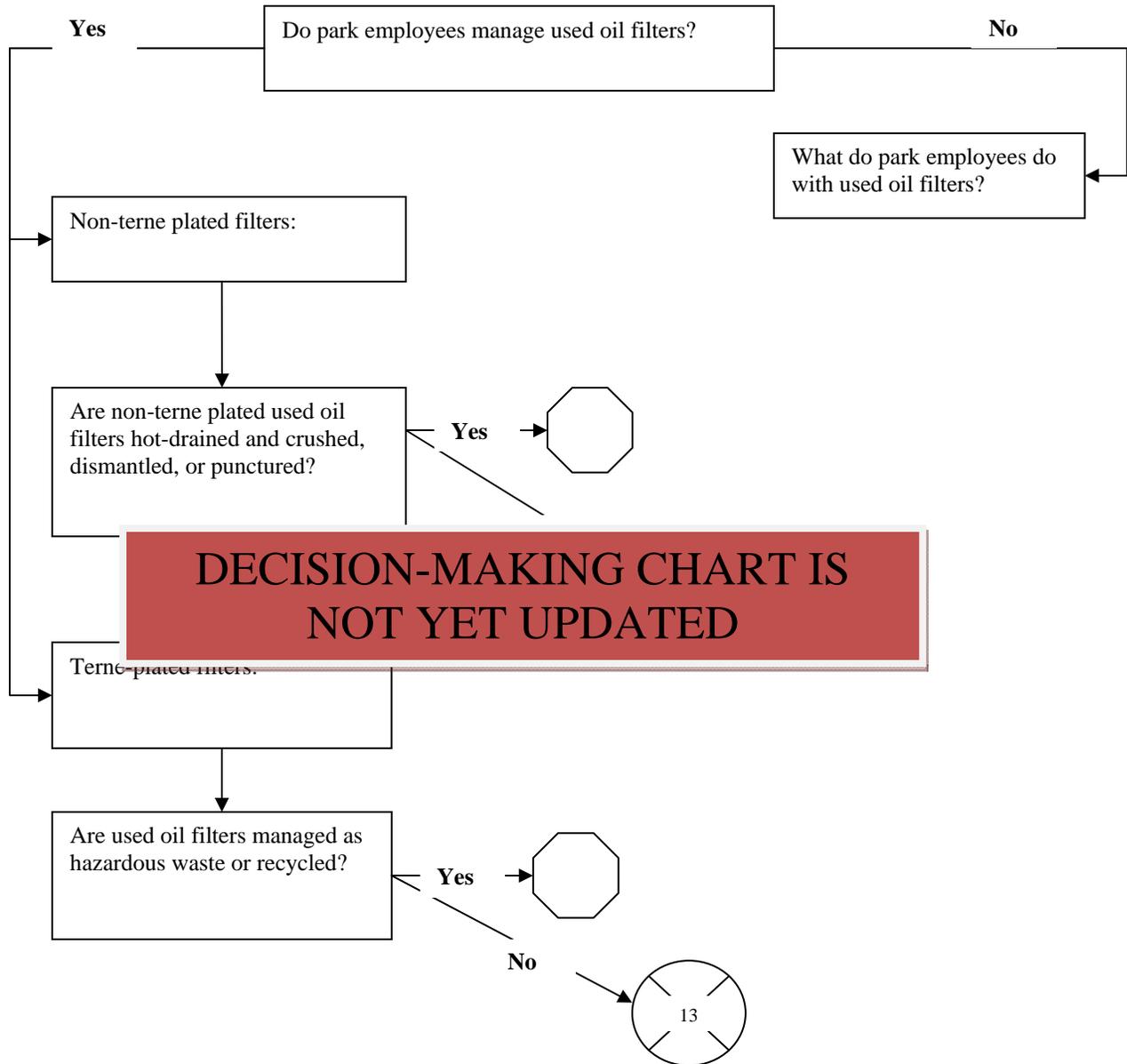
*Used Oil
2012 Update*





NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Used Oil
2012 Update*





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Used Oil
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director’s Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>Storage and Handling</i>		
2.	<p>Are mixtures of used oil and hazardous waste managed as hazardous waste? [40 CFR 279.21 (a)]</p> <p><i>Auditors: Verify through interviews and observations that no other chemicals are mixed with used oil to make it hazardous.</i></p>	2
19.	<p>Are used oil containers managed according to the following criteria:</p> <ul style="list-style-type: none"> • In good condition; • Compatible with contents; • Closed (unless in use); • Not opened, handled, or stored in a manner that causes rupturing or leaking; • Inspected weekly; • Located on a surfaces impervious to liquids (e.g., concrete, pavement), or elevated above an impervious base; and • Provided with secondary containment. <p>[40 CFR 279.22 (a)]</p> <p><i>Auditors: Use this citation (Question #19) for used oil containers that are not managed according to multiple criteria. Use Question #5 for used oil containers and Aboveground Storage Tanks that are only not in good condition.</i></p>	2
5.	<p>Are containers of used oil and Aboveground Storage Tanks (ASTs) of used oil maintained in good condition? [40 CFR 279.22 (b)]</p> <p>Note: Containers must not be leaking, bulging, rusting, damaged, or dented.</p> <p><i>Auditors: Use this citation (Question #5) for used oil containers and Aboveground Storage Tanks that are only not in good condition. Use Question #19 for used oil containers that are not managed according to multiple criteria.</i></p>	2
6.	<p>Are “Used Oil” labels located on all used oil containers, ASTs, and on fill pipes used to transfer used oil to Underground Storage Tanks (USTs)? [40 CFR 279.22 (c)]</p> <p>Note: The phrase “Used Oil” is acceptable. No other phrase is permitted to identify used oil to comply with 40 CFR 279.22 (c). However, some states require that all used oil be treated as waste oil, and may require additional language or different language to be placed on the label. For example, some states (e.g., PA), require the phrase “waste oil” to be placed on the label.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Used Oil
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
20.	<p>If the park burns its used oil, does the park ensure the used oil meets the following criteria:</p> <ul style="list-style-type: none"> • Burned in an oil-fired space heater that has a maximum capacity of less than 0.5 million BTUs per hour; • Burns only used oil generated by the park or household do-it-yourself generators; and • Combustion gasses are vented to the ambient air? <p>[40 CFR 279.23]</p>	2
<i>Releases</i>		
9.	<p>Is a procedure in place to respond to releases of used oil? [40 CFR 279.22 (d)]</p> <p>Note: The procedure should address park staff responsibilities to:</p> <ul style="list-style-type: none"> • Stop and contain the release; • Properly manage any used oil or contaminated materials; and • Repair or replace the leaking container or tank. 	2
<i>Transportation</i>		
10.	<p>Does the park confirm that all used oil transporters (e.g., contractors, park staff, etc.) have an EPA identification number? [40 CFR 279.24]</p> <p>Note: The used oil transporter is not required to obtain an EPA identification number if they meet the following criteria:</p> <ul style="list-style-type: none"> • Used oil is transported in a vehicle owned by the park or park employee; • 55 gallons or less of used oil is transported at any one time; and • Used oil is taken to an aggregation point owned and/or operated by NPS; or a used oil collection center registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil. <p>In addition, an EPA identification number is not required if the park has a tolling arrangement – a contract with a processor/re-refiner to process the reclaimed oil and return it to the park for specific uses.</p>	2
<i>Used Oil Filter Management</i>		
12.	<p>Are non-terne plated used oil filters properly managed? [40 CFR 261.4 (b)(13)]</p> <p>Note: Acceptable management techniques for these filters include:</p> <ul style="list-style-type: none"> • Gravity hot-draining after puncturing the filter’s anti-drain back valve or dome end; • Hot-draining and crushing the filter; • Hot-draining and dismantling; or • Any equivalent method that will remove the used oil. <p>Note: The EPA defines ‘gravity hot-draining’ as a process of draining oil filters for at least 12 hours at a temperature of 60°F or higher.</p>	2
13.	<p>Are terne-plated used oil filters recycled? [40 CFR 261.6 (a)(3)(ii)]</p> <p>If these filters are not recycled, are they managed as hazardous waste due to the metal content of the filter [40 CFR 261.4 (b)(13)]?</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Used Oil
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
	<p>Note: States may not recognize the scrap metal recycling exemption for terne-plated used oil filters and treat them as hazardous waste.</p> <p>If treated as hazardous waste, refer to the Hazardous Waste Management EnviroCheck Sheet for specific requirements.</p>	
15.	<p>Do park employees test contaminated/off-specification used oil to determine if it is hazardous waste? [40 CFR 262.11]</p>	2

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
1.	<p>Have park employees determined and documented differences between state and federal used oil regulations? [BMP]</p> <p>Note: State regulations may be stricter than federal regulations and should be considered in determining compliance.</p>	4
<i>Storage and Handling</i>		
3.	<p>Is a procedure in place to prevent used oil from being mixed with other hazardous materials? [BMP]</p>	4
4.	<p>Are park employees familiar with the used oil regulatory requirements? [BMP]</p>	4
<i>Transportation</i>		
11.	<p>Are used oil generation and transportation records maintained? [BMP]</p> <p>Note: Records to maintain include:</p> <ul style="list-style-type: none"> • Quantity of shipments; • Date of shipments; • Name of transporter; • EPA identification number; and • Name of recycling facility. 	4
<i>Used Oil Filter Management</i>		
14.	<p>Are used oil filters disposed of as scrap metal? [BMP]</p> <p>Note: Recycled terne-plated used oil filters are exempt from hazardous waste regulations under the scrap metal exemption of 40 CFR 261.6 (a)(3)(ii).</p>	4
<i>Pollution Prevention/Green Procurement</i>		
18.	<p>If the park accepts used oil from visitors, are procedures in place to properly manage that oil? [BMP]</p>	4



NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Wastewater Management
2012 Update*

INTRODUCTION

Pollutants make surface water and groundwater unsafe for drinking, fishing, swimming, and other uses. As authorized by the Clean Water Act (CWA), the National Pollutant Discharge Elimination System (NPDES) permit program controls surface water pollution by regulating *point sources*, discrete conveyances such as pipes or man-made ditches, that discharge pollutants into waters of the United States. The Safe Drinking Water Act protects drinking water sources through the Underground Injection Control (UIC) Program, which regulates the disposal of wastes into the subsurface through injection wells.

Wastewater is generated from a variety of sources at parks, including:

- Steam cleaning or pressure washing vehicles, parts, and equipment;
- Maintenance shop floor cleaning;
- Drips and spills from vehicles and equipment;
- Boiler blow-down and condensate, air compressor condensate, and others; or
- Park staff and visitor sanitary waste.

This wastewater may drain to shop floor drains, parking lot catch basins, or culverts. The wastewater can be discharged through various routes, including:

- Direct discharge to surface waters (e.g., nearby lakes streams or storm sewers);
- To the subsurface via underground injection wells which include on-site septic systems, cesspools, french drains, etc;
or
- To a sanitary sewer (either a park sewage treatment plant or Publicly Owned Treatment Works (POTW)).

AUDITOR'S GUIDELINES

The auditor should collect and organize data gathered from records reviews, interviews with personnel, and observations made during a walk-around of the park. Use this data to populate the regulatory findings database that will be submitted to and used by the park. This data will also be used to populate the Environmental Condition Assessment database.

Ask to review the following written records, if available:

- National Pollutant Discharge Elimination System (NPDES) Permits
- NPDES Permit renewal applications (for permits that expire within 180 days)
- Discharge monitoring reports for the past year
- Diagrams of sewer and storm drain layout
- Sampling records and sample shipping records
- Underground Injection Control (UIC) Permits for Injection Wells
- UIC well inventory/registration forms

Ask to interview or plan to contact the following park personnel:

- Wastewater treatment plant operator
- Maintenance supervisor
- Auto shop mechanic
- Rangers

During the walk-around of the park, observe the following:

- Discharge outfall pipes
- Underground injection wells such as septic systems, cesspools, storm drains, or french drains
- Streams, rivers, open waterways
- Floor and sink drains

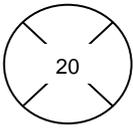


NATIONAL PARK SERVICE Environmental Audit Program EnviroCheck Sheet

*Wastewater Management
2012 Update*

- Evidence of residues or staining in sinks that indicate something other than water is going down the drain
- Signage, or lack of, that prohibits drain disposal of chemicals
- Storm water collection points
- Campground sewage dump stations or pump-outs
- Wastewater treatment plants
- Oil/water separators
- Ranger activities

Use the following decision-making chart to guide you through the compliance data collection process. However, note that not all checklist items are taken into account by this decision-making chart.



*Indicates the need for an audit finding.
Numbers in the center or to the right of the circle
specify the EnviroCheck Sheet question numbers.*

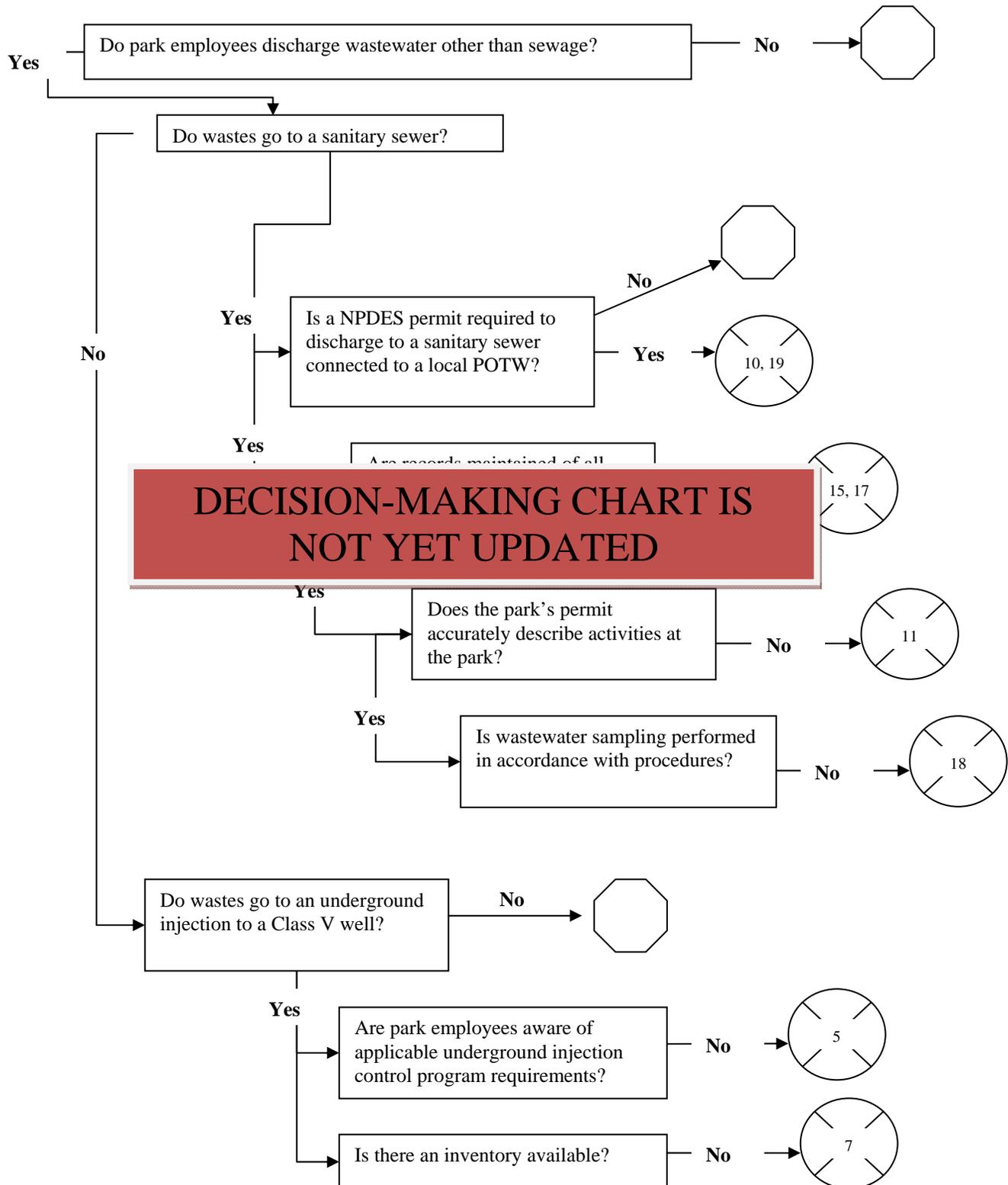


*Indicates that the regulatory
requirement has been met and that the
train of questions can stop.*



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Wastewater Management
2012 Update*





**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Wastewater Management
2012 Update*

ENVIROCHECK SHEET

Use the checklist to guide you through the interview portion of the compliance audit. The first column indicates a numbering system that accommodates different NPS regional numbering schemes. The last column identifies the priority of a finding associated with the question asked. Priority 1 findings are regulatory findings with imminent dangers associated with noncompliance. Priority 2 findings are regulatory findings that do not have an imminent danger associated with noncompliance. Priority 3 findings are nonregulatory findings, e.g., NPS Executive Orders or Director's Orders. Priority 4 findings are Best Management Practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
<i>Underground Injection Control Program Requirements</i>		
5.	<p>Has park staff submitted information about their inventory of Class V injection wells pursuant to the UIC program? [40 CFR 144.83 (a)(3)]</p> <p>Notes: Class V injection wells include large capacity cesspools, motor vehicle waste disposal wells, and other drainage wells. In addition, septic systems that meet one of the following requirements are also considered Class V injection wells:</p> <ul style="list-style-type: none"> • A septic system regardless of size that receives any industrial or commercial wastewater (i.e. motor vehicle waste disposal or maintenance wastes); or • A septic system that receives solely sanitary waste from multiple family residences or a non-residential establishment, and has the capacity to serve 20 or more persons per day (this is known as a large capacity septic system). <p>An inventory of the park's Class V injection wells must include at a minimum:</p> <ul style="list-style-type: none"> • Facility name and location; • Name and address of legal contact; • Ownership of facility; • Nature and type of injection well(s); and • Operating status of injection well(s). [40 CFR 144.83 (a)(2)(i)] <p>An inventory form may be obtained from the EPA website at: http://www.epa.gov/safewater/uic/pdfs/7520-16.pdf</p>	2
6.	<p>Are any wastes other than sanitary wastes discharged to the park's Class V injection wells? [40 CFR 144.1 (g)]</p> <p>Note: If more than just sanitary wastes are discharged, the Class V injection well may require a UIC permit or authorization by rule.</p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Wastewater Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
24.	<p>If the park operates a large capacity septic system (Class V injection well) and only sanitary wastes are discharged into it, does the park meet reporting and/or permitting requirements? [Site applicable local code]</p> <p>Note: If only sanitary wastes are discharged, unless required by local, state, or tribal government, many large-capacity septic systems do not require an individual permit, provided they meet the minimum federal requirements of:</p> <ul style="list-style-type: none"> • Submission of an inventory form to their permitting authority; • Operation of wells in a way that does not endanger Underground Sources of Drinking Water (USDWS) (the permitting authority will explain any specific requirements); and • Proper closure of the well when no longer being used. <p>The permitting authority varies from the Regional EPA Administrator in direct implementation states to a State or Tribal Director in primacy states (where the state or tribe administers the permit). Refer to 40 CFR 144.83 (a)(1) or the website below for a list of states and their status.</p> <p>“Authorized by rule” means an individual permit is not required. However local, state or tribal regulations may be more stringent than federal regulations.</p> <p><i>AUDITORS: Refer to http://www.epa.gov/safewater/uic/class5/comply.html for more information about UIC regulations. Refer to http://www.epa.gov/safewater/uic/pdfs/7520-16.pdf for the inventory form.</i></p>	2
NPDES Permit		
9.	<p>Is documentation maintained indicating whether a NPDES permit is required for discharges of sanitary wastewater or maintenance wastewater to a sanitary sewer connected to the local POTW? [Site applicable local code]</p> <p>Note: NPDES permits are required for the discharge of pollutants from any point source into waters of the United States.</p>	2
23.	<p>Does the park meet the discharge requirements of the local POTW? [Site applicable local code]</p>	2
10.	<p>Does the park meet the discharge requirements of a NPDES permit? [40 CFR 122.1 (b) and Permit sections]</p> <p>Note: Discharges requiring a permit may include discharges from laboratories, vehicle washing, wastewater treatment, or wastewater discharge to a storm sewer or floor drain.</p> <p><i>AUDITORS: Be sure to review provisions of the permit and compare them with actions taking place at the park.</i></p>	2



**NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet**

*Wastewater Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
11.	<p>Does the NPDES permit accurately describe the park's regulated activities? [40 CFR 122.41 – Auditor should cite permit sections if facility is not meeting permit requirements.]</p> <p>Note: Regulated activities may include:</p> <ul style="list-style-type: none"> • The description of the park's wastewater treatment processes; • All discharge points; • Listed chemicals used at the park; • Effluent limitations; and • Data recorded on discharge monitoring reports. 	2
12.	<p>Are procedures in place to assure regulated discharges remain within the parameters of the NPDES permit? [Auditor should cite permit sections if facility is not meeting permit requirements.]</p>	2
13.	<p>Are procedures in place to assure discharges from oil/water separators conform with the NPDES permit or with local POTW requirements? [Auditor should cite permit section or local code]</p>	2
14.	<p>Have procedures been developed and implemented to assure wastewater treatment systems receive preventive maintenance and inspections? [BMP or permit requirement]</p>	2 or 4
15.	<p>Are records maintained of all data and any supplemental information used to complete NPDES permit applications? [40 CFR 122.21 (p)]</p> <p>Note: Records must be maintained for three years from the date the permit application was signed.</p>	2
16.	<p>Are procedures in place to notify the NPDES permitting authority of planned physical alterations that may significantly change the nature or increase the quantity of pollutants discharged? [40 CFR 122.41 (l)(2)]</p>	2
17.	<p>Have timely permit renewal applications been submitted by the park (renewal applications should be sent to the permitting authority 180 days before the permit expiration date)? [40 CFR 122.6 (a)(1)]</p>	2
18.	<p>Is wastewater sampling performed in accordance with proper collection, testing, preservation, and shipping procedures? [40 CFR 136.3]</p> <p>Note: These procedures include:</p> <ul style="list-style-type: none"> • Using proper sample containers; • Properly preserving samples prior to analysis; • Using proper preservation techniques; • Conforming with sampling holding times requirements prior to analyses; • Maintaining the chain of custody from the sampling point through testing to results; and • Reporting results to the park's self-monitoring report. 	2



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*Wastewater Management
2012 Update*

v02	CHECKLIST ITEM	PRIORITY
<i>Hazardous Waste Determination</i>		
19.	<p>Is sludge generated from the onsite treatment of wastewater? If so is it managed as a hazardous waste? [40 CFR 262.10 and 262.11]</p> <p>Note: Sludge must be analyzed to determine if it is a hazardous waste. Refer to the Hazardous Waste EnviroCheck Sheet for more information.</p>	2

Priority 4 findings encourage the development and implementation of best management practices (BMPs).

v02	CHECKLIST ITEM	PRIORITY
1.	<p>Have the proper regulatory authorities been contacted to determine:</p> <ul style="list-style-type: none"> • The UIC regulatory authority and NPDES permitting authority (state or EPA); • Whether any of the park’s activities are required to have a permit or authorization by rule for discharges to surface water, a POTW, or an underground injection well; • Whether the state or local agency imposes regulations that are stricter than the federal regulations; and • Whether the facility is complying with state and local water quality requirements and applicable permits? <p>[BMP]</p>	4
2.	<p>Have park employees determined where wastewater is generated at the park? [BMP]</p> <p>Note: Some common locations include maintenance shops and vehicle maintenance bays.</p>	4
3.	<p>Have park employees identified the discharge locations for each type of wastewater generated? [BMP]</p> <p>Note: Some common locations may include storm drains that feed surface water, storm drains that feed the local POTW, and floor drains piped to french drains.</p>	4
4.	<p>Have drains/pipes been plugged or blocked to control or prevent non-permitted discharges? [BMP]</p>	4
<i>Pollution Prevention (P2)</i>		
20.	<p>Have P2 opportunities to eliminate or reduce wastewater discharges from maintenance shops and vehicle maintenance bays been identified? [BMP]</p> <p>Note: Examples may include:</p> <ul style="list-style-type: none"> • Developing an SOP that aims to minimize the use of water in areas where hazardous materials (including vehicle fluids) are used; • Plugging floor drains; • Providing warning labels on drains and catch basins; • Implementing process and equipment changes to reduce the use of hazardous materials; • Providing personnel with training; and/or • Implementing good housekeeping procedures. 	4



NATIONAL PARK SERVICE
Environmental Audit Program
EnviroCheck Sheet

Wastewater Management
2012 Update

v02	CHECKLIST ITEM	PRIORITY
21.	Have procedures been implemented that: <ul style="list-style-type: none">• Verify that contractors and concessioners are complying with regulatory and permit requirements for maintenance wastewaters they generate; and• Prevent maintenance wastewaters from interrupting the park wastewater treatment process? [BMP]	4
22.	Have procedures been implemented to educate visitors about wastewater reduction methods? [BMP] Note: For example: <ul style="list-style-type: none">• Posting signs;• Distributing literature; and• Displaying interpretive exhibits.	4
25.	If appropriate, has the park investigated the use gray water for irrigation purposes? [BMP] Note: Bacteriological concerns may have to be addressed.	4