

NAMA VEIA ENVIRONMENTAL MANAGEMENT PROGRAM STANDARDS

PURPOSE

These standards define the NPS's minimum requirements for the Operator's Environmental Management Program (EMP) in accordance with the NPS's policy. The EMP is the management system the Operator develops and implements to address the environmental management aspects of its operations. The Operator is independently responsible for developing and implementing an EMP of adequate scope and content to comply with all Applicable Laws and to provide for the protection of the environment, irrespective of these EMP standards.

EMP STANDARDS

The EMP standards defined by the NPS consist of the requirements associated with eight elements, identified in Table 1 below. While the EMP must address each of these elements, it should be specific to, and adequately address, the type and size of services the Operator provides under the Privilege Percentage Agreement. The EMP can, and should be, simple and flexible to ensure it is fully embraced and implemented by the Operator's management and staff. More complex operations and services, or additional Area requirements to address specific environmental impacts or activities, may warrant a more detailed program with additional elements or sub-elements than those defined through the NPS's standards.

Table 1 – VEIA EMP Elements

1	Environmental Management Program Scope	5	Communications
2	Responsibility and Accountability	6	Reporting
3	Training	7	Monitoring, Measurement, and Corrective Action
4	Documentation and Operational Controls	8	Other Agreement Requirements

EMP Element 1 –Environmental Management Program Scope

The Operator establishes and maintains an EMP appropriate for the activities, size, and complexity of the operation.

Standards:

- 1.1 The Operator's EMP scope covers the environmental objectives and environmental management aspects applicable to the operation including:
 - legal requirements (Applicable Laws), Privilege Percentage Agreement requirements, and environmental best management practices
 - facilities and operations
 - natural and cultural resources
- 1.2 The EMP is documented.
- 1.3 The EMP establishes the Operator's environmental policy. The policy indicates commitment to:
 - complying with Applicable Laws
 - protecting and conserving Area resources and human health

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- assigning responsibilities
- providing staff and resources
- monitoring performance

EMP Element 2 – Responsibility and Accountability

The Operator must establish the organizational structure, personnel roles and responsibilities, and resources needed to effectively implement the EMP.

Standards:

- 2.1 The Operator must identify an environmental officer and/or program manager and document this assignment in the EMP.
- 2.2 The Operator determines management and staff responsibilities as necessary to effectively manage environmental activities and describes this structure and these assignments in the documented EMP.
- 2.3 EMP resources are developed, documented in the EMP, and applied; resources are adequate to execute the program. Resources include:
 - personnel (e.g., number of staff, experience and skills)
 - facilities and equipment
 - information, documentation, and data management systems
 - agreements for support from outside contractors, agencies, or affiliates
 - training programs for Operator personnel

EMP Element 3 – Training

Personnel must be competent to perform the tasks assigned to implement the EMP.

Standards:

- 3.1 Managers and staff with environmental management responsibilities meet qualification requirements defined in the documented EMP.
- 3.2 A training plan is developed, documented in the EMP and executed; and includes:
 - Defined training requirements for the environmental officer and other personnel, including requirements to meet Applicable Laws, the Privilege Percentage Agreement, and the EMP.
 - Required training records, such as training materials, schedules, and participant records.
- 3.3 The Operator has conducted and documented all training.

EMP Element 4 – Documentation and Operational Controls

The Operator must establish and maintain plans and procedures to manage operations and emergencies associated with its EMP. The number and complexity of these plans and procedures will depend on the size and complexity of the operation. Some plans and procedures may be required by Applicable Law or the Privilege Percentage Agreement.

Standards:

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- 4.1 EMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the documented EMP. These procedures address requirements in Applicable Laws, the Privilege Percentage Agreement, and the EMP to ensure protection of human health and the environment. Examples of operating procedures include:
- Procedures for the storage and handling of chemicals
 - Procedures for the management and maintenance of fuel
 - Procedures for pesticide use
 - Procedures for hazardous and solid waste disposal
 - Procedures for weed and pest management
 - Procedures for the protection of cultural and archeological resources
- 4.2 EMP emergency plans and procedures for environmental management are developed, documented, implemented, maintained, and included or referenced in the documented EMP. These plans and procedures address requirements in Applicable Laws, the Privilege Percentage Agreement, and the EMP. The minimum emergencies to be addressed include:
- Hazardous substance spill response
 - Leaks from fuel storage tanks or other chemical storage areas
 - Storm water contamination

EMP Element 5 – Communication

The EMP must be effectively communicated internally to Operator employees and externally to Area personnel, visitors, and to other parties involved in the EMP.

Standards:

- 5.1 The EMP is available to staff and communicated throughout the Operator's organization so that personnel understand and can effectively implement the EMP.
- 5.2 The EMP addresses procedures for communicating environmental controls and initiatives to visitors. These may include:
- Handling hazardous materials (e.g., fuel)
 - Handling waste (e.g., trash)
 - Natural resource or cultural resource impacts
 - Pest management (e.g., notification of pests if observed)
- 5.3 The Operator's environmental emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local environmental agencies.

EMP Element 6 – Reporting

The Operator must develop and implement procedures for reporting internally within the Operator's organization, and externally to the NPS and regulatory agencies.

Standards:

- 6.1 All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided upon the NPS request. Additional plans,

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reports, and other documentation are submitted to the NPS in accordance with the documented EMP. These may include inventories of hazardous substance and waste streams.

- 6.2 Notices of any discharges, release or threatened release of hazardous or toxic substance, material or waste are reported in a timely manner to the NPS.
- 6.3 Any written, threatened or actual notices of violation of Applicable Law from any environmental regulatory agency are reported in a timely manner to the NPS.
- 6.4 The NPS is provided timely written advance notice of, and the opportunity to participate in, communications with regulatory agencies regarding the Operator's environmental activities.

EMP Element 7 – Monitoring, Measurement and Corrective Action

The Operator must develop and implement inspection processes to identify environmental management issues and correct deficiencies identified through such inspections. The Operator must effectively respond to environmental incidents. The Operator must develop and implement management review procedures to improve EMP performance over time.

Standards:

- 7.1 Environmental inspections are completed as required by Applicable Law and the documented EMP, or as otherwise necessary to effectively manage environmental activities.
- 7.2 Environmental deficiencies identified by internal or external inspections (e.g., the NPS's environmental audits, etc.) are analyzed, corrected, or mitigated within the timeframes designated by Applicable Law, the documented EMP, or inspection report. Any deviations from these timeframes must be approved by the NPS and documented.
- 7.3 Environmental incidents are responded to in a timely and effective manner to stop, contain, and remediate the incident. Investigations are conducted, and corrective actions are taken to prevent recurrences to the satisfaction of the NPS in accordance with the EMP and applicable regulations.
- 7.4 The EMP is reviewed at least annually and updated as necessary.
 - The EMP review includes analysis of performance in each EMP element area to determine any systemic program failures (particularly failures that resulted in serious incidents of inspection deficiencies), and non-compliance with Applicable Laws.
 - Systemic problems are addressed in EMP updates.
- 7.5 The initial EMP is submitted to the NPS within the Privilege Percentage Agreement's specified timeframe for review and must be approved by the NPS. Any subsequent documented EMP updates are submitted to the NPS for review and acceptance and approval.

EMP Element 8 – Other Requirements

In addition to the requirements outlined in the EMP elements, the operation may have environmental requirements not otherwise addressed in the EMP and the Operator must meet those standards and requirements.

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DEFINITIONS

Applicable Laws: The applicable federal, state, and local laws governing the Area, including the rules, regulations, requirements, and policies promulgated under those laws, whether now in force or amended, enacted, or promulgated in the future. This includes federal, state and local laws, rules, regulations, requirements, and policies governing nondiscrimination, labor, protection of the environment, and protection of public health and safety.

Area: The property within the boundaries of the respective National Park System unit under the Privilege Percentage Agreement.

Privilege Percentage Agreement: A binding written agreement between the NPS and an Operator entered into under 36 C.F.R. part 52. It authorizes the Operator to provide certain visitor services within an Area under specified terms and conditions.

Environmental Management Program (EMP): A program that (1) complies with all Applicable Laws pertaining to the protection of human health and the environment and (2) incorporates best management practices in the Operator's operation, construction, maintenance, acquisition, provision of visitor services, and other activities under the Privilege Percentage Agreement. The Operator must create, implement, and interpret its Environmental Management Program (EMP) and initiatives that support the goals, objectives, and themes of the Area. The EMP must account for all activities with potential environmental impacts conducted by the Operator or to which the Operator contributes.