



GreenLine

Addressing Climate Change Impacts Within the NPS

On September 14, 2009, Secretary of the Interior Ken Salazar signed Secretarial Order (SO) 3289, *Addressing the Impacts of Climate Change on America's Water, Land and Other Natural and Cultural Resources*, establishing a Department-wide approach to understanding and responding to the issues of climate change. Through SO 3289, the Department of the Interior (DOI) seeks to further the development of environmentally responsible renewable energy on public lands, and protect "our country's water, land, fish and wildlife, and cultural heritage and tribal lands and resources from the dramatic effects of climate change."

Secretarial Order (SO) 3289 establishes a framework through which DOI bureaus and departments will coordinate climate change science and resource management strategies. This framework includes the development of a Climate Change Response Council that will be coordinating the DOI's response to the impacts of climate change impacts, as well as working with other federal agencies, state and local partners, and the public to coordinate management strategies on more of a landscape-level (i.e., across state and agency boundaries).

The National Park Service (NPS) has been working on specific initiatives to address climate change and greenhouse gas (GHG) reduction for nearly 10 years, and is therefore well positioned to address this Departmental initiative. For example, in 2002, the Climate Friendly Parks (CFP) Program was established as a partnership between NPS and the US En-

vironmental Protection Agency (EPA) to provide national parks with management tools and resources to address climate change. The program's three-pronged approach, consisting of measuring park-based GHG emissions, developing sustainable strategies to mitigate these emissions and adapt to climate change impacts, and educating the public about these efforts, has been implemented at more than 70 parks Servicewide. These efforts have included not only parks, but also the concessioners operating within the park units.

In 2007, the NPS Director established a Climate Change Response Program under the Associate Director for Natural Resource Stewardship and Science. In 2009, efforts to address climate change within the NPS were furthered by the formation of a Sustainable Operations and Climate Change branch within Park Planning, Facilities and Lands, as well as through the development of an NPS Climate Change

Response Steering Committee. The committee is responsible for creating a Climate Change Response Strategy outlining goals and objects for the Service in the areas of science, adaptation, mitigation, and communication. One of the goals of the Response Strategy currently under development is the integration of climate change mitigation activities into NPS business practices and culture, including concession operations.

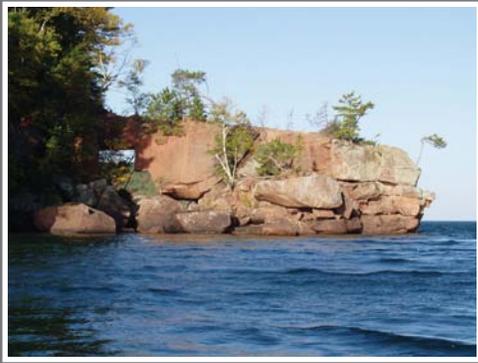
What does all this mean for park concessioners? It may mean being asked to voluntarily participate in CFP programs, report GHG emissions, and implement GHG reduction measures using the Climate Leadership in Parks (CLIP) Tool. Concessioners can also expect there to be more emphasis on GHG reduction strategies in contract prospectuses as parks continue to look for ways to reduce their environmental footprint.

The NPS has a great opportunity to demonstrate leadership and serve as an example to the visiting public on climate change mitigation. As a critical partner in this effort, concessioners also have an opportunity to continue to help protect our park resources, educate their customers, and show their commitment to becoming industry examples in sustainability and ecotourism.

For more information on CFP:
www.nps.gov/climatefriendlyparks/

For more information on SO 3289:
www.fws.gov/home/climatechange/pdf/Sec-Order3289.pdf





Apostle Islands National Lakeshore.

Ask Dr. Ima Park



? *I have not read through my Operating and Maintenance (O&M) plans since I was first awarded my contract with the NPS, but I was recently reminded of it during an environmental audit. Can these plans be changed? Am I required to comply with changes made to the plans? How often would you recommend the O&M plans be reviewed?*

Dr. Ima Park: Although they are Exhibits to the concession contract, O&M plans are important because they outline specific operating and maintenance responsibilities of the concessioner within the park, including those pertaining to the environment. The operating plan includes items such as NPS and concessioner responsibilities, hours of operation, required staff trainings, annual reporting requirements, emergency operations, operational standards, and general details for carrying out the terms and conditions of the concession contract. Maintenance plans contain details for maintaining the concession facilities and grounds, including general maintenance requirements such as painting and roofing, as well as larger maintenance requirements such as capital improvements, concessioner maintenance management systems, and overall maintenance tracking for the life of the contract.

Depending upon the contract authority and complexity of your concession contract, the O&M plans may also contain a number of environmental requirements. These may include guidelines for environmental or “green” purchasing; solid waste management requirements, including recycling; hazardous materials and waste management requirements; implementation of energy and water conserving measures; and requirements to use non-toxic, environmentally preferable cleaning products. Environmental requirements are generally defined in the main body of the contract and within the operating plan; however, there may be additional requirements found within the maintenance plan and other contract attachments, such as the Superintendent’s Compendium and backcountry guidelines.

Park staff, in consultation with concessioner staff, can review and update or amend the concessioner’s O&M plans on an annual basis. Operating and maintenance plans associated with 1998 Law contracts can be updated without prior approval from the concessioner so long as the change is reasonable, in furtherance of the purposes of the contract, and there are no financial impacts; however, there must be mutual concurrence on any changes to O&M plans issued under a 1965 Law contract. It is important to note that O&M plans are part of every concession contract, and concessioners are expected to be familiar and in compliance with their entire contract at all times.

To ensure that you fully understand your contract’s operating and maintenance responsibilities, review the O&M plans at least twice each year. Be sure to ask the park to notify you if updates have been made to either plan, and talk to your concession management specialist if something in your O&M plans appears to be outdated or incorrect.

Nominations

Nominations are currently being accepted through May 1 for the 2010 NPS Environmental Achievement Awards. To be eligible for consideration, the nominated project or activity must have occurred in Fiscal Year 2009. Partner nominations (including concessioners) must be submitted by an NPS employee, and receive written concurrence of the park superintendent and regional director. For more information on how to submit an award nomination, visit www.nps.gov/commercialservices/tools_env_awards.htm.

For more information on the 2009 award winners, see pages 4 and 5.

GreenLine

GreenLine is an official publication of the Commercial Services. The newsletter provides a forum in which the NPS can share information with NPS staff and concessioners about NPS Commercial Services, current environmental requirements, and best management practices. The newsletter also identifies resources available to improve concessioner environmental performance and highlights success stories.

Guest articles have been reviewed by the NPS Commercial Services and, if required, edited in collaboration with the original author.

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Understanding When to Report an LOC or EDL

Environmental liabilities at concessioner sites can be easily overlooked. Therefore it is extremely important to understand how to identify a Location of Concern (LOC) or an Environmental and Disposal Liability (EDL) site, and to ensure that it is reported to the proper authorities in a timely manner per concessioner contract requirements.

An LOC is an area on park land that is suspected to be contaminated based on known past activities or observed and reported physical indicators, but where no due care has yet been conducted. Due care is the process by which all reasonable efforts are used to examine an LOC to identify the presence or likely presence of contamination at concentrations significant enough to require further study or cleanup. Oversight is provided by environmental professionals with the expertise to develop opinions and conclusions regarding site conditions. These professionals are able to detect releases of hazardous substances (e.g., petroleum) on park lands. After the due care process has been completed, the park may report the area as an EDL site, if a release is suspected or confirmed. An EDL site is an area of park land which requires further study, environmental monitoring, cleanup, or remediation due to past or current operations. In general, but not always, a site is identified as an LOC before it is classified as an EDL.

For more than 30 years, federal and state laws and regulations that address the management of hazardous substances (e.g., petroleum), including the Resource Conservation and Recovery Act (RCRA), have helped define and reduce environmental risks and liabilities associated with contaminated sites. However, areas of environmental risk still exist, even within the seemingly pristine areas of the National Park System. For this reason, individuals responsible for managing contaminated sites identified at national parks often seek guidance from the NPS's EDL program.

Common examples of LOC or EDL sites include, but are not limited to, acquired property that is contaminated, areas where unapproved or banned pesticides have been used, areas where leaks or non-incidentals spills from aboveground or underground storage tanks occurred, areas where illegal dumping occurred, areas where hazardous substances were burned, and landfills. If sites that are either suspected or confirmed to be contaminated are not reported in a timely manner, the situation may worsen and cleanup costs may escalate. A concession operator may be liable for cleanup costs if the environmental assessment indicates that the concession manager's operation is responsible for the contamination. As such, it is



Photo courtesy of www.toxicdrums.com.

important for concession operator to identify and report any potential LOC or EDL site to their park's Concession Specialist.

If you are aware of a potential LOC or EDL site, or if you would like additional assistance in determining if your site meets the criteria of an LOC or EDL site, please contact the GreenLine hotline: NPS_GreenLine@nps.gov or (303) 987-6820. For additional information on identifying and reporting an LOC or EDL site please visit: <http://inside.nps.gov/waso/waso.cfm?prg=1167&lv=4>. Additional guidance regarding the EDL Assessment process is described in the Department of the Interior's EDL Handbook: www.doi.gov/oepc/EDLHandbook.pdf.

Incidental vs. Non-incidentals Spills

While you may have heard the terms incidental and non-incidentals spills used from time to time, you may be unclear as to what they actually mean. The Occupational Safety and Health Administration (OSHA) defines an incidental spill as "a release of a hazardous substance which does not pose a significant safety or health hazard to employees in the immediate vicinity, the employee cleaning it up, nor does it have the potential to become an emergency within a mshort time frame." In other words, an incidental spill is a small spill that presents only minor safety or health hazards.

The difference between an incidental and a non-incidentals spill is the quantity of a haz-

ardous substance that is safe for employees to clean-up without requiring assistance from professionally trained emergency personnel. The threshold that determines what an incidental or non-incidentals spill or release is dependent upon an employee's familiarity with the substance, the amount spilled or released, the toxicity of the material, and the environment in which the spill or release occurs. The state or local regulatory agency, park, or concessioner may determine the threshold quantity for incidental spills, and the amount may vary from chemical to chemical. The NPS typically recommends a threshold quantity for incidental spills of 5 gallons or less.

In some cases non-incidentals spills may lead to an area being declared an LOC or EDL site, depending on the size and type of substance spilled. For these reasons, it is important that concessioners develop plans for incidental and non-incidentals spills to ensure staff are aware of how to respond to spill-related emergencies.

For more information on the incidental spill definition, visit www.osha.gov/html/faq-hazwoper.html#faq8.

Mountain Guides Take Environmental Efforts to a New Level

Throughout the National Park System, mountain guides and climbing instructors take environmental stewardship seriously. The staff at Exum Mountain Guides in Grand Teton National Park is certainly no exception. Since 1925, Exum has been teaching visitors about the beauty of the Grand Tetons while instructing them on safely scaling their massive cliffs. Whether they are enforcing and expanding their extensive written environmental policy or providing guests with environmentally friendly gear for their climbs, Exum Mountain Guides remains



committed to preserving the mountainous terrain of Grand Teton National Park.

One of the company's more recent, not to mention challenging, efforts to protect the local environment was the installation of a solar electric system at its Lower Saddle hut—a camp located at 11,600 feet! In the past, Exum used propane to provide overnight guests with power for lighting, and for charging the guide's emergency cell phones. But after witnessing the negative environmental impact created by using propane, Exum devised a plan to install the solar electric system which provides direct current (DC) power to their Lower Saddle hut.

In order to install the solar electric system, a solar panel and all the required equipment had to be carried by Exum mountain guides to the high camp; a challenging technical climb even without the excess weight. Once all of the equipment was delivered to base camp, they then had to install and set up the solar power system for use. Upon completion of the installation, the equipment from the original power system had to be disabled and carried back down the mountain.

Exum estimates that the solar panel electric system will save them from using and dis-



posing of 32 propane canisters per year. The solar panel is expected to have a 30-year life span, so Exum will eliminate the need to use more than 160 canisters of propane over the remainder of their contract, and potentially 1,000 canisters of propane during the lifetime of the solar panel.

When it comes to protecting and preserving the environment, the mountain guides in Grand Teton National Park have a lot at stake, and they know it. By using innovative strategies, such as the solar power system, Exum guides have proven that the challenging mountain environment that provides their livelihood is worthy of the significant efforts needed to protect it.

To learn more about Exum Mountain Guides and their environmental philosophy visit their website: www.exumguides.com/.

Education, Energy Conservation, and Solid Waste Reduction Make a Big Impact for Certified Green Business

Located in a secluded valley of the Point Reyes National Seashore in Northern California, the Point Reyes Hostel offers the only lodging available to visitors within the 70-acre national park. With more than 140 miles of breathtaking coastal wilderness trails surrounding their operation, hostel staff feel a strong attachment to this virtual island that has been protected from the modern world located a mere hour away. As a result, they have worked tirelessly to demonstrate their commitment to the environment by exceeding federal and state environmental regula-



tions, conserving natural resources, preventing pollution, and reducing waste.

Due to their environmental efforts, the Point Reyes Hostel was awarded the honor of becoming a certified Marin County Green Business, part of the Bay Area Green Business Program. In order to receive its green certification, the Point Reyes Hostel incorporated a number of eco-friendly changes into its operation. These changes included simple modifications such as switching to compact florescent light bulbs; ensuring

Four Concession Operations Recognized with 2009 NPS and DOI Environmental Achievement Awards



that all paper products purchased are made of unbleached, 100% post-consumer-waste recycled content paper; utilizing environmentally preferable cleaning products; and line-drying linens to save energy. The hostel has also implemented a number of resource-intensive environmental practices, including the use of non-lethal pest control solutions, an extensive recycling and composting program, and the installation of an on-demand propane hot water system.

Point Reyes Hostel staff are also committed to educating and encouraging their guests to participate in environmental stewardship activities. For example, guests are asked to bring their own refillable water containers rather than relying on bottled water. Guests who bring a reusable bottle, or purchase one onsite, are able to take advantage of the hostel's new Multi-Pure water filtration system. To further support the hostel's energy conservation goals, guests are also asked to bring their own linens. The hostel's recently purchased Energy Star washer and dryer help to curb energy usage from washing linens onsite as well. Finally, all of the hostel's guests are provided with information about environmental preservation in hopes that they will adopt eco-friendly practices upon returning home.

Owned and operated by the Golden Gate Council of Hostelling International USA, the Point Reyes Hostel is committed to eco-friendly, low-impact travel. Their Green Business certification and environmental education efforts prove their dedication to energy conservation, solid waste management, and overall environmental protection. It is no wonder this hostel was the second highest customer-rated hostel in the world in 2009!!

For more information about the Point Reyes Hostel, visit their website at: <http://norcal-hostels.org/reyes/>.

NPS Environmental Achievement Awards (NPS EAAs) were presented to four concession operations in 2009, three of which also received DOI EAAs. These concessioners were selected for their superior performance and innovative solutions in the areas of Environmental Management Systems (EMS) and Waste/Pollution Prevention and Recycling.

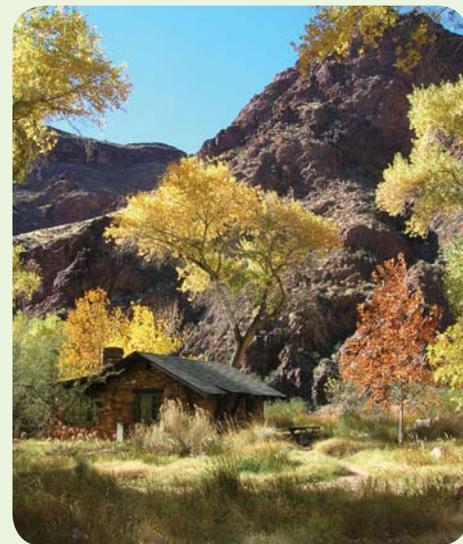
NPS EAA Winner and DOI EAA Honorable Mention recipient, Xanterra Parks and Resorts at Yellowstone, was honored for establishing an onsite cooking oil recovery and reuse program. In 2008, Xanterra developed equipment that would allow used cooking oil from the company's food service operations to be injected directly into boilers at their hotel operations and used for heat.



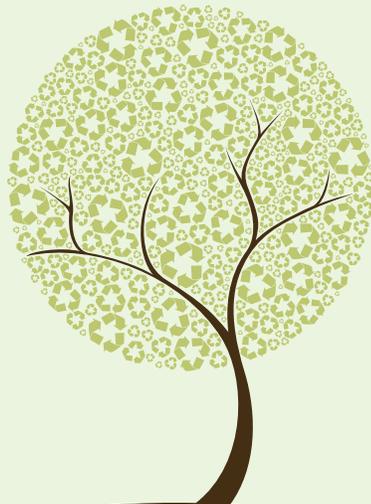
Xanterra South Rim, L.L.C., a concessioner at Grand Canyon National Park, received NPS and DOI EAAs for implementing a number of noteworthy waste reduction efforts at its Phantom Ranch hotel, located in a remote and difficult to manage area of the canyon. Waste reduction efforts include implementing a composting program, providing reusable water bottles and hay feed duffle bags to guests, and establishing a river clean-up adoption program.

Delaware North Companies Parks and Resorts (DNC P&R) received an NPS EAA for implementing its state-of-the-art GreenPath® EMS at its Grand Canyon, Sequoia, Yellowstone, and Yosemite National Park locations. Through its GreenPath® program, DNC P&R has provided significant environmental benefits to the aforementioned parks, their visitors, and their surrounding communities.

Xanterra Parks and Resorts received a DOI EAA and an NPS EAA Honorable Mention for establishing a partnership with Bryce Canyon National Park and a local solid waste management facility to transport all of the area's recycled waste offsite. This partnership is the first of its kind in Southern Utah, which brings together a national park, a concessioner, and a local government to manage recyclables more efficiently.



For more information on the DOI EAA winners and honorable mention recipients, please visit: www.doi.gov/greening/awards/2009/env2009awards.html.





Understanding HAZCOM



Environmental audit findings related to Hazard Communication (HAZCOM), including the improper labeling of containers (e.g., bottles, jugs, canisters, etc.) and the failure to maintain Material Safety Data Sheets (MSDSs), are among the most common findings observed during NPS Commercial Services Program environmental audits. To assist concessioners in improving the environmental and human safety of their businesses, the NPS Commercial Services Program created the following guide to provide an overview and discuss the elements of a successful HAZCOM program.

BACKGROUND

The Occupational Safety and Health Administration established the HAZCOM Standard in 1983 to protect employees who use hazardous materials on the job. While some of the hazardous chemicals that are prevalent in concession operations pose little danger to employees, others are deadly. The HAZCOM Standard helps ensure that dangerous accidents do not occur.

WRITTEN PROGRAM

The first step in promoting the safe use and handling of chemicals in your concession operation is to develop and implement a written HAZCOM program. At a minimum, a written HAZCOM program must include sections describing how the following requirements will be met: maintaining a chemical inventory and related MSDSs, providing labels and other forms of warning, and employee training.

TRAINING

Once your written program is in place, employees must receive HAZCOM training. HAZCOM training explains and reinforces the information presented to employees through the chemical labels and MSDSs, and instructs employees on how to apply this information in their workplace.

LABELING

Labels are an employee's most immediate source for hazard information. ALL hazardous materials and substances must be

labeled. The only exception to this rule is for hazardous chemicals in portable containers, which are for the immediate use of the employee who performs the transfer. For instance, if an employee transfers a chemical to a spray bottle and the spray bottle is within their possession until the contents are transferred back into the original, labeled container (or otherwise completely emptied), then the spray bottle would be exempted from the HAZCOM Standard.

MSDSs

MSDSs provide more detailed information on the proper handling and storage of chemicals. Employees must read and understand the MSDSs describing the hazardous materials present in their work area before use. In addition, MSDSs must be readily available to employees at all times, and they must be kept up to date.

For more information on OSHA's HazCom Program, visit www.osha.gov/dsg/hazcom/oshacomplianceassistance.html.

2010 Environmental Audit Update

The 2010 environmental audit season is off to an excellent start! This year's ambitious audit schedule includes 103 baseline audits; 93 of which are telephone audits of Category III operations. The audits include a total of 11 parks located across six regions. As of the end of March 2010, all 93 telephone audits have been completed; however, not all audit reports have been finalized. The telephone audits were used for Category III operations that do not have facilities within park boundaries, and included operations such as air taxis, dog sledding, tour and charter vessels, canoe rentals, and guide and outfitter operations. The remaining 10 audits, which entail site visits, are scheduled to take place in July 2010.

Look for more specific information on the 2010 environmental audit season in the fall issue of the *GreenLine* Newsletter.



New Training Requirements for UST Operators

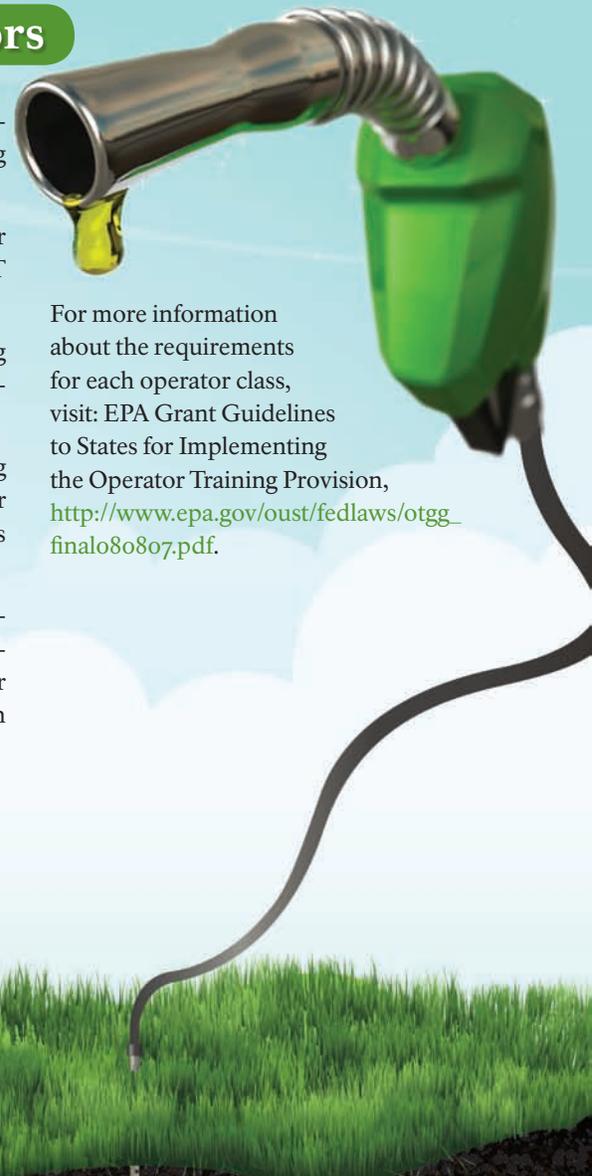
The 2005 Energy Policy Act requires that all Underground Storage Tank (UST) operators receive mandatory training regarding the operation and maintenance of UST systems by August 8, 2012. Concessioners with gas station or marina fueling operations will need to ensure that staff who operate USTs are provided with training.

Each state is required to develop its own UST operator training program. If a state is not authorized to manage USTs, the EPA will administer the program. Many states have already developed their own requirements and some states already require that UST operators be trained, while others have set a deadline that is earlier than the federal 2012 deadline. Check with your state to determine your deadline for training. (Information on states with training programs can be found at <http://petroleumtrainingsolutions.com/resources.html>.)

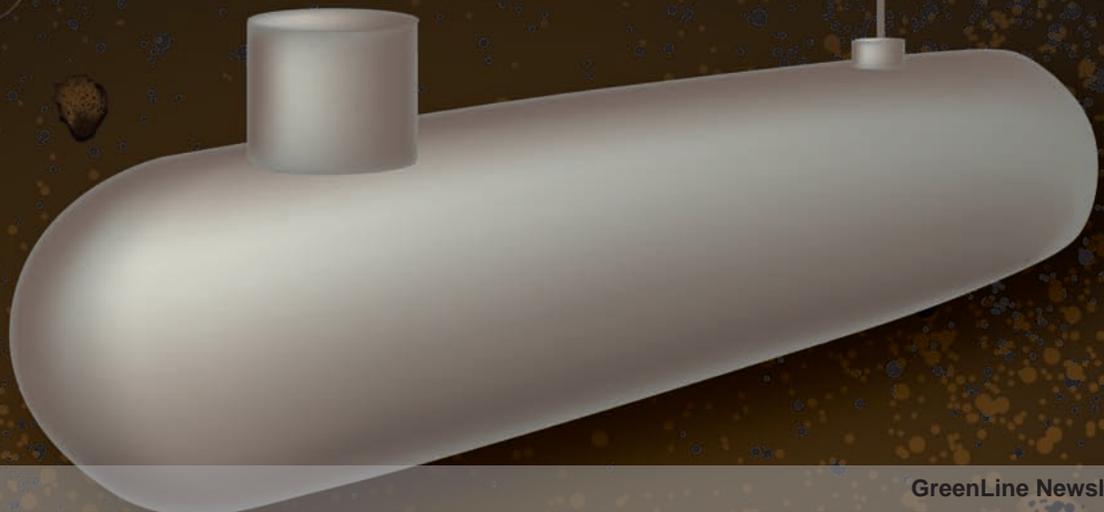
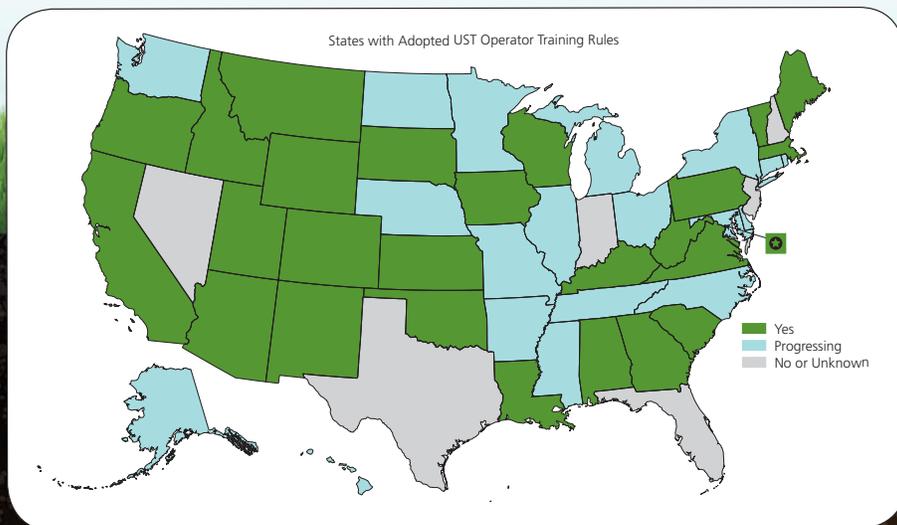
The EPA designated three separate UST operator classes. Each class will receive training specific to the tasks they conduct.

- Class A: Staff primarily responsible for operating and maintaining the entire UST system(s)
- Class B: Staff responsible for implementing day-to-day aspects of operating, maintaining, and recordkeeping at UST system(s)
- Class C: Staff responsible for notifying Class B and C operators of alarms or other indications of emergencies caused by spills or releases from UST system(s)

A Class A, B, and C operator must be designated for each UST. Individuals who perform the work of more than one operator class must be trained in each class to which they are assigned.



For more information about the requirements for each operator class, visit: EPA Grant Guidelines to States for Implementing the Operator Training Provision, http://www.epa.gov/oust/fedlaws/otgg_final080807.pdf.



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Branch Chief's Corner

With a new year underway and spring around the corner, it is time to once again commit ourselves to continuing progress towards greater environmental achievements. In order to support park and concessioner environmental endeavors, this issue of the *GreenLine* Newsletter focuses on topics that will guide us towards improved protection of both our parks and the people who work at and visit them.

In "Addressing the Impacts of Climate Change within the NPS", we discuss Secretarial Order 3289, and how the DOI approach to understanding and responding to the issues of climate change may affect concessioners. In "Understanding When to Report an LOC or EDL", we discuss what needs to be done if you are operating at a site that is suspected or confirmed to be contaminated. In an effort to minimize the chance of hazardous substance spills occurring, "New Training Requirements for UST Operators" discusses federally mandated training for concessioners with gas station or marina fueling operations.

We also included two articles based on common findings from the environmental audit program. In "Understanding HAZCOM", we provide an overview of programmatic require-

ments and discuss the elements of a successful HAZCOM program. In "Ask Dr. Ima Park", we discuss the importance of reviewing and updating your concession contract's Operating and Maintenance plans.

Finally, we are excited to highlight concessioners who are demonstrating excellence in environmental stewardship. Whether they are installing solar panels or engaging in solid waste reduction, these concessioners serve as excellent role models for other concession operations. We want to congratulate the following 2009 NPS EAA recipients: Delaware North Companies Parks and Resorts, Xanterra Parks and Resorts at Yellowstone, Xanterra South Rim, LLC, and Honorable Mention recipients Bryce Canyon National Park and Xanterra Parks and Resorts. Xanterra Parks and Resorts, and its aforementioned affiliates, were also the 2009 recipients of two DOI EAAs and one DOI EAA Honorable Mention. Keep up the great work everyone!!

Deb Harvey

Acting Contract Management Branch Chief,
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GreenLine ASSISTANCE

If you require technical assistance on environmental issues or want to learn more about NPS Commercial Services, contact us:

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