

National Park Service  
US Department of the Interior

National Park Service Commercial Services Program  
Denver, Colorado



## Preliminary Environmental Audit Report



### Concessioner Name (CONCID)

January 1, 2013

**Prepared for:**

Park Name  
Mailing/Street Address  
City, STATE 11111

**Prepared by:**

National Park Service  
Commercial Services Program  
PO Box 25287  
Denver, CO 80228

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## **I. Executive Summary**

PRELIMINARY ENVIRONMENTAL AUDIT REPORT

**EXECUTIVE SUMMARY**

**I. INTRODUCTION**

This Preliminary Environmental Audit Report documents the audit findings of the baseline environmental audit for facilities and services provided by Concessioner Name (the concessioner) in Park Name (the park) under the concession contract for CONCID. The audit team conducted the site visit from January 1, 2012 through .

Key representatives participating in the environmental audit included those identified below:

	NAME	TITLE
Audit Team	Name	Audit Team Leader (Hitachi Consulting)
	Name	Auditor (Hitachi Consulting)
NPS Commercial Services Program	Kat Berry	Environmental Audit Coordinator
Concessioner	Name	Owner/President
	Name	Manager
	Name	Maintenance Supervisor
Park	Name	Concessions Management Assistant
	Name	Concessions Management Assistant

In preparation for this audit, the audit team reviewed the concessioner’s Final Environmental Audit Report from the previous audit, which took place from/on April 1, 2002 through April 5, 2002. This exercise familiarized the audit team with past concessioner environmental management issues so that progress towards addressing these areas could be assessed. This also allowed this Preliminary Environmental Audit Report to be inclusive of current National Park Service (NPS) Commercial Services Program recommendations for improving environmental performance. Therefore, this Preliminary Environmental Audit Report should be used alone as a guide for addressing NPS Commercial Services Program audit findings; the previous Final Environmental Audit Report should be saved for reference purposes, but does not need to be referred to any further for audit finding closure.

The audit period under review was January 1, 2012 to January 1, 2013. Only those concessioner facilities and services located within the park boundary and directly related to the CONCID contract were audited against audit criteria found in the *National Park Service (NPS) Environmental Audit Program Operating Guide* (January 2006) and the *draft NPS Commercial Services Program Audit Operating Guide* (January 2009). The environmental audit is considered to be a “snapshot in time” and does not guarantee that all regulatory compliance or environmental best management practice (BMP) issues were identified. Concessioner staff are required to be in compliance with all Applicable Laws and regulations at all times, regardless of identified findings and deadlines to close them.

**II. AUDIT FINDINGS**

Audit findings are areas of non-compliance with Applicable Laws.

- **Priority 1** findings represent non-conformances with laws and regulations that pose immediate, actual, or potential harm to human health or the environment; or the potential for significant liability exists. Priority 1 findings are required to be closed within 90 days of the distribution date of the Preliminary Environmental Audit Report.

- **Priority 2** findings represent non-conformances with laws and regulations that do not pose an immediate threat to human health or the environment. Priority 2 findings are required to be closed within 180 days of the distribution date of the Preliminary Environmental Audit Report.
- **Priority 3** findings represent non-conformances with Executive Orders, Department of the Interior (DOI), NPS, or park policy, or the concession contract that do not pose an immediate threat to human health or the environment. Priority 3 findings are required to be closed within 180 days of the distribution date of the Preliminary Environmental Audit Report.

If the concession operation is closed for the season on the date by which an audit finding should be closed, then these audit findings should be addressed within one month after the start of the next operating season.

Audit findings may be further assigned a ranking of isolated if the observed non-conformance is not viewed as a programmatic issue or is not pervasive throughout the concessioner operation. Concessioner staff may take into account the isolated ranking when developing corrective action plans and assigning resources. Audit findings noted as “isolated” will be removed if they are closed prior to the Final Environmental Audit Report being distributed.

This environmental audit identified **two** audit finding(s), in the area of **Solid Waste Management**.

Following the audit site visit, on June 26, 2013, **XX** audit finding(s) was/were able to be closed/voided based on action by the concessioner/based on additional information that was provided to the audit team prior to the issuance of this Preliminary Environmental Audit Report.

The audit finding(s) were/was in the following area(s):

<b>Audit Findings by Topic Area and Priority</b>				
	<b>Topic Area</b>	<b>Priority</b>	<b>Number of Findings</b>	<b>Total</b>
<b>Open Findings</b>				<b>24</b>
	Environmental Purchasing	3	2	
	Food Service	3	1	
	Fuel Storage Management	2	1	
	Fuel Storage Management	3	7	
	Hazardous Materials Management	2	3	
	Hazardous Waste	2	1	
	Hazardous Waste	3	1	
	Solid Waste Management	2	2	
	Solid Waste Management	3	2	
	Storm Water Management	2	2	
	Used Oil	2	1	
	Wastewater Management	2	1	
<b>Total Findings</b>				

Photographs are provided to help park and concessioner staff identify some of the audit findings. See the Photos section of this Preliminary Environmental Audit Report for more information.

Of the XX audit findings listed above, X were/was identified as “REPEAT” audit findings. Repeat audit findings are findings identified during the previous audit that were again identified during this audit. They are designated by \*REPEAT\* at the end of the audit finding number.

The repeat audit findings were in the following areas:

<b>Repeat Audit Findings by Topic Area and Priority</b>				
	<b>Topic Area</b>	<b>Priority</b>	<b>Number of Findings</b>	<b>Total</b>
<b>Open</b>				<b>2</b>
	Fuel Storage Management	3	1	
	Hazardous Materials Management	2	1	
<b>Total Repeat Findings</b>				<b>2</b>

This environmental audit did not identify any audit findings.

### III. BEST MANAGEMENT PRACTICES

BMPs are recommended practices from industry, regulations, or other sources that may result in:

- Improved compliance (e.g., it could be a BMP to develop standard operating procedures (SOPs) to help ensure compliance, even though they are not required);
- Pollution prevention and/or minimized compliance responsibilities (e.g., it could be a BMP to eliminate the use of solvents); or
- Helping the NPS meet its goals of promoting environmental management and demonstrating its commitment to environmental stewardship and sustainability (e.g., it could be a BMP to work in tandem with the NPS on its Environmental Management System (EMS)).

BMPs are derived from a number of sources, including the expertise of the auditors. Auditors use their experience and discretion to identify those BMPs which are believed to be appropriate to the concessioner's facilities and operations.

Concessioner staff had already incorporated a number of BMPs into their operations, including:

- Insert BMP information; and
- Insert BMP information.

The resources and time needed to implement BMPs varies. Some BMPs may be implemented in the short-term and with few additional resources. Others may be implemented over a longer timeline when more resources are available.

BMPs are recommendations to improve environmental stewardship, sustainability and staff work processes at concessioner facilities. It is understood that these BMPs may not be technically and/or economically feasible at this point in time for the current concession operation. However, concessioner staff should evaluate the feasibility of these BMPs moving forward, and are highly encouraged to implement them, where appropriate, as a means to further protect park resources.

The audit team identified BMPs opportunity/ies in the areas of [insert topic area] and [insert topic area].

The audit team identified BMP opportunity/ies in the following areas:

- Environmental Purchasing: Consider providing reusable tableware in the employee dining room, instead of plastic.
- Hazardous Materials Management: Considering securing compressed gas cylinders by chaining them individually to the wall one-third of the way from the top.
- Solid Waste Management: Consider separating glass from solid waste for recycling.
- Air Quality:
- CFC and Halon Management:
- Fuel Storage Management:
- Hazardous Waste:
- Laboratory Chemical and Waste Management:
- Pesticide Management:
- SPCC Planning:
- Storm Water Management:
- Universal Waste Management:
- Used Oil:
- Wastewater Management:

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

The Audit Team Leader can provide further detail on the above BMP recommendations if needed. If you need further information or resources to assist in implementing the above BMPs, please contact the Audit Team Leader or the Commercial Services Program using the Greenline phone number or email listed below.

The environmental audit did not identify any BMPs.

#### **IV. EXCEPTIONAL PRACTICES**

Exceptional practices are products used or activities undertaken not often seen at park concession operations that demonstrate the concessioner's commitment to environmental protection beyond compliance.

The environmental audit identified XX exceptional practices in the following areas:

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

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

The environmental audit did not identify any exceptional practices.

#### **V. NEXT STEPS – COMMENTING ON THE PRELIMINARY ENVIRONMENTAL AUDIT REPORT**

Park and concessioner staff should review and comment on the Preliminary Environmental Audit Report. The audit team leader will contact the park to schedule a teleconference between park staff, concessioner staff, and the Commercial Services Program audit team no later than **January 1, 2013 at 5:00 a.m. MST**. Park and concessioner staff may submit written comments – in MS Word – to the NPS Commercial Services Program prior to the teleconference if desired.

#### **VI. FOR MORE INFORMATION**

The NPS Commercial Services Program has established a technical assistance telephone line (*GreenLine* Assistance Number: 303-987-6820) and email address ([NPS\\_GreenLine@nps.gov](mailto:NPS_GreenLine@nps.gov)) which are available to park and concessioner staff to provide support throughout the audit and corrective action process, and to answer general questions regarding the NPS Commercial Services Program.

Additionally, the NPS Commercial Services Program has an environmental update that provides information about on-going environmental programs, issues, and topics. The GreenLine News Update can be viewed directly on the NPS Commercial Services website at [http://concessions.nps.gov/tools\\_greenline.htm](http://concessions.nps.gov/tools_greenline.htm).

## **II. Priority 1, 2, and 3 Regulatory Audit Findings**

These audit findings are based upon Applicable Laws and are required to be addressed by concessioner staff.

### **III. Exceptional Practices**

#### **IV. Photos**

Preliminary Environmental Audit Report – January 1, 2013  
Concessioner Name-CONCID  
Park Name

Photo: CONCID-MM-YYYY-P001

Audit Finding Number or  
BMP Number: CONCID-MM-YYYY-###



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Photo: CONCID-MM-YYYY -P002

Audit Finding Number or  
BMP Number: CONCID-MM-YYYY-###

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Photo: CONCID-MM-YYYY -P003

Audit Finding Number or  
BMP Number: CONCID-MM-YYYY-###

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Photo: CONCID-MM-YYYY -P004

Audit Finding Number or  
BMP Number: CONCID-MM-YYYY-###

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## **V. Assistance Resources**