

National Park Service
U.S. Department of the Interior
Commercial Services Program



Environmental Audit Information for Concessioners

Agenda



- Scope of an environmental audit
 - Types of environmental audits
 - Environmental audit criteria
- Site audits
- Audit finding priority levels
- Post-visit process and timeline
- Final Audit Report
- Closing out the environmental audit
- Telephone audits

Introduction to the ENV Audit Program



- Who we are:
 - Concessions Environmental Audit Coordinator (WASO)
 - Regional concessions chiefs
 - Park concessions specialists
 - Hitachi Consulting audit teams

- What we do:
 - Work with parks and concessioners to provide independent third party environmental audits and compliance assistance

Scope of an Environmental Audit



- Facilities and services to be audited
- Audit type (i.e., site versus telephone audit)
- Audit criteria
- Period under review
- Concessioner Tools and Information



Scope of the Audit

- Concessioner facilities located within park boundaries.
- Concessioner services and operations taking place within park boundaries.
- Concessioner services and operations taking place outside park boundaries that are specifically mentioned in the concession contract.

Environmental Audit Types



- **Standard audit:** Standard audits are consistent with Department of Interior (DOI) policy and the NPS Environmental Audit Program. They include a site visit and pre- and post-visit phases.

Environmental Audit Types



- **Non-standard audits:**

- **Telephone audit:** Telephone audits are the most common non-standard audit type, and are used for Category III concessioners and some Category II concessioners.
- **Cruise Ship Audits:** Some concessioners (e.g., cruise ships) are subject to comprehensive environmental evaluations through a third-party auditor (e.g., U.S. Coast Guard) and that may serve in place of standard NPS Commercial Services environmental audit.

Environmental Audit Types



- **Conditionally exempt:** Some concessioners may not warrant an audit due to negligible potential for environmental impact. In these cases, the program collects sufficient information to justify and document these concession operations as conditionally exempt. Conditionally exempt justifications are verified at least every ten years.

Environmental Audit Criteria



- Federal environmental laws and regulations.
- Applicable Executive Orders (EOs).
- Applicable state and tribal environmental laws and regulations.
- Applicable regional and local environmental codes and ordinances.
- Applicable DOI, NPS, and park policies and procedures.
- Concession contract requirements (includes operating and maintenance plans).

Environmental Audit Finding Priority Scheme



- **Priority 1:** Findings represent non-conformance with laws and regulations that pose immediate, actual, or potential harm to human health or the environment, or the potential for significant liability exists. Liability may apply to the concession or the park.
- **Priority 2:** Findings represent non-conformance with laws and regulations that do not pose an immediate threat to human health or the environment.
- **Priority 3:** Findings represent non-conformance with EOs; DOI, NPS, or park policy; or contract requirements.

Isolated Findings



- Priority 2 and Priority 3 audit findings may be assigned an additional ranking of “isolated” if the observed non-conformances are not viewed as programmatic issues and are not pervasive throughout the concessioner operations.
 - This ranking is useful in prioritizing corrective actions and assigning readily available resources to close audit findings with a minimal level of effort.
 - Audit findings noted as “isolated” will be removed from the report if they are addressed prior to the Final Environmental Audit Report being distributed.

Pre-Audit Process



- The Audit Team Leader (ATL) contacts the park Point of Contact (POC) to schedule the audit site visit and answer questions.
- The park POC will contact the concessioner to confirm the audit dates.
- Park POC will forward the questionnaire to the concessioner. Documentation can be provided beforehand to save time.

Site Visit



- Focuses on an inspection of concession facilities, services, and operations.
- Concession staff and park POC must accompany the audit team.
- Is an opportunity to exchange information between the audit team, park staff, and concession staff. The audit team works to understand compliance issues and to identify BMP opportunities.
- A typical audit site visit is a day. Audits for multiple or complex concessions may take up to a week.

In Brief



- Short (20 minute) highlights presentation. Can also be done remotely ahead of time.
- Required attendees:
 - Concession POC
 - Concession environmental manager
- Recommended attendees:
 - Concession facilities manager
 - Concession general manager

Data Collection



- Physical observations include the audit team touring concession facilities and taking notes and photographs.
- Interviews with concession staff.
- Review records and documents.
- Concessioner and park staff should ask questions. This is a chance to exchange information.

Exit Brief



- Presentation of preliminary audit findings.
- Separate exit brief presentations will take place for each concession.
- BMPs and exceptional practices observed during each individual concession site visit.
- ATL will schedule post-visit conference call to discuss preliminary findings.

Post-Visit Process



- Preliminary Audit Report is developed and submitted to the park POC who will forward it to the concession POC.
- Concessioner and park staff will be provided a form to submit comments on the Preliminary Audit Report to the audit team.
- Final Audit Report is developed and submitted to the park POC who will forward it to the concession POC.

Post-Visit Timeline



3.5
Weeks

- Within 3.5 weeks following the site visit:
 - Preliminary audit report is developed and forwarded to park POC.
 - Park POC reviews audit report and forwards to concession POC.
 - Concession POC reviews audit report.

5.5
Weeks

- Within 5.5 weeks following the site visit:
 - Concession POC will identify and document isolated findings they don't agree with, have questions about, and completed corrective actions on the tracker.
 - Concession POC will be prepared to discuss questions and comments with audit team and present corrective action measures taken on isolated findings (if applicable).
 - Park POC will confirm isolated finding closures (if any) and comment on concessioner staff comments in the corrective action tracker.

Post-Visit Timeline



1 Week
Following
Comment
Call

- Within one week following the comment call:
 - The Final Audit Report and Report Memo will be drafted and submitted to the Commercial Services Program Chief.
 - Once reviewed and signed, the memo and final audit report will be distributed.

Ongoing

- Bi-monthly request for corrective action:
 - Email request from Park POC for update on corrective actions.
 - Park POC will forward the latest version of corrective action tracker to Commercial Services.
- After 180 days of the issuance of the Preliminary Audit Report (deadline for closure of Priority 2 and 3 audit findings), NPS Commercial Services will request updates on corrective actions on an annual basis.



Final Audit Report notification

Final audit report reviewed and approved by NPS Commercial Services Program Chief



Audit coordinator



Park Superintendent will receive a memo with the results of the audit and notification that the final audit report was sent to the park POC. The memo is copied to the regional director, regional environmental coordinator, regional concessions chief, park POC, and the ATL.



Park POC will receive an email with the final audit report and instructions on transmitting the report to the concessioner.



Concession POC receives the final audit report from Park POC with instructions and guidance on managing corrective actions and closing any remaining audit findings.

Documenting closed findings



- Concession staff will prioritize and implement corrective action for each open finding.
- Concession staff will complete the corrective action tracker for closed findings and submit it to park POC.
- Park POC will review that the concessioner completed corrective action tracker and verify closure (in person/via photographs/or other as appropriate) and document in corrective action tracker. They will forward results to the ATL.

Priority 3 Findings



- Many Priority 3 findings are identified non-conformances with maintenance or operating plan requirements.
- Contract plan requirements that are determined in consultation with park staff to be unfeasible will be voided if the contract plan requirements are revised.
- Unfeasible plan requirements must be replaced with an attainable requirement that provides equal or greater benefit to the environment.

Corrective Action Tracker



NPSCS Corrective Action Tracking Tool

Park: Wrangell St. Elias

Date of Audit: 12/12/2012

Concessioner: Wild Bill Outfitters

Date PEAR Issued: 12/12/2012

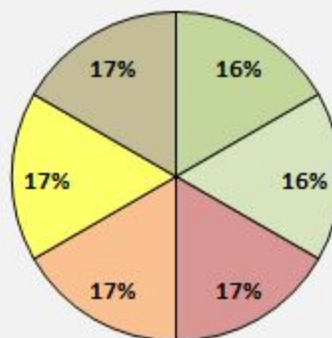
Contract Number: WRST007

Date FEAR Issued: 12/12/2012

Corrective Action Report Summary:

BREAKDOWN OF FINDINGS	
Closed	1
Closed (prior to Final)*	1
Open	1
Disagree	1
Unknown	1
Voided	1
TOTAL	6

Finding Status



Audit Closure Progress:

50%

Priority 1 Findings	1
Priority 2 Findings	2
Priority 3 Findings	3
Isolated Findings	1

Date of Last Update: 3/14/2016

* Isolated findings closed prior to the issuance of the Final will not be included in the report.

[CLICK HERE TO VIEW FINDINGS](#)

Corrective Action Tracker



Park: Wrangell St. Elias
Contract: WRST007
Concessioner: Wild Bill Outfitters

Last Update Made: 3/14/2016

INSTRUCTIONS
 First, use this form to classify all Preliminary Environmental Audit Report (PEAR) findings into one of three categories:
 1. **Agree** – Concessioner agrees that the finding as written is valid and should be addressed through corrective action.
 2. **Disagree** – Concessioner has reason to believe that the finding as written is not or may not be valid and should be voided.
 3. **Unknown** – Concessioner cannot agree or disagree with the finding due to a lack of information or clarity.
 If a finding is categorized as either "Disagree" or "Unknown," scroll to the right and fill out the corresponding questions as to why.
 Once the table is complete and all findings are accounted for, please submit the completed form to the park concessions specialist who will complete their portion of the form and submit it to the audit team.
 Next, use this form to document the corrective action steps taken for all findings that are in agreement.
 NOTE: Be sure to change the date to the left whenever this form is updated!

Finding Number	Finding Status	Priority	Isolated?	In Final Report?	Topic Area	Description	CONCESSIONER		
							Classification	Concessioner Comments	Corrective Action Taken
WRST007-2017-001	Voided	2		No	Fuel Storage Management	TEMPLATE FINDING The [INSERT SIZE AND CONTENTS/TYPE OF TANK] underground storage tank (UST) system was not permanently closed after being temporarily closed for more than 12 months.	Agree		
WRST007-2017-002	Unknown	1	Yes			TEMPLATE FINDING The [INSERT SIZE AND CONTENTS/TYPE OF TANK] underground	Unknown		
WRST007-2017-003	Disagree	2				TEMPLATE FINDING The [INSERT SIZE AND CONTENTS/TYPE OF TANK] underground	Disagree		
WRST007-2017-004	Closed	3		Yes		TEMPLATE FINDING The [INSERT SIZE AND CONTENTS/TYPE OF TANK] underground	Agree	We have closed this finding	
WRST007-2017-005	Open	3		Yes		TEMPLATE FINDING The [INSERT SIZE AND CONTENTS/TYPE OF TANK] underground	Agree	We will close this next week	
WRST007-2017-006	Closed	3		No		TEMPLATE FINDING The [INSERT SIZE AND CONTENTS/TYPE OF TANK] underground	Agree		
WRST007-2017-007									

Park: Wrangell St. Elias
Contract: WRST007
Concessioner: Wild Bill Outfitters

Last Update Made: 3/14/2016

Finding Number	Finding Status	PARK			CONCESSIONER		PARK	
		Should Finding be Closed?	Date Finding is Closed	Park Comments	Corrective Action Confirmed?	Should Finding be Closed?	Why does concessioner staff disagree with the finding?	Does park staff agree that finding is not or may not be valid?
WRST007-2017-001	Voided	No						
WRST007-2017-002	Unknown							
WRST007-2017-003	Disagree							
WRST007-2017-004	Closed	Yes		Concessioner closed the finding	Yes	Yes		
WRST007-2017-005	Open	No						
WRST007-2017-006	Closed	Yes				Yes		
WRST007-2017-007								



Closing out the Environmental Audit

- Concessioners are required to identify and implement corrective actions for findings. Updates need to be made to the tracker and documentation provided to the park POC.
- The park POC will verify whether findings have been closed and forward closure updates bi-monthly.
- After all findings are corrected and corrective actions are verified, the audit report is closed.

Open Findings and the AOR



- Environmental audits are a ‘special attention item’ in the Environmental Management Program section of the Annual Overall Rating (AOR). Concessioners with open findings after the closure deadline will be capped at ‘marginal’ on their EMP ratings which will prevent them from acquiring a ‘superior’ rating in the overall AOR.
- WASO will do spot checks on AORs submitted for contracts with open audit findings to make sure the EMP has been completed correctly.

Telephone Pre-Audit



- Park POC coordinates with ATL and concession staff to schedule telephone audit. Telephone audit generally requires one hour.
- Park POC will forward audit questionnaire to concession staff.
- Concession staff can complete the questionnaire ahead of time, but it is not required. The questionnaire is intended to help you prepare for the audit.

Telephone Audit



Phone call includes:

- Brief introduction
- Audit Questionnaire review
- Data collection including telephone interview, records, documentation, and photo review
- The concessioner should ask questions. This is a chance to exchange information.

Telephone Post-Audit



- Any documentation necessary that was not provided during the call is sent to the park POC who will forward to the ATL.
- Process resumes with the same procedures as site audits.



Questions?

Contact Information



- **cs_envaudits@nps.gov**
- **Kat Berry, Concessions Management Specialist/Environmental Audit Coordinator**
kat_berry@nps.gov
202.513.7153
- **Gabrielle McDonald, Hitachi Consulting**
gabrielle_mcdonald@contractor.nps.gov
303.667.7146

Remember to contact your park's
Concessions Management Specialist first!