

# NPS CONCESSION ENVIRONMENTAL MANAGEMENT PROGRAM SAMPLE

## PURPOSE

This document has been prepared as an educational and resource tool for National Park Service (NPS) concessioners to assist them in developing and administering a documented Environmental Management Program (EMP) in accordance with their concession contract and EMP standards for NPS Concessioners.

This EMP sample is for a fictitious SCUBA diving concession operating under a Category II contract in a fictitious park. Black text highlights each EMP elements as defined in the NPS standards. Example EMP text and tables are marked in blue.

## NOTICE

This EMP is a sample only. The sample information provided is for illustration only and may not be accurate or complete. It does not constitute a complete reference to Federal, State or local laws, regulations or ordinance or policy requirements. Relying on the information contained in this sample does not guarantee contractual compliance or protect a concessioner legally. Concessioners are independently responsible for developing their own EMP appropriate to their operation and that meets all legal requirements, contractual requirements and provides for the environmentally safe operation of the concession.

## EMP AREA 1 – ENVIRONMENTAL MANAGEMENT PROGRAM SCOPE

The concessioner establishes and maintains an EMP appropriate for the activities, size, and complexity of the operation.

**Environmental Management Program Scope.** This documented Environmental Management Program (EMP) is developed in accordance with the Wonder Water Dives (WWD) concession contract with the National Park Service (NPS) (CC-WOWA004-16), specifically Contract Section 6. The EMP complies with NPS EMP standards.

**Policy:** In support of our mission and environmental stewardship, WWD is committed to meeting and striving to exceed all applicable environmental compliance regulations and operating in a manner that prevents pollution, reduces energy and fuel consumption, and promotes sustainable best management practices. This EMP describes the program that WWD has established to meet these commitments and continuously try to improve its operations.

**Goals and Targets:** WWD annually establishes goals and targets to maintain and improve the company's environmental performance. These are identified in Table 1 below. These particular actions are in addition to the ongoing procedures otherwise described in this EMP. We also welcome other suggestions for improving the EMP to ensure that it responds to the needs of our employees, visitors, and the environment in which we operate.

Table 1 – WWD Annual EMP Objectives		
Goal	Target	Due Date
Minimize air pollutant emissions	Upgrade trip boat engines to more energy-efficient models (Tier II) when replaced.	12/31/2016

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Reduce noise pollution and other impacts to marine wildlife	Institute no idling policy.	09/25/2015
Reduce waste of overall operations	Institute on-vessel trash recycling program.	12/31/2015

### EMP ELEMENT 2 – RESPONSIBILITY AND ACCOUNTABILITY

The concessioner must establish the organizational structure, personnel roles and responsibilities, and resources needed to effectively implement the EMP.

**EMP Responsibilities.** The General Manager (GM) of WWD is the designed Environmental Officer (EO). The GM is responsible for overall development, implementation and monitoring of this EMP. The GM also has other specific EMP responsibilities.

All WWD employees are responsible for complying with applicable laws and regulations, NPS requirements and company policies and procedures. In addition to these general responsibilities, the GM is responsible for all land-side environmental operations. On the water, the boat captains are responsible for environmental management and safety. Dive masters are responsible for environmental protection practices in the water. Table 1 lists specific assignments.

<b>Table 2 – WWD EMP Responsibilities</b>	
<b>Position</b>	<b>Environmental Responsibilities</b>
GM (Environmental Officer) Sandy Shore	<ul style="list-style-type: none"> <li>• General - EMP development and implementation.</li> <li>• General - Environmental recordkeeping and reporting.</li> <li>• Office - Recycling program.</li> <li>• Office – Compressor maintenance and waste management</li> </ul>
Boat Captain Tug Shipman	<ul style="list-style-type: none"> <li>• Vessel - Engine operations, maintenance, testing and waste management</li> <li>• Vessel - Trash recycling program</li> <li>• Vessel - Mooring Environmental damage avoidance</li> <li>• Vessel – Fueling</li> <li>• Vessel – Spill Response</li> </ul>
Dive Masters Bob Diver Cindy Seaworthy	<ul style="list-style-type: none"> <li>• Dive – Securing equipment</li> <li>• Dive – Visitor education on low impact diving practices</li> </ul>

All employees are held accountable to ensure everyone follows environmental practices. Performance relative to their environmental responsibilities is a part of each employee’s annual review. In addition, the GM is responsible for the results of the NPS EMP evaluation.

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## EMP ELEMENT 3 – TRAINING

Personnel must be competent to perform the tasks assigned to implement the EMP.

**Training and Qualifications.** WWD has the following certification and training requirements to ensure environmentally safe operations. Certifications are tracked copies are maintained in the WWD Office. Training logs are completed to track WWD participation. These logs are filed in the WWD office.

Training Topic	Type	Trainer	Employees Covered	Frequency
EMP Awareness	In-House	GM	All	Initial Hire Annual
SOPs	In-House	Applicable Manger	Applicable Staff	Annual
Vessel Fuel Spill Response Plan	In-House	Captain	Applicable Staff	Annual

## EMP ELEMENT 4 – DOCUMENTATION AND OPERATIONAL CONTROLS

The concessioner must establish and maintain plans and procedures to manage operations and emergencies associated with its EMP. The number and complexity of these plans and procedures will depend on the size and complexity of the concessions operation. Some plans and procedures may be required by Applicable Law or the contract.

**Documentation and Operational Controls.** This EMP is developed and maintained by the GM. WWD also has documented standard operating procedures (SOPs) and environmental emergency plans to ensure environmentally safe operations. SOPs and environmental and safety plans are listed below. The SOPs and emergency plans are developed and updated by the EMP as necessary in collaboration with applicable WWD personnel. SOPs and emergency plans are maintained in the applicable WWD safety file on board each vessel and in the office with master hardcopies and electronic versions in the WWD GM’s office. SOPs and environmental plans are dated to ensure currency.

Other EMP documentation includes: personnel certification and training records; regulatory reports; inspection logs and corrective action reports; and other EMP-related correspondence. These are maintained by the GM in the WWD office as well as on-board vessels as applicable.

Area	Title/Description	Version Date	Responsibility
<i>Vessel</i>	Vessel Cleaning		Captain
	Vessel Engine Maintenance Waste Management		Captain
	Vessel Engine Emission Testing		Captain
	Vessel Fueling (see also RMP)		Captain
	Vessel Trash Management		Captain
	Vessel Bilge Water Disposal		Captain
<i>Dive</i>	Dive Leave-No-Trace		Lead Dive Master
<i>Office/Dock</i>	Landside Trash Recycling		GM
<i>General</i>	EMP		GM

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Table 5 - WWD Environmental Emergency Plans			
Area	Title/Description	Version Date	Responsibility
<i>Vessel</i>	Fuel Spill Response		GM/Captain/mate

### EMP ELEMENT 5 - COMMUNICATION

The EMP must be effectively communicated internally to concessioner employees and externally to park personnel, visitors and to other parties involved in the EMP.

**EMP Communication.** The EMP is available to staff in the GM’s office. Employees are briefed on the EMP and associated SOPs and environmental plans thorough annual and monthly training programs.

Electronic copies of the EMP are provided to WOWA Concessions who provide them to the Chief Ranger’s Office and Park Dispatch. The EMP briefs WOWA Concession personnel annually regarding the WWD EMP during the annual EMP review as well as during other check-in meetings.

The GM is responsible for all communications with regulatory agencies such as the USEPA, State and USCG. In emergency situations, the Captain may communicate with these agencies on environmental matters as directed by the GM and described in SOPs and emergency plans.

EMP topics covering handling SCUBA gear, handling waste and leave-no-trace practices are communicated to visitors by boat (captain or mate) and in dive briefs (dive staff).

### EMP ELEMENT 6 - REPORTING

The concessioner must develop and implement procedures for reporting internally within the concession organization, and externally to the park and regulatory agencies.

**EMP Reporting.** WWD internal EMP reporting will be completed by the GM with information provided by captains and dive staff as appropriate. WWD will complete all documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies in accordance with Applicable Laws, and to the NPS in accordance with the contract and documented EMP (if applicable).

Any discharges, release or threatened release of hazardous or toxic substance, material or waste will be reported in a timely manner to the NPS. WWD will provide timely written advance notice of, and the opportunity to participate in, communications with regulatory agencies regarding the concessioner’s environmental activities.

Table 6 - WWD EMP Reports				
Report	Recipient	Reporter	Frequency	Copy to NPS
<i>External Reports</i>				
EMP	NPS	GM	Initial and Annual	Yes
Inventory of Hazardous Materials	NPS	GM	Annual	Yes
Inventory of Waste Streams	NPS	GM	Annual	Yes
Other Regulatory Agency Reports	Applicable Agency	GM	As they Occur	Yes
Fuel Spill Reports	USCG	GM	As they Occur	Yes
Environmental Audit Corrective Action Report	NPS	GM	As they Occur	Yes
<b>Table 6 - WWD EMP Reports (Cont.)</b>				

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Report	Recipient	Reporter	Frequency	Copy to NPS
<b>Internal Reports</b>				
Vessel Environmental Inspection Report	Captain	GM	Monthly	No
Vessel Waste Tracking Logs	Captain	GM	Monthly	No

### EMP ELEMENT 7 – MONITORING, MEASUREMENT AND CORRECTIVE ACTION

Concessioners must develop and implement inspection processes to identify environmental management issues and correct deficiencies identified through such inspections. Concessioners effectively respond to environmental incidents. Concessioners must develop and implement management review procedures to improve EMP performance over time.

**Monitoring, Measurement and Corrective Action.** WWD has instated inspection and corrective action, emergency response and abatement and management review processes to maintain and improve its EMP.

Inspections and Corrective Action: WWD has instituted an internal inspection program to ensure compliance with regulations and environment protection. Inspection schedules are maintained to ensure inspections are conducted as required and include frequency, inspector's name, findings, and date completed. Environmental deficiencies are raked based on their severity as imminently dangerous, serious, and minor. Deficiencies are recorded and are reported to the GM. Imminently dangerous and serious deficiencies must be reported to the GM immediately. All deficiencies corrected as soon as possible. The GM sets corrective action timeframes. Imminently dangerous and serious deficiencies may require that operations be shut down until the issue is corrected. The WWD equipment, facilities and operations are also subject to external environmental inspections. These include USCG vessel inspections, NPS periodic inspections and NPS environmental audits. Table 7 outlines internal and external inspections.

<b>Table 7 – WWD Environmental Inspections</b>				
Inspection	Inspector	Frequency	Requirements	Documentation
<b>External Inspections</b>				
Vessel inspection	USGS	Annual	USGS	USGS Report
Periodic Operational Performance Inspection	NPS	Semi-annual	10-DIV (NPS)	Periodic Inspection Report
EMP Evaluation	NPS	Annual	10-EMP	RMP Evaluation Report
Environmental Audit	NPS	Once Every 3 to 5 yrs.	Concession Env. Audit Protocol	Concession Env. Audit Report
Vessel Emissions Monitoring	Contractor	Annual	Vessel Test Protocol	Air Emissions Test Report
<b>Internal Inspections</b>				
Vessel Engine Room	Mate	Dailey	Internal Checksheet	Deficiency Record; Inspection Log
Vessel (Monthly)	Captain	Monthly	Internal Checksheet	Completed Check Sheet
Dock (see also RMP)	Captain	Daily	Internal Checksheet	Deficiency Record Inspection Log
Environmental Audit	GM	Annual	Audit Protocol	Internal Env. Audit Report

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Environmental Emergency Incident and Abatement: All emergency incidents fuel spills or damage to reef resources from anchoring failures are reported to the GM. Incidents are investigated and abatement based on timeframes that consider the issue and its severity. At minimum, all incidents are reviewed by the GM and Captain. WWD classifies incidents based upon their severity as defined in NPS standards. Serious incidents are reported to the park and serious incident investigations are conducted in coordination with the NPS.

Management Review: The GM annual reviews the EMP to ensure that it is current, that the EMP and associated procedures are effective and that any annual goals and targets for improvement were met. Included in this review is an analysis of internal and external inspection results, incident reports, WWD procedural changes, and other input. The GM makes any necessary changes to the EMP based on this analysis and submits the updated EMP to the park for review and acceptance. The GM also updates and SOPs or Emergency Plans to reflect necessary improvements or changes. The GM orients staff on the updated RMP and SOPs and Emergency Plans through the WWD training program.

### EMP ELEMENT 8 – OTHER CONTRACT REQUIREMENTS

In addition to the requirements outlined for other EMP elements, the concession contract may have additional environmental requirements in the contract, operating, or maintenance plans that are de facto standards.

**Other Contract Requirements.** Contract-specific requirements are:

Mask defogger must be made of baby shampoo and water only.

No sunscreen is to be applied before entering the water.

### EMP ATTACHMENTS

The concessioner may opt to attach documentation such as training logs, SOPs and emergency plans, inspection forms and reports to the EMP.