



# GreenLine

## CoEMP Corner: Moving Forward

Welcome to the fifth issue of the *GreenLine* newsletter! Two years ago when we published our first issue, we identified three goals. First, the *GreenLine* newsletter serves as our main outlet for communicating issues of topical interest to concessioners and park concession staff – including information on environmental compliance, Best Management Practices (BMPs), and concession environmental audits. Second, it gives the opportunity to highlight some of the innovative environmental programs being initiated by a number of concessioners. Finally, it provides a vehicle to announce upcoming events, conferences, and awards.

As the Concession Environmental Management Program (CoEMP) has evolved, we recognized the need to make changes in the format and content of the newsletter. The most apparent change is the redesign of the newsletter to conform to the NPS “dress code” for publications. Also, to make sure you continue to re-



Mountains and river in Glacier National Park, Montana

ceive the newsletter in a timely manner, we changed our mailing procedure and will now mail it directly to you rather than distributing the newsletter through indirect channels.

We also decided to focus each newsletter issue on a subject of interest important to concessioners. In this issue, we focus on environmental management systems (EMSs). As you know, new Concession Contracts require a business to develop an Environmental Management Program (EMP). The EMP is one type of EMS based on key principles we adopted from a number of environmental management standards. We thought it was appropriate to showcase the Department of the Interior and NPS Environmental Management System initiatives in this issue to highlight that environmental management is fast becoming a core concept not just for NPS concessioners but also for federal agencies and programs.

Developing and executing an EMS is not a one-time effort – it requires continual planning, reviewing, checking, and improving of business processes and strategies to ensure regulatory compliance and to demonstrate a commitment to environmental stewardship and leadership. Like you, the CoEMP is in the process of developing our own EMS. Our first step was to craft a mission statement to guide our program and direct our goals and strategies.

### National Park Service Concession Environmental Management Program Mission Statement

***To provide assistance and guidance that advances the environmental performance of businesses offering visitor services in National Parks.***

It should be helpful to know that you are not alone in your efforts to develop an EMS. We hope that the information and resources identified in this newsletter continue to assist and advance your individual environmental management programs. Future issues of the *GreenLine* newsletter will provide assistance in such areas as hazardous waste, green procurement, and solid waste management.

As always, we appreciate your suggestions and comments to help us produce a professional and useful publication. We also welcome article submissions. Please call me at 303/987-6913 or email us at [NPS\\_GreenLine@nps.gov](mailto:NPS_GreenLine@nps.gov) to share your ideas and thoughts.

Wendy M. Berhman  
Team Leader  
Concession Environmental  
Management Program



Autumn trees at McKittrick Canyon in Guadalupe Mountains National Park, Texas



GreenLine is an official publication of the National Park Service (NPS) 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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Notice: This newsletter is intended as an educational tool for businesses providing visitor services in national parks. Every effort has been made to ensure the information presented is accurate. However, the content does not constitute a complete reference to State, Federal, or local laws nor does it constitute National Park Service rulemaking, policy, or guidance. Relying solely on the information in the newsletter will not guarantee compliance with applicable regulations. Strategies, procedures, and proposed solutions for compliance issues should be discussed with the appropriate State, Federal, and/or local regulatory agencies; it remains the sole responsibility of operators to determine compliance with regulations. Inclusion in the newsletter is not an endorsement of a particular operator, product, or strategy.

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# Concessioners Win Environmental Awards

The GreenLine staff congratulates the following concessioners for receiving environmental awards in 2002:

**Evelyn Hill Inc.** received the Department of the Interior (DOI) 2002 Environmental Achievement Award for its solid waste management program. Evelyn Hill operates the gift shop and cafeteria at the Statue Of Liberty National Monument. In 2000, the family-owned business of 150 employees established a recycling center on the island that recycled over 361,000 pounds of materials.

Information on the DOI Environmental Achievement Awards program may be found at [webteam.nbc.gov/green/awards/index.html](http://webteam.nbc.gov/green/awards/index.html) or by contacting the DOI Office of Environmental Policy and Compliance at 202/208-7877.

**Delaware North Parks Services** (DNPS) received two environmental awards: the Travel Industry Association of America's (TIA) 2002 Odyssey Award in the Environment category and an honorable mention from the DOI 2002 Environmental Achievement Awards program. Both awards were given to DNPS for its environmental management program, GreenPath, which has earned ISO 14001 registration through the International Organization for Standardization. DNPS was one of the first in the hospitality industry to be registered under this ISO standard, which establishes environmental management standards. ISO 14001 registration was obtained for operations in Yosemite, Sequoia, and Grand Canyon National Parks.

Information on the TIA Odyssey Awards may be found at [www.tia.org/program/odyssey.asp](http://www.tia.org/program/odyssey.asp).

For more information on the GreenPath environmental management program, refer to page 4 in the Spring/Summer 2002 issue of GreenLine.

**Xanterra Parks & Resorts** received the 2002 Environmental Achievement Award from the Environmental Protection Agency (EPA) Region 9 Office. The award was given in recognition of Xanterra's environmental management programs in Death Valley and Grand

Many EPA Regions have environmental awards. Contact information for your EPA Region may be found at [www.epa.gov/epahome/locate2.htm](http://www.epa.gov/epahome/locate2.htm).

Canyon National Parks. The company operates lodges, restaurants, gift shops, and tours in these national parks.

**Signal Mountain Lodge, a Forever Resorts** property in Grand Teton National Park, received the Green Star Award from the Eagle Valley Alliance for Sustainability. The Lodge achieved 12 Green Star standards in environmental stewardship. The standards achieved were in the areas of energy conservation, solid waste management, and green procurement.

Information on the Green Star Award may be found at [www.greenstarinc.org](http://www.greenstarinc.org).

If your business has received an environmental award, please let us know by emailing us at [NPS\\_GreenLine@nps.gov](mailto:NPS_GreenLine@nps.gov) or mailing information to GreenLine, NPS Concession Program Center, P.O. Box 25287, Denver, CO 80225-0287.

## Upcoming Events

**2003 Department of the Interior Conference on the Environment**, May 13 – 14, 2003 in Phoenix, AZ. Hosted by the U.S. Fish and Wildlife Service, the theme for the conference is "Partnering for Environmental Stewardship – Resource Conservation for the Future." Attendees will be able to meet and exchange information on a variety of environmental topics and issues. Activities include training sessions, educational field trips, papers, panels, and poster presentations. For more information, go to [www.doi.gov/conference/environment](http://www.doi.gov/conference/environment), or contact Marlene Johnson at 303/445-2117 or Erin Quinn at 303/445-2709.

**Correction:** In the Volume II, Issue II issue of GreenLine, the individual in the photo accompanying "Clean Marinas=Clean Water" was David Merrill. The Concession Environmental Management Program apologizes for any inconvenience this error may have caused.

# It's Not Just Concessioners that Need EMPs . . .

By James Ortiz, Office of Environmental Policy and Compliance, U.S. Department of the Interior, and Carl Wang, Park Facility Management Division, National Park Service.

You may already be aware of the new Concession Contract language that requires concessioners to develop and implement an Environmental Management Program (EMP), which is a type of environmental management system (EMS) developed by the NPS Concession Environmental Management Program (CoEMP).

Developing and implementing an EMS provides a systematic way to review and improve your operations for better environmental management. An EMS identifies environmental issues related to operations, identifies strategies to address those environmental issues, monitors operations to determine if further action is required, and strives for overall improved environmental performance.

Concessioners are not the only parties charged with developing and implementing an EMS – it is also a requirement for all government agencies. President William J. Clinton signed Executive Order (EO) 13148, Greening the Government Through Leadership in Environmental Management, on April 21, 2000. This EO includes requirements for each government agency to develop and implement environmental management systems at appropriate facilities by December 31, 2005.

## Department of the Interior EMS Update

The Department of the Interior (DOI) issued a new policy on October 2, 2002 to comply with EO 13148. This policy, entitled “Environmental Management Systems,” provides a framework for establishing EMSs and requires all DOI bureaus and offices, including the NPS, to establish EMSs for all lands, facilities, operations, and services subject to federal, state, and local environmental requirements. EMSs are required at appropriate facilities based on facility operations that impact the environment, and facility size and complexity of operations. As such, concessioners, contractors, permittees, and other parties operating on Departmental lands are subject to the EMS policy.

The EMS policy requires all DOI bureaus and offices to have an EMS directive or policy in place by December 31, 2003, and to have an EMS implemented in all appropriate facilities by December 31, 2005. To assist in this and other EMS efforts, a Department level EMS Council was formed to provide a forum to discuss EMS issues, share EMS resources, and to help in EMS implementation. The EMS Council's first meeting was held in November 2002.

*For more information on the DOI EMS Policy, contact James Ortiz at 202/208-7553 or james\_ortiz@ios.doi.gov.*

## National Park Service EMS Update

The NPS is an active member of the DOI EMS Council and has also convened its own EMS Task Group that includes representatives from a variety of NPS programs and park units. The NPS EMS Task Group is currently working on developing a model park-level EMS, which will provide national consistency and ultimately be implemented at all appropriate parks. This model EMS will provide an umbrella under which all environ-

mental matters will reside, including environmental sustainability, green procurement initiatives, and compliance with environmental laws, regulations, and policies.

After the NPS EMS Task Group finalizes the model park-level EMS, the EMS will be piloted at a select few national parks starting in early 2003. Those national parks that are selected to implement the EMS will receive EMS training and full implementation support from Washington, DC. These pilot EMSs will provide invaluable data that will help shape the Service-wide EMS.

The NPS has also drafted a Director's Order (DO) on EMSs that is in the process of being finalized. This DO will provide written guidance to help NPS managers make day-to-day EMS decisions at the park level.

Communication is a key component to a successful EMS. Concessioners are encouraged to coordinate and communicate with their parks – the more parks know and understand concessioner EMS efforts, the greater the chance for consistency in the overall park environmental management system. If you find yourself operating in a park chosen to implement a pilot EMS, get involved and leverage the expertise you have gained thus far in developing and implementing your own EMS, or use the opportunity to learn more about EMSs.

*For more information on the NPS EMS or to receive Task Group updates, contact Carl Wang at 202/513-7033 or carl\_wang@nps.gov.*

**RESOURCE:** Text for EO 13148 can be found at [www.epa.gov/oppt/epp/pubs/eo13148.pdf](http://www.epa.gov/oppt/epp/pubs/eo13148.pdf).

## EMS Timeline

**April 21, 2000 - Executive Order 13148, Greening the Government Through Leadership in Environmental Management.** Charges each government agency to develop and implement environmental management systems (EMSs).

**June 11, 2002 - First NPS EMS Task Group meeting.** Representatives from organizational units within the NPS met to begin developing and implementing a Service-wide EMS by December 31, 2005.

**October 2, 2002 - DOI Departmental Manual, Part 515, Chapter 4 (515 DM 4), Environmental Management Systems.** Charges all eight DOI bureaus, including the NPS, to establish EMSs for all lands, facilities, operations, and services subject to environmental requirements.

**November 20, 2002 - First DOI EMS Council meeting.** Representatives from all DOI bureaus, including the NPS, met to develop EMS performance measures, goals, and reporting mechanisms.

**2003 - NPS implements model park-level EMS.** Selected parks pilot NPS EMS Task Group's model park-level EMS.

**December 31, 2003 - Deadline for DOI offices and bureaus to develop an EMS directive or policy.** A 515 DM 4 requirement.

**December 31, 2005 - Deadline for DOI offices and bureaus to implement EMSs.** An Executive Order 13148 requirement.

## Times Are A-Changin’

Coauthored by Jason Ryan, Environmental Program Manager, Signal Mountain Lodge

When staff at Signal Mountain Lodge began to write the first draft of their Environmental Management Plan (EMP), they thought it would be a quick and easy assignment that, when completed, would remain unaltered for years to come. After all, the Lodge already had a strong recycling program and had been using environmentally-preferable cleaning chemicals for most of the past decade.

But confidence dwindled for Jason Ryan, the Lodge’s Environmental Program Manager, as it became apparent in the first week that an EMP involved much more than continuing the current environmental programs. It meant communicating with multiple partners to convey the Lodge’s environmental message and to listen and respond to their suggestions for the EMP. Over time, Ryan became excited as he started to see involvement and commitment from supervisors and employees in this new venture.

The first challenge was determining what constituted a worthy program not only for the Lodge, but for its parent company, Forever Resorts, and for Grand Teton National Park itself. Two organizations, Green Star and Green Seal, provided assistance in identifying goals appropriate for the EMP. Other information was provided by the local community recycling director, representatives from utility companies, lodge employees, and park concession staff. This input helped customize the EMP to meet the

needs of the Lodge and the park and support Jackson-area community efforts.

The Jackson-area community proved to be one of the Lodge’s largest resources, but due to its relative size and remoteness (as compared with metropolitan cities), also one of its biggest challenges. Lodge staff realized that in order to make its green procurement program (a fundamental part of its EMP) truly successful, they would need to collaborate with various community groups. One strategy taken by the Lodge was sending a letter to vendors and contractors in the community to let them know that the Lodge would only purchase and use environmentally preferable products and services. The letter also listed some criteria for what was considered environmentally preferable, such as minimizing volatile organic content (VOC) levels in paints and other chemicals. Because of this letter, local hardware stores now have a better understanding as to what environmentally preferable products are and know that Lodge employees will be looking for environmentally preferable products.

Educating employees and guests about the EMP was perhaps the next biggest factor in making it successful. The EMP was discussed in various meetings and memos to employees, and guests were educated through professionally-designed postings throughout the property that described what the Lodge was doing to help protect park resources. The more the Lodge publicized its EMP and how individuals, including guests, could participate, the more successful the EMP became. The Lodge’s EMP implementation efforts paid off when it was recently awarded the Green Star Award from the Eagle Valley Alliance for Sustainability and the distinction of being named the first National Park Service concessioner to become a Green Seal-certified lodge.

Signal Mountain Lodge is still improving its EMP and realizes that this program will never be complete. Instead, it will be a continual “work in progress” that will help improve protection of park resources over time.

**RESOURCES:** [www.greenstarinc.org](http://www.greenstarinc.org) and [www.greenseal.org](http://www.greenseal.org)

## Reaching for the Top at Mount Pisgah

Coauthored by Bruce O’Connell, General Manager, Pisgah Inn

“The employees of the lodging operation, operated by Parkway Inn, Inc. have a passion for protecting and preserving the environment,” said Bruce O’Connell, general manager of Pisgah Inn for over 24 years. The 38-year-old Inn is located at about 5,700 feet on the Blue Ridge Parkway and provides breathtaking views of the mountains of western North Carolina.

O’Connell shares his passion for protecting the environment on the Inn’s website. As part of “Bruce’s daily dose of information,” he updates visitors on actions taken at the Inn as part of its environmental management initiative and suggests ways visitors can change their lifestyle to benefit the environment.

Recently on the website, O’Connell urged park visitors to encourage local community leaders to enact a beverage container deposit law. This suggestion was based on experience O’Connell gained eight years earlier when he collaborated with park staff to establish a beverage container deposit program for the Inn’s operations. This program continues today. If a customer purchases and returns a recyclable beverage container at the Inn, the Inn refunds the 15-cent deposit to the customer.

*(continued on next page)*



Aerial view of Signal Mountain Lodge on the shores of Jackson Lake, Grand Teton National Park, Wyoming

## Reaching for the Top at Mount Pisgah *(continued from previous page)*

If beverage containers are not returned, the Inn uses surplus deposit money for environmental projects approved by the Park. For example, O'Connell proposed using some of the money to design and install an energy-efficient heat exchanger coil. Incoming cold water (46°F) passing through a fan coil reduces the air conditioning loads in the lobby. The water then proceeds to the hot water heater where it is heated for kitchen use. This innovative idea reduces the energy load for heating cold water and air conditioning. O'Connell said that "the fund allows us to test ideas that would normally be too risky to test without funding help of some sort."

Other initiatives that Inn employees have implemented include:

- Recycling glass, plastic, aluminum, cardboard, and white paper in a locality that does not support a recycling program.
- Replacing all incandescent lights with compact fluorescent lights.
- Installing low-flow water fixtures in hotel rooms.
- Installing timers on hot water circulating pumps and heaters.
- Purchasing energy- and water-conserving front-loading washing machines.
- Locating refrigeration condensers outside to reduce heat loads as well as cleaning refrigeration condensers monthly to ensure they are working efficiently.
- Developing a green procurement program.
- Combining the employee safety committee with the environmental committee to increase employee participation.
- Doing business only with vendors that provide documentation of their environmental policies and commitments.
- Using a vendor's empty delivery truck to transport cardboard to the recycler.

The success of the Inn's environmental program is due in large part to its genuine dedication to lessening its impacts on the environment. As O'Connell says, "There is no better way to operate and no better goal to aspire to. Thinking needs to be out of the box. What better place to set an example than in a national park?"

**RESOURCE:** [www.pisgahinn.com](http://www.pisgahinn.com)



View from Pisgah Inn on the Blue Ridge Parkway, North Carolina, overlooking the Mills River Valley in Pisgah National Forest

## No Smell or Hazardous Substances Around Here

Coauthored by Debora Saliego, Environmental Manager, Aramark Sports & Entertainment Division

The environmental mission for ARAMARK Parks and Resorts involves finding solutions to preserve the earth and its natural resources. At Glen Canyon National Recreation Area, the housekeeping staff at Wahweap Lodge extended this philosophy to its housekeeping operations.

One issue staff tackled was how to neutralize odors from rooms, such as those where guests may have smoked. Conventional deodorizers that Wahweap Lodge previously used contained numerous chemicals that were hazardous to workers and the environment. The concessioner had to keep material safety data sheets on file for and train workers on the hazards of these conventional deodorizers.

But the solution that Wahweap Lodge staff identified was Nature's Mist™, an environmentally friendly room deodorizer product manufactured by Green Suites International. Nature's Mist™ reportedly contains no hazardous substances, ozone, enzymes, or masking agents. The product is a two-component natural deodorization process, which leaves no residue and is readily biodegradable.

Green Seal has certified Nature's Mist™ as being a product that has less environmental impact than other products. This independent, non-profit organization identifies and promotes products and services that cause less toxic pollution and waste, conserve resources and habitats, and minimize global warming and ozone depletion. To earn a certification, a product must meet Green Seal's environmental standards by undergoing rigorous evaluation and testing.

Wahweap Lodge staff reported that the Nature's Mist™ deodorizing system actually neutralized odors in guest rooms more effectively than hazardous chemical deodorizing products that were previously used. By being proactive in identifying environmentally preferable products, Wahweap Lodge staff ended up with a superior product for deodorizing rooms that was safer for both employees and the environment, minimizes compliance requirements and supports ARAMARK Parks and Resorts environmental mission.

**RESOURCES:** [www.greensuites.com](http://www.greensuites.com) and [www.greenseal.org](http://www.greenseal.org)



Wahweap Lodge in Glen Canyon National Recreation Area, Arizona

# From Kitchen to Shop - Compressed Gas Cylinder Safety

What does serving fountain drinks have in common with welding a joint?

Both involve the use of compressed gas cylinders. A carbon dioxide cylinder carbonates the soda pop, and oxygen and acetylene cylinders are used to weld metals together.

Many concessioners use these and other types of cylinders in their operations, but may not be aware of some of the Occupational Safety and Health Administration (OSHA) regulations and Best Management Practices (BMPs) governing cylinder storage and management. Cylinders can be dangerous since they may leak or explode if handled or stored incorrectly, damaging property, the environment, and even injuring people. The movie scenes where a regulator breaks off of a cylinder, transforming it into a rocket are not just Hollywood special effects. A few tips on how to manage compressed gas cylinders safely are provided below.

**Awareness.** Include compressed gas cylinder safety in your Hazard Communication Program. Know the safety and first aid requirements for gases being used; this can be accomplished by reviewing Safety Bulletins, material safety data sheets (MSDSs), and reading product warning labels. Remember that cylinders contain pressurized gases that may be toxic, flammable, or combustible; be discharged under tremendous force; and cause burns or other injuries.

**Inspection.** Visually inspect cylinders on a routine basis to make sure they are stored safely and have a legible label or stencil that identifies the type of gas stored in the cylinder. Use protective caps on all cylinders until they are about to be used. Take cylinders out of service when they leak, or when internal or external corrosion, denting, bulging, or other indications demonstrate that they are damaged or have weakened appreciably.

## Special Considerations

Store oxygen cylinders at least 20 feet away from highly combustible materials (especially oil and grease) and reserve stocks of acetylene or other fuel-gas cylinders.

Management of compressed propane cylinders is subject to more stringent regulations than those described in this article. Contact your local fire department and refer to the National Fire Protection Association (NFPA) - Liquefied Petroleum Gas Code.

**Recommended BMP:** Contact the gas supplier and ask what should be done if you have an unsafe cylinder.

**Storage.** Post signs in a cylinder storage area that identifies the gases stored in the area. Make sure stored cylinders are not exposed to temperature extremes – over 125°F or in refrigerated areas – unless authorized by the gas supplier. Always secure cylinders so that they cannot fall over, roll away, or strike other cylinders or objects. Separate empty and full cylinders, and label or tag cylinders as to whether they are “full,” “in use,” or “empty.”

**Recommended BMPs:** To secure cylinders, use a cylinder stand or chain or strap cylinders to a wall bracket or other fixed surface. Chain or strap cylinders around the upper third of the cylinder, but not around the neck where regulators can break. Strapping or chaining multiple cylinders together (gang chaining) is not as effective as individually strapping or chaining them. Even smaller carbon dioxide cylinders for beverage systems should be secured against falling.

**Handling.** Only use cylinders to store gases; do not use them as rollers, supports, or for other purposes. Never try to paint, repair, or tamper with cylinders, their valves, and their safety relief devices. Never lift cylinders by valve protection caps. Close cylinder valves before moving cylinders. Always secure cylinders when in use or being transported so that they cannot fall over, roll away, or strike other cylinders or objects. Move cylinders with a suitable hand truck.

## RESOURCES:

- OSHA Compressed Gas and Equipment: [www.osha.gov/SLTC/compressedgasequipment/index.html](http://www.osha.gov/SLTC/compressedgasequipment/index.html)
- Compressed Gas Association: [www.cganet.com](http://www.cganet.com)



These cylinders are improperly stored. Some of the cylinders on the left are chained around the neck where the valve could break off. The cylinders on the right are not secure since they could still fall over the chain wrapped around them. It would be best if these cylinders were individually secured. If chained, the chain should go around the upper third of the cylinders but not around the neck.



# Big Release - New and Improved SPCC Regs!

The United States Environmental Protection Agency (US EPA) published a revised spill prevention control and countermeasure (SPCC) rule that took effect August 16, 2002; an interim revised rule was also published on January 9, 2003. This revised rule contains some provisions designed to decrease regulatory burden on facility owners or operators, while preserving environmental protection.

The SPCC rule (40 CFR 112) is designed to proactively prevent oil spills from occurring and provide direction on how to control any oil spills that may occur. Concessioners should keep in mind that the SPCC definition of oil is not just petroleum-based oils, but includes oil of any kind or in any form, including, but not limited to **fats, oils, or greases** of animal, fish, or marine mammal origin; **vegetable oils**, including oils from seeds, nuts, fruits, or kernels; and **other oils and greases**, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

If you have an SPCC Plan, you may no longer need it for your facility under the 2002 rule. However, the US EPA has also changed a few requirements and included additional conditions not in the old rule. If a concessioner had an SPCC Plan in place at the time the revised rule was published, it has until April 17, 2003 to make any necessary changes to the Plan and

Even if you are not required by EPA regulation to have an SPCC Plan, a documented spill plan might still be a Concession Contract requirement or a recommended Best Management Practice.

until October 18, 2003 to implement those changes. If you are unaware of the SPCC rule, you may be surprised to learn that your facility requires one. You

should contact your state business assistance program or state or federal environmental agency for help in developing and implementing one. Read on to learn more about some of the key changes in the SPCC rule!\*

	2000 (Old) Rule	2002 (New) Rule
When is an SPCC Plan needed?	An SPCC Plan was required if: <ul style="list-style-type: none"> <li>any single aboveground oil storage container had a capacity of over 660 gallons;</li> <li>the aboveground oil storage capacity was greater than 1,320 gallons; or</li> <li>the underground oil storage capacity was greater than 42,000 gallons.</li> </ul>	An SPCC Plan is required if: <ul style="list-style-type: none"> <li>the aboveground oil storage capacity is greater than 1,320 gallons; or</li> <li>the underground oil storage capacity is greater than 42,000 gallons.</li> </ul>
What containers do you count in calculating <b>aboveground</b> oil storage capacity?	The rule did not specify what containers needed to be included in the calculation. EPA Regions differed in their interpretation on whether oil storage containers less than 55 gallons needed to be included.	Only containers with a capacity of 55 gallons or greater are counted in the calculation of aboveground storage capacity.
What containers do you count in calculating <b>underground</b> oil storage capacity?	All underground containers were included in the calculation of underground storage capacity.	<u>Completely</u> buried storage tanks subject to all of the technical requirements in 40 CFR 280 (Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks (UST)) or a State program approved under 40 CFR 281 are not included in the calculation of underground storage capacity, but all others are included.
How often should the SPCC Plan be reviewed by the owner or operator?	The SPCC Plan should have been reviewed by the owner or operator of the facility at least every <b>three (3)</b> years.	The SPCC Plan should be reviewed by the owner or operator of the facility at least every <b>five (5)</b> years.
When should a Professional Engineer (PE) certify SPCC Plan amendments?	A PE should have certified any technical amendments to an SPCC Plan. It was not clear whether a PE had to certify non-technical amendments to an SPCC Plan.	A PE must certify only technical amendments. PE certification is not required for non-technical amendments such as changes to phone numbers and names.
What should be the format of the SPCC Plan?	The SPCC Plan had to follow the sequence specified in the 2000 rule.	The SPCC Plan can be written in different formats as long as they are acceptable to the EPA Regional Administrator, and as long as there is a cross-reference to SPCC rule requirements.
Do exempted completely buried tanks need to be included in the facility diagram?	Not addressed in the 2000 rule.	Yes.
Who should undergo SPCC training, and how often?	All "personnel" should have undergone SPCC training "at intervals frequent enough to assure adequate understanding of the SPCC Plan."	Only oil-handling employees need to undergo SPCC training. Training should take place at least once a year.
Should portable tanks be included in the SPCC Plan?	Portable tanks were included in the SPCC Plan, but issues related to their portability were not addressed.	Portable tanks are still included in the SPCC Plan, but secondary containment of portable tanks must have additional freeboard in case of rain.
Is periodic integrity and leak testing required for aboveground storage tanks?	Only the aboveground storage tanks, not the associated valves and piping, need to be tested.	Aboveground storage tanks and associated valves and piping need to undergo periodic integrity and leak testing.

\*All differences between the 2000 and 2002 rule and the 2003 interim rule, have not been described in this article. You should refer to 40 CFR 112 for the complete text of the new SPCC rule and specific requirements.

## RESOURCES:

- Final Rule on SPCC: [www.epa.gov/oilspill/pdfs/40cfr112.pdf](http://www.epa.gov/oilspill/pdfs/40cfr112.pdf)
- US EPA Oil Program – SPCC: Includes information on the interim SPCC rule and the proposed final SPCC rule: [www.epa.gov/oilspill/spcc.htm](http://www.epa.gov/oilspill/spcc.htm)
- RCRA, Superfund, & EPCRA Call Center: 1-800-424-9346

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## GreenLine Assistance

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

GreenLine Number:  
303/987-6913



Email:  
NPS\_GreenLine@nps.gov



## Power Up With Biodiesel



Diesel engines have many uses in various concessioner operations, such as in generators, trucks, boats, or snow machines.

An alternative fuel for these engines is biodiesel. This non-toxic, biodegradable fuel is made from new or used vegetable oils and animal fats. It can be used as a pure fuel or blended with petroleum. The use of biodiesel has grown dramatically during the last few years and is easier to find. Gasoline stations in many states offer this product, or it can be ordered on the Internet or by mail.

### Facts About Biodiesel

- **Can be used in most conventional engines.**  
If pure biodiesel is used, it can degrade natural hoses and gaskets; it may also gel below 32°F. But this is not a problem with the popular B20 blend, which is 20 percent biodiesel and 80 percent diesel.
- **Does not require special storage.**  
The standard storage and handling procedures used for petroleum diesel can be used for biodiesel. The fuel should be stored in a clean, dry, dark environment. Biodiesel storage may still be subject to

Spill Prevention Control and Countermeasures (SPCC) regulations (40 CFR 112) and other applicable federal, state, and local regulations.

- **Smells better than diesel exhaust.**  
Many have compared biodiesel emissions to the smell of french fries!
- **Approved for use in the United States.**  
Biodiesel is registered as a fuel and fuel additive with the United States Environmental Protection Agency (US EPA). Neat (100 percent) biodiesel has been designated as an alternative fuel by the Department of Energy (DOE) and the US Department of Transportation (DOT).
- **Better for the environment.**  
Compared to diesel fuel emissions, the use of a B20 blend in a conventional diesel engine results in a substantial reduction of unburned hydrocarbons (-20%), carbon monoxide (-12%), and particulate matter (-12%).

**RESOURCES:** National Biodiesel Board-  
[www.biodiesel.org](http://www.biodiesel.org) or 1-800-841-5849