

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



Environmental Audit In-Brief

FULL PARK NAME
DATE

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Agenda



- National Park Service (NPS) Commercial Services Program – Contract Management
- Concessioners to be audited
- Audit team
- Purpose and objectives
- Scope
- Process
- Schedule
- Reporting

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NPS Commercial Services Program - Contract Management



Mission: To provide assistance and guidance that advances the environmental performance of businesses offering visitor services in national parks.

Policy and Program Support:

- Regulations
- Director's Orders
- Standard Contract Language
- Operational Evaluation Criteria

Contracting Support:

- Prospectus Development
- Proposal Evaluation

Environmental Audits

NPS Commercial Services Program - Contract Management



Outreach:

- *GreenLine* News Update
- *GreenLine* Phone – (303) 987-6820
- *GreenLine* Email – NPS_GreenLine@nps.gov
- Commercial Services Program website – www.concessions.nps.gov
- Assistance resources (compliance assistance, best management practices (BMPs), Environmental Management Plans (EMPs))
- Training

Concessioners to be Audited



- Insert Concessioner Name (ConcID)
- Insert Concessioner Name (ConcID)

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Audit Team - Qualifications and Experience



[Insert ATL Name]

- Audit Team Leader
 - [Insert Time w/ PRIZIM]
 - [Insert Title/Background]
- [Insert Auditor Name]
- Auditor
 - [Insert Time w/ PRIZIM]
 - [Insert Title/Background]
- [Insert Auditor in Training Name]
- Auditor in Training
 - [Insert Time w/ PRIZIM]
 - [Insert Title/Background]

**NPS Commercial
Services Program
Environmental Audit
Coordinator:**

Kat Berry

Phone: 202.513.7153

Fax: 202.371.2090

Email:

Kat_Berry@nps.gov

Audit Purpose



- Audits are required of all federal facilities per Order (EO) 13148, superseded by EO 13423.
- Audits assist concessioners in reviewing their existing environmental programs.
- Audits allow concessioner implemented BMPs to be recognized, and identify opportunities for new BMPs to be implemented.
- Audits allow for concessioner recognition of Exceptional Practices (EPs), demonstrating environmental stewardship/management.
- Auditors identify applicable federal, state, and local environmental requirements and help concessioners and park staff to understand these requirements.
- Auditors identify recommended corrective actions and provide compliance assistance resources.

Audit Findings



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



Audit Findings (cont.)

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

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

Best Management Practice (BMP)



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



Exceptional Practice (EP)

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

Audit Scope



- **Audited Entity:** Concessioner facilities and operations within park boundaries or covered by the concession contract.
- **Period Under Review:**
 - Practices from the prior calendar year to present (January 1, 2010 – [Date]) – Baseline Audit
 - Practices from the last date of previous audit to present ([Date]– [Date]) – Routine Audit
- **Audit Criteria:**
 - Federal (e.g., EPA, OSHA), state, and local requirements
 - DOI, NPS, and park policies (including concession regulations and policies)
 - Concession contract requirements (including the Operating and Maintenance Plan)

Audit Scope (cont.)



Audit Criteria – NPS Environmental Program Areas

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

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

Audit Scope (cont.)



Audit Criteria – NPSCS Environmental Program Areas

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

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

Risk Management – Not Within Audit Scope



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



Audit Process

- Collect information
 - Interview staff at all levels
 - Observe key operations
 - Review relevant documents and records
- Compare information to the audit criteria
- Develop audit findings and recommendations in the form of an Environmental Audit Report

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Safety During the Audit

Auditors have a strict safety policy to adhere to during the course of the audit, this includes:

- Not entering confined spaces;
- Not entering dark or poorly lit areas;
- Not entering areas marked ‘**Danger**’ or ‘**Keep Out**’;
- Not handling unknown or unlabeled chemicals; and
- Not opening chemical storage lockers, containers, or tanks.

*****The Audit Team asks that concession staff lead the group through the facilities, and may ask for assistance in turning on lights, opening storage cabinets, or moving containers.*****

Proposed Audit Schedule



Date	Day	Activities

Proposed Audit Schedule



Date	Day	Activities

The Environmental Audit Report – What to Expect



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



QUESTIONS?

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