

**National Park Service  
US Department of the Interior**

**National Park Service Commercial Services Program  
Denver, Colorado**



# **National Park Service Commercial Services Program Environmental Audit Operating Guide**

**Version 1.0 (DRAFT 4.0)**

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## FOREWORD

This is the first edition (Version 1.0 (DRAFT 4.0)) of the *National Park Service Commercial Services Program Environmental Audit Operating Guide* (Guide), effective September 30, 2013. The Guide will be used to conduct environmental audits of National Park Service (NPS) concessions from the effective date until it is revised.

The primary audience for the Guide is audit team members who conduct environmental audits for the NPS Commercial Services (Commercial Services). The Guide describes policies and protocols for conducting environmental audits, and is intended to be used as a reference for how the Commercial Services environmental audit program should operate. The Guide is not intended to describe all environmental requirements applicable to NPS concession contracts.

NPS personnel who are engaged in the administration of concession contracts must be knowledgeable about and apply the provisions of Title 36 of the Code of Federal Regulations (36 CFR) Part 51, *NPS Management Policies*, as well as the contract and its Operating Plan and Maintenance Plan exhibits. In the event of any inconsistency between the Guide and the National Parks Omnibus Management Act of 1998, 36 CFR Part 51, or the contract, the latter document or documents prevail.

This document is for internal guidance only, and does not impose mandatory requirements for the NPS, its contractors or concessioners. This document does not create any rights, substantive or procedural, that are enforceable by law by any party.

The heart of this Guide is the Auditor’s Handbook. To keep the Auditor’s Handbook concise, some topics are supplemented with appendices that provide greater detail.

The Auditor’s Handbook addresses issues of particular relevance to auditors, such as the audit planning process and steps that should be taken during the pre-visit, site visit, and post-visit phases of each audit. The appendices include explanations of the audit criteria in more detail, documents that support and explain the relationship between the Commercial Services environmental audit program and the NPS Environmental Audit Program (for audits of national parks), and tools and guidance to assist auditors in completing an environmental audit.

The Guide will be reviewed periodically and updated as necessary to address policy and program changes. The Environmental Audit Coordinator (Coordinator) and staff welcome comments, clarifications, and/or suggested improvements. Please direct them to:

National Park Service  
Commercial Services Program  
Attn: Environmental Audit Coordinator  
PO Box 25287  
Denver, CO 80225

or

[CSEnvAuditCoordinator@nps.gov](mailto:CSEnvAuditCoordinator@nps.gov)

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**TABLE OF CONTENTS**

**I. INTRODUCTION** ..... 1

    NPS Commercial Services Program Environmental Audit Program Background and Purpose ..... 1

    Disclaimer ..... 2

    Authorities ..... 2

    How to Use the Guide..... 3

        Guide Organization..... 3

        Guide Audiences..... 3

    Definition of Terms ..... 3

    Glossary ..... 3

    Acronyms and Abbreviations ..... 7

**II. ENVIRONMENTAL AUDIT PLANNING** ..... 8

    Understanding the Scope of an Environmental Audit ..... 8

        Audited Entities ..... 8

        Audit Types ..... 9

        Audit Criteria..... 9

        Audit Frequency and Period under Review..... 11

    The Environmental Audit Team ..... 11

        Roles and Responsibilities..... 11

        Qualifications..... 14

**III. CONDUCTING A STANDARD ENVIRONMENTAL AUDIT** ..... 17

    Pre-Visit Activities ..... 17

        Contact Park Staff (6 weeks prior to the site visit)..... 18

        Confirm Audit Scope (6 weeks prior to the site visit)..... 18

        Determine and Assign Applicable Audit Criteria (6 weeks prior to the site visit)..... 19

        Develop Audit Logistics Plan (6 weeks prior to the site visit)..... 20

        Prepare In-Brief (2 weeks prior to site visit) ..... 20

        Complete Audit Team Preparations (1 week prior to site visit) ..... 21

    Site Visit Activities..... 21

        Conduct In-Brief..... 22

        Collect Audit Data..... 23

        Site Visit Reporting ..... 26

    Post-Visit Activities..... 29

        Prepare and Submit Preliminary Audit Report..... 31

        Comments on the Preliminary Audit Report ..... 32

        Prepare Final Audit Report..... 33

    After the Environmental Audit ..... 34

---

<b>IV. CONDUCTING A TELEPHONE ENVIRONMENTAL AUDIT .....</b>	<b>35</b>
Telephone Audit Pre-Teleconference Activities.....	35
Confirm Audit Scope.....	36
Determine and Assign Applicable Audit Criteria.....	36
Develop Audit Logistics Plan.....	36
Audit Criteria.....	36
Teleconference Activities .....	36
Conduct In-Brief.....	37
Gather Audit Data.....	37
Reporting Emergency Conditions.....	38
Conduct EMP Review .....	38
Develop Preliminary Audit Findings, BMPs, and Exceptional Practices .....	38
Conduct Exit-Brief .....	38
Telephone Audit Post-Conference Activities .....	39
After the Environmental Audit .....	39

## I. INTRODUCTION

### **NPS Commercial Services Program Environmental Audit Program Background and Purpose**

In 1916, the Organic Act established the National Park Service (NPS) to “promote and regulate the use of the...national parks...[their] purpose [being] to conserve the scenery and the natural and historic objects and the wildlife therein to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” This legislative mandate challenged the NPS to be an accountable, active, and responsible steward, while also providing visitor services and carrying out associated operations in national parks that can potentially impact resources both inside and outside park boundaries.

Given federal and state environmental protection laws and regulations designed to ensure that adverse resource impacts are minimized, the Department of the Interior (DOI) recognized a need for improved systems to measure compliance of facilities, including federal agencies and others (e.g., concessioners and contractors). The DOI established an internal environmental audit program in 1997 (DOI Audit Policy) that mandates that DOI bureaus, including the NPS, develop and implement an environmental auditing program for “all lands, facilities, and operations.” The NPS has interpreted this directive to include NPS concessioners.

Commercial Services established a concession environmental audit program in 1999, and has been conducting environmental audits ever since. Commercial Services adopted the NPS Environmental Audit Program (EAP) Operating Guide, which was developed by the NPS for auditing park operations and facilities, in support of the DOI Audit Policy.

Commercial Services recognizes the need to develop and implement an additional audit program to account for various programmatic and procedural issues related to concessions that differ from park operations. These differences include the following:

- NPS EAP audits of parks are conducted under regionally managed programs, whereas Commercial Services environmental audits of concessioners are centrally administered. While each region uses the NPS EAP Operating Guide as a minimum standard, it has been implemented differently in each region. Potentially, a business holding concession contracts in different regions would be subject to different protocols and criteria if it were audited by regionally managed programs. Having a single national program to audit concessioners allows for a comprehensive and consistent national environmental performance baseline for all concessioners.
- Concession activities are authorized by a legally binding contract that stipulates the legal responsibilities and requirements for a concessioner. Environmental audits review concession contract requirements and ensure that audit recommendations are consistent with and reinforce those requirements.
- Environmental audits provide useful information to the NPS for developing new concession contracts and managing current concession contracts. Accordingly, environmental audits are scheduled in consideration of concession contract effective and renewal dates.
- Most concession contracts are awarded to small businesses that may not have the technological or financial resources afforded by some larger concessioner companies. As a result, environmental audits of concession operations emphasize compliance assistance and best management practice (BMP) recommendations to concessioners and park concession staff. Developing useful and consistent compliance assistance tools is more easily and efficiently accomplished through a distinct national-level program.

To verify that the approach and criteria used for auditing concessioners does not conflict with other environmental programs, a third party compared the environmental audits to the Board of Environmental, Health, and Safety Auditor Certifications (BEAC) *Standards for Auditing* and the American Society for Testing and Materials (ASTM) *Environmental Auditing Guidelines*, both of which are nationally recognized audit standards. The conclusion was that the environmental audits generally conform to the BEAC and ASTM standards with no significant disparities or contradictions.

### Disclaimer

Notwithstanding anything to the contrary in this Guide and its appendices, this material is not intended to describe all environmental requirements that may be applicable to NPS concession contracts, nor is it intended to suggest that all environmental authorities cited herein may be applicable to concessions.

In addition, this document establishes internal guidance only and does not impose mandatory requirements on the NPS, its contractors or concessioners. This document does not create any rights, substantive or procedural, that are enforceable by law by any party.

### Authorities

The authorities for environmental audit policy and procedures are as follows:

- **NPS, Title 36 of the Code of Federal Regulations (36 CFR) Part 51 (Concession Contracts).** Part 51 contains regulations pertaining to the preservation of the parks and administration of concession operations.
- **DOI, Policy, “Environmental Auditing,” *Departmental Manual 515, Chapter 2 (515 DM 2)*.** Mandates that the NPS develop and implement an environmental auditing program for “all lands, facilities, and operations.” The NPS has interpreted this directive to include concessioners.
- **Executive Order (EO) 13423, “Strengthening Federal Environmental, Energy, and Transportation Management.”** Specifies that the head of each agency establish an agency program for environmental compliance reviews and audits to ensure “...legally-binding obligations between the agency and a tenant or [concessioner]...to the extent the head of the agency determines appropriate, that the tenant or concessionaire take actions relating to matters within the scope of the contract that facilitate the agency’s compliance with this order” (Section 3). Note that EO 13423 supersedes EO 13148, which specified that all federal agencies, including DOI, conduct periodic environmental audits including their “contractors and concessioners as appropriate.”
- **NPS, *Management Policies, Chapter 10, “Commercial Visitor Services.”*** Authorizes commercial visitor services through concession contracts or Commercial Use Authorizations (CUAs). Section 10.2.4.10, “Environmental Program Requirements,” provides authority for the NPS to require concessioners to meet environmental compliance objectives, and to conduct environmental compliance audits of all commercial visitor services at least every three to five years, in accordance with this Guide.
- **NPS, Director’s Order (DO) 48, Chapter on “Concessions Environmental Management” (draft).** Requires that Commercial Services develop and implement an environmental audit program for concessions consistent with the NPS EAP for parks.
- **NPS, Contractual Agreements.** Concession contracts, CUAs, or historical leases impose compliance with environmental laws.

## How to Use the Guide

The Guide documents programmatic responsibilities and procedures for conducting environmental audits of NPS concession facilities and services. Concessioner-owned facilities, operations, and services should not be included in park audits. However, in some cases, operational responsibilities may be shared between park and concession staff. Accordingly, to the greatest extent possible, the management and implementation of the Commercial Services environmental audit program is consistent with the *NPS EAP Operating Guide*, although certain environmental audit program management and field procedures differ from the NPS EAP.

Relying solely on information in the Guide does not guarantee compliance with applicable laws. Strategies, procedures, and proposed solutions for compliance issues should be discussed with the appropriate federal, state, and/or local regulatory agencies as well as with park staff. It remains the responsibility of concession staff to ensure that they are in compliance with all applicable laws and regulations.

## Guide Organization

The Guide consists of four primary sections, plus associated appendices. The focal point of the Guide is the Auditor’s Handbook, which consists of Sections [II](#), [III](#), and [IV](#) and is supported by information in the appendices.

The Auditor’s Handbook provides environmental audit team members with guidance and general procedures for conducting environmental audits. It is divided into three main sections:

- [Section II](#) – “Environmental Audit Planning,” which defines the scope of environmental audits and audit team roles and responsibilities;
- [Section III](#) – “Conducting a Standard Environmental Audit”; and
- [Section IV](#) – “Conducting a Telephone Environmental Audit.”

Guide appendices support and augment the Auditor’s Handbook and provide specific tools for auditors.

## Guide Audiences

Environmental audit team members are the primary intended audience for the Guide. However, the Guide can also be useful for NPS staff and NPS concessioner representatives. Nevertheless, the Guide is not intended to describe all environmental requirements applicable to NPS concession contracts. Concessioners remain responsible for determining and complying with all applicable laws and regulations.

The Guide has been designed to provide a relatively comprehensive reference for NPS Commercial Services auditors. However, keep in mind that it is built upon the foundation of the NPS EAP. Therefore, those reading this Guide should also be familiar with the *NPS EAP Operating Guide* and understand how the Commercial Services environmental audit program for concessioners relates to the NPS EAP for parks.

## Definition of Terms

The terms defined in this section are useful for understanding procedures explained in the Guide. Acronyms and abbreviations commonly used by Commercial Services are also provided.

## Glossary

Many terms are identical or very similar to those given in the *NPS EAP Operating Guide*. Definitions that are specific to Commercial Services and are not defined in the *NPS EAP Operating Guide* are denoted with an asterisk (\*).

**Applicable Laws\*:** Applicable laws are defined under concession contract language found in the Federal Register (FR) (Vol. 65, No. 87, May 2000) and consist of “the laws of Congress governing the Area, including, but not limited to, the rules, regulations, requirements and policies promulgated under those laws (e.g., 36 CFR Part 51), whether now in force, or amended, enacted or promulgated in the future, including, without limitation, federal, state and local laws, rules, regulations, requirements and policies governing nondiscrimination, protection of the environment and protection of public health and safety.”

**Audit Criteria:** The regulatory and policy standards developed or adopted by the NPS EAP and Commercial Services, against which audited entities are evaluated during an audit. They are summarized in the EnviroCheck Sheets. (See EnviroCheck Sheet definition below.)

**Audit Finding:** A documented conclusion of conditions at the audited entity’s facilities or property at the time of the audit, based on objective and verifiable evidence gathered during the audit and based on a comparison of that evidence against the audit criteria. Audit findings may relate to individual occurrences of non-compliance, or they may relate to a single issue that impacts all concession facilities, services, or operations.

**Audit Handler\*:** An audit team member who assists in all aspects of the pre-audit, audit, and post-audit activities as requested by the audit team leader.

**Audit Logistics Plan\*:** A plan developed by the audit team to prepare for and manage an audit.

**Audit Protocol:** A list of issues or questions designed to help address objectives related to applicable audit criteria. The NPS EAP and NPS Commercial Services EAP audit protocols are contained primarily within the set of documents known as EnviroCheck Sheets. (See EnviroCheck Sheet definition below.)

**Audit Program Manager\*:** The designated person in Commercial Services responsible for day-to-day aspects of the environmental audit program (e.g., scheduling, template development, auditor selection/approval).

**Audit Report:** The report generated upon completion of the audit, detailing audit findings, BMPs, and exceptional practices.

**Audit Schedule:** The schedule developed by the Audit Program Manager and the Coordinator for auditing concessioners during the year.

**Audit Scope:** A description of what is to be audited. The audit scope includes a definition of the audited entity, audit period under review, and audit criteria.

**Audit Team Leader (ATL):** The audit team member who has demonstrated technical knowledge of audit criteria, has been approved by the Audit Program Manager to lead an audit, and assumes overall responsibility and authority for completing an environmental audit. Section II. B describes ATL qualifications in more detail.

**Audit Team:** A group of individuals consisting of an ATL and at least one other auditor, responsible for conducting an audit and preparing the audit report.

**Audited Entity\*:** The concession whose contractually assigned or defined facilities, services, activities, and operations are evaluated under an environmental audit.

**Auditor:** An audit team member qualified to conduct a Commercial Services environmental audit. Section II.B describes auditor qualifications in more detail.

**Auditor-in-Training\*:** Individuals who have not completed required audit training and do not have appropriate experience qualifications. Auditors-in-training may attend any portion of the audit and work with the audit team to gather evidence, understand concession operations, and learn about the audit process, auditing techniques, and audit criteria.

**Baseline Environmental Audit:** The initial environmental audit conducted of an audited entity, in conformance with this Guide and including the minimum audit criteria described herein.

**Best Management Practice (BMP)\*:** Policies and practices that apply the most current and advanced means and technologies available to undertake and maintain a superior level of environmental performance that is reasonable for use in the operations conducted under the contract. BMPs are expected to evolve over time.

**Closed Audit Finding\*:** The status granted when a compliance issue identified in an audit report (i.e., an audit finding) no longer exists.

**Concessioner\*:** An individual, corporation, or other legally recognized entity that holds a concession contract authorized under the National Parks Omnibus Management Act of 1998 (Title IV of Public Law 105-391) or the National Park Service Concession Policies Act of 1965 (Public Law 89-249, 79 Stat. 969), and managed by Commercial Services.

**Concession Contract\*:** A binding written agreement between the NPS Director and a concessioner authorized under one of the statutes cited in the preceding definition, and implemented in accordance with 36 CFR Part 51. A concession contract authorizes a concessioner to provide necessary and appropriate visitor services within a park area under specified terms and conditions.

**Contract Category\*:** The designation of a concession contract under the National Parks Omnibus Management Act of 1998 that defines the concessioner’s ability to obtain a compensatory interest for constructing capital improvements on government lands. Categories include Category I, Category II, and Category III contracts.

**Coordinator\*:** The designated person in Commercial Services responsible for overall environmental audit program management and providing guidance on the environmental audits. This individual should be an NPS employee rather than the consultant conducting the third party environmental audit.

**Corrective Action:** An action taken by the audited entity to address issues identified in an audit finding.

**EnviroCheck Sheet:** The documented audit protocol for the NPS EAP and Commercial Services. EnviroCheck Sheets include a list of issues or questions designed to address the audit objectives based on audit criteria. Auditors should use EnviroCheck Sheets to assure that each audit criterion area is thoroughly evaluated. Each EnviroCheck Sheet provides guidance on interpreting regulatory and non-regulatory audit criteria as well as instructions for the auditor on what to evaluate, who to interview, and which records to review. Note that the EnviroCheck Sheets are not all-encompassing and are not intended to describe every environmental requirement applicable to NPS concession contracts.

**Environmental Audit:** A systematic, periodic, objective, and documented evaluation of an NPS concession in accordance with the Guide.

**Environmental Management Program (EMP)\*:** A comprehensive, documented program developed and implemented by a concessioner to achieve environmental management objectives. For the purposes of Commercial Services, an EMP is intended to be equivalent to an Environmental Management System (EMS) (see Environmental Management System definition below). Development and implementation of an EMP is required by contract and other NPS policy for all Category I and II contracts. According to NPS *Management Policies*, Chapter 10, Section 10.2.4.10, the EMP:

- Should be appropriate to the size and nature of the operation;
- Must account for all concession activities with potential environmental impact;
- Must be updated at least annually; and
- Must be approved by the Superintendent.

EMPs are evaluated by the audit team at the same time they conduct the environmental audit.

**Environmental Management Systems (EMS):** The systems and procedures in use by a unit of the NPS, designed to help park staff identify, manage, and consider all activities of the unit that may have an environmental impact, and select the most significant ones to address.

**Environmental Purchasing\*:** The acquisition of environmentally preferable products. Environmentally preferable products are products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider raw materials, production, manufacturing, packaging, distribution, reuse, operations, maintenance, and/or disposal. “Environmental purchasing” is also known as “green procurement.”

**Exceptional Practice\*:** Activities undertaken that are not often used by park concession operations and that demonstrate a concessioner’s commitment to environmental excellence.

**Executive Summary:** Part of the audit report that summarizes the audit and audit results.

**Isolated Finding\*:** An audit finding that is not indicative of a programmatic issue and/or is not pervasive throughout the concessioner’s operation.

**Open Issues:** An issue that cannot be resolved without an auditor obtaining additional information.

**Park:** Any one of the hundreds of areas of land and water administered as part of the national park system. The term is used interchangeably with “unit,” “park unit,” “area,” and “park area.”

**Period under Review:** The time interval under which conditions at the audited entity are evaluated against the audit criteria. Start and end dates are specified to define this time interval.

**Recommended Corrective Action\*:** Action(s) recommended by the audit team for concession staff to take to close an audit finding.

**Routine Audit:** An audit conducted in accordance with the Guide after the baseline audit. Routine audits take place if the concessioner has not changed and the required services under the current contract are similar to the previous contract. A routine audit may still take place if required services have changed, as long as the majority of services have not changed in type or scope. The determination of whether a concessioner has changed or if required services have changed in type or scope will be made by Commercial Services on a case-by-case basis. If the concessioner has changed, even if the services have not, a new baseline audit will be performed.

**Superintendent’s Compendium:** A document that provides the public and park employees with the special designations, closures, public use limits, permit requirements, and other restrictions imposed under the discretionary authority of the Superintendent.

**Standard Operating Procedure (SOP):** A procedure used to carry out a specific activity or operation. SOPs are usually documented and filed or posted in a readily accessible location for employee review.

### **Acronyms and Abbreviations**

The following abbreviations, acronyms, and terms used throughout the Guide are provided for convenience of the reader. Many terms are identical or very similar to those provided in the *NPS EAP Operating Guide*. Acronyms and abbreviations that are specific to Commercial Services and are not defined in the *NPS EAP Operating Guide* are denoted with an asterisk (\*).

<b>36 CFR</b>	Title 36 of the Code of Federal Regulations	<b>EMS</b>	Environmental Management System
<b>515 DM 2</b>	Departmental Manual 515, Chapter 2	<b>EO</b>	Executive Order
<b>Audit</b>	Environmental audit	<b>EPA</b>	U.S. Environmental Protection Agency
<b>AQ*</b>	Audit Questionnaire	<b>FAR*</b>	Federal Acquisition Regulation
<b>ASTM*</b>	American Society for Testing and Materials	<b>FR</b>	Federal Register
<b>BEAC*</b>	Board of Environmental Health and Safety Auditor Certifications	<b>FY</b>	Fiscal Year
<b>BMP</b>	Best Management Practice	<b>Guide*</b>	NPS Commercial Services Program Environmental Audit Operating Guide
<b>CFC</b>	Chlorofluorocarbon	<b>HAZCOM</b>	Hazard Communication
<b>CFR</b>	Code of Federal Regulations	<b>NPS</b>	National Park Service
<b>CONCID*</b>	Concessioner Identification Number	<b>NRC</b>	National Response Center
<b>CUA</b>	Commercial Use Authorization	<b>OSHA</b>	Occupational Safety and Health Administration
<b>DM</b>	Departmental Manual	<b>PDF</b>	Portable Document Format
<b>DO</b>	Director’s Order	<b>POC</b>	Point of Contact
<b>DOI</b>	Department of the Interior	<b>RCA</b>	Recommended Corrective Action
<b>DOT</b>	Department of Transportation	<b>RCRA*</b>	Resource Conservation and Recovery Act
<b>EAP</b>	Environmental Audit Program	<b>SOP*</b>	Standard Operating Procedure
<b>EAR</b>	Environmental Audit Report	<b>SPCC</b>	Spill Prevention, Control, and Countermeasures
<b>EMP*</b>	Environmental Management Program	<b>WASO</b>	Washington Area Support Office

## II. ENVIRONMENTAL AUDIT PLANNING

This section of the Guide introduces the various components that characterize the scope of each environmental audit, such as defining audited entities, types of audits, audit criteria, audit frequency, and period under review. Additionally, this section provides an overview of the environmental audit team, including roles and responsibilities and auditor qualifications.

### Understanding the Scope of an Environmental Audit

A clearly defined scope is critical to a successful audit. The environmental audit scope depends on:

- Which concessioner and which associated facilities and services will be audited;
- Which audit type (i.e., standard versus telephone audit) will be used;
- The audit criteria against which to audit the concessioner; and
- The period under review for each concessioner.

### Audited Entities

Commercial Services is responsible for auditing operations authorized by a concession contract that provide visitor services in national parks. A concessioner may be authorized to provide visitor services under multiple concession contracts at one or multiple parks, with most contracts authorizing provision of services at a single park. However, each contract requires a separate audit.

Typically, audits under Commercial Services are scheduled on a park-by-park basis—not on an individual concession basis—to conserve travel costs, minimize disruption to park operations, and allow for park-wide concession environmental management issues to be more easily identified. This does not mean that in every case, every concession contract in a park is audited in a single visit. The Coordinator, who is responsible for overall management and guidance of Commercial Services environmental audits, works in collaboration with parks and regions to determine an annual environmental audit schedule that factors in park planning, contract expiration and award dates, and funding.

The scope of facilities, services, and operations associated with each concession to be audited consists of the following:

- Concessioner-operated facilities within park boundaries;
- Concession services and operations taking place within park boundaries;
- Concessioner-owned and concessioner-operated facilities outside park boundaries that are specifically mentioned in the concession contract; and
- Concession services and operations taking place outside park boundaries that are specifically mentioned in the concession contract; for example, if a concession contract requires composting and the concessioner composts outside park boundaries.

In some cases, operational responsibilities may be shared between park and concession staff (e.g., the park owns a fuel storage tank and NPS staff are responsible for corrosion and spill/overflow protection, but concession staff are responsible for conducting daily fuel and inventory control). In these cases, the audit team should audit only those operations that are the concessioner’s responsibility and document how operational responsibility was determined.

If park or concession staff responsibility for a facility, service, or operation cannot be definitively determined, the audit team should include the facility, service, or operation within the audit scope. Otherwise it is possible that neither an NPS EAP nor an NPS Commercial Services environmental audit would address the environmental issues connected to that facility, service, or operation.

## **Audit Types**

Audits conducted by NPS Commercial Services can take the form of a standard environmental audit or a telephone audit. In certain cases, concessions may be conditionally exempt from an audit. These determinations are made by the Coordinator based on the size, complexity, contract category, and potential for environmental impact of each concession operation to ensure that the appropriate level of effort is applied to each environmental audit. A description of these audit types is provided in the subsections below.

**Standard Audit:** Standard audits are consistent with DOI policy and the NPS EAP. They include a site visit as well as pre- and post-visit phases, and are described in more detail in [Section III](#) of this Audit Operating Guide.

**Non-Standard Audit:** Some concessions may not warrant audit site visits due to their small size, less complex operations, and/or lesser potentials for environmental impact. In addition, access to concessions can be challenging, particularly for those that have no assigned facilities in the park (e.g., river guiding, hunting, mountaineering guiding). Furthermore, some concessions (e.g., cruise ships) are subject to comprehensive environmental evaluations through a third-party auditor (e.g., U.S. Coast Guard) and as such, that environmental evaluation may serve in place of an NPS Commercial Services environmental audit. In these cases, the Coordinator collects sufficient information to determine that the concession contract warrants a site visit exemption. The site visit exemption should be re-confirmed on a 10-year interval, which coincides with the usual frequency of a contract renewal or issuance. The Site Visit Exemption form can be found in [Appendix 2](#).

Those concessions that meet site visit exemption criteria are eligible for undergoing a non-standard audit. Although the non-standard audit typically has a reduced level of effort for both the audit team and concessioner, the process involves the same basic elements as a standard audit, except that data collection is accomplished remotely through telephone interviews and sharing of electronic documentation. Information shared through mail, fax, and email, and potentially second-hand observations via photographs, take the place of an in-person inspection.

**Telephone Audit:** The most common non-standard audit is a telephone audit. Telephone audits are described in more detail in [Section IV](#) of the Guide. Another example of a non-standard audit is a cruise line audit.

**Cruise Line Audit:** Due to the transient nature of cruise line concession operations in parks and the complexity of such vessel operations, they present a unique challenge. As a result, an alternate audit process is implemented whereby a questionnaire is used to gather information on general and specific contract requirements from each cruise line company operating in the waters within national parks. Commercial Services auditors review the audit questionnaire, and develop an audit report summarizing the findings of the questionnaire review.

**Conditionally Exempt:** Some concessions may not warrant an audit due to negligible potential for environmental impact (e.g., a small business supplying only firewood). In these cases, the Coordinator collects sufficient information to justify and document these concessions as conditionally exempt. The conditionally exempt justification should be verified at least every ten years.

## **Audit Criteria**

Environmental audit criteria are summarized in the NPS [EAP EnviroCheck Sheets](#) provided in [Appendix 3](#) and concession-specific NPS [Commercial Services EnviroCheck Sheets](#) provided in [Appendix 4](#). Auditors use applicable EnviroCheck Sheets as the minimum audit criteria against

which to compare the activities and operations of concessions, and may formulate additional audit findings based on applicable regulations/requirements as needed. Environmental audit criteria include:

- **Federal laws**, including, but not limited to, those specified in 515 DM 2;
- **Applicable EOs** regarding environmental issues (e.g., EO 13423, Strengthening Federal Environmental, Energy, and Transportation Management) and the EOs specified in 515 DM 2. These are applicable if compliance with an EO is required in the concession contract or if the EO states it is applicable to concessions. In other cases, findings related to requirements established by EOs would have a finding level of a BMP;
- **Federal regulations** administered by U.S. agencies such as the Environmental Protection Agency, Occupational Safety and Health Administration, and Department of Transportation, in accordance with their authority;
- **Applicable state and tribal environmental laws and regulations**. More stringent state environmental requirements supersede federal environmental requirements;
- **Applicable regional and local environmental codes and ordinances**. More stringent regional and local requirements supersede federal and state environmental requirements. For instance, regional boards and authorities may establish more stringent air quality and/or water quality standards, or the local Fire Marshall may have specific codes for the siting, construction, and operation of aboveground fuel storage tanks;
- **Applicable DOI, NPS, and park policies and procedures**, which include the DM, NPS *Management Policies*, DOs, and Superintendent’s Compendium; and
- **Concession contract requirements**, which may include an EMP (per 65 FR 26052-26086), and other contract requirements regarding environmental issues. Note: these requirements are primarily located in the operating and maintenance plans included as exhibits to contracts.

State, regional, and local criteria that relate to federal audit criteria depend on the location of the concession contract being audited. Compiling these audit criteria is the responsibility of the audit team. The determination of these audit criteria by the audit team does not preclude the entity being audited from understanding and complying with all applicable laws and regulations.

NPS [EnviroCheck Sheets](#) include the topic areas identified in [Exhibit 1](#). Not all topic areas will apply to each concession audit. The ATL will need to identify applicable topic areas prior to conducting the audit, and ensure that all team members are familiar with the criteria being evaluated. Note: Hazard Communication (HAZCOM) and Respiratory Protection Program EnviroCheck Sheets have been removed from Commercial Services audit scope since they are now strictly safety-related topic areas.

#### EXHIBIT 1: NPS [EAP ENVIROCHECK SHEET TOPICS](#)

- |                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Air Quality</li> <li>• Chlorofluorocarbon (CFC) and Halon Management</li> <li>• Emergency Planning and Reporting</li> <li>• Environmental Purchasing (formerly Green Procurement)</li> <li>• Fuel Storage Management</li> <li>• Hazardous Materials Management</li> <li>• Hazardous Waste</li> </ul> | <ul style="list-style-type: none"> <li>• Laboratory Chemical and Waste Management</li> <li>• Pesticide Management</li> <li>• Solid Waste Management</li> <li>• Spill Prevention, Control, and Countermeasure (SPCC) Planning</li> <li>• Storm Water Management</li> <li>• Universal Waste Management</li> <li>• Used Oil</li> <li>• Waste Water Management</li> </ul> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Commercial Services [EnviroCheck Sheets](#) (see [Appendix 4](#)) have been developed to augment the NPS EAP protocols, and focus on concession service types (e.g., food and beverage services). They refer to applicable NPS EAP [EnviroCheck Sheets](#) for each concession service type, and provide additional requirements unique to concession facilities and services. The concession service types addressed by [Commercial Services EnviroCheck Sheets](#) are identified in [Exhibit 2](#). Note: the [Commercial Services EnviroCheck Sheet](#) for evaluating a concessioner’s EMP is applicable to all concession service types.

#### EXHIBIT 2: [COMMERCIAL SERVICE ENVIROCHECK SHEET TOPICS](#)

- |                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Campgrounds and Trailer Villages</li> <li>• Food and Beverage Service</li> <li>• Environmental Management Systems</li> <li>• Gas and Service Stations</li> <li>• Golf Courses</li> <li>• Guide and Outfitter Services</li> <li>• Horse, Mule, and Animal Husbandry Operations</li> <li>• Laundry, Swimming Pool, Shower, and Bathhouse Operations</li> </ul> | <ul style="list-style-type: none"> <li>• Lodging Management</li> <li>• Marinas and Watercraft Rental Operations</li> <li>• Medical Clinics</li> <li>• Retail Operations</li> <li>• Tennis Courts</li> <li>• Transportation Operations</li> <li>• Water Guide Services</li> <li>• Winter Sports Operations</li> </ul> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

#### ***Audit Frequency and Period under Review***

The audit frequency for each concession is every three to five years (contingent upon funding availability). Auditors are required to review only those activities that occurred during the pre-determined period of time: the period under review. The audit period under review is used to balance interest in obtaining an adequate review of concession facilities and operations with the need to limit audit scope because of time and resource constraints.

- **Baseline Audit Period under Review.** The period under review for baseline (initial) audits of concessions is January 1st of the previous calendar year to the last day of the audit site visit or telephone audit. For example, a baseline concession audit occurring August 15-19, 2011, would have a period under review of January 1, 2010, through August 19, 2011.
- **Routine Audit Period under Review.** The period under review for routine audits (i.e., audits of concessions conducted after the baseline audit), in which the business has not changed since the last environmental audit, is the first day after the previous audit concluded to the last day of the present audit. For example, a routine concession audit occurring August 15-19, 2011, with a baseline audit that occurred October 10-14, 2007, would have a period under review of October 14, 2007, through August 19, 2011.

#### **The Environmental Audit Team**

This section describes the roles and responsibilities of the audit team and the audit team support staff as they relate to the Coordinator, the audited entity (i.e., the concessioner), and park staff involved in concession management. (A checklist of park staff and concessioners’ roles and responsibilities is included in [Appendix 1](#).)

#### ***Roles and Responsibilities***

Before discussing the roles and responsibilities of the audit team and audit team support, it is important to understand some of the roles and responsibilities of the Coordinator, given that the Coordinator is the primary Commercial Services point of contact (POC) for all environmental audit-

related issues. Some of the Coordinator’s roles and responsibilities as they relate to the audit team are described in [Exhibit 3](#) below.

### EXHIBIT 3: COORDINATOR RESPONSIBILITIES

The Coordinator is the primary POC for all Commercial Services environmental audit-related issues, and therefore should be apprised of all notable environmental audit issues that are encountered.

Responsibilities of the Coordinator include:

- Notifying park staff of upcoming environmental audits;
- Confirming the audit scope, including the concession to be audited, and audit type (i.e., standard vs. non-standard audit);
- Acting as initial POC between the audit team and park staff;
- Responding to audit issues as they are presented by the audit team;
- Receiving, reviewing, approving, and distributing the Preliminary Audit Report;
- Receiving, reviewing, approving, and distributing the Final Audit Report;
- Soliciting feedback from concessioner, park, and NPS regional staff on the audit process;
- Soliciting corrective action completion status reports from park staff on a periodic basis, at least once a year; and
- Serving as the POC regarding follow-up on corrective action implementation.

The audit team, which should be composed of at least an ATL and an auditor, is responsible for conducting an audit in accordance with the Guide. This includes evaluating concession operations as required under the audit scope, and preparing the audit report.

As representatives of Commercial Services, the audit team members are also responsible for meeting the following goals:

- Conducting the audit as an open process and disclosing all that is found, and adhering to the most current confidentiality policies;
- Promoting education and awareness to concession and NPS staff at the audited entity, wherever possible; and
- Promoting lessons learned from other environmental audits.

The roles and responsibilities of audit team members are described in [Exhibit 4](#) below.

### EXHIBIT 4: AUDIT TEAM RESPONSIBILITIES

#### AUDIT PROGRAM MANAGER

The Audit Program Manager is responsible for the day-to-day management of the environmental audit program. The Audit Program Manager oversees the overall processes, scheduling, template development, and auditor assignments. Responsibilities include:

- Coordinating the development of the audit schedule;
- Approving audit team sizes and audit team members;
- Developing and approving audit budgets; and
- Ensuring audit team participants, including the ATL, are qualified to conduct the audit of the concession to which they are assigned;

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## ATL

The ATL serves as the primary POC between the audit team and the Coordinator, and between the audit team and park staff. As the person ultimately responsible for successful audit completion in accordance with the Guide, the ATL must be on site during the entire audit site visit for standard audits, and participate in all significant interviews for telephone audits. Responsibilities include:

- Developing a detailed audit logistics plan, to include audit schedule and scope, with park staff;
- Ensuring applicable audit criteria have been identified, including researching possible more stringent state and local laws and regulations as well as NPS regional and park policies, and documenting these in a regulatory summary;
- Reviewing the concession contract and developing (or coordinating the development of) a summary to help understand general concession operations, and identifying key environmental requirements;
- Assigning responsibility for covering audit criteria and audit protocols (i.e., EnviroCheck Sheets) to members of the audit team;
- Coordinating travel logistics for the audit team;
- Preparing, or coordinating the preparation of, the In-Brief and Exit-Brief presentations;
- Ensuring all relevant pre-audit data is collected—such as the regulatory summary, concession contract summary, and audit logistics plan—and distributed to the audit team for review;
- Managing audit activities, such as executing site visit logistics or coordinating telephone interviews;
- Managing the audit budget, as provided by the Audit Program Manager;
- Contributing to the audit team as an auditor;
- Reviewing and verifying audit findings and recommended corrective actions developed by the auditors;
- Preparing and submitting the Preliminary Audit Report to the audit handler in a timely manner;
- Coordinating and participating in the audit comment teleconference between park staff, concession staff, and the audit team;
- Preparing and submitting the Final Audit Report to the audit handler in a timely manner; and
- Submitting all documentation to the audit handler for inclusion in the official concession audit file (including field notes).

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## AUDITOR

Auditors are responsible for supporting the ATL in successfully completing the audit. Responsibilities include:

- Following ATL directions;
  - Reviewing pre-visit information distributed by the ATL;
  - Reviewing assigned audit criteria, audit protocols, and applicable state and local regulations;
  - Confirming travel and lodging reservations;
  - Gathering audit evidence;
  - Providing the ATL with supportable audit findings and recommended corrective actions for the areas to which they are assigned;
  - Providing assistance or input to the ATL in addressing park or concessioner comments on the Preliminary and Final Audit Reports; and
  - Providing all necessary audit documents, including field notes, to the ATL for inclusion in the official concession audit file once the Final Audit Report is submitted.
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## AUDIT HANDLER

Audit handlers are responsible for supporting the audit team in successfully completing the audit. Responsibilities, as requested by the audit team, include:

- Assisting in the preparation of pre-audit documentation;
- Assisting in the gathering of all relevant pre-audit data—such as the regulatory summary, concession contract summary, and audit logistics plan—and distributing it to the audit team for review;
- Assisting in the preparation of the Preliminary Audit Report and transmittal documents;
- Posting the Preliminary Audit Report to the Commercial Services Audit SharePoint site;
- Developing email communication for the Coordinator to distribute;
- Participating as requested by the ATL during the audit comment process;
- Assisting in the preparation of the Final Audit Report and transmittal documents;
- Transmitting the Final Audit Report to the Coordinator for distribution; and
- Receiving all audit documentation for inclusion in the official concession audit file.

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Audit team support members are optional additional staff who may assist the audit team during any step of the audit process. Since they may not have the training, experience, and/or qualifications of audit team members, they are considered audit team support.

The roles and responsibilities of audit team support are described in [Exhibit 5](#).

### EXHIBIT 5: AUDIT TEAM SUPPORT RESPONSIBILITIES

#### OBSERVER

Observers may be present during the audit process for different reasons, but are not considered part of the audit team. Observers may be auditors-in-training, technical experts who are not qualified to be auditors, or others, such as NPS staff from another park or the WASO. Any finding noted by observers must be physically observed by an auditor on the audit team and reviewed by the ATL prior to being included in a Preliminary Audit Report.

- An auditor-in-training works with the audit team to improve their understanding of the environmental audit process, environmental regulatory criteria, BMPs, and sustainable practices as they apply to concessions. They receive instruction and direction from the ATL.
- Others, such as WASO staff, NPS staff from other parks, or the Coordinator, may be present during the audit process to learn more about how concession audits are conducted or to evaluate the audit team’s performance.

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#### REVIEWER

Reviewers conduct a quality check of the Preliminary and Final Audit Reports prior to the report being sent to the Coordinator, and are responsible for:

- Conducting a technical quality review on Preliminary and Final Audit Reports;
- Conducting an editorial quality review on Preliminary and Final Audit Reports; and
- Submitting reviewed Preliminary and Final Audit Reports to the ATL in a timely manner.

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#### *Qualifications*

Only qualified audit team members participate in environmental audits. Audit team qualifications include technical knowledge, training, and proficiency in the [NPS EAP EnviroCheck Sheets](#), [Commercial Services EnviroCheck Sheets](#), and additional Commercial Services audit protocols and procedures not included in the [Commercial Services EnviroCheck Sheets](#). The qualifications of the assigned audit team should be commensurate with the scope and location of the audit and the specific intricacies of the concession operation and contract requirements.

Audit team members must be independent of the concession being audited. For the purpose of Commercial Services, ‘independence’ means that the audit team member is not providing and has not provided services to the concessioner (i.e., through parent company management, or other relationship) that could influence the objective environmental assessment of the concession. Audit team members must maintain the following personal attributes and skills:

- Objectivity
- Independence
- Knowledge of audit criteria
- Technical credibility
- Communication skills
- Diplomacy skills
- Familiarity with operations being reviewed
- Competence with environmental audit tools and techniques

Environmental auditors must also have Commercial Services-approved training and environmental audit experience, as summarized in [Exhibit 6](#). The Audit Program Manager is responsible for confirming whether an individual meets these qualifications.

#### EXHIBIT 6: ENVIRONMENTAL AUDIT TEAM QUALIFICATIONS

##### ATL

###### Training/Experience

- 32-hour environmental audit training, or equivalent documented experience on Commercial Services environmental audits and NPS EAP.
- Annual refresher on Commercial Services environmental audits, or equivalent documented experience that includes any NPS EAP updates.

###### Other Qualifications

- Exceptional understanding of Commercial Services environmental audits, including scope, benefits, regulatory risks, and legal issues.
- Strong knowledge of Commercial Services and associated policies and procedures.
- Strong knowledge of NPS concession operations and associated environmental considerations.
- Thorough understanding of regulatory requirements addressed in the NPS EAP and Commercial Services EnviroCheck Sheets.
- Proven ability to lead a team and manage a budget.

##### AUDITOR

###### Training/Experience

- 32-hour environmental audit training, or equivalent documented experience on Commercial Services environmental audits and NPS EAP.
- Annual refresher on Commercial Services environmental audits, or equivalent documented experience that includes any NPS EAP updates.

###### Other Qualifications

- Familiar with Commercial Services environmental audit scope, benefits, risks, and legal issues.
- Familiar with regulatory requirements addressed in the [NPS EAP EnviroCheck Sheet](#) and the particular [Commercial Services EnviroCheck Sheet](#) that the auditor has been assigned to use.

Audit team support members who are observers must have all of the personal attributes and skills listed above if they have contact with park or concession staff. They must be aware of their limited role in the audit.

Audit team support members who are reviewers must understand how the Preliminary and Final Audit Reports are developed and must be familiar with auditing processes and editing techniques.

### III. CONDUCTING A STANDARD ENVIRONMENTAL AUDIT

This section of the Guide describes how the Coordinator and the audit team conduct a standard environmental audit. Preparations that park and concession staff should take to participate in an environmental audit are described in [Appendix 1](#).

#### Pre-Visit Activities

The audit process begins with scheduling concession audits (i.e., developing the annual audit schedule) at the beginning of the fiscal year. Preparation for each audit site visit begins several weeks in advance of the site visit, and includes contacting the region, parks, and concession staff; collecting pre-visit data; confirming the audit scope; arranging audit logistics; preparing the In-Brief presentation; and conducting pre-visit final preparations. [Exhibit 7](#) provides a timeline for pre-visit activities, which is also provided in the Pre-Visit Checklist in [Appendix 5](#) of this Guide. Detailed information on the pre-visit process is provided in the subsections below.

**EXHIBIT 7: PRE-VISIT TIMELINE**

<b>Timeline</b>	<b>Responsible Party and Task(s)</b>
6 weeks before site visit	<p><b>Coordinator</b></p> <ul style="list-style-type: none"> <li>Notify the park POC that pre-visit materials (including the Audit Questionnaire [AQ]) are available on the Commercial Services audit SharePoint site.</li> </ul>
6 weeks before site visit	<p><b>ATL</b></p> <ul style="list-style-type: none"> <li>Confirm audit dates and audit scope with park POC;</li> <li>Ensure the most current concession contracts, including operating plans and maintenance plans, are available;</li> <li>Coordinate site visit logistics with park POC;</li> <li>Arrange audit team travel plans (e.g., flights, lodging, car rentals);</li> <li>Assign audit criteria to auditors; and</li> <li>Develop audit logistics plan.</li> </ul>
2 weeks before site visit	<p><b>ATL</b></p> <ul style="list-style-type: none"> <li>Ensure completed AQ and other pre-visit information is available on the Commercial Services audit SharePoint site (Park POC will have saved this information on the site as appropriate);</li> <li>Finalize audit team travel plans (e.g., flights, lodging, car rentals);</li> <li>Prepare In-Brief;</li> <li>Review concession contract and develop summary of key environmental requirements; forward to auditors; and</li> <li>Prepare state/local/park/NPS regional environmental regulatory and policy summary; forward to auditors.</li> </ul>
1 week before site visit	<p><b>Auditors/ATL</b></p> <ul style="list-style-type: none"> <li>Review AQ, concession contract summary of key environmental requirements, state/local/park/NPS regional environmental regulatory and policy summary, and previous audit reports, if applicable; and</li> <li>Review assigned audit criteria.</li> </ul> <p><b>ATL</b></p> <ul style="list-style-type: none"> <li>Confirm auditors have reviewed required information; and</li> <li>Confirm audit logistics with park POC.</li> </ul>

**EXHIBIT 7: PRE-VISIT TIMELINE**

<b>Timeline</b>	<b>Responsible Party and Task(s)</b>
2 days before site visit	<b>ATL</b> <ul style="list-style-type: none"> <li>• Ensure all documentation and equipment required for the site visit is available.</li> </ul>

**Contact Park Staff (6 weeks prior to the site visit)**

Typically six weeks in advance of the audit, the Coordinator sends official notification to the park Superintendent of proposed environmental audit(s); a request for the following pre-visit data is included.

**Audit Questionnaire:** The AQ ([Appendix 7](#)) requests information on concession facilities, services, and operations, as well as environmental program information. The Coordinator sends pre-visit information request emails ([Appendices 6](#)) to the park POC. The park POC is responsible for pulling the AQ from the Commercial Services audit SharePoint site and distributing to each concession being audited, collecting the completed AQs, and saving them back to the Commercial Services audit SharePoint site no later than two weeks before the site visit.

**Additional Information:** In addition to the information requested in the AQ, there may be additional concession information helpful for completing the audit, which is either forwarded to the ATL prior to the site visit or is made available during the site visit. This type of information may include general background information on the concession not found in the concession contract documentation as well as the concessioner’s EMP. These documents should be delivered at least two weeks prior to the site visit.

**Confirm Audit Scope (6 weeks prior to the site visit)**

After the ATL has contacted the park POC and forwarded the AQ for the concessioner(s) to complete, the ATL contacts the park POC to confirm the audit scope in terms of the size and complexity of each concession’s operations, audit type, and audit criteria.

**Audited Entities:** For concessions to be audited, as indicated by the Coordinator, the ATL identifies those concession facilities, services, and operations that fall under the audit scope. Facilities and operations that take place outside of park boundaries should not be audited unless they are specifically mentioned in the concession contract.

**Audit Type:** The ATL confirms that the standard audit type is appropriate for each concession. Any consideration for modifying the standard audit type to a non-standard audit type must be made in coordination with, and approved by, the Coordinator.

**Audit Criteria:** The ATL verifies that the audit team has the necessary qualifications in the audit criteria areas applicable to the concession being audited, including non-federal audit criteria. If the assigned audit team does not have the necessary qualifications, the ATL discusses potential changes to the audit team with the Audit Program Manager.

**Audit Period under Review:** The ATL confirms that the concession is undergoing a baseline or routine audit, as designated by the Coordinator, in order to establish the period under review. If it is unclear whether a concession should be undergoing a baseline or routine audit, the ATL works with the Coordinator and Audit Program Manager to make this determination.

### ***Determine and Assign Applicable Audit Criteria (6 weeks prior to the site visit)***

Identifying applicable audit criteria is based on the ATL’s understanding of the concession operation. The ATL assigns auditors responsibility for applicable environmental topic areas and concession service types based on their qualifications. The ATL may assign secondary responsibility for applicable environmental topic areas and concession service types for instances in which large and/or complex concession operations may require that the audit team split into sub-teams during the site visit, or in order to ensure that all applicable data is collected.

The ATL should also inform auditors as to whether a routine audit is to be conducted. If this is the case, the ATL should forward a copy of the Final Audit Report from the previous audit to the auditors.

Applicable audit criteria categories include the following:

- **NPS EnviroCheck Sheets**: The ATL will obtain the most current set of [NPS EnviroCheck Sheets](#), organized by environmental topic area, to be used for the site visit. Based on their understanding of concession operations, the ATL can determine which [NPS EnviroCheck Sheets](#) may or may not be applicable.
- **Commercial Services EnviroCheck Sheets**: The ATL will obtain the most current set of [Commercial Services EnviroCheck Sheets](#), organized by concession service type, and add them to the [NPS EnviroCheck Sheets](#) to be used for the site visit.
- **Current Federal Requirements**: Federal standards, such as laws, regulations, and EOs, are the basis for compliance-focused NPS and Commercial Services EnviroCheck Sheets and may change over time. Prior to each audit, the ATL should contact knowledgeable parties to determine whether they are aware of any federal regulatory, interpretative, or EO changes that have been implemented since the most recent update of the Guide, and forward this information to the audit team. Note: EOs clearly define federal facility requirements. Unless stated in the concession contract or stated in the EOs, EOs are not applicable to concessions.
- **State, Tribal, Regional, and Local Requirements**: Concessions may be subject to state, tribal, regional, and local requirements in addition to federal requirements. The ATL should determine how state, tribal, regional, and local regulations differ from federal standards. If the more stringent state, tribal, regional, or local requirements apply, the ATL should forward this information to the audit team and ensure that they evaluate concessions against these more stringent criteria.
- **DOI and NPS policies and procedures**: These include DOI and NPS policies, such as NPS *Management Policies* and DOs. Unlike EOs, DOI and NPS policies always apply to concession activities. The ATL should determine if new DOI or NPS policies and procedures have become effective since the most recent update of the Guide, and forward this information to the audit team.
- **Concession Contract**: The concession contract, including certain exhibits such as the operating and maintenance plans, may have specific environmental requirements for concessions pertaining to solid waste management, hazardous materials management, emergency response, and pesticide management, among other topic areas. The ATL should obtain the most current versions of the concession contracts, including exhibits, and develop a summary of environmental requirements for the audit team.
- **Other Requirements**:
  - In some cases, concession requirements may be located in documents other than those listed above, including, but not limited to, the Superintendent’s Compendium, park General Management Plan, park memoranda, or park SPCC Plan. The ATL should work

- with the park POC to identify, obtain, and review these documents prior to the environmental audit site visit.
- Park-approved documents may also specify concession environmental requirements. Such documents may include, but are not limited to, the concessioner EMP, concessioner SPCC Plan, or concessioner Integrated Pest Management Plan. The ATL should obtain these documents from the park POC prior to the audit and have the audit team review them in advance of the site visit.

### ***Develop Audit Logistics Plan (6 weeks prior to the site visit)***

The ATL, in consultation with the park POC, develops an audit logistics plan (see [Appendix 8](#)) summarizing the environmental audit purpose, concession(s) to be audited, period under review, auditors assigned, audit criteria responsibilities, site visit schedule, and travel logistics.

The site visit schedule section of the audit logistics plan provides the opportunity to prioritize site visit activities based on potential environmental risk (e.g., more time may be spent at a lodging operation than a bicycle rental facility). The audit team will review all concession operations with the potential for environmental liability. The level of effort expended at different facilities and concession operations is based on the ability of that review to help achieve Commercial Services goals, and the complexity of the operation and its potential to impact the environment. For example, dividing an audit team comprised of four or more members into smaller teams may be required to complete all site visit work within the limitations of the site visit schedule. It is desirable to have smaller teams of two (never one), so that concession staff are not overwhelmed by the number of auditors. Each smaller team should have adequate qualifications, and the ATL should designate a secondary ATL for each smaller team. For parks where there are multiple concessions, an audit team of four or more auditors might be divided by concession; in the case of a large concession with multiple facilities, services, and operations at multiple locations, the audit team might be divided based on service types or locations.

The ATL should inquire of the park POC as to audit team workspace availability; room availability for presentations; copier, fax, telephone, and internet access; and park and concession operating hours during the site visit. If meeting space and other items are not available, the ATL should coordinate with the park POC to consider alternate solutions for portions of the site visit that require these types of spaces and resources.

Audit team travel logistics such as flights, rental cars, and lodging should be included in the audit logistics plan for easy reference by the audit team. It is recommended that travel logistics be arranged in advance, especially when lodging may not be available due to seasonal demands. It is appropriate for the audit team to stay at lodging provided by the concession that is being audited, provided no special treatment is accepted by the audit team.

The ATL should make the audit logistics plan available for review by the Audit Program Manager and/or Coordinator. The audit logistics plan is an organizational tool for the audit team and does not necessarily need to be communicated to other individuals, except for the schedule, which should be discussed with the park POC.

### ***Prepare In-Brief (2 weeks prior to site visit)***

The ATL prepares an In-Brief presentation for both park and concession staff. The presentation provides background information about the audit team, communicates the objectives of the environmental audit, and describes the audit scope, schedule, and reporting process. Depending on

the audit schedule, the ATL may need to prepare separate In-Brief presentations for park staff and concession staff. A model In-Brief presentation is found in [Appendix 9](#) of this Guide.

### ***Complete Audit Team Preparations (1 week prior to site visit)***

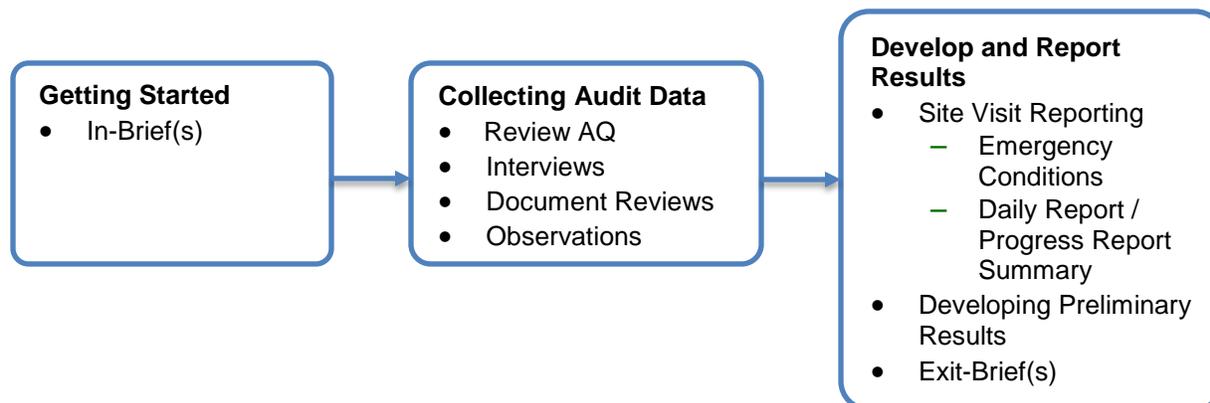
At least one week before the site visit, the ATL should conduct a final check to ensure that auditors are prepared for the site visit. The ATL should:

- Contact the park POC to ensure that park and concession staff are ready for the site visit;
- Ensure audit logistics are finalized;
- Check that auditors understand their roles and responsibilities;
- Ensure auditors have reviewed the completed AQ, concession contract environmental requirements summary, environmental regulatory and policy summary, assigned audit criteria (i.e., NPS and Commercial Services EnviroCheck Sheets), the Final Audit Report for the previous audit completed (if appropriate), and other information forwarded for review; and
- Ensure that the following is available during the site visit:
  - Equipment: auditor notebooks, cameras, computers, and projector;
  - Hardcopy documents: In-Brief presentation and sign-in sheets; and
  - Electronic files: In-Brief presentation, blank databases, NPS and Commercial Services EnviroCheck Sheets, concessioner contract, Exit-Brief template presentation.

### **Site Visit Activities**

The site visit is the most intensive portion of a standard environmental audit; the audit team has the most interaction with concession and park staff during this phase of the audit. The site visit is not simply an inspection of concession facilities, services, and operations; it should be regarded as an exchange of information between the audit team, park staff, and concession staff. The audit team works to understand each concession’s compliance issues and to identify BMP opportunities, while at the same time sharing knowledge with concession and park personnel on environmental issues and corrective action opportunities.

There is no specific timeline for completion of the environmental audit site visit because time spent on site will vary based on the size of the audit team, the number of concessions to be audited, and the size, complexity, and location of each concession. Typical audit site visits for multiple concessions are completed in a week or less. It is rare for an audit site visit to extend beyond one week. An overview of site visit activities is given in [Exhibit 8](#).

**EXHIBIT 8: ENVIRONMENTAL AUDIT SITE VISIT PROCESS****Conduct In-Brief**

The site visit begins with an In-Brief presentation, which provides an opportunity to introduce the audit team to park and concession personnel, orient the park and concessioner(s) to the environmental audit process, and allow the audit team to get to know and gather general information on the park and concession (s). The In-Brief presentation specifically covers the following information:

- Relationship between the environmental audit program and Commercial Services;
- Identification of concessions to be audited;
- Background information on audit team members;
- Audit purpose and objectives;
- Audit criteria and period under review;
- Audit scope and process;
- Audit site visit schedule and logistics;
- Audit report process and schedule; and
- Assistance resources available from Commercial Services.

The In-Brief presentation should take no longer than one hour. The audit team should use the In-Brief presentation as an opportunity to confirm the site visit schedule with park and concession staff, to ensure that it is feasible. Changes may be needed to accommodate concession staff schedules and to account for new information on the size and complexity of concession facilities, services, and operations, as well as logistical considerations and other unanticipated issues. The audit team should not start the detailed data collection phase of the site visit during the In-Brief presentation.

It is best if the ATL and park POC can coordinate a single In-Brief presentation for all applicable park and concession personnel (see [Exhibit 9](#) for a list of required and recommended individuals to attend the In-Brief presentation) to minimize audit team time spent in meetings. (Usually, this meeting occurs at park headquarters.) In cases in which not all parties are available at the same time for the In-Brief presentation, or in which travel to the meeting location may be a hardship for concession staff, additional In-Brief presentations may be scheduled. In these instances, a separate In-Brief presentation should occur upon arrival at the concession facilities, prior to conducting audit interviews, document reviews, and inspections. Note: if presenting a separate In-Brief at a concession facility, the audit team may want to consider providing an informal presentation instead of the formal presentation given to park staff at headquarters.

**EXHIBIT 9: IN-BRIEF AND EXIT-BRIEF ATTENDEES**

<b>TITLE</b>	<b>PRESENCE REQUIRED OR RECOMMENDED</b>
Audit team	Required
Auditor-in-training	Required
Park Superintendent	Highly Recommended
Park POC	Required
Park Concession Chief	Highly Recommended
Other park concession personnel	Recommended
Other park personnel	Recommended
Concession POC(s)	Required
Concession Environmental Manager(s)	Required
Concession Facilities Manager(s)	Highly Recommended
Concession General Manager(s)	Highly Recommended

While it is recommended that others attend the In-Brief to maximize educational opportunities and to ensure logistical coordination, it is not required. The ATL should request that all In-Brief presentation attendees fill out a sign-in sheet that includes each attendee’s name, title, organization, telephone number, and email address.

**Collect Audit Data**

After the In-Brief presentation, auditors typically start collecting audit data by traveling to each concession location according to the site visit schedule.

**Site Visit Schedule:** The key to a successful audit is flexibility. It is not uncommon for plans to change several times during the period of the audit site visit. If any site visit schedule changes are made, ***the park POC and affected concession staff should be notified as soon as possible.***

**Audit Questionnaire Review.** Before beginning the detailed audit data collection process by observing concession operations, it is often useful to review the concession AQ with the concession POC and other relevant concession personnel. The AQ review allows auditors to obtain clarification on information contained in the document, such as the concession’s hazardous waste generator status. Auditors should avoid allowing discussions to get bogged down in data collection at this point, as data collection might be more efficient to conduct during observations of concession operations. If the audit team is not careful, what is planned as a simple overview and clarification exercise can take longer than expected, which can compromise the site visit schedule and leave the concessioner and park POC feeling frustrated with the audit process from the start.

**Collecting Detailed Audit Data:** There are three ways in which audit data are gathered:

- Physical observations;
- Interviews; and
- Record and document reviews.

Each of these data collection methods, discussed in more detail in the subsections below, is used to develop supportable audit conclusions that may eventually be written as audit findings. At least two

of the three data collection methods listed above should be used in generating audit conclusions. The NPS EAP and Commercial Services EnviroCheck Sheets provide guidance on applicable areas, staff to interview, and records to review.

While EnviroCheck Sheets have been assigned to each audit team member during pre-visit planning, it is likely that during the site visit, information relevant to another auditor's EnviroCheck Sheets will be discovered. This information should be recorded by the auditor who discovered it and passed along to the auditor responsible for the EnviroCheck Sheet at the earliest opportunity.

**Physical Observation:** Auditors observe assigned buildings and lands, storage areas, and work practices and operations. Auditors should record detailed information on each observation that does not appear to meet the audit criteria. This information includes specific locations where the observations were made, clear descriptions of what was observed, and quantitative data on issues observed (e.g., numbers and sizes of containers). Auditors should take photographs of key observations, trying not to photograph individuals if they are not needed to demonstrate the key observation.

When conducting data gathering through physical observations, auditors must use prudent and safe work practices. They must not enter unsafe areas (e.g., unstable buildings, confined spaces, or areas with potentially uncontrolled physical or chemical hazards). Auditors should try not to disturb materials and equipment they are observing; instead, they should ask concession staff to move pieces of equipment or containers if necessary to inspect them. Auditors should ask if it is acceptable to go into new areas or to open cabinets and lockers.

If a concession staff member indicates that an area cannot be inspected due to safety or security concerns, because it is a personal rather than a company area, or for any other reason, the auditor should accept this explanation, document the issue in his or her notebook, and move on. If the auditor feels entry into the area is within the scope of the audit and is important for the integrity and completeness of the environmental audit, the issue should be discussed with the ATL so that it can be elevated for consideration by the park POC, concession POC, and their respective managers, if necessary. For general reference, it is appropriate to inspect employee housing common areas. It is also appropriate to inspect employee housing personal areas if a concern has been raised and the park POC or concession POC requests that this inspection take place.

**Interviews:** Auditors conduct interviews with concession staff to gather information on concession facilities, services, and operations. Interview objectives are to:

- Discuss employee responsibilities to understand the degree to which they are defined and delegated;
- Understand how environmental programs are implemented;
- Confirm implementation of concessioner-documented policies and SOPs;
- Assess concessioner training effectiveness;
- Educate concession staff on how environmental performance can be improved; and
- Verify issues identified from physical observation or record and document reviews.

Auditors should document the name and title of the person interviewed and attempt to document their contact information (e.g., telephone number and email address). Guidelines for conducting interviews are shown in [Exhibit 10](#).

**EXHIBIT 10: INTERVIEW GUIDELINES**

<b>SUGGESTION</b>	<b>EXAMPLE</b>
Ask both open-ended and specific questions.	<b>Open-ended:</b> “Can you please describe what happens when you change the oil?” <b>Specific:</b> “If I understand you correctly, you carry an open five-gallon bucket across the driveway, and then pour it into the 250-gallon tank, right?”
Avoid leading questions.	<b>Leading question:</b> “You don’t mix anything with the used oil, do you?”
Obtain definitive answers to questions.	<b>Ask different individuals the same question:</b> Ask all employees whether they have received spill response training. <b>Ask the same question in different ways:</b> “Have you received spill response training?”; “Did someone here teach you how to respond to a fuel spill?”
Avoid questions of judgment or blame.	<b>Judgment/blame question:</b> “So it’s your fault that the hazardous waste storage area is a mess, right?”

**Record and Document Reviews:** Auditors review concession records and documents in order to:

- Assess compliance with current applicable laws; DOI, NPS, or park policy; and the concession contract;
- Understand the concessioner’s EMP; and
- Verify the issues identified by interviews or observations.

Each [NPS](#) and [Commercial Services EnviroCheck Sheet](#) identifies records and documents that auditors should review as applicable. Key documents or portions of key documents may be copied for reference purposes. It is often useful to copy the cover page and table of contents of a document. ***Information contained in the records and documents reviewed should not be shared with other concessions.***

During the site visit, the auditor responsible for [Commercial Services EnviroCheck Sheet](#) on EMPs should conduct a review of the concessioner’s EMP (if it exists) and should evaluate the EMP for compliance with concession contract requirements and applicable provisions of NPS *Management Policies*, Chapter 10. The same audit team member should also make observations, ask interview questions, and collect data to evaluate implementation of the EMP.

**Recording Audit Data:** All audit data is recorded by each auditor. Recorded audit information should be legible, written in ink, and recorded in a professional manner that maintains objectivity and avoids inflammatory language. Pages should be neatly removed from the notebook if necessary, and corrections should be neatly crossed out rather than scratched out or erased.

The front page of each notebook section for a specific concession should include the following information:

- Auditor’s name;
- Company or agency representation (e.g., XYZ Consulting, Commercial Services);
- ATL’s name;
- Auditors’ names;
- Concessioner Identification Number (CONCID); and
- Date(s) of site visit.

Each page within the notebook section for a specific concession should have the following information in the upper right-hand side:

- Auditor’s initials;
- CONCID;
- Date of that particular page entry; and
- Page number/total pages (e.g.,5/22).

Photographs provide an excellent record to help document an audit conclusion. Each audit team should have a digital camera and should attempt to take photographs of all observations that support a preliminary audit finding or exceptional practice.

**Providing Compliance Assistance while Collecting Data:** While auditors are gathering information to develop audit findings, they should also educate concession and park staff on how other concessions have successfully addressed similar environmental issues, or offer ideas on how these issues could be addressed. However, auditors must remember that although Commercial Services has a strong interest in educating and providing assistance to concession staff during audits, this effort cannot be allowed to compromise the ability of the audit team to fully complete the audits. The audit team should ensure that they adhere to their site visit schedule in order to complete all concession audits; however, auditors should note compliance questions and information requested by concession staff and seek to assist them after the site visit. Note: providing compliance and BMP assistance does not preclude the concession from understanding and being in compliance with all applicable laws at all times.

### ***Site Visit Reporting***

Concessioner POCs, other concession personnel, and park personnel are often interested in obtaining information from the audit team firsthand during the audit. Because the audit process is an open exchange between auditors, park staff, and concession personnel, the audit team should point out preliminary audit findings, recommended corrective actions, and exceptional practices as they are identified, rather than waiting for distribution of the Preliminary Audit Report. Site visit reporting includes:

- Reporting emergency conditions;
- In-progress reporting to park and concession staff;
- Presenting the Exit-Brief; and
- Audit team debriefings.

**Reporting Emergency Conditions:** Emergency conditions include practices or situations that could reasonably be expected to cause death, serious physical harm to persons or the environment, or immediate loss of concession or NPS structures or resources before the danger can be eliminated through normal procedures. Emergency conditions may include past and present spills of hazardous substances to the environment, old and unstable chemicals, and imminent fire hazards, among others.

The audit team should make no attempt to correct emergency conditions, but should immediately report them to the Superintendent, the park POC, and the responsible concession manager or supervisor. If possible, this report should be made by the ATL. If the ATL is not readily available, the auditor should report the concern so that information is provided in a timely manner.

If there is a release of oil or any hazardous substance to the environment in excess of the reportable quantity specified in federal regulations, the audit team must immediately notify the responsible concession manager, supervisor, or designee; the Superintendent; and the park POC. The responsible concession manager, supervisor, or designee in turn must call the **National Response Center (NRC)**

at **1-800-424-8802** as well as other appropriate regulatory agencies. If this does not occur, the audit team should tell the park POC to make this call. If this does not occur in a timely manner, the audit team should inform the Coordinator that they are notifying the NRC of the release, as required by regulation.

**In-Progress Reporting:** As preliminary audit findings, recommended corrective actions, and exceptional practices are identified by the audit team, they should be communicated verbally to the responsible concession staff and the park POC. This may occur informally in the field as data collection is occurring, or during more formal debriefings to concession and/or park staff if scheduled (e.g., daily). If the audit team is not certain about details of a preliminary audit finding, recommended corrective action, or exceptional practice, they should still inform concession and park staff about these concerns, but add a caveat that additional research needs to be carried out.

**Developing Preliminary Audit Findings, BMPs, and Exceptional Practices:** Based on data collected, the audit team should develop preliminary conclusions in the field about concession operations related to audit criteria. These take one of three forms: audit findings, BMPs, and exceptional practices.

**Audit Findings:** Audit findings are developed when the audit team concludes that concession staff are not meeting compliance audit criteria. Audit findings are assigned a level of Priority 1, 2, or 3.

- Priority 1 audit findings represent non-conformances with laws and regulations that pose (i) immediate actual or potential harm to human health or the environment, or (ii) the potential for significant liability;
- Priority 2 audit findings represent non-conformances with laws and regulations that do not pose an immediate threat to human health or the environment; and
- Priority 3 audit findings represent non-conformances with DOI, NPS, or park policy, or with the concession contract, that do not pose an immediate threat to human health or the environment.

Priority 2 and 3 audit findings may be further assigned a ranking as an “isolated” instance. An isolated audit finding is a finding in which the nonconformance observed is isolated, and the majority of other operations, locations, or facilities comply with the audit criteria and demonstrate that the audited entity has made an effort and understands the audit criteria. For routine audits, Priority 1, 2, and 3 audit findings may further be designated as “repeat” audit findings. Repeat audit findings occur when the same issue is documented in both the current audit and previous audit, regardless of whether or not the citation is exactly the same.

Recommended corrective actions are developed for audit findings and describe the audit team’s recommended approach for addressing and closing audit findings. Recommended corrective actions should describe a method for reducing or eliminating the actual or potential harm to human health or the environment, and/or should provide the concessioner a roadmap for achieving compliance.

Recommended corrective actions may include additional helpful tips that the concessioner could implement to help achieve and maintain compliance. While the recommended corrective action describes how a concessioner could achieve compliance, the helpful tip is a related recommended strategy that may assist the concessioner in achieving compliance.

**BMPs:** BMPs are recommended practices from industry, regulatory agencies, or other sources, including the expertise of the auditors, that may result in improved compliance, pollution prevention, and/or minimized compliance responsibilities. BMPs may also help the NPS meet its goals of promoting environmental management, and demonstrate commitment to environmental stewardship and sustainability. BMPs are not required to be implemented, but concession staff are strongly

encouraged to implement them as a means to further protect park resources. The resources and time needed to implement BMPs varies; some may be implemented in the short-term with few resources, while others may be implemented if a longer timeline and more resources are available. BMPs identified by the audit team may not be technically and economically feasible at the time of the site visit; however, concession staff should continue to evaluate the feasibility of implementing the BMPs over time.

Note: while BMPs are important to note during the audit, they are not incorporated into the audit database as findings. BMPs that the concessioner has already implemented, as well as those suggested by the audit team, are incorporated into the Executive Summary of the audit report.

**Exceptional Practices:** Exceptional practices are products used or activities undertaken that are not often seen at park concession operations and that demonstrate a concessioner’s commitment to environmental protection beyond compliance. Since they are exemplary practices that do not need to be corrected, there is no recommended corrective action associated with them. In addition, exceptional practices are approved by the Coordinator. This provides a final verification that the exceptional practice is truly exceptional that it is not a contract requirement or otherwise required of the concession operation and it is not common to other concession operations.

**Audit Team Debriefings:** Audit findings, BMPs, and exceptional practices developed during the site visit are considered ‘preliminary’ since they are developed based on information available in the field, when there may not be time or resources (e.g., internet access) available to research the applicability of specific audit criteria. Even so, the audit team should strive to provide the most accurate and complete information at this preliminary stage.

The process of developing preliminary audit findings, BMPs, and exceptional practices should be collaborative among auditors. This process typically occurs during audit team debriefings, which should take place periodically (e.g., at the end of each day) to discuss the day’s activities, progress made relative to the site visit schedule, and any adjustments that may need to be made for the remainder of the site visit.

During the audit team debriefings, individual auditors should present their preliminary audit findings, BMPs, and exceptional practices for their EnviroCheck Sheet topic areas. If the audit team was split up into smaller teams during the day, auditors with primary responsibility for the same EnviroCheck Sheet should compare conclusions and determine if the preliminary audit findings, BMPs, and exceptional practices affect the concession programmatically or are limited to specific locations and types of operations. Auditors having secondary responsibilities and other individuals who may have gathered information on the same topic area should also provide input at this time, especially since some EnviroCheck Sheet topic areas overlap.

The results of this onsite collaboration should be a ‘master list’ of preliminary audit findings, BMPs, and exceptional practices that can be reported to park and concession staff during the Exit-Brief presentation. The master list can be used to assist in developing the audit findings during the post-visit portion of the audit. It is highly recommended that the audit team, to the greatest extent possible, strive to develop audit findings, BMPs, and exceptional practices during the site visit, since the issues are fresh in auditors’ minds. Development and documentation of audit findings, BMPs, and exceptional practices is a formal and rigorous practice. A complete description of this process can be found in [Appendix 12](#).

**Presenting the Exit-Brief:** The final site visit activity is the Exit-Brief presentation. During the Exit-Brief presentation, the audit team gives a more formal presentation of preliminary audit findings

and associated recommended corrective actions, BMPs, and exceptional practices observed during each individual concession site visit.

Unlike the In-Brief presentation, which may be handled in a single meeting with all concession staff from different operations and park participants in attendance, a separate Exit-Brief presentation should take place for each concession, so that audit findings, BMPs, and exceptional practices can be discussed in confidence. One summary Exit-Brief presentation highlighting higher priority audit findings, viable BMPs, and exceptional practices should be developed for the park Superintendent, who most likely will not be able to attend each concession’s Exit-Brief presentation. Each Exit-Brief presentation should be no more than one hour long. Larger, more complex concession operations may have longer Exit-Brief presentations due to questions from the audience; the ATL should take this into account when scheduling Exit-Brief presentation times with the park POC.

Key topics that should be covered during the Exit-Brief presentation include:

- Concessions and associated facilities, services, and operations that were audited;
- Audit criteria applicable to concessions;
- Audit findings and associated recommended corrective actions;
- BMPs;
- Exceptional practices;
- Open issues;
- Audit reporting process and schedule; and
- Assistance resources available from Commercial Services.

The audit team should summarize important issues and avoid detailing every preliminary audit finding, BMP, and exceptional practice during the Exit-Brief presentation. However, the audit team should be ready to provide more details upon request as well as compliance and BMP assistance for areas of particular interest to concession or park staff.

For some smaller concessions and/or in instances in which scheduling and logistical concerns exist, a formal Exit-Brief presentation may not be necessary. Instead, the audit team can choose to present an informal Exit-Brief at the end of a site visit. An informal Exit-Brief simply involves a wrap-up discussion following the collection of audit data, touching on what concession staff may expect to see in the environmental audit report.

A copy of the Exit-Brief presentation that includes information on preliminary audit findings, BMPs, and exceptional practices **should not** be given to park or concession staff, as they are not final audit findings and should not be presented as such.

During the Exit-Brief presentation, be sure to provide a sign-in sheet or otherwise document attendance. Generally many of the same individuals attend both the in brief and the exit brief, in that case simply noting attendance is sufficient. Individuals that did not attend the in brief should provide their name, title, organization, telephone number, and email address.

Individuals who are required or recommended participants at the Exit-Brief presentation are the same individuals required or recommended to participate in the In-Brief presentation. These individuals are identified in [Exhibit 9](#), which appeared earlier in this section. A sample Exit-Brief presentation is provided in [Appendix 10](#) of this Guide.

### **Post-Visit Activities**

Post-visit activities may stretch out over many months. They involve preparing the Preliminary Audit Report(s); soliciting and responding to comments on the Preliminary Audit Report(s); and

preparing the Final Audit Report(s). [Exhibits 11](#) and [12](#) lay out the key elements of post-visit activities. The timeline in [Exhibit 12](#) represents the standard timing for the post-visit process.

The process is standardized so that schedules are consistent among all environmental audits, and there is a clear endpoint to the audit report process. Although the steps in the post-visit process should not substantially change from one audit to the next, it is possible for the schedule to vary depending upon specific circumstances. Details on the post-visit process are provided in the subsections that follow.

**EXHIBIT 11: ENVIRONMENTAL AUDIT POST-SITE VISIT PROCESS**

<b>Preliminary Audit Report</b>	<ul style="list-style-type: none"> <li>• Resolve open issues; and</li> <li>• Develop and submit Preliminary Audit Report.</li> </ul>
<b>Comment Period</b>	<ul style="list-style-type: none"> <li>• Solicit concession and park staff comments on Preliminary Audit Report.</li> </ul>
<b>Final Audit Report</b>	<ul style="list-style-type: none"> <li>• Document and incorporate concession and park staff comments; and</li> <li>• Develop and submit Final Audit Report.</li> </ul>

**EXHIBIT 12: STANDARD AUDIT PROCESS – POST-VISIT TIMELINE**

TIMELINE	RESPONSIBLE PARTY AND TASK(S)
Within 3 weeks of site visit	<p><b>Audit team</b></p> <ul style="list-style-type: none"> <li>• Prepares audit findings, BMPs, and exceptional practices for Preliminary Audit Report, including closing open issues remaining from the site visit.</li> </ul> <p><b>ATL</b></p> <ul style="list-style-type: none"> <li>• Assembles and reviews Preliminary Audit Report;</li> <li>• Ensures Preliminary Audit Report undergoes a quality review;</li> <li>• Submits Preliminary Audit Report to audit handler; and</li> <li>• Posts Preliminary Audit Report on SharePoint and prepares transmittal document for Coordinator.</li> </ul> <p><b>Audit handler</b></p> <ul style="list-style-type: none"> <li>• Submits transmittal document to Coordinator.</li> </ul> <p><b>Coordinator</b></p> <ul style="list-style-type: none"> <li>• Sends notification of availability of PAR to park POC.</li> </ul> <p><b>Park POC</b></p> <ul style="list-style-type: none"> <li>• Reviews and approves Preliminary Audit Report; and</li> <li>• Sends Preliminary Audit Report to concessioner POC.</li> </ul>
Within 5.5 weeks of site visit	<p><b>Park POC</b></p> <ul style="list-style-type: none"> <li>• Coordinates comment teleconference date and time with concessioner and Commercial Services staff.</li> </ul> <p><b>Concessioner POC</b></p> <ul style="list-style-type: none"> <li>• Reviews Preliminary Audit Report and prepares to participate in comment teleconference.</li> </ul> <p><b>ATL</b></p> <ul style="list-style-type: none"> <li>• Leads comment teleconference.</li> </ul> <p><b>Audit team support (auditor or audit handler)</b></p> <ul style="list-style-type: none"> <li>• Documents park, concessioner, and Commercial Services staff comments on Preliminary Audit Report.</li> </ul>

Within 7 weeks of site visit	<p><b>ATL</b></p> <ul style="list-style-type: none"> <li>Addresses concession and park staff comments on Preliminary Audit Report;</li> <li>Prepares draft Final Audit Report;</li> <li>May submit a draft Final Audit Report to park and concessioner to review integrated comments;</li> <li>Ensures draft Final Audit Report undergoes quality review;</li> <li>Submits draft Final Audit Report to audit handler; and</li> <li>Posts FAR on SharePoint and prepares Final Audit Report transmittal document for Coordinator.</li> </ul> <p><b>Park POC</b></p> <ul style="list-style-type: none"> <li>Reviews draft Final Audit Report and provides any additional comments to the ATL.</li> </ul> <p><b>Concessioner POC</b></p> <ul style="list-style-type: none"> <li>Reviews draft Final Audit Report and provides any additional comments to the park POC.</li> </ul>
Within 9 to 10 weeks of site visit	<p><b>Audit handler</b></p> <ul style="list-style-type: none"> <li>Posts Final Audit Report on SharePoint and prepares transmittal documents for Coordinator.</li> </ul> <p><b>Coordinator</b></p> <ul style="list-style-type: none"> <li>Sends memo on behalf of Chief of Concessions to park Superintendent and carbon copies Regional Concession Chief, Regional Environmental Coordinator, and park POC; and</li> <li>Sends memo to park POC notifying them that the FAR is available on SharePoint.</li> </ul> <p><b>Park POC and Park Superintendent</b></p> <ul style="list-style-type: none"> <li>Sends Final Audit Report to concessioner POC.</li> </ul>
Within 10 weeks of site visit	<p><b>Audit team</b></p> <ul style="list-style-type: none"> <li>Submits all audit documents to audit handler (e.g., In-Brief and Exit-Brief presentations and sign-in sheets, auditor notebooks, concession documents gathered during the site visit).</li> </ul>

### **Prepare and Submit Preliminary Audit Report**

**Developing Complete Audit Findings, Associated Recommended Corrective Actions, BMPs, and Exceptional Practices:** The most time-intensive portion of post-visit activities is the development of well-documented and properly constructed audit findings, in addition to recommended corrective actions, BMPs, and exceptional practices. For instances in which an audit team has visited multiple concessions at one park, auditors should plan to spend a substantial portion of their time during the week(s) following the site visit, preparing audit findings for all concessions.

The audit team must research and resolve open issues related to preliminary audit findings, BMPs, and exceptional practices identified during and after the site visit in order to develop complete audit findings and associated recommended corrective actions, BMPs, and exceptional practices. The audit team may need to follow-up with teleconference interviews with concession staff to verify information collected during the site visit or obtain copies of concession documents to fill in data gaps. However, it is highly recommended that the audit team gather this information on site if possible. The audit team may also need to conduct additional research on federal, state, tribal, regional, local, or park requirements and interpretation. Some common federal environmental agency hotlines and information resources that the Audit Team may use in conducting its research are listed in [Appendix 13](#).

**Assembling the Preliminary Audit Report:** The Preliminary Audit Report is a document in a portable document format (PDF) with multiple sections. The sections are the:

- Executive Summary;
- Priority 1, 2, and 3 Audit Findings;
- Exceptional Practices;
- Photos; and
- Assistance Resources.

**Template Audit Report:** The template audit report, presented in [Appendix 11](#), is a Microsoft Word document that includes template wording for the executive summary and a framework for inserting photos and findings relevant to the Preliminary Audit Report.

The executive summary provides background information on Commercial Services; the audit scope; statistical data on concession audit findings, BMPs, and exceptional practices; and instructions for commenting on the Preliminary Audit Report. The photo section displays photographs taken during the audit site visit of audit findings and exceptional practices observed by the audit team.

**Preliminary Audit Database:** The audit database is a Microsoft Access file in which auditors can enter data to develop audit findings and exceptional practices. The reports in the database become the “Priority 1, 2, and 3 Regulatory Audit Findings,” “Exceptional Practices,” and “Assistance Resources” sections of the Preliminary Audit Report.

The ATL, with the assistance of the auditors, completes each concession’s Preliminary Audit Report and forwards it to the audit handler. Completion of the Preliminary Audit Report by the audit should occur within three weeks of the completion of the site visit.

**Submitting the Preliminary Audit Report:** The Preliminary Audit Report is preferably uploaded in electronic format to the SharePoint and the park POC is notified by the Coordinator. Upon receiving the report, the park POC should review it and provide any comments or changes to the audit team. Once the changes have been made by the audit team, the park POC forwards the Preliminary Audit Report to the concessioner POC immediately.

### ***Comments on the Preliminary Audit Report***

Concession and park staff have an opportunity to provide comments on the Preliminary Audit Report. Once the Preliminary Audit Report has been distributed, the park POC coordinates a teleconference to take place among park, concession, and Commercial Services staff. Alternatively, before the end of the site visit, the ATL can arrange a date and time for this teleconference. During the comment teleconference, the ATL will review each audit finding and offer any further explanation as to the basis for the audit finding or recommended corrective actions. Audit team support may participate on this teleconference to document comments for the ATL.

Based on the comment teleconference, the ATL responds to park and concessioner comments by making appropriate modifications to the Preliminary Audit Report, which becomes the draft Final Audit Report. Audit findings, associated recommended corrective actions, BMPs, and exceptional practices may be modified based on information provided.

Audit findings may be considered closed if concession staff have adequately addressed the audit finding of concern. Isolated audit findings that have been closed are removed from the Final Audit Report to demonstrate that Commercial Services recognizes the concessioner’s understanding of and efforts to meet the audit criteria, even though a noncompliance was identified at the time of the audit.

However, Priority 1 audit findings are never removed from the Final Audit Report, even if they have been closed.

Audit findings may be voided if it is determined that the audit criteria were not correctly applied.

Voided audit findings are not included in the Final Audit Report. Exceptional practices may also be voided if they are not applicable to the scope of the audit.

### ***Prepare Final Audit Report***

**Assembling the Final Audit Report.** Similar to the Preliminary Audit Report, the Final Audit Report is a PDF document with multiple sections.

The sections are the:

- Executive Summary;
- Priority 1, 2, and 3 Audit Findings with any applicable Preliminary Audit Report comments;
- Exceptional Practices;
- Photos; and
- Assistance Resources.

The ATL, with the assistance of the auditors and audit handler as requested, completes each concession’s Final Audit Report and forwards it to the audit handler

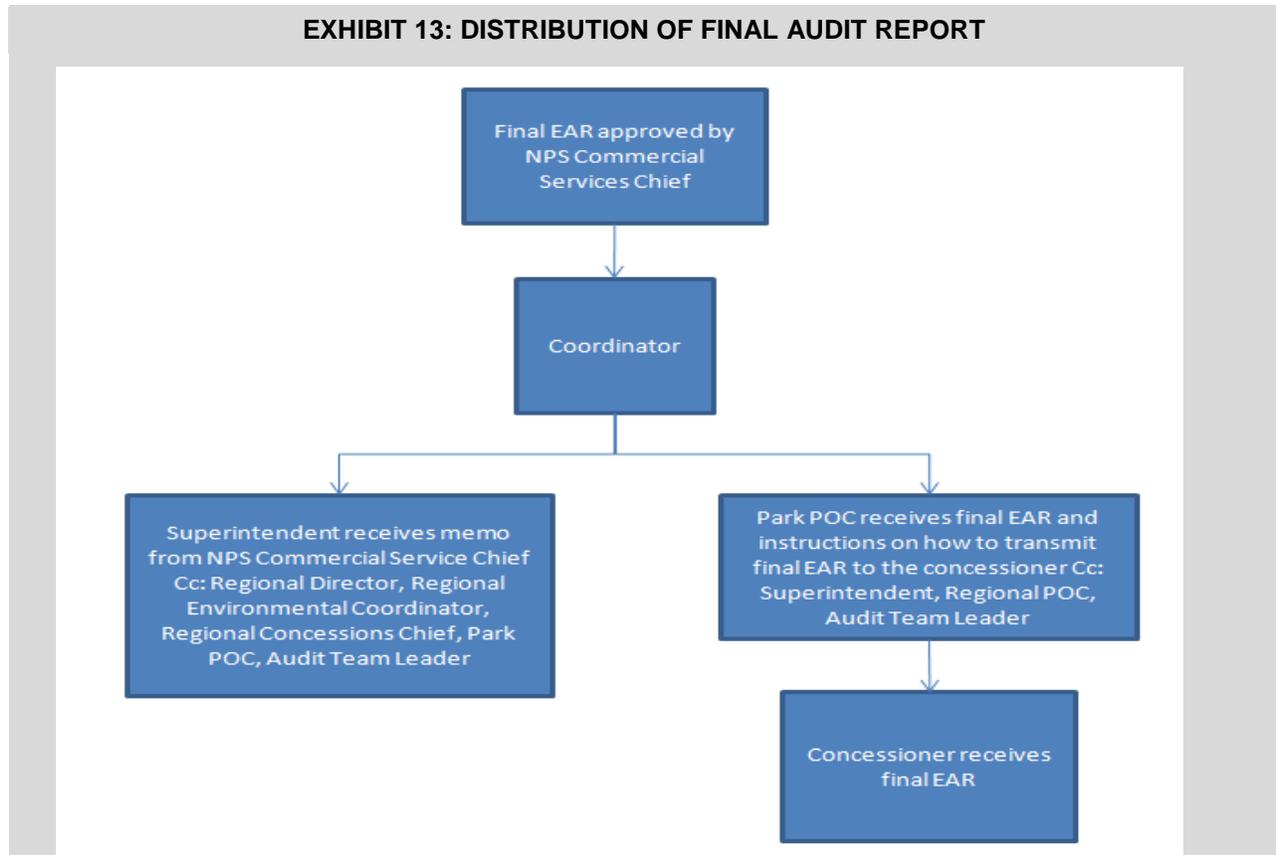
Once completed, the audit handler forwards the Final Audit Report to the Chief of Concessions for review and approval.

**Submitting the Final Audit Report:** Once the Final Audit Report is approved by the Chief of Concessions, it is submitted electronically to park staff, and then to each concessioner through a formal routing process, described below. This process ensures that all parties are aware of the audit, that proper chain of command has been followed, and that associated chain of command emphasis can be applied to the importance of addressing audit findings.

On behalf of the Chief of Concessions, the Coordinator forwards a signed memo from the Chief of Concessions to the park Superintendent to apprise him/her of the completion of the Final Audit Report. The memo requests that the park Superintendent coordinate with the park POC to forward the Final Audit Report to the concessioner POC. The Regional Concession Chief, Regional Environmental Coordinator, and park POC are carbon copied on the correspondence to the park Superintendent.

At the same time the Coordinator forwards the memo signed by the Chief of Concessions to the park Superintendent. Additionally, the Coordinator advises the park POC that the Final Audit Report has been saved to the Commercial Services audit SharePoint site and requests that they coordinate with the park Superintendent in forwarding the Final Audit Report to the concessioner POC.

As the last step, the park Superintendent, in coordination with the park POC, forwards the Final Audit Report to the concessioner POC. [See Exhibit 13.](#)

**EXHIBIT 13: DISTRIBUTION OF FINAL AUDIT REPORT**

**Turn in Notebooks and Documents to be Filed:** The audit handler should coordinate the collection of auditor notebooks and all other audit-related documents (e.g., updated concession contracts, the AQ, and concession documents collected during the site visit) following distribution of the Final Audit Report for each concession. If notebooks and audit-related documents are shipped to the WASO Denver office, they should be shipped via a tracked delivery method.

**After the Environmental Audit**

Distribution of the Final Audit Report completes the environmental audit, but does not complete the process. This is because it is a Commercial Services goal to close audit findings in order to close the audit, and concession staff are expected to inform park staff of progress made in taking corrective actions. After distribution of the Final Audit Report, the park POC is responsible for verifying whether concession staff have closed audit findings, as well as for forwarding these updates to the Coordinator. Once concession staff has closed all compliance audit findings, the audit as a whole can be closed.

Although auditors are not generally involved in the corrective action process, the Coordinator may occasionally consult with them, should questions or issues arise as concession staff work to close audit findings. Recommended corrective actions are primarily intended as guidance for park and concession staff.

## IV. CONDUCTING A TELEPHONE ENVIRONMENTAL AUDIT

The telephone audit is a type of non-standard audit and may be used in place of a standard audit when approved by the Coordinator. The Coordinator and Audit Program Manager gather required information and make the determination to conduct a non-standard audit. Some of the criteria considered when making this determination include:

- Size and complexity of the concession operation (e.g., concession operations that have minimal or no facilities within in park boundaries, or concession operations that have minimal environmental impacts);
- Logistical issues (e.g., difficulty in conducting a cost-efficient standard audit due to remote location);
- Change in understanding of concession operations (e.g., it is determined that the concession operations are less complex than originally thought by Commercial Services in reviewing the contract); and/or
- Demonstration by the concessioner that they undergo regular, comprehensive environmental audits by a government-sanctioned third party (i.e., U.S. Coast Guard), and those regular audits cover, at a minimum, all Commercial Services audit criteria.

The process of planning and conducting telephone audits is similar to standard audits and can also be divided into three phases: [pre-teleconference activities](#), teleconference, and [post-teleconference activities](#). The [audit team members](#) are the same as well, the audit team in comprised of an ATL and an auditor. The steps involved in each of these phases are outlined below in [Exhibit 14](#) and described in the subsections that follow.

### EXHIBIT 14: TELEPHONE ENVIRONMENTAL AUDIT PROCESS

<b>Notification</b>	<ul style="list-style-type: none"> <li>• Notify park staff of environmental audit; and</li> <li>• Forward AQ.</li> </ul>
<b>Confirmation and Preparation</b>	<ul style="list-style-type: none"> <li>• Receive and review AQ;</li> <li>• Confirm telephone audit scope;</li> <li>• Arrange audit logistics; and</li> <li>• Submit In-Brief presentation to park POC for distribution.</li> </ul>
<b>Audit</b>	<ul style="list-style-type: none"> <li>• Brief introduction;</li> <li>• AQ review;</li> <li>• Data collection, including:               <ul style="list-style-type: none"> <li>– Phone interviews; and</li> <li>– Record, document, and photo review; and</li> </ul> </li> <li>• Conclude call.</li> </ul>
<b>Comments and Reporting</b>	<ul style="list-style-type: none"> <li>• Generate Preliminary Audit Report and Final Audit Report in same manner as a standard environmental audit, including the comment period for the Preliminary Audit Report.</li> </ul>

### Telephone Audit Pre-Teleconference Activities

Pre-teleconference activities for a telephone audit generally mirror [pre-visit activities for a standard audit](#), and include notifying park staff of the audit, establishing the audit team, administering the AQ, refining and confirming the audit scope, and developing an audit logistics plan.

### **Confirm Audit Scope**

The Coordinator and ATL make initial contact with the concessioner POC undergoing the telephone audit in the same manner and with the same objectives as those for [standard audits](#). This involves checking in with park staff to notify them of the proposed environmental audit[s] and schedule, and obtaining general information on the scope of concession facilities, services, and operations in the park.

### **Determine and Assign Applicable Audit Criteria**

Data are collected from concession staff undergoing the telephone audit primarily during the teleconference, although concession staff have the opportunity to submit any additional documentation or information in advance of the scheduled teleconference audit.

**Audit Questionnaire (AQ):** As with the standard audit, the will forward the AQ to the park POC, and the park POC will forward the AQ to the concession POC. However, the AQ for a telephone audit is simplified with questions tailored for the specific concession operation and contract being audited. The concession POC has the option, but is not required to, return the audit questionnaire prior to the schedule telephone audit.

**Additional Information:** In addition to information requested in the AQ, concession staff may submit further information considered helpful for completing the audit, which will be forwarded to the ATL. This type of information may include general background information on the concession that is not found in the concession contract documentation as well as information on the EMP, if applicable.

### **Develop Audit Logistics Plan**

After the Coordinator has contacted the park POC and forwarded a copy of the AQ for concession staff to complete, the ATL contacts the park POC to confirm the schedule and audit scope. At this time, the ATL also confirms that the telephone audit method, originally determined by the Coordinator during the planning process, is appropriate for the concession. Any decision to switch to the standard audit method must be made in coordination with, and with approval from, the Coordinator.

The ATL, in consultation with the park POC, confirms audit logistics. However, unlike a standard audit, the audit team can accomplish this task through discussions and email, rather than developing an audit logistics plan.

The most important logistical considerations for the telephone audit are arranging which concession personnel should be interviewed, and setting up the interview schedule.

### **Audit Criteria**

Identifying applicable audit criteria and assigning auditor responsibilities for applicable environmental topic areas and concession service types is conducted in the same manner for telephone audits as it is for [standard audits](#). The ATL assigns auditor responsibility for applicable environmental topic areas and concession service types based on their qualifications.

### **Teleconference Activities**

Although there are no site visit activities for a telephone audit, it involves many of the [same steps as the standard environmental audit](#), including presenting an abbreviated and informal In-Brief; collecting data; reviewing the EMP, if applicable; and developing preliminary audit findings, BMPs,

and exceptional practices. However, unlike a standard audit, the audit team does not attempt to present potential audit findings, BMPs, or exceptional practices over the phone at the close of the audit interview.

Telephone audit activities primarily involve teleconferences with concession and park personnel. Depending upon the size and complexity of the concession's operations and personnel availability, the audit may involve only one teleconference. However, while unlikely, multiple calls may be necessary to contact all the concession and park staff necessary to obtain a clear understanding of concession activities.

When conducting teleconferences, the audit team should follow the questions developed on the AQ in order to minimize the amount of time spent on the phone.

The audit team needs to be cautious in the manner in which a telephone audit is conducted. Since the exchange will not include face-to-face contact, questions should be as clear as possible. The audit team should take care to explain the scope and context of the questions, due to the compressed time spent with the concessioner as compared with a site visit. In addition, the audit team should be mindful of the amount of paperwork requested, so as to lessen the burden on the resources of both park and concession staff.

### ***Conduct In-Brief***

Prior to collecting audit data, the ATL should conduct an abbreviated and informal In-Brief presentation via teleconference to introduce the audit team to park and concession personnel, and orient park and concession staff to the environmental audit process. Through the informal In-Brief presentation, the ATL should ensure that concession staff understand, at a minimum, which facilities, services, and operations are being audited; what the audit criteria are; and why it was decided that the concession should undergo a telephone audit rather than a standard audit.

### ***Gather Audit Data***

**AQ Review:** Following the informal In-Brief, the ATL should proceed through the questions on the AQ with concession staff. The AQ review is essential for the audit team, concession, and park staff to stay focused on the task of collecting data relevant to the environmental audit. To this end, the audit team should proceed through the AQ in order.

**Collecting Detailed Audit Data:** There are two ways in which audit data are gathered during telephone audits:

- Interviews; and
- Record, photo, and document reviews.

Since physical observations are not possible during telephone audits, only one of the two data collection methods listed above is needed to generate audit conclusions; however, at least two auditors must agree with the conclusion for it to appear in an audit report.

**Interviews:** Auditors should collect audit data in a manner similar to the interview process for the standard environmental audit. During the teleconference, auditors should ask concession staff in-depth questions about their operations and applicable environmental program areas, as detailed in the AQ.

**Record and Document Reviews:** Through the AQ review and audit data collection interviews, auditors may identify key concession records and documents that should be reviewed to understand the status of the concession's environmental operations and activities. Examples of the type of

documents to be reviewed are emergency action plans, SOPs, hazardous waste manifests, and training and inspection logs.

The ATL should request copies of key documents from the park POC. Transmission of these documents, by express mail, fax, or email, should occur within one week of the request. In many cases, the collection of these key documents will occur during the pre-audit planning phase, at the time that the AQ is collected. Auditors should be conscious of the burden that collecting, copying, and submitting these documents imposes on park and concession staff. The audit team as a group must weigh the need for the documentation against this burden to determine if the need for the documentation to conduct the audit accurately and completely is justified. The need for too many documents may be an indicator that a standard environmental audit is more appropriate for the concession than a telephone audit.

The audit team may also choose to review photographs to better understand concession facilities, services, and operations. If audit team members determine that visual evidence is needed to understand or come to a conclusion about concession activities, the ATL may request that the park POC take photographs and send them to the audit team for review. Photographs may provide general information or be directed at a particular operation of interest.

**Recording Audit Data:** All audit data should be recorded by the audit team in a notebook, in a manner similar to that used for [standard audits](#).

**Providing Compliance Assistance while Collecting Data:** While auditors are gathering information to develop audit findings, they should also educate concession and park staff on how other concessions have successfully addressed similar environmental issues, or offer other ideas on how these issues could be addressed. This should be carried out similarly to how it is done for [standard audits](#).

### ***Reporting Emergency Conditions***

Emergency conditions and in-progress reporting should be conducted in the same general manner as for the [standard environmental audit](#). In the unlikely event that emergency conditions are detected by audit team members during the teleconference, these should be reported immediately the park POC, the responsible concession manager or supervisor, and the park Superintendent. Since the audit team is not on site to physically observe perceived emergency conditions, it is not recommended that the audit team inform the park Superintendent directly, unless necessary.

### ***Conduct EMP Review***

The EMP review, if applicable, should be conducted similarly to how it is carried out for the [standard audit](#).

### ***Develop Preliminary Audit Findings, BMPs, and Exceptional Practices***

Preliminary audit findings, BMPs, and exceptional practices are developed in the same manner as for the [standard environmental audit](#).

### ***Conduct Exit-Brief***

Unlike a standard environmental audit, the audit team is not expected to detail potential audit findings, BMPs, and exceptional practices in an Exit-Brief presentation for each concession audited. Due to the nature of the telephone audit, the Exit-Brief presentation will be a simple wrap-up discussion detailing next steps in the audit process and soliciting final questions or concerns from the concession or park POC.

**Telephone Audit Post-Conference Activities**

Post-audit activities occur for telephone audits in the same manner as for the [standard environmental audit](#).

**After the Environmental Audit**

Corrective action and reporting on progress toward closing the telephone audit occurs in the same manner as for the [standard environmental audit](#).