



## 2004: A Year In Review for the CEAS

The Concession Environmental Audit System (CEAS) has come a long way since being established in 1999. Over the past five years, the CEAS has helped close to 120 concessioners in over 45 parks by providing assistance in a variety of environmental areas, such as environmental training and hazardous waste management.

### What are CEAS audits?

CEAS environmental audits evaluate a concessioner's operations as they relate to environmental safety and health. (For helpful tips on the audit process, please see "Audit Tips" on page 6.)

During an audit, the audit team, which consists of at least two independent third party auditors, evaluates the concessioner's operations against Applicable Laws. These laws include Federal, Tribal, state, and local regulations. Concessioner operations are also evaluated against Department of the Interior (DOI) and NPS policies, and industry-accepted best management practices (BMPs). If the audit team finds that the concessioner's operations do not meet these audit criteria, an audit finding is developed using CEAS protocol. The CEAS auditors categorize the audit findings by priority level (see Table 1).

**Table 1: CY2004 Audit Finding Descriptions & Numbers**

| Priority     | Description   | Total      |
|--------------|---|------------|
| 1            | Immediate harm to human health or the environment.  | 0          |
| 2            | Regulatory audit findings that are not causing immediate harm to human health or the environment.           | 380        |
| 3a           | Non-regulatory audit findings. Can be reasonably achieved in the short-term with little effort and/or cost. | 293        |
| 3b           | Non-regulatory audit findings. May require significant time and/or capital costs to implement.              | 73         |
| <b>TOTAL</b> |   | <b>746</b> |

CEAS auditors also identify positive observations, which are outstanding or innovative practices that help protect or con-

serve natural resources, but are not yet widely adopted by other concessioners and are not required by Applicable Laws. In 2004, auditors noted 19 positive observations. However, the CEAS also noted that NPS concessioners implemented a variety of BMPs not required by Applicable Laws that helped further protect and conserve NPS resources. BMPs are often noted in the audit report sent to parks and concessioners, which is more formally known as the Environmental Audit Report (EAR) Package.

### 2004 Audit Overview

The CEAS audited over 30 concessioners operating in 14 different parks in 2004. These operations included marinas, gas and service stations, food and beverage facilities, lodging establishments, shower and laundry operations, employee housing, and retail outlets. The top five most frequent environmental issues encountered at these concession operations are summarized in Table 2.

**Table 2: CY2004 Percent of the Top Five Environmental Topic Area Audit Findings by Priority Level**

| Environmental Topic Area                     | 1 | 2  | 3a  | 3b |
|--|---|----|-----|----|
| 1. Respiratory Protection                    | 0 | 99 | 1   | 0  |
| 2. Hazard Communication (HAZCOM)             | 0 | 88 | 12  | 0  |
| 3. Emergency Response Planning and Reporting | 0 | 88 | 12  | 0  |
| 4. Environmental Management Systems          | 0 | 0  | 20  | 80 |
| 5. Universal Waste Management                | 0 | 0  | 100 | 0  |

Concessioners who provide respirators or filtering facepieces (such as dust masks) to their employees, either for required or voluntary use, are subject to the Occupational Safety and Health Administration's (OSHA) **Respiratory Protection Standard** (29 CFR 1910.134). As with last year, most concessioners with respiratory protection audit findings either did not have or were missing elements of a respiratory protection program.

By using and storing hazardous chemicals, many concessioners are subject to **hazard communication (HAZCOM)** regulations (29 CFR 1910.1200) since employees could be exposed to hazardous chemicals while working. In 2004, some concessioners did not know about the HAZCOM

*(continued on page 3)*



The Teton Range at sunrise in Grand Teton National Park, Wyoming.



**GreenLine** is an official publication of the National Park Service Concession Program. The newsletter provides a forum in which the NPS can share information with NPS staff and concessioners about the Concession Environmental Management Program, current environmental requirements, and best management practices; it also identifies resources available to improve concessioner environmental performance and highlights success stories.

Guest articles have been reviewed by the NPS Concession Environmental Management Program and, if required, edited in collaboration with the original author.

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## Ask Dr. Ima Park

For this *GreenLine* Newsletter issue, we ask our in-house expert, Dr. Ima Park, to help explain bat management.

**?** *My customers and employees have reported odd sounds coming from the attic. I think a bat colony may be sharing our living and business quarters. What do I do?*

**Dr. Ima Park:** First, don't panic! Try to identify what is causing the noise. Contact your park or regional integrated pest management (IPM) coordinator or wildlife biologist for assistance.

Bats are beneficial creatures and, as native species, are protected by Federal and state laws and NPS regulations. These flying mammals are remarkably diverse; there are 75 types of bats in more than 200 NPS units. Moreover, national parks provide an important sanctuary for six endangered species of bats.

Some bat species eat as many as 600 insects per hour, including mosquitoes, beetles, and crickets. They play a pivotal role in pollinating flowers and other plants and are very shy creatures that normally avoid people.

Unfortunately, bats can become a nuisance when they enter and roost in human dwellings. The accumulation of their guano (i.e., droppings) can damage resources and serve as a breeding ground for a fungus species which, when its spores are inhaled by humans, may cause the respiratory disease histoplasmosis. Removal of guano can be costly and



must be done by trained personnel. Like some other mammals in the wild, bats can carry rabies, which may affect humans. In order to avoid these risks, education is key.



The most prudent long-term solution for the management of bats that enter a building is ongoing monitoring and active exclusion to bat-proof the structure. Your park or regional IPM coordinator can recommend various exclusion methods. If you are operating in historic structures, you will also need to work with your park's cultural resource staff.

A bat that unexpectedly appears in a room may have entered through a door, window, attic, basement, or chimney. In order to solve this problem, isolate the animal to one room by closing doors to adjoining areas. If the bat has not bitten or scratched anyone, open any doors or windows to the outside from that one room. Turn down lights in the room so the bat doesn't hide behind curtains or furniture to avoid the light, and allow it to find its own way out. If this does not work, contact a trained professional to remove the bat. If a bat has bitten or scratched someone or if one of your staff or a visitor awakens to find a bat in their room, contact your park concession specialist immediately. They will then contact the NPS Public Health Service and the wildlife health program for assistance.

It is also important to remember that NPS management policies specify that a management plan should be in place for potential pest issues to reduce risks to people and resources. You should contact the park or regional IPM coordinator for technical assistance. Bats are beneficial and interesting animals and as stewards of the national parks, we must protect bats and learn how to safely live with them.

### RESOURCES:

Contact your park or regional Integrated Pest Management (IPM) coordinator before employing bat management efforts. Note that any proposed pesticide must be reviewed and approved prior to use, according to NPS management policies.

- NPS Integrated Pest Management Program: [www.nature.nps.gov/biology/ipm](http://www.nature.nps.gov/biology/ipm)
- NPS Public Health Program: [www.nps.gov/public\\_health](http://www.nps.gov/public_health)
- NPS Wildlife Health Program: Go to [www.nature.nps.gov](http://www.nature.nps.gov) and click on "Biology," then click on "Wildlife Health & Disease."
- Bat Conservation International: Go to [www.batcon.org](http://www.batcon.org) and click on "Discover," then click on "Excluding Bats."
- US Geological Survey Northern Prairie Wildlife Research Center's House Bat Management: Go to [www.npwrc.usgs.gov](http://www.npwrc.usgs.gov) and click on "Biological Resources," "Mammals," and then "House Bat Management" under the Species Accounts/Descriptions heading.

## 2004: A Year In Review for the CEAS (continued from page 1)

requirement, while others had incomplete program components.

**Emergency response planning and reporting regulations** (29 CFR 1910.120 and 1910.38) apply to those concessioners who use and store hazardous chemicals that could accidentally spill or leak into the environment. These include common products found even in the smallest of concession operations, such as household cleaning products, paints, oils, pesticides, and bulk storage of gasoline and propane. Concessioners and parks should coordinate to determine who is responsible for cleaning up hazardous chemical spills and releases, ensuring spill cleanup materials are readily available, and adequately training designated employees.

**Environmental management system (EMS)** findings were also prevalent during the 2004 CEAS audit season. An EMS is a set of written processes and practices that enable an organization to reduce its environmental impacts and increase its operating efficiency. New concession contracts that assign concessioners Federal land and facilities require that concessioners have an environmental management program (EMP), which is a type of EMS. Since EMPs can result in efficiencies that may reduce operating and maintenance costs and reduce environmental liabilities, EMPs may be valuable even for those concessioners who are not required to maintain one.

**Universal waste management** issues were the fifth most frequent type of audit finding in 2004; however, none of these audit findings resulted from non-compliance with environmental regulations. Instead, these findings simply encouraged concessioners to implement BMPs that would further protect park resources. The most common type of universal waste for concessioners is used fluorescent lamps, but lead acid and other types of batteries also fall under this category. These products should be recycled rather than tossed in the regular

trash where they may release mercury and other hazardous substances into the environment.

### Looking Ahead

Overall, the most frequent types of audit findings (see Table 2) have not changed much since 2002 when the CEAS first started reporting audit data. Yet concessioner awareness and understanding of these issues has improved. For example, some concessioners have remarked that the *GreenLine* Newsletter and the *GreenLine* CD have helped them better understand environmental requirements applicable to their operations and improve their overall environmental management. Additionally, a number of resources have been developed to assist concessioners in understanding environmental regulations and provide suggestions for how to ensure compliance with the applicable regulations.

The CEAS plans to continue outreach efforts that emphasize the importance of environmental compliance while encouraging concessioners to go beyond compliance. This will help concessioners reap the benefits of improved cost savings and operating and maintenance efficiencies that come with improved environmental management.

### RESOURCES:

- *Developing a Written Environmental Management Program (EMP)*
- *Guidance for Conducting Hazard Communication (HAZCOM) Training*
- *Guidance for Developing a Written Hazard Communication (HAZCOM) Program*
- *Guidance for Developing a Written Respiratory Protection Program*
- *Guidance for Managing Universal Waste*
- *Guidance for Writing an Emergency Action Plan (EAP)*
- *Guidance for Writing an Emergency Response Program (ERP)*

To request a copy of any of these assistance resources, please contact the CoEMP (see page 8). These resources are also available on the Internet; go to [www.concessions.nps.gov](http://www.concessions.nps.gov), click on "CoEMP" and then "Assistance Resources."



## and Our Parks

[www.p2rx.org](http://www.p2rx.org)

National parks provide diverse natural, cultural, and historic resources for the enjoyment and education of visitors. However, pollution from visitor activities and services as well as land and facilities maintenance activities can result in negative impacts to resources in those parks.

Concessioners can help mitigate these impacts by preventing pollution before it is created. Pollution prevention (P2) can help protect the park resources, strengthen environmental compliance, and increase operating and maintenance efficiencies.

The Pollution Prevention Resource Exchange (P2RX) is a network of P2 information centers funded by Federal, state, and local government organizations as well as private businesses that can help you achieve your environmental goals, from solid waste reduction to respiratory protection. The following resources offered by P2RX provide information that your operation may find helpful now and in the future. Some of these resources have been designed

specifically for operations located on public lands, like national parks.



**P2RX Homepage.** Provides P2 information for a variety of industry sectors such as hospitality and tourism, food service, and marinas. Go to [www.p2rx.org](http://www.p2rx.org).

**P2RX's Topic Hub™ on Public Lands.** Provides P2 fact sheets, case studies, and handbooks for those operating in such places as national parks. To access this Topic Hub™, go to [www.p2rx.org](http://www.p2rx.org) and click on "Topic Hubs and Sector Resources" under the P2 Information tab. Then, click on "Public Lands" under the Hospitality and Tourism section.

**P2 Fact Sheets, Case Studies, and Other References.** To access these resources, first go to P2RX's Topic Hub on Public Lands (see above) and then click on "Complete List of Links."

**Other P2RX Programs.** Information on P2 programs around the country can be found by going to [www.p2rx.org](http://www.p2rx.org) and clicking on "P2 Programs Directory" under the "Networking" tab.



## A Commitment to Clean Energy in Crater Lake

Xanterra Parks & Resorts recently began buying electricity generated by wind, solar, and biomass projects in the Pacific Northwest to offset 50 percent of its electricity use at Crater Lake Lodge and other facilities in Oregon's only national park: Crater Lake National Park (NP).

Pacific Power, the electric utility provider for Crater Lake Lodge and much of southern Oregon, offers renewable energy to customers through its Blue Sky program. Xanterra is enrolled in Pacific Power's Blue Sky Habitat program, purchasing energy from newly developed renewable resources—a blend of wind, biomass, and solar. Under this program, customers also make monthly contributions to The Nature Conservancy of Oregon to help fund habitat restoration projects for native fish.

Xanterra is also buying 756 blocks of wind power each month through Pacific Power's new Blue Sky QS (i.e., Quantity Savings) program for large commercial customers. This program allows large business customers to buy renewable energy for less, providing they purchase at least 101 blocks of Blue Sky per month for a year. Blue Sky is wind power sold in 100-kilowatt hour increments called "blocks."

Xanterra's Blue Sky purchase offers significant environmental benefits. Using wind power helps reduce greenhouse gas emissions as it produces no air pollutants, wastewater, smog, or acid rain. Xanterra's Blue Sky purchase of 1,021,104 kilowatt hours offsets the release of 1,020 tons of carbon dioxide into the atmosphere each year, which is the same as taking 175 cars off the road or planting 33 acres of trees each month.

In addition to buying renewables and reducing energy consumption, Xanterra also implemented the

following measures at Crater Lake:

- Began using a blend of bio-diesel fuel (B20) rather than regular petroleum diesel to significantly reduce greenhouse gas emissions and other air pollutants.
- Increased total pounds of recycled materials at Crater Lake Lodge from 6,000 pounds in 2002 to 60,000 pounds in 2004, thereby diverting more than 20 percent of its total solid waste from the local landfill.
- Implemented a property Environmental Management System (EMS) and became ISO 14001 Certified.

Crater Lake National Park attracts thousands of visitors each year.



### RESOURCES:

- Consumer Guide to Buying Clean Energy: [www.consumerguides.info/energy/buy\\_clean\\_electricity](http://www.consumerguides.info/energy/buy_clean_electricity)

*"We operate in some of the most pristine environments in the nation, so we take our sustainability goals seriously," explained Chris Lane, corporate director of environmental affairs for Xanterra Parks & Resorts. "By increasing our participation in Blue Sky, we are able to address our corporate sustainability goals while supporting the development of renewable energy resources. We believe that economic and ecological sustainability can operate hand-in-hand."*

## Taming Trash in the City by the Bay

Perched on spectacular cliffs overlooking the Pacific Ocean, the Cliff House is one of the crown jewels of San Francisco's Golden Gate National Recreation Area. Peanut Wagon Inc., the Concessioner who has operated the Cliff House for over 30 of the restaurant's 142 years, offers guests both fine and casual dining that features local seafood, organically grown products, and boutique California wines. The company also operates an on-site gift shop.

But the Cliff House is not just rooted in the city's past; it is also embracing the future by implementing an award-winning solid waste program at its historic structure.

In January 2003, the Cliff House and the NPS began a 19-month long joint renovation project to update the existing building. It was during this time that the Cliff House management decided to upgrade its solid waste reduction program.

The first step was to install sets of color-coded waste receptacles in various locations around the restaurant. These containers, provided by the city of

San Francisco, come in three colors: green, blue, and black. Compostable materials are placed in green containers, recyclables in blue containers, and trash in black containers.

The composting component of the program helps keep a lot of the restaurant's solid waste out of the landfill. Run by the city of San Francisco, this voluntary program for local businesses accepts a variety of compostable items. Staff sort leftover meat, fish, fruits, vegetables, dairy products, and food-soiled paper products into containers that are collected by the city. The materials are then composted at an off-site location, producing nutrient-rich finished compost for use by other local businesses.

The Cliff House management also expanded their recycling program. In addition to cardboard and glass bottles, the restaurant staff now recycles juice cans, aluminum foil, and plastic bottles.



*(continued on next page)*

## Park Visitors Cruise in Style with Biodiesel Boats

Many of the two million annual visitors to Glacier National Park in Montana add a boat ride to their outdoor adventure in the nation's fourth largest national park. As far back as the early 1900s, boats ferried visitors on Lake McDonald, the Park's largest lake at 10 miles long and one mile wide.

Today, the owners of Glacier Park Boat Company (GPBC) use some of the same wooden boats that their grandparents used when the company was formed in 1937. The company operates a fleet of five boats, including two 45-foot-long boats which were built in 1925 and 1926. Two other boats were launched in 1930 and 1945. Another boat was added to the fleet in 1985.

As part of their environmental program, GPBC decided to explore using biodiesel for their boat engines. GPBC worked with the Park's facility manager, Lou Summerfield, who helped them learn about the unique issues associated with switching to biodiesel, such as potentially needing to replace engine hoses and gaskets. The company also worked with their fuel supplier, who helped them find biodiesel at the best price and gave them suggestions for more efficient fuel transport and storage.

### What is biodiesel?

**Biodiesel is a clean-burning alternative fuel produced from renewable sources like peanut or soybean oil. Vehicle and boat diesel engines can use various mixtures of biodiesel and regular diesel, as well as pure biodiesel (also known as B100).**

When GPBC researched the availability of biodiesel in their area, there were no rebates or promotions being offered at the time (although these do exist in other states and localities). They discovered that the only product available was Bioo, pure biodiesel. Not wanting to make a change from regular diesel to pure biodiesel without knowing the effects pure biodiesel could have on their engines, GPBC decided to blend their own fuel of 20 percent biodiesel and 80 percent regular diesel, also known as B20.

The conversion from regular diesel to biodiesel didn't require a large capital investment for GPBC. Once the company bought some barrels for mixing the biodiesel and changed the seals and hoses on the boats, they were ready to use the new fuel. Denise VanArtsdale, one of the owners of GPBC, said,

"We've had very little problems with the conversion aspect. Most of the engines took the

change easily after we changed the seals and hoses." VanArtsdale added that their engines run more smoothly with fewer knocks and pings than with regular diesel.

Price was not a major factor in the company's decision to switch to biodiesel although VanArtsdale estimates the average cost of B20 is roughly 25 percent

more than regular diesel. However, as the price of regular diesel rises, biodiesel will become more cost-effective. In fact, despite the current price difference, GPBC is now researching the feasibility of using biodiesel in their truck fleet.

GPBC's primary reason for switching to biodiesel was environmental: biodiesel has dramatically less carbon monoxide and particulate matter emissions when compared to regular diesel (although nitrogen oxide emissions may increase). Additionally, GPBC's research showed that biodiesel would add lubricity to their engines, which VanArtsdale credits for making their engines run better and longer, resulting in savings for the company.



The Glacier Park Boat Company uses some of the same wooden boats that floated more than 90 years ago.

## Taming Trash in the City by the Bay *(continued from previous page)*

Additionally, the office and gift shop staff recycles office paper, magazines, and ink cartridges.

Implementing a new solid waste program was not easy. To help motivate employees, Executive Sous Chef Art Bradley designed an employee training program complete with posters, handouts, and on-the-job instruction that reminded employees how to sort the solid waste correctly. He has also solicited help from line-level staff members, who were encouraged to provide suggestions that will improve the program. Over time, the program has paid off. Before the introduction of their solid waste reduction plan, the Cliff House sent 75 percent of their solid waste to the landfill; now just 25 percent of their solid waste ends up there, saving the concessioner approximately \$1,600 per month in avoided costs like waste hauling fees.

In 2004, the Cliff House was officially recognized for its solid waste reduction efforts when it accepted second place for the San Francisco Department of the Environment's Commercial Recycler of the Year (CORY) Award.

For this concessioner, however, a second place CORY award just isn't good enough. That is why they are currently working toward their new goal of sending a mere 15 percent of their solid waste to the landfill. To meet this target, Bradley says they will continue to look for ways to reduce solid waste while continuing to educate staff and guests on what products can be recycled or accepted for composting.



The Cliff House has reduced solid waste by 67 percent.

## Paper or Plastic?



What type of bag do you offer your customers? Which bag is the best ecological choice?

The answer: It depends.

Manufacturing both paper and plastic bags requires consumption of large amounts of natural resources and produces numerous pollutants. Manufacturers use wood, a renewable resource, to make paper bags and use petroleum, a nonrenewable resource, to make plastic bags. The Environmental Protection Agency (EPA) states that it takes 40 percent less energy to produce plastic bags than paper bags. In addition, plastic bag manufacturing produces considerably less air pollution and solid waste than paper bag manufacturing.

After using bags, most consumers toss them into the trash where they eventually end up in a landfill. Plastic bags take up less space in landfills although it may take 1,000 years for them to break down. Paper bags, however, may break down within one month when landfill conditions are right, such as when the bags are exposed to adequate sunlight and air.

Your concession operations may dictate the type of bag you use. For example, you may not want to use plastic bags at a marina since they are easily blown away and may get entangled in boat engines or become traps for wildlife.

It may also not be necessary for concessioners to offer a bag with every purchase, although this may depend on other strategies you have in place to control shoplifting. Some concessioners have found that if they have only one entrance to a shop for customer use, they can better control shoplifting. Simply having a policy in place to ensure customers are provided receipts can also limit merchandise loss. If customers prefer having a bag, encourage them to reuse it and help conserve our precious resources.

As you can see, there is no clear cut answer to whether paper or plastic bags are better for the environment. When making the decision, there are many considerations you must weigh including availability, what works best for your concession operation, environmental impact, and opportunities to educate visitors.

## Audit Tips

The Concession Environmental Audit System (CEAS) conducts environmental audits of concessioners as required by Executive Order 13148, Greening the Government Through Leadership in Environmental Management. The CEAS tries to make its audits as worry-free as possible but knows that audits can seem stressful, especially when a concessioner feels unprepared. Below are some tips that will help you successfully prepare for and participate in an environmental audit.



**Don't worry.** Although an audit may sound scary, it doesn't (and shouldn't) have to be. An audit is an educational tool that will help you minimize environmental liability and may potentially save you time and resources. Concessioner audits are confidential, which means auditors never notify anyone outside of the NPS of your compliance status, unless required by law to do so. (Since the CEAS started in 1999, this type of reporting has not yet been required.) If auditors do find deficiencies in your environmental management program, they will share information and resources with you and park staff on how to correct them.

**Maintain good, constant communication with your park point of contact (POC), typically your park concession specialist, before, during, and after the audit.** Your park POC will be coordinating with the CEAS on everything, so you should work with them to make the audit go smoothly.



**Complete the Audit Questionnaire as accurately as possible.** The Audit Questionnaire (AQ) is a document that your park POC will forward to you approximately four to six weeks before the audit. Auditors review the AQ so they better understand what environmental issues you may have. Be sure to complete it as accurately as possible, but if you don't know the answer, just choose "Unsure" and move on.



**Allow time so that you can actively participate in the audit.** The CEAS does what it can to minimize any disruption the audit may cause to your operation. The audits provide a great opportunity to learn from the auditors, and planning time so you can participate during the entire audit will ultimately help you.



**Have realistic expectations.** No one expects you to know everything about the environmental issues you face – it would be impossible! The audit team is available to explain the environmental regulations, answer questions, and provide technical assistance and resources to help you improve your operation.



Most postcards are written immediately after they have been purchased; therefore, a bag may not be needed.



Place a "purchased" sticker on items that have been purchased but are not being put in a bag to help control shoplifting.



Have bags imprinted with the following or similar message to educate visitors: "Please reuse this bag to conserve resources and protect our environment."



### RESOURCES:

- Information on paper and plastic bags: [www.epa.gov/region1/communities/shopbags.html](http://www.epa.gov/region1/communities/shopbags.html)

# Learning the Ins and Outs of HAZCOM

Bill's Concessions in Beautiful National Park is a picturesque operation that Bill and his wife, Anna, have owned for over ten years. They and their four seasonal employees maintain five rental cabins, a swimming pool, a convenience store, and public restrooms.

When they learned that their operation was scheduled for an environmental audit by the NPS Concession Environmental Audit System (CEAS), Bill and Anna were apprehensive. They believe in protecting the environment and their employees' health by following the appropriate environmental regulations and implementing best management practices. However, they claimed that keeping track of the environmental regulations is difficult. "We're such a small business that trying to stay aware of the regulations was daunting!" exclaimed Anna.

When the CEAS auditors arrived, one of the first things they discussed with the couple was the need for a Hazard Communication (HAZCOM) Program. The auditors explained that the Occupational Safety and Health Administration (OSHA) requires a HAZCOM Program when an operation uses or stores hazardous chemicals. Bill and Anna learned the list of hazardous chemicals includes more than just the chlorine they put in their pool. "We were amazed to find that even our toilet bowl cleaners and cabin interior paint needed to be included in the HAZCOM program," said Anna.



The auditors explained that cleaning products can be dangerous when used more frequently or in a different manner than an average consumer uses them and the products can have potentially serious effects on worker health.

Since Bill and Anna didn't have a HAZCOM program, the auditors explained that there are four main sections of a HAZCOM program, and that there needs to be a written document detailing how the business will manage hazardous chemicals. The length of the document can be as short as a few pages – if all required elements are addressed.

After going through the audit process, Bill and Anna felt it was a good learning experience. Bill added the auditors pointed out what they needed to fix, explaining why and how. "They even gave us resources, such as information on how to develop a HAZCOM Program," Bill said, "We can use these resources to make sure we're in compliance in the future. The best part was the auditors made sure we knew they would help even after the audit was over."

*Disclaimer: This is not a real concessioner, but an example to illustrate what is required in a HAZCOM program. For further assistance, contact your Federal, state, or local OSHA offices.*

## A HAZCOM Program written document should include:

### 1 A List of Hazardous Chemicals

For Bill and Anna, this list includes paints, household cleaners, swimming pool chemicals, and household bleach. To make sure the list was comprehensive, the couple asked each of their employees to go through their work areas and write down any chemicals they used.



### 2 Material Safety Data Sheets

Once they compiled the list of chemicals, Anna reviewed it and made sure there was a material safety data sheet (MSDS) for each item. An MSDS is developed by the product's manufacturer and provides information regarding the safety and handling procedures and precautions for materials used in the workplace. Some of the MSDSs Anna needed were already available; those that weren't, Anna found on the Internet.



Bill and Anna decided to keep master copies of the MSDSs alphabetized in a three-ring binder that Anna would update regularly. Copies of the MSDSs also would be kept in the cleaning room and in the employee common room, where employees would have immediate access to them.

### 3 A Labeling System

Bill made sure all containers were labeled with the content's name and associated hazard warnings. He said, "I went through all of our cabinets and made sure that we had everything labeled including all our containers and spray bottles. I even relabeled those containers that we reuse. After removing or completely blacking out the original label, I just wrote the necessary information with a permanent marker. It only took a few hours and it



was done." Bill also made sure that staff properly rinsed and disposed of the original contents of a container before reusing the container for another product. This helps ensure that incompatible chemicals are not mixed inadvertently. For example, he made sure that products containing ammonia (like glass cleaner) were not put in containers that previously held bleach unless they had been thoroughly rinsed and all traces of bleach removed. This is because a harmful reaction can occur when bleach and ammonia are combined.

In the HAZCOM program document, Bill included a description of their labeling system, directions for reading and interpreting the labels, and procedures for labeling portable containers.

### 4 Job-specific Training

Bill and Anna decided that they both will be responsible for training employees on the HAZCOM program. Bill will review the program with all employees at their annual meeting as well as when a new person is hired, or when a new hazardous chemical is purchased.



As part of this training, he will make sure all employees know where the MSDSs are kept and how to label containers, if needed. Anna will train personnel on how to detect hazardous chemicals in the workplace and will teach employees how to understand and interpret an MSDS.

## RESOURCES:

- *Guidance for Developing a Written Hazard Communication (HAZCOM) Program*
- *Guidance for Conducting Hazard Communication (HAZCOM) Training*

To request a copy of any of these assistance resources, please contact the CoEMP (see page 8). These resources are also available on the Internet; go to [www.concessions.nps.gov](http://www.concessions.nps.gov), click on "CoEMP" and then "Assistance Resources."

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## CoEMP Corner

It has been five busy years since the Concession Environmental Management Program (CoEMP) was formed. During that time, the program has produced a variety of resource assistance documents, created several outreach materials (such as the *GreenLine* Newsletter and CD), performed numerous environmental audits, and helped countless concessioners improve their environmental management. I think you'd agree that's not bad for the first five years!

You can view some of our accomplishments on the Concession Program website at [concessions.nps.gov/program3.cfm](http://concessions.nps.gov/program3.cfm). Not only will you find a history of the CoEMP, but you can also learn more about the Concession Environmental Audit System (CEAS) that was started in 1999 (click on "Audits"), get help from environmental resources (click on "Assistance Resources"), and find information on products and services that can help you improve your environmental management (click on "Assistance Resources," then click on "Products & Services"). We are constantly working to improve and add to our collection of resources, so check back every so often to find new information and tools.

In this issue of the *GreenLine* Newsletter, we have addressed some of the most common concessioner questions and issues we have encountered over the years, related to the CoEMP:

- How can I prepare for an environmental audit?
- What resources are available to help me prevent pollution and save energy?
- Should I use paper or plastic bags in my operation?
- Why do I need a hazard communication (HAZCOM) program?

- How can I implement a HAZCOM program?

We've tried to present the answers to these questions clearly and concisely in an effort to facilitate understanding and awareness of these key issues.

In addition to providing answers to some of the most common concessioner questions, we have also highlighted three concessioners who took the initiative to go beyond what is required by Applicable Laws and enhanced their environmental programs to help protect our national park resources. In these articles, you'll learn about Crater Lake National Park using renewable energy; biodiesel finding its way into 80-year-old boats in Glacier National Park; and the historic Cliff House at Golden Gate National Recreation Area implementing award-winning waste reduction strategies.

The CoEMP would like to thank the many concessioners and park employees who have helped us with our program over the past five years. Your input has been invaluable in helping further protect our national parks. I continue to encourage your participation, suggestions, and comments so that the next five years for the CoEMP are even better.

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Team Lead  
Concession Environmental Management Program



## ASSISTANCE

If you require technical assistance on environmental issues or want to learn more about the Concession Environmental Management Program (CoEMP), contact us:

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