



# GreenLine

## Concession Environmental Audits f Years In Review—2005 and 2006

The NPS Concession Program conducts environmental audits of concessioners that:

- Identify areas of non-compliance with environmental regulations; Department of the Interior (DOI), NPS and park-specific policies; and concession contract requirements;
- Identify areas where Best Management Practices (BMPs) can be implemented. (BMPs are recommended practices from industry, or other sources that improve compliance and prevent pollution); and
- Identify BMPs and exceptional practices that concessioners are already doing.

In calendar year (CY) 2005 and 2006, the NPS Concession Program conducted environmental audits at 71 concession operations (32 operations in 2005, 39 in 2006). These concessioners were located in 29 national parks (nine parks in 2005, 20 parks in 2006). During CY2005, a few environmental audits were conducted by phone while CY2006 audits were exclusively conducted on-site.

### Audit Findings

#### How are Audit Findings Ranked?

**Priority 1 Finding:** Findings that pose immediate actual or potential harm to human health or the environment.

**Priority 2 Findings:** Findings of non-conformances with laws and regulations that do not pose an immediate threat to human health or the environment.

**Priority 3 Findings:** Findings of non-conformances with Executive Orders; DOI, NPS, or park policy; or the concession contract.

Table 1 identifies the top five environmental topic areas under which most Priority 2 and 3 audit findings were found; the top two areas are described below.

HAZCOM was a topic area under which most audit findings in 2005 were categorized. HAZCOM is a series of Federal requirements under the Occupational Safety and Health Administration (OSHA). HAZCOM requires employers communicate to their employees information about hazardous chemicals employees may be exposed to in the workplace. A compliant HAZCOM program includes a written HAZCOM plan, material safety data sheets (MSDSs) for each hazardous chemical in the workplace, a chemical inventory of all hazardous chemicals, appropriate container labeling, and employee training.

In 2006, respiratory protection was the topic area under which most audit findings were categorized. Respiratory protection is another Federal requirement under OSHA, and is concerned with employees who use any type of respiratory protection while

performing work duties. It is designed to protect employees from inhalation health hazards. An employer is required to evaluate job hazards to determine whether employees should wear respiratory protection. Depending on the type of respiratory protection, medical evaluations, fit testing, training, and other requirements may be required. Concessioners must ensure employees are protected from respiratory hazards and use appropriate respiratory protection.

### BMPs

Audit teams also provide suggestions that can result in efficiencies and reduce compliance burden. BMPs can improve environmental management through pollution prevention and proactive planning, and help concessioners move towards sustainability. BMPs identified in an environmental audit may be incorporated during an annual concession contract operating and maintenance plan update or when the

(continued on page 3)

TABLE 1

Topic Area	# of Findings in 2005	# of Findings in 2006
Hazard Communication (HAZCOM)	70	100
Respiratory Protection	60	140
Emergency Response Planning and Reporting	40	92
Gas and Service Stations <i>This is a checklist tailored for concessioners with gasoline and fuel service operations.</i>	33	60
Hazardous Materials Management	22	61

\* There were no Priority 1's identified during the CY2005 or CY2006 audit seasons.

Note: The priority scheme was updated in 2006 and 2007. Audits conducted in 2005 used a priority scheme different than what is summarized above. Data from 2005 have been adjusted to be comparable with 2006 audit data. Please refer to "NPS Concession Program Changes in 2006 and 2007" for more information.



## Dr. Ima Park

For this *GreenLine* Newsletter issue, we ask our in-house expert, Dr. Ima Park, to provide us with information on how to host a “green” meeting.

? *Several times throughout the year, my concession operation hosts meetings, conferences, and other events. We’ve started to receive questions from individuals planning meetings on what aspects of our facilities and services can be made more environmentally preferable. We’re not sure how to answer these questions and what more we could offer our guests. Can you help?*

### Dr Ima Park:

Helping plan a green meeting can be easy! All it takes is a little creative thinking and attention given to the environmental impact of decisions. There can be “green” aspects added into the planning of any and every event; from site logistics, food and beverage, meeting supplies and materials, to more individualized opportunities if the event attendees are guests in your facilities.

Below are a few examples to think about.

### Event Logistics and Planning

- Is lighting in meeting rooms maintained on a motion sensor to turn off when rooms are empty?
- Is electronic equipment put into “sleep” mode during breaks or lunches?
- Are recycling bins for drink containers and paper provided in well-populated areas and clearly labeled?

### RESOURCES

- Blue Green Meetings: [www.bluegreenmeetings.org](http://www.bluegreenmeetings.org)
- EPA’s *It’s Easy Being Green!* A Guide to Planning and Conducting Environmentally Aware Meetings and Events: [www.epa.gov/epaoswer/non-hw/reduce/grn-mtgs/gm-bklt.pdf](http://www.epa.gov/epaoswer/non-hw/reduce/grn-mtgs/gm-bklt.pdf)
- EPA’s Green Meeting website: [www.epa.gov/oppt/greenmeetings](http://www.epa.gov/oppt/greenmeetings)
- Green Meeting Industry Council: [www.greenmeetings.info](http://www.greenmeetings.info)

### Food and Beverage

- Are local food sources used as much as possible?
- Are organic food items and shade-grown, organic coffees served?
- Are bulk dispensers used for cream, sugar, water, etc.?
- Are quantities for food confirmed in advance to better prepare and reduce the amount of leftover food?
- Are all utensils, plates, etc. reusable rather than disposable? If disposable, are they compostable?
- Are leftover food items donated or given to farmers as scraps for their animals?

### Lodging

- Do rooms provide shampoo and lotion in bulk dispensers?
- Do rooms have recycling bins?
- Do rooms participate in towel and linen reuse programs?
- Do guests have an option NOT to receive a morning paper?
- Are low flow showers, toilets, and faucets provided in bathroom facilities?

These are just a few ideas to talk about with meeting planners. Communicate the steps and options you have available to support green meetings to meeting planners and you may have a leg-up on the competition!

Resources such as the Environmental Protection Agency’s (EPA’s) *It’s Easy Being Green!* offer additional practical suggestions



## National Parks—Serious about Global Climate Change

Ever wonder what folks at the NPS think about climate change? Log onto [www.nature.nps.gov/sustainabilityNews](http://www.nature.nps.gov/sustainabilityNews) and find out! Sustainability News is a publication developed semiannually by the NPS. In the Fall 2006 issue, seven parks are highlighted for working collaboratively with the Environmental Protection Agency in its Climate Friendly Parks Program. There are also other articles highlighting climate change initiatives.



Canyonlands National Park, Utah

# GreenLine

*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 NPS Concession 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 Program and, if required, edited in collaboration with the original author.

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## Concession Environmental Audits Years In Review—2005 and 2006 f

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concession contract goes out for bid. BMPs are voluntary unless specified in a concession contract.

Table 2 identifies the environmental topic areas where the most BMPs were suggested in CY2005 and CY2006 audits.

### Exceptional Practices

Exceptional Practices are outstanding practices adopted by a concessioner. There were eight Exceptional Practices at seven concession operations identified during CY2005, and 17 Exceptional Practices at 11 concession operations during CY2006.

#### 2005:

- Outdoors Unlimited, Grand Canyon National Park
- Grand Canyon Discovery, Grand Canyon National Park
- Acadia Corporation, Acadia National Park
- Oli's Trolley, Acadia National Park
- Overton Beach Resort, Lake Mead National Recreation Area
- Seven Resorts, Inc. (Echo Bay Resort), Lake Mead National Recreation Area—received two Exceptional Practices

- Crescent fLake Lodge (Forever Resorts, LLC), Olympic National Park.

#### 2006:

- Xanterra fSouth Rim LLC, Grand Canyon National Park—received two Exceptional Practices
- Delaware fNorth Companies, Grand Canyon National Park
- Grand Canyon Railway, Inc., Grand Canyon National Park
- Sayville Ferry Services, Inc., Fire Island National Seashore
- CASCO Marina Development, LLC dba James Creek Marina, National Capital Parks-East—received five Exceptional Practices
- Guest Services, Inc., National Mall and Memorial Parks
- Xanterra Parks and Resorts, Inc., Crater Lake National Park

TABLE 2

BMP Topic Area	# of BMPS in 2005	# of BMPS in 2006
Environmental Management Systems	65	68
Solid Waste Management	31	46
Hazardous Waste Management	46	35
Chlorofluorocarbon (CFC) and Halon Management	14	40
Hazardous Materials Management	11	44
Environmental Purchasing	32	39
Emergency Response Planning and Reporting	38	4

- Jenny Lake Boating, Inc., Grand Teton National Park—received two Exceptional Practices
- Caville Bay Marina (DBA) - Forever Resorts, Lake Mead National Recreation Area
- Las Vegas Boat Harbor, Inc., Lake Mead National Recreation Area
- Xanterra Parks and Resorts, Inc., Mount Rushmore National Memorial

For an in depth description of three of these Exceptional Practices, turn to Concessioner Highlights on pages 4-5.

## EPA's Manifest Manifesto

If you generate hazardous waste and ship it off-site, you should know that the Environmental Protection Agency (EPA) recently made changes to the hazardous waste (HW) manifest. Effective September 6, 2006 a revised uniform HW manifest is required for all shipments sent off-site.

With the new uniform HW manifest, time and money are saved by eliminating differences in individual state manifests. The paper trail for HW generation, shipping, and disposal is also more streamlined.

### Significant Changes

Each manifest has a unique identification number (ID#) for better tracking of HW shipments. Only organizations approved by EPA are allowed to print manifests.

Contact your HW hauler to determine whether they are an approved



manifest printing source. If they are not, visit [www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/printers.htm](http://www.epa.gov/epaoswer/hazwaste/gener/manifest/registry/printers.htm) to find alternate printing sources.

Unlike older manifests, each blank field listed under the manifest's Generator Section is required to be filled in.

Another change requires generators to provide an emergency response phone number on each manifest. The phone number must be manned 24 hours a day and the person answering the phone must be able to provide clean-up and spill response information.

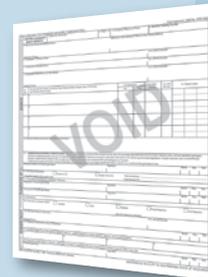
Finally, the uniform manifest provides clearer instructions for international shipments of HW, containers with residue, and rejected shipments of HW.

### The Future of Manifests

EPA believes a uniform manifest is a step towards transitioning to an electronic manifest system. The future of the HW manifest, they believe, will consist of on-line forms

### Summary of Changes to the Uniform HW Manifest for Generators

- Each manifest has a unique ID#;
- All fields for generators are mandatory;
- A 24 hour emergency number must be listed;
- An additional address field is available for shipments sent from an address different than the registered facility address; and
- Generator must certify (sign) the manifest to demonstrate compliance with all applicable regulations.



and real-time receipts of signed manifests rather than hard copies.

### RESOURCES

- Online training video on uniform HW manifest: [www.pneac.org/hazwastemanifest](http://www.pneac.org/hazwastemanifest)
- EPA website on uniform HW manifest: [www.epa.gov/epaoswer/hazwaste/gener/manifest](http://www.epa.gov/epaoswer/hazwaste/gener/manifest)

# Taking Care of What You Care About

Arizona Raft Adventures (AzRA) is a family-owned business that has been outfitting trips in Grand Canyon National Park for three generations. The Elliott family's long history with the Colorado River has led them to realize the importance of 'taking care of what you care about,' which they achieve in part through participation in the Grand Canyon Conservation Fund (GCCF) and One Percent for the Planet (1% FTP).

Rob Elliott, owner of AzRA, founded the GCCF in 1988 with the help of five other Grand Canyon outfitters. The idea behind this non-profit public charity is to support efforts to protect the Colorado River and Grand Canyon through a guest donation program. Commitment to the program has grown since 1988, with 15 river outfitters participating in and managing the program today.

Each year, roughly 80% of all professionally outfitted river trip passengers donate \$1 per day of their river trip to the GCCF. Over the past 18 years, an estimated \$850,000 has been donated through the GCCF to local non-profit conservation groups and organizations working to provide river trip access to persons with physical and socio-economic disadvantages. Grant recipients have included River of Dreams, The



Arizona Raft Adventures in Grand Canyon National Park, Arizona

Whale Foundation, Grand Canyon Youth, and the Grand Canyon National Park Foundation. For more information on this program, visit [www.gcrao.org](http://www.gcrao.org).

In addition to co-founding the GCCF, AzRA is also an active member of 1% FTP. This program, launched by Yvon Chouinard of Patagonia in 2001, is an 'alliance of businesses committed to leveraging their resources to create a healthier planet. Members recognize their responsibility to and dependence on a healthy environment and donate at least 1% of their annual sales to environmental organizations worldwide.'

AzRA joined 1% FTP in March of 2005, through which it donates approximately

\$30,000 a year to organizations that are 'actively working to protect our global environment.' AzRA wanted to donate to local groups that were not on the list of approved organizations, so the company worked with 1% FTP to qualify local environmental non-profits to receive program donations. As a result of the company's drive to support local efforts, AzRA is now able to donate much of its one percent to organizations that directly benefit the Grand Canyon.

Some of the organizations that have benefited from this program include Leave No Trace, Willow Bend Environmental Education Center, and KNAU Arizona Public Radio's Earth Notes.

## Saving Energy—Room by Room

As part of its company-wide Environmental Management System (EMS), Xanterra is continuously researching methods to improve energy efficiency within its concession operations. At its South Rim lodging facilities at Grand Canyon National Park, Xanterra utilizes

two types of devices that regulate and adjust room heating, ventilation, and air conditioning (HVAC) systems based on room occupancy.

Since 2004, Xanterra has retrofitted over 500 rooms in its lodging facilities with



infrared motion sensors. When the sensor detects the body heat of an individual in the room, the room's HVAC system operates at its current temperature setting.

However, when no body heat is detected in the room, the HVAC system

# On the Move to Reduce Solid Waste

Oli's Trolley, a small concessioner that offers narrated motor tours of Acadia National Park, has established an incentive-based employee program to encourage staff to 'think green.' Since the program's inception in 2005, Oli's Trolley has successfully doubled both the amount of solid waste that has been diverted from the landfill as well as employee morale.

The recycling incentive program is the result of an effort to meet both NPS contractual requirements and increase teamwork and employee involvement in environmental efforts. In order to improve employee compliance with goals to reduce solid waste, the company matches 1:1 all money collected from returning recyclables in order to throw an end-of-the-season party for employees.

During employee orientation, Oli's Trolley employees are provided information about the recycling program including the importance of being a good environmental steward. Trolley drivers are instructed

to inform Park visitors of the need to recycle beverage containers as

part of a Park stewardship program entitled "pack in, pack out." To ensure that no solid waste is left in Acadia National Park by Oli's Trolley employees and guests, recycling and trash containers have been located at the front of the trolleys, at the trolley ticket office, and along the street near the ticket office.

All recyclables collected by Oli's Trolley employees are returned to the local collection site for \$0.05 per container refund. The amount of money collected and the total number of containers recycled is tracked and the information is posted in employee areas. Posting information allows employees to track their progress, highlight their accomplishments, and encourages employees to further improve recycling efforts. The success of this program is illustrated by the increase in recycling efforts over the past two seasons, with the number of recycled containers growing from a baseline of zero to 2,800 in 2005 and 3,600 in 2006.

In addition to the container recycling program, Oli's Trolley

has also implemented a number of other solid waste reduction strategies over the past few years. The company recently adopted policies requiring all paper products used within its operations to contain at least 30 percent post-consumer recycled content. Oli's Trolley has also begun laminating trolley tickets as a means of saving both paper resources and money. Reusable laminated tickets last up to four years longer than disposable paper versions. Additionally, the back of each ticket includes Leave No Trace information to further encourage guests to reduce their impact on the environment while enjoying the outdoors. Finally, Oli's Trolley has decreased solid waste by offering guests reused Acadia National Park maps and encouraging guests to leave the maps for another user. Once the maps are worn, they are recycled.



powers down and remains in a state of hibernation. Once body heat is detected, the system returns to its present temperature setting. To date, these systems have been installed in all but 2 lodges managed by Xanterra at the Grand Canyon.

The second device used to save energy is an open door sensor which has been installed in over 150 rooms at Maswik North. The sensor detects when a hotel room door has been ajar for more than 10 seconds, at which point the HVAC system will shut down to avoid heating or air conditioning the outside air. This sensor works for both the room entrance door, as well as the slid-

ing glass door that leads to the porch.

In combination, these two systems are expected to result in an annual energy savings of 25 to 35 percent.

The energy saving technologies that have been implemented in Grand Canyon National Park help Xanterra move towards meeting the company-wide goal of reducing both fossil fuel usage and greenhouse gas emissions 30 percent by 2015. Reducing energy consumption at its lodging facilities not only reduces demand for energy from local power plants that use coal or other



**El Tovar Hotel (this page) and aerial view of Xanterra's lodging facilities (page 4) in Grand Canyon National Park, Arizona**

types of fossil fuels to generate energy; it also improves air quality and saves the company money on its energy costs.



# Spill Prevention, Control, and Countermeasure Rule

## December 2006 Amendments

In December 2006, the Environmental Protection Agency (EPA) finalized amendments to Spill Prevention, Control, and Countermeasure (SPCC) rules for certain facilities. The rule went into effect on February 26, 2007 and streamlines requirements for:

- 1 Facilities with an aboveground oil storage capacity of 10,000 gallons or less (referred to as 'qualified facilities');
- 2 Oil-filled operational equipment; and
- 3 Mobile refuelers.

### 1 REQUIREMENTS FOR QUALIFIED FACILITIES:

If a facility is qualified then the owner/operator of the facility may:

- Prepare and self-certify an SPCC plan instead of having one reviewed and certified by a Professional Engineer (PE); and
- Meet tailored facility security and tank integrity inspection requirements without PE certification.



#### What is an environmental equivalence and impracticability determination?

- The law allows for owners/operators to deviate from the specific SPCC rule provisions if the Plan clearly states the reason for the deviation and what means of spill prevention, control, and counter measures will be implemented that are equivalent to the rules standard.
- The law also allows for owners/operators to determine that the general secondary containment requirements in the rule are impractical. Where impracticability has been demonstrated the owner/operator can develop a contingency plan and comply with additional requirements of the SPCC rule such as having a PE certify those sections which identify impracticability and environmental equivalence.

#### What is a Qualified Facility?

A qualified facility is one that:

- Has 10,000 gallons or less in aggregate aboveground oil storage capacity; and
- For three years prior to plan certification, or since becoming subject to the

SPCC rule if the facility is new, has not had:

- a) A greater than 1,000 gallon discharge of oil to navigable waters; or
- b) Two greater than 42 gallon discharges of oil to navigable waters within a 12 month timeframe.

### 2 REQUIREMENTS FOR SECONDARY CONTAINMENT FOR OIL-FILLED OPERATIONAL EQUIPMENT:

If the facility meets the definition of a 'qualified facility,' then the facility:

- Does not need to make a secondary containment impracticability determination for each piece of equipment; and instead
- May implement an inspection and monitoring program, develop an oil spill contingency plan, and provide a written commitment of resources to control and remove discharged oil in lieu of secondary containment for oil-filled operational equipment.



#### Oil-Filled Operational Equipment:

Examples include transformers, hydraulic systems, lubricating systems, and other systems containing oil solely to allow the device to operate.

### 3 REQUIREMENTS FOR MOBILE REFUELERS:

- Mobile refuelers at a non-transportation-related facility will no longer need to provide secondary containment sufficient to contain the capacity of the

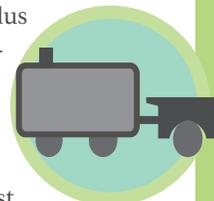
#### Who Needs an SPCC Plan?

Facilities that have:

- Aggregate oil aboveground storage capacity greater than 1,320 gallons or underground storage capacity greater than 42,000 gallons; and
- Reasonable expectation to discharge oil into navigable waters.

largest compartment plus volume to contain precipitation; and

- General secondary containment requirements to protect against the most likely discharge scenario still apply.



#### Mobile Refuelers:

Containers on a vehicle or towed behind that are designed to store and transport fuel into or from a motor vehicle, vessel, ground service equipment, or other storage container.

#### ADDITIONAL EXEMPTIONS:

Fuel tanks (motive power containers) on vehicles are now exempt from the SPCC rule. Prior to these amendments, fuel tanks greater than 55-gallons were included in a facility's SPCC plan.

#### Motive Power Containers:

Include aircraft, buses, sport utility vehicles, construction and excavation vehicles, locomotives, etc, that contain oil in capacities greater than or equal to 55 gallons for the purpose of providing fuel for propulsion or to facilitate the operation of the vehicle.

#### IMPLEMENTATION DATES:

Facilities must amend and implement updated SPCC plans no later than July 1, 2009.

#### RESOURCES:

EPA, SPCC Amendments: [www.epa.gov/oilspill/spcc\\_dec06.htm](http://www.epa.gov/oilspill/spcc_dec06.htm)



# We are listening...

The NPS Concession Program recently received feedback on our environmental audit program and we wanted to share the outcome. A concessioner had undergone an environmental audit in 2005 and felt the program could be made more effective and efficient:

**Concessioner Comment (summarized):** More time is needed for park and concessioner staff during the audit site visit to verify reported audit findings. Highlights of the most significant findings presented in the Exit-Brief are not sufficient. Each finding should be discussed in detail at the Exit-Brief.

**NPS Concession Program Response:** *The audit process was designed to limit the amount of time spent on-site by the audit team to reduce disruption to the business, to the concessioner, and park personnel.*

*Concessioner and park staff participation during the on-site audit allow both parties to observe and discuss what the audit team observed real-time. Audit teams discuss potential*

*audit findings and Best Management Practice (BMP) opportunities with concessioner and park staff while ensuring a comprehensive audit is completed.*

*The on-site audit concludes with an Exit-Brief in which the significant potential audit findings and BMP opportunities are highlighted. Photographs taken during the audit are used to exhibit potential audit findings and BMP opportunities. During the Exit-Brief, the concessioner can request clarification of audit team observations. A detailed Exit-Brief discussion of each potential audit finding is not realistic due to the time commitment involved.*

**Concessioner Comment (summarized):** More time is needed to interpret audit findings. Allow the audit team to remain on-site an extra day or two to complete a preliminary report.

**NPS Concession Program Response:** *Following the on-site audit, discussions continue between the audit team, concessioner, and park staff as needed, including after the preliminary audit report is issued. The pre-*

*liminary audit report is used as a method to continue discussions and clarify audit findings and BMP opportunities before the audit report is finalized. Audit findings and BMPs included in the preliminary audit report found not to be applicable, will be removed from the final audit report.*

**Concessioner Comment (summarized):** Do not develop a preliminary report; rather, issue a final report after audit findings have been interpreted by park and concessioner staff. Preliminary audit reports are perceived as a permanent record on concessioner performance. This is inappropriate if findings are ultimately removed.

**NPS Concession Program Response:** *The preliminary audit report is developed and presented to the concessioner and park staff for review and continued discussion. The preliminary audit report is not used to evaluate the concessioner. It is a tool for the concessioner, park staff, and the audit team to ensure all audit findings and BMP opportunities were accurately captured and provides the opportunity for the concessioner and park staff to clarify information.*

## NPS Concession Program Changes—2006/07

The NPS Concession Program underwent several program changes in 2006 and 2007. Changes were made to ensure consistency with the overall NPS audit program which was updated in 2006. Additionally, feedback

from concessioners resulted in programmatic adjustments in how environmental audits are conducted and how audit findings are developed.

The table below provides the most up-to-date outline of the NPS Concession Program and components of concessioner environmental audits. These changes represent the goal of the NPS Concession Program in ensuring environmental audits are a value-added experience for concessioners and park staff.

AREA	DESCRIPTION	2007 VERSION
Audit Finding Priority Scheme	Each audit finding receives a rating that identifies the severity of the finding.	<p><b>Priority scheme includes a scale of:</b></p> <p><b>1:</b> Findings that pose immediate actual or potential harm to human health or the environment.</p> <p><b>2:</b> Findings of non-conformances with laws and regulations that do not pose an immediate threat to human health or the environment. A priority 2 finding that is an 'isolated incident' will be indicated as such.</p> <p><b>3:</b> Findings of non-conformances with Executive Orders; DOI, NPS, or park policy; or the concession contract.</p> <p><b>BMP (potentially low time &amp; resources):</b> They are suggestions and are voluntary unless specifically required in a concessions contract. They are recommended practices from industry, regulations, or other sources that may improve overall environmental management.</p> <p><b>BMP (potentially high time &amp; resources):</b> Identical to 'BMP (potentially low time &amp; resources)' except may require more time or resources to address.</p> <p><b>Exceptional practices:</b> Outstanding products used or activities undertaken that demonstrate a commitment to environmental protection.</p>
Audit Findings	Only some audit findings may be removed from the final audit report.	Audit findings with a priority of 2 (isolated) or 3 (isolated) may be voided from the final report if the concessioner addresses and closes the finding prior to when the final audit report is developed. Park staff must confirm that all aspects of the audit finding have been addressed.
Audit Reports and Databases	Preliminary and final audit reports are distributed to the park and concessioner.	Audit findings are in a PDF format and comments collected from the park and concessioner are entered into a MSWord table.
Audits	Implementation of a NPS Concession Program audit.	Phone audits were discontinued in 2006 based on feedback that they were not as effective as on-site audits in providing opportunities for education and communication. Now, only on-site audits are conducted.*

\* Phone audits were used for concession operations determined by the NPS Concession Program and park staff to have minimal impact on the environment or park resources.

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## NPS Concession Program Corner: Full Steam Ahead!

There's no rest in environmental management – it is continuously evolving and getting better. This issue of the *GreenLine* Newsletter has its eye on the latest environmental regulatory and policy developments with updates on EPA's new hazardous waste manifest and spill prevention, control and countermeasure (SPCC) plan regulations (40 CFR 112).

We also take a look at the NPS Concession Program including how audits are being conducted and how audit findings are currently being developed to address your recommendations for the program. Specifically, the articles *NPS Concession Program, Years in Review – 2005-2006*, *NPS Concession Program Changes in 2006 and 2007*, and *We Are Listening...* feature information on the NPS Concession Program.

This issue also recognizes some of the amazing programs and activities concessioners are volun-

tarily implementing to benefit the environment above and beyond what is already required. Go to pages 4-5 to read the Concessioner Highlights; we hope that all concessioners – small and large – will aspire to be featured someday in the *GreenLine* Newsletter Concessioner Highlights.

With focus on the environment, the NPS Concession Program looks to the future on additional ways of assisting concessioners with improving environmental management for the good of your businesses, NPS visitor services, and the protection of environmental resources. Your feedback is important to us, so if you ever have any comments or questions, please contact us at the phone number, email address, or fax number listed to the left of this letter.

**Wendy M. Berhman**  
Contract Management Team Lead,  
NPS Concession Program

### GreenLine ASSISTANCE

If you require technical assistance on environmental issues or want to learn more about the NPS Concession Program, contact us:

**GreenLine Number:**  
303/987-6913



**Email:**  
NPS\_GreenLine@nps.gov



**Website:**  
concessions.nps.gov,  
click "CoEMP"



## Pass It On

Ever wish there was an easy, FREE way to get rid of unwanted paints, gently used furniture, carpet, and other items? Earth 911 is the way to go! Just go to the Earth 911 web site, type in your zip code and the site generates a list of local organizations that will take donated items.

The organizations will take your unwanted paints and other materials to be used for projects or resale in the community. Be sure to look closely on restrictions that may apply (i.e., one organization will only take paint cans at least ¾ full and with a legible label). Also, some organizations may be local hazardous waste collection sites that only accept hazardous materials from residents and not businesses.

Donating materials to these organizations helps you avoid expensive tipping fees and hazardous waste disposal costs. The best part is that you are helping members of your community.

If you choose to donate items that have hazardous chemicals (such as electronics, paints, cleaners, etc.) make sure to include a letter to the organization stating that your company no longer is responsible for the item and therefore any disposal cost associated with the item is not your responsibility. You should also document the donation in your environmental management records for future reference.

**RESOURCES**  
www.earth911.org/master.  
asp?sIs&serviceid=115

