

VEIA ENVIRONMENTAL MANAGEMENT PROGRAM STANDARDS

PURPOSE

These standards define the Owner's minimum requirements for the Management Company's Environmental Management Program (EMP) in accordance with the Owner's policy. The EMP is the management system the Management Company develops and implements to address the environmental management aspects of its operations. The Management Company 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 Owner 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 Management Company provides under the Management Agreement. The EMP can, and should be, simple and flexible to ensure it is fully embraced and implemented by the Management Company'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 Owner's standards.

Table 1 – VEIA EMP Elements

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

EMP Element 1 –Environmental Management Program Scope

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

Standards:

- 1.1 The Management Company's EMP scope covers the environmental objectives and environmental management aspects applicable to the operation including:
 - legal requirements (Applicable Laws), Management 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 Management Company's environmental policy. The policy indicates commitment to:
 - complying with Applicable Laws
 - protecting and conserving Area resources and human health
 - assigning responsibilities
 - providing staff and resources

- monitoring performance.

EMP Element 2 – Responsibility and Accountability

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

Standards:

- 2.1 The Management Company must identify an environmental officer and/or program manager and document this assignment in the EMP.
- 2.2 The Management Company 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 Management Company 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 Management Agreement, and the EMP.
 - Required training records, such as training materials, schedules, and participant records.
- 3.3 The Management Company has conducted and documented all training.

EMP Element 4 – Documentation and Operational Controls

The Management Company 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 Management Agreement.

Standards:

- 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 Management 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 Management 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 Management Company 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 Management Company'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 Management Company's environmental emergency plans are coordinated and agreements in place with other applicable parties such as the Owner, other federal, state, or local environmental agencies.

EMP Element 6 – Reporting

The Management Company must develop and implement procedures for reporting internally within the management company's organization, and externally to the Owner 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 Owner request. Additional plans, reports, and other documentation are submitted to the Owner 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 Owner.
- 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 Owner.
- 6.4 The Owner is provided timely written advance notice of, and the opportunity to participate in, communications with regulatory agencies regarding the Management Company's environmental activities.

EMP Element 7 – Monitoring, Measurement and Corrective Action

The Management Company must develop and implement inspection processes to identify environmental management issues and correct deficiencies identified through such inspections. The Management Company must effectively respond to environmental incidents. The Management Company 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 Owner'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 Owner 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 Owner 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 Owner within the Management Agreement's specified timeframe for review and must be approved by the Owner. Any subsequent documented EMP updates are submitted to the Owner 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 Management Company must meet those standards and requirements.

DEFINITIONS

Applicable Laws: The Federal, state, and local laws governing the Area, including, but not limited to, the rules, regulations, requirements, and policies promulgated under those laws, whether now in force or amended, enacted, or promulgated in the future. This includes without limitation, Federal, state and local laws, rules, regulations, requirements, and policies governing nondiscrimination, labor, protection of the environment, and protection of public health and safety.

Management Agreement: A binding written agreement between the Owner and a Management Company entered into under 36 C.F.R. part 52. It authorizes the Management Company 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 Management Company's operation, construction, maintenance, acquisition, provision of visitor services, and other activities under the Management Agreement. The Management Company 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 Management Company or to which the Management Company contributes.