

UPPER DELAWARE SCENIC & RECREATIONAL RIVER

Environmental Management Plan

Date of Plan: September 2005
Updated: July 2008

Upper Delaware Scenic & Recreational River (UPDE)

Environmental Management Plan (EMP)

Upper Delaware Scenic and Recreational River (UPDE) Environmental Management Plan documents the Park's Environmental Management System. The Plan's development and revision history and distribution list are as follows:

1. The current version was prepared in August 2005 and represents the final draft of the EMP.
2. The Plan will be reviewed annually by the Environmental Management Team (EMT).
3. The Plan is distributed to the members of the EMT (see appendix, Section D) and to the Superintendent.
4. Previous hard copy versions of the Plan are returned to the EMT and recycled. Previous electronic copies of the EMP are deleted.

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Approved by: Vidal Martinez
Superintendent

Date August 11, 2008

**UPDE EMS Manual
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Introduction to the UPDE Environmental Management Plan

1. This Plan describes the Environmental Management System (EMS) in place at Upper Delaware Scenic and Recreational River (UPDE). UPDE EMS includes all eight elements of the Model National Park Service EMS and conforms to the minimum requirements contained therein.
2. This Plan documents our overall EMS activities and our current EMS targets. Section B and C describe the process we follow to choose our current year's targets.
3. Each chapter contains the following sections: Purpose and Scope; Procedures; Responsibilities; Appendices; Related Documentation; and Records.

Section A: Environmental Commitment Statement (ECS)

Purpose

The purpose of this chapter is to provide the latest edition of our Environmental Commitment Statement (ECS).

Scope

The ECS governs our EMS activities at UPDE.

1.0 Procedures

1. Our ECS is prepared by the UPDE Environmental Management Team (EMT). It receives the full commitment of UPDE's management, including the Superintendent. Section D of this Plan contains a list of EMT team members and their contact information.
2. The final version and updates to the ECS are communicated to all NPS personnel and affected stakeholders at UPDE. The communication process is described in Section F of this Plan.
3. Our ECS is prepared, following guidelines described in Element A of the Model NPS EMS. In this way, we continually consider how our EMS can enhance environmental management activities at our park.
4. In addition to the procedures described in Section F, a copy of our park ECS is available at each park location. A copy of the ECS is provided in the Appendix to this section.

2.0 Responsibilities

1. The EMT reviews the ECS annually, during the planned January EMT meeting, to ensure that it is current and that it fully expresses our environmental management priorities at UPDE.
2. The Superintendent reviews and approves updates to the ECS.
3. The Superintendent signs approvals of each final version of the ECS.

3.0 Appendix

1. This Appendix contains the current version of the UPDE ECS.

4.0 Related Documentation

1. See Management Policies 2001, National Park Service.

5.0 Records

NA

ENVIRONMENTAL COMMITMENT STATEMENT
Upper Delaware Scenic & Recreational River

The purpose of the Upper Delaware Scenic & Recreational River (UPDE) is to conserve, protect, and interpret the river, its surrounding landscape and other superlative values that qualified the Upper Delaware River for inclusion in the National System of Wild and Scenic Rivers. In addition we are bound by the Organic Act of 1916, which states that **“the Service thus established shall promote and regulate the use of Federal areas known as national parks, monuments and reservations ... by such means and measures as conform to the fundamental purpose of the said parks, monuments and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”**

- In order to carry out its mission and ensure the preservation, conservation, and enhancement of the valuable natural, historic, and ecological resource with which we are entrusted, UPDE will provide environmental leadership by example.
- Will conduct our operations in an environmentally responsible manner, in accordance with NPS Director’s Order 13A and other pertinent directives and Executive Orders relating to the environment.
- Will meet or exceed all applicable federal, state, and local environmental laws and regulations.
- To fulfill these commitments, we will incorporate best management practices, foster the sustainable use of natural resources, promote pollution prevention, reduce waste generation, purchase environmentally preferable products, and recycle and reuse all materials where practicable in our operations.
- We will work cooperatively with federal, state, county, and local governments as well as with other organizations and local communities to promote sound environmental management of the park and, to the extent of our authority and influence, the surrounding region. We will strive to educate visitors, recreational users, and other park stakeholders on these concepts.
- Will strive for continual improvement in environmental management and provide leadership in working with suppliers, vendors, contractors, visitors, and partners to comply with these same principles.

Vidal Martinez
Superintendent
Upper Delaware Scenic & Recreational River

August 11, 2008
Date

Section B: Facility Activities and Environmental Impacts

Purpose

This chapter details the procedures we follow in order to assess our facility interactions, activities, and environmental impacts. Additional procedures included in this chapter govern the ranking of those interactions, activities, and impacts to determine which are significant to the environment at UPDE.

An understanding of these facility interactions and activities and their associated environmental impacts is important to determine the focus of our EMS, and to indicate areas where positive change in environmental management can be realistically made.

Scope

All interactions and activities that occur on or within the lands owned or leased by UPDE (including those of third parties and contractors) are subject to the procedures described in this chapter.

The above considerations are combined with recognition of, and a commitment to, compliance with all applicable laws, regulations, and policies that affect our park.

1.0 Procedures

1. The EMT will annually review park facilities and operations including, but not limited to, the following: our current environmental interactions and impacts; environmental compliance requirements stemming from all applicable laws, regulations, and policies including open audit findings; NPS Washington Area Support Office (WASO) and Region goals; and other goals and directives, including those established by DOI or Office of the Federal Environmental Executive (OFEE). Activities are also reviewed in light of our park mission, our ECS, recent performance results, and input from our park partners and stakeholders.
2. The park EMT will complete a Facility Interaction Assessment. In assessing these interactions, a scoring system will be used to determine the most significant impacts to our park and therefore those which will be the subjects and priorities of our objectives and targets. The latest version of the scoring system is included in Section 5.0 of this section.
3. Interactions, impacts, legal requirements, and other issues will be reviewed on an annual basis, in conjunction with our EMT review, to determine if there are any changes that should be reflected in our EMS.
4. The EMT proposes to begin the first year of our EMS by considering Priority 2 (non-conformance) and Priority 3 (non – regulatory) findings which were highlighted by our NPS environmental audit report. We will use the experience gained by accomplishing

such targets to strengthen our EMS in subsequent years to include other, perhaps more complex, facility interactions and associated environmental impacts.

2.0 Responsibilities

1. It is the responsibility of the EMT to conduct facility activities and environmental impact assessment.
2. The EMT will summarize the assessment and will discuss its contents and all new proposed objectives and targets.
3. The results of the assessment will be included in the Appendix to this section of the Plan.
4. The EMT will brief park staff upon achievement of specific EMS targets (see Section H).

3.0 Appendix

This Appendix contains the following:

1. Facility Interaction Assessment.
2. Significant Impact Ranking
3. Legal and Other Requirements
4. Regulatory Environmental Information Resources
5. Supplemental Environmental Information Resources

Facility Interaction Assessment

Facility Activity	Interaction(s)	Impact(s)
1. Administrative Facility Operation (offices, storage areas etc.)	Staff use electricity, fuel, water (restrooms) and a variety of consumable products. This generates wastewater and solids, universal, and occasionally hazardous wastes.	Consumptive use of power, water and raw materials. Wastes generated create disposal costs and environmental risks (water pollution) if not handled and disposed of properly.
2. Building Maintenance (carpentry, electrical. Painting, plumbing etc.)	Building maintenance activities use electricity, water, fuel, raw materials, chemical products. This generates solid, universal and hazardous waste.	Consumptive use of raw materials, power, fuel and water. Use of chemical products and generation of wastes contribute to employee health and safety risks. Waste generated create disposal costs and environmental risks (water pollution) if not handled and disposed of properly.
3. Fuel Use & Storage (vehicle and heating fuel)	Staff use gasoline and operate vehicles and equipment. Heating fuel is used to heat all park facilities.	Consumptive use of raw materials and chemical products. Storage tanks require monitoring and maintenance. Spills, leaks or fire can cause water, soil and/or air pollution concerns.
4. Hazardous Waste Management	Staff generate, handle and store hazardous waste at one designated location and one additional satellite site.	Proper hazardous waste disposal is labor intensive and costly. Leaks, spills or fire can cause water, soil and air pollution concerns.

5. Laboratory Operations	Staff use electricity, water, chemical or toxic substances and raw materials in the process of performing laboratory analysis of water samples. This generates solid and hazardous wastes.	Consumptive use of electricity, water and raw materials. Wastes generated create disposal costs and environmental risks if not handled and disposed of properly.
6. Procurement and Purchasing	Staff purchase and use a wide variety of products and equipment that use electricity, water, fuel, chemical substances and raw materials. This generates solid and hazardous wastes.	Consumptive use of electricity, fuel, water, and raw materials. Supplies/materials/equipment constitute a major operating cost, so life span and efficiency of products purchased has significant budgetary implications. Wastes generated create disposal costs and environmental risks if not handled and disposed of properly.
7. Property Management & Disposal	Park staff store excess, obsolete or unserviceable property and equipment, sometimes outdoors, pending disposal.	Storage of old property & equipment creates opportunities for spills and leaks. Disposal may cost the park operating budget and may generate solid and hazardous wastes.
8. Roads, Trails, Parking Lots & Grounds	The park operates and maintains one quarter mile of road, one mile of trail, five parking areas and grounds at six sites.	Consumptive use of fuel, electricity, water and raw materials; use of chemical or toxic substances; can create storm water runoff issues and generate solid and hazardous waste. Spills and leaks can cause water, soil and air pollution concerns.

<p>9. Solid & Universal Waste Management</p>	<p>The park operation generates solid and universal wastes. Park visitors contribute a significant volume of solid waste to the park waste stream. Park staff store and dispose of a minimal amount of solid and universal waste.</p>	<p>Proper handling and disposal is costly. Leaks, spills, or fire can cause water, soil and air pollution concerns.</p>
<p>10. Utility Systems (water, wastewater, electric, telephone etc.)</p>	<p>Operation of park utility systems use electricity, water, fuel, raw materials and chemical products. These activities generate wastewater, solid and universal and hazardous waste.</p>	<p>Consumptive use of raw materials, power, fuel and water. Use of chemical products and generation of wastes contributes to employee health and safety risks. Spills & leaks can cause water and soil concerns.</p>
<p>11. Vehicle & Equipment Use & Maintenance</p>	<p>Operation and maintenance of motorized vehicles & equipment uses fuel, chemical substances and raw materials. The activities generate air emissions, solid wastes and hazardous wastes.</p>	<p>Consumptive use of fuel and raw materials. Use of chemical products and generation of wastes contribute to employee health and safety as well as environmental risks. Waste generated create environmental risks if not handled and disposed of properly. Spills & leaks can cause water, soil and air pollution concerns.</p>
<p>12. Electrical Energy Use</p>	<p>Staff and visitors use electrical energy for lighting, heating, air conditioning, pumping water, operating appliances and power tools, etc.</p>	<p>Consumptive use of electrical energy and raw materials used to generate electrical energy, generation of air emissions at power stations has impacts upon the air, land and water; power distribution infrastructure has a visual impact upon landscapes, land values and alternative use impacts.</p>

Significant Impact Ranking

Facility Activity	Severity	Frequency	Financial	Stakeholder	Total
1. Administrative Facility Operations	1	3	2	1	7
2. Building Maintenance	2	2	2	1	7
3. Fuel Use & Storage	3	1	2	2	8
4. Hazardous Waste Management	1	1	2	2	6
5. Laboratory Operations	1	1	2	2	6
6. Procurement and Purchasing	1	3	2	1	7
7. Property Management & Disposal	1	1	2	1	5
8. Roads, Trails, Parking Lots and Grounds	2	2	2	1	7
9. Solid & Universal Waste Management	2	2	2	2	8
10. Utility Systems	1	1	2	1	5
11. Vehicle & Equipment Use & Maintenance	2	1	2	1	6
12. Electrical Energy Use	2	2	2	1	7

See Page 13 for scale information

Legal and Other Requirements

Program Area/Requirement
<i>Environmental Laws, Regulations and Policies (including requirements to appropriately store, handle, and use HM).</i>
Federal Laws and Regulations
State Laws and Regulations
Environmental Plans
Green Procurement
Emergency Action Plan (list version and date)
Spill Prevention Control and Countermeasure Plan/Emergency Response Plan (list version and date)
Vessel Response Plan (list version and date)
Hazard Communication
Environmental Permits
New State UST Permit #1723A
RCRA Generator #555
Boiler Emission Permit #GR-07-6323-90
Energy Conservation (Executive Order 13123)
Town of Localburg Wastewater Discharge License – December 1999

Regulatory Environmental Information Resources

Source	Data	Address/Park Location	Access
Internet	Federal environmental laws and regulations, guidance	www.epa.gov	BEST-wide
Internet	State environmental laws and regulations, guidance	www.state.us	BEST-wide
Paper copy	Localburg environmental laws and regulations, guidance	Environmental Coordinator's office	Upon request

Supplemental Environmental Information Resources

Source	Data	Address/Park Location	Access
Internet	DOI environmental policies	www.doi.gov/	UPDE-wide
Internet	DOI environmental guidance - Office of Environmental Policy and Compliance (environmental compliance, NEPA, NRDA)	www.doi.gov/oepe	UPDE-wide
Internet	Greening the Government Executive Order 13123	www.eere.energy.gov/femp/resources/exec13123.html	UPDE-wide
Internet	OSHA regulations	www.osha.gov/SLTC/hazardcommunications/index.html	UPDE-wide
Internet	DOI environmental guidance – Property Acquisition and Management (environmentally preferable purchasing)	www.doi.gov/pam	UPDE-wide
Internet	General environmental information	www.cleanstuff.com	UPDE-wide
Service Intranet	Enter key Service intranet sites	www.nps.gov	UPDE-wide
Paper Copies/CD	EMS training and resource materials	EMT Files	Upon request
Paper Copies/CD	Pollution Engineering Magazine & similar reference materials	Environmental Coordinator's office	Upon request
Telephone/in person	Greening and natural resource management reference materials, case studies	Natural Resource Manager's Office	Upon request

4.0 Related Documentation

The 2004 Environmental Audit, conducted by Prizim, identified a total of 40 findings. The relative distribution of these findings by priority is: zero priority 1 findings, 26 findings were priority 2 and 14 findings were priority 3. The distribution of these findings by area of criteria were: 6 findings were associated with EPA requirements (40 CFR), 11 findings with OSHA requirements (29 CFR), 9 findings with state requirements, Executive Orders, DOI or NPS Policies, National Fire Protection Association and Uniform Fire Code requirements and 14 findings with NPS adopted BMP criteria that go beyond compliance requirements.

There were no priority 1 findings but there were priority 2 findings that must be addressed. Most of these findings can be resolved through development of plans or procedures, documentation, communication, training and periodic review. Overall, the implementation of the Park EMS will provide additional opportunities for the Park to address many of these issues.

5.0 Records

The following components make up our Significant Impact Ranking system. Each facility interaction is assessed and, based upon a summation of the following criteria, is deemed significant or not significant. We currently set a minimum score of 8 to determine significance of an impact.

1. We assign a ranking score to each impact based on the following four criteria:
 - a. *Severity* – What is the severity of the impact?
 - 1- Minimal severity or aesthetic impact only
 - 2- Moderate impact to water, air, or land quality
 - 3- Substantial impact to water, air or land quality, or detrimental to the health of humans, flora, or fauna
 - b. *Frequency* – What is the overall frequency or probability of the impacts occurring?
 - 1- Low frequency - less than once a year
 - 2- Moderate frequency - more than once a year, but less than once a month
 - 3- High frequency - monthly or more frequent
 - c. *Financial* – What is the overall economic effect of correcting the impact?
 - 1- Correcting the impact is likely to be prohibitively expensive
 - 2- Associated costs are negligible or modest
 - 3- Correcting the impact is likely to save the park money and/or provide a financial payback
 - d. *Stakeholders* – How would stakeholders react to, or be affected by, the impact?
 - 1- Neutral or disinterested

- 2- Mildly concerned
- 3- Greatly concerned

2. Once ranking scores have been assigned, we add up the rows. Impacts with ranking scores greater than 8 can be considered significant impacts, and are worthy of addressing through our EMS.

Section C: Environmental Management Plan

Purpose

To describe the process used by the UPDE EMS to choose appropriate objectives, targets, goals for our EMS.

Scope

This section contains a description of how we choose our objectives, targets, and goals for the significant impacts previously identified in Section B.

Objectives, targets, and goals are identified and reviewed during this process to maintain and improve park operations, minimize park impact to the ecosystem, and demonstrate environmental leadership.

These objectives, targets, and goals are to be practical and realistic, and should provide clear direction regarding park environmental management activities. Chosen objectives, targets, and goals will normally be achieved within the calendar year.

1.0 Procedures

1. The EMT will refer to the contents of the Significant Impact Ranking Table in Section B to identify those significant impacts which are to be addressed through the imposition of objectives, targets, and goals.
2. In addition, the EMT will refer to the list of open environmental audit findings as part of the process of determining appropriate objectives, targets, and goals. We will refer to the policy or regulation that relates to the audit finding to provide specific guidance in determining what will be needed to achieve an objective, target, or goal if that finding is selected.
3. The objectives, targets, and goals will be listed in separate tables and will be included in the Appendix to this chapter. Any information used to substantiate the choice of objectives, targets, and goals will be incorporated or referenced in Section 4.0 of this chapter.

2.0 Responsibilities

1. The EMT will select the EMS objectives, targets, and goals for the year.

3.0 Appendix

The Appendix contains the following:

1. A table identifying each objective, target, and goals.

Environmental Management Plan

Objectives, Targets, and Goals

Objectives and Targets	Responsible Parties	Existing or New Program	Completion Date and Report Due	Notes
<p>1. Fuel Use & Storage</p> <p>Objectives:</p> <ul style="list-style-type: none"> A. Develop small “spill” clean-up procedures for vehicles, boats and equipment. B. Conduct and document yearly oil tank inspections. C. Acquire, maintain and stage spill equipment at designated locations. <p>Targets:</p> <ul style="list-style-type: none"> A. Draft plan B. Inspect annually C. Distribute to appropriate areas. 	<p>Alan Henry/ Pat Connolly</p> <p>Pat Connolly/ Loren Goering</p> <p>Pat Connolly</p>	<p>EP</p> <p>EP</p> <p>EP</p>	<p>Dec 2006</p> <p>July 2008</p> <p>Ongoing, July 2008</p>	<p>Spills over 5 gallons call outside agencies for assistance. Spills under 5 gallons can be cleaned by trained park staff.</p> <p>Also conduct visual inspections for leaks bi-weekly during winter</p> <p>Pigs, absorbent pillows, and drain plugs are in place at all interior tank locations.</p>
<p>2. Solid & Universal Waste Management</p> <p>Objectives:</p> <ul style="list-style-type: none"> A. Consolidate used fluorescent tube in waste storage area. B. Store recycled tires flat so water is not collected in them. C. Assure lids to dumpsters remain closed. D. Document quality of lead-acid or Ni-cad batteries recycled in the Park <p>Targets:</p> <ul style="list-style-type: none"> A. 100% of Park fluorescent light bulbs are recycled. B. All tires picked-up from River clean-up &/or access areas are stored properly. C. 50% of dumpster lids are closed at all times. D. Documents are filed at the HQ central file. 	<p>Pat Connolly</p> <p>Maintenance & Don Hamilton</p> <p>S. Maciejewski</p> <p>Cliff Daniels</p>	<p>EP</p> <p>EP</p> <p>EP</p> <p>EP</p>	<p>May 2008</p> <p>Ongoing, July 2008</p> <p>Aug 2008</p> <p>Ongoing, Sep 2007</p>	<p>Also any bulbs containing mercury are recycled.</p> <p>Tires stored in evaporator shed until transported out of park.</p> <p>Contract amended to require lids to be closed.</p> <p>List of recycled batteries is kept on file at the Barryville Office.</p>

4.0 Related Documentation

The following table contains information taken from Executive Order 13123:

Sec. 201. Greenhouse Gases Reduction Goal. Through life-cycle cost-effective energy measures, each agency shall reduce its greenhouse gas emissions attributed to facility energy use by 30 percent by 2010 compared to such emissions levels in 1990.
Sec. 202. Energy Efficiency Improvement Goals. Through life-cycle cost-effective measures, each agency shall reduce energy consumption per gross square foot of its facilities, excluding facilities covered in section 203 of this order, by 30 percent by 2005 and 35 percent by 2010 relative to 1985.
Sec. 204. Renewable Energy. Each agency shall strive to expand the use of renewable energy within its facilities and in its activities by implementing renewable energy projects and by purchasing electricity from renewable energy sources.
Sec. 205. Petroleum. Through life-cycle cost-effective measures, each agency shall reduce the use of petroleum within its facilities. Agencies may accomplish this reduction by switching to a less greenhouse gas-intensive, non-petroleum energy source, such as natural gas or renewable energy sources; by eliminating unnecessary fuel use; or by other appropriate methods. Where alternative fuels are not practical or life-cycle cost-effective, agencies shall strive to improve the efficiency of their facilities.
Sec. 207. Water Conservation. Through life-cycle cost-effective measures, agencies shall reduce water consumption and associated energy use in their facilities to reach the goals set under section 503(f) of this order. Where possible, water cost savings and associated energy cost savings shall be included in Energy-Savings Performance Contracts and other financing mechanisms.

The EMT understands that UPDE is not in itself an Agency; but a park within the NPS. However, we recognize that efforts we make at the park-level will be combined at the Service-level and ultimately at the DOI-level. All of the efforts we make will contribute to the achievement of the energy goals as stated in EO 13123.

5.0 Records

NA

Section D: Roles, Responsibilities, and Accountability

Purpose

To assign roles, responsibilities, and accountability to personnel charged with both specific EMS tasks and general environmental management activities within UPDE.

Scope

Sound environmental practices, like sound safety practices, are considered everyone's job at UPDE. This responsibility is incorporated into all position descriptions as a general performance element under environmental management.

The EMT will identify key roles and responsibilities for appropriate third parties (contractors) operating in the park. These roles and responsibilities will be incorporated into appropriate contract documents.

1.0 Procedures

1. The EMT will compile a detailed listing of all personnel on the EMT.
2. The EMT will list all personnel involved with the UPDE EMS.
3. The roles and responsibilities identified in this section will conform to the established personnel system based on Service requirements.
4. Employees will be informed of their designated environmental responsibilities when they start their job. They will be made aware of these responsibilities and associated environmental practices at the time of assignment through an initial park orientation training and specific job orientation provided by their supervisor.
5. Duties will be assessed by supervisors during the course of day-to-day activities. Supervisors will be responsible for correcting staff on an *ad hoc* basis when improper procedures are observed.
6. Supervisors will be responsible for conducting formal annual performance evaluations for staff under their administration. This performance evaluation considers employee performance related to general performance requirements; job specific performance requirements in personnel position descriptions; and the individual's success in meeting EMS goals. Performance is to be measured using Service criteria and procedures.
7. Failure to complete designated environmental responsibilities in a satisfactory manner may be grounds for disciplinary action and termination, in accordance with Service policies and procedures, depending upon the severity and persistence of the behavior.

2.0 Responsibilities

The EMT will update the tables detailing EMT and other EMS personnel responsibilities.

3.0 Appendix

The Appendix contains the following:

1. A table listing the members of the UPDE EMT.

Environmental Management Team

Position	Name	Contact Information
Team Member	Park Superintendent Vidal Martinez	570-729-8251 Radio Call #: 100 vidal_martinez@nps.gov
Team Member	Assistant Superintendent Sandra Schultz	570-729-8251 Radio Call #: 101 sandra_schultz@nps.gov
Team Record Keeper	Maintenance Management Assistant Paula Lasko	570-729-7137 Radio call # 420 Paula_Lasko@nps.gov
Deputy Team Leader	Chief of Maintenance Pat Connolly	570-729-7137 Radio Call #: 410 patrick_connolly@nps.gov
Team Member	Chief of Protection Alan Henry	570-729-7134 Radio Call # 210 alan_henry@nps.gov
Team Leader	Chief of Interpretation Loren Goering	570-729-7574 Radio Call # 510 loren_goering@nps.gov
Team Member	Administrative Officer Karen Henry	570-729-8255 Radio Call #: 310 karen_henry@nps.gov
Team Member	Natural Resource Specialist Don Hamilton	570-729-7842 Radio Call # 612 don_hamilton@nps.gov
Team Member	Cultural Resource Specialist Dot Moon	570-685-4871 Radio Call #611 dorothy_moon@nps.gov

EMS Roles and Responsibilities

Position	Responsibility
Superintendent	General manager of Upper Delaware Scenic and Recreational River with overall responsibility for the management of park programs, operations and internal/external relationships. Serves to assist EMT leader.
Assistant Superintendent	Assist the Superintendent with the management of park programs and external relationships. Serves as EMT member.
Maintenance Management Assistant	Record keeper for EMS documents and meeting note taker. Serves as EMT member
Chief of Maintenance	Manages park facility maintenance operations and programs. Serves as Deputy EMT leader.
Chief of Protection	Manages resource and visitor protection operations and programs. Services as Emergency Spill Response Coordinator and EMT member
Administrative Officer	Coordinates any contracts/purchases that may be necessary to implement EMS. Serves as EMT member
Chief of Interpretation	Serves as Park's Collateral Duty Safety Officer and the EMT leader.
Natural Resource Specialist	Manages the park's natural and cultural resource and science programs. Serves as EMT member and offers profession advise on natural resource issues.
Cultural Resource Specialist	Manages the park's cultural resource programs. Serves as EMT member.

4.0 Related Documentation

NA

5.0 Records

NA

Section E: Document Control, Recordkeeping, and Reporting

Purpose

To describe the procedures to be followed to ensure that a comprehensive environmental document and record management system is implemented and maintained at UPDE. This system will ensure that all appropriate personnel have access to the documents and records necessary to manage environmental activities at UPDE.

Scope

This section describes how we manage our environmental documents and records at UPDE.

1.0 Procedures

1. EMS documents for UPDE are maintained through a formal file management system. The central EMS documents file is maintained at the park headquarters. This file contains all key environmental documents and records generated by the UPDE EMS. An EMT designated Record Keeper is responsible for maintaining the file. In addition, key EMS documents are included in various appendices in this Plan.
2. Environmental records for UPDE are maintained through a formal environmental document and record management system. This system conforms to Service and Region standards. The system is designed to ensure compliance with all reporting requirements mandated by law, regulation, and policy; to maintain accountability for key operations; to assure timely and efficient access to environmental data; and to maintain security where necessary. The system consists of both hard copy and electronic files (where allowed by law). The EMT Record Keeper is responsible for maintaining the reporting file.
3. Each EMS document and record will receive a label containing specific information that will help in its control and file management. See UPDE's record Management SOP for labeling documents and records. See Section 6 of this Plan for a detail graphic depicting the contents of the EMS label.
4. Certain files such as logs and inspection or monitoring reports are generated, and/or are required to be maintained, in operational areas. These reports are maintained at the point of use and are under the administrative control of the operational area supervisor. Some of these operational files may be designated as "important". These files are duplicated and copies or originals are maintained in the central file.
5. Our EMS Documentation and Environmental Records tables are intended to list all of the key documents, records, and reports used, generated, and/or submitted by the park. These reference tables are not designed to include actual documents and records. The documents and records requirements listed in this table are reviewed and the table is updated at least annually. A copy of the summary table is in the Appendix to this chapter.

2.0 Responsibilities

1. The EMT is responsible for overseeing and making any required changes to the document control, recordkeeping, and reporting procedures.
2. The EMT Record Keeper is responsible for keeping the EMS Documentation and Environmental Records tables current.

3.0 Appendix

The Appendix contains the following:

1. A table listing the existing UPDE EMS documentation.

EMS Documentation

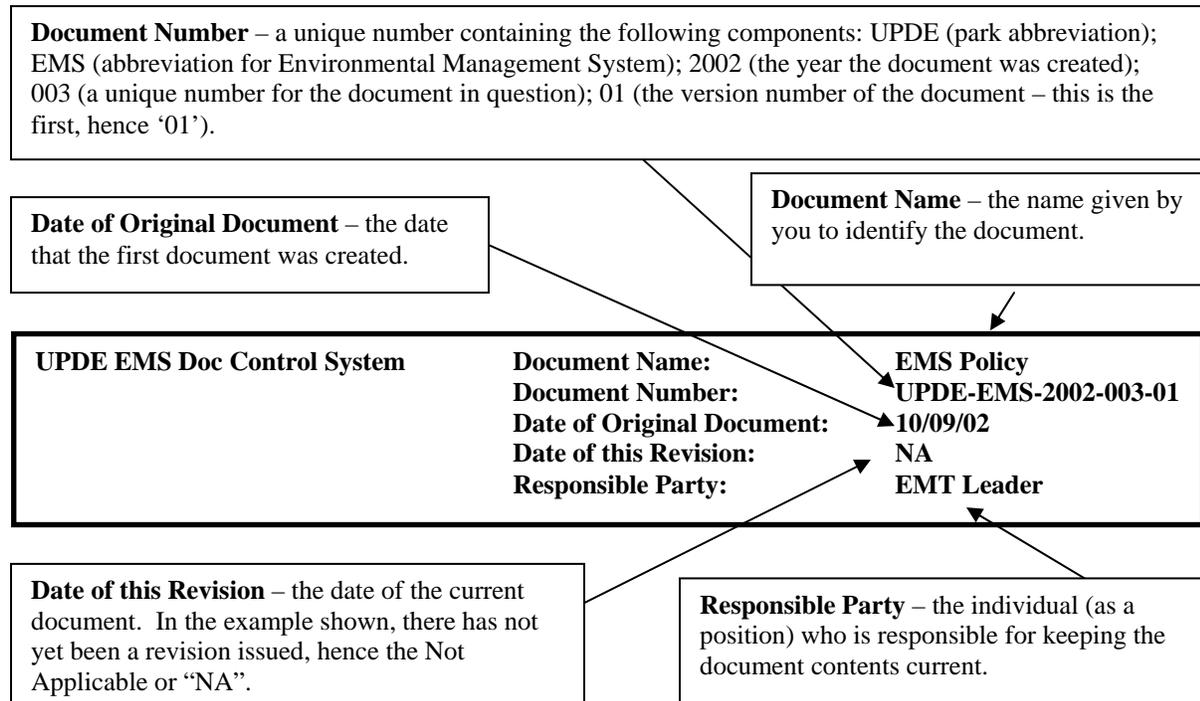
Document Name	Location	Party Responsible for Update
UPDE Environmental Management Plan	Posted in HQ annex building	Chief of Interpretation
EMS planning activities and operational procedures	Chief Maintenance Office	EMT Record Keeper
EMS Roles and Responsibilities	EMP	Chief of Interpretation
External Audits	Chief Maintenance Office	EMT Record Keeper
Annual Management Review	Chief Maintenance Office	EMT Leader
Manifests	Resource Office – Milanville with copy in HQ files	Natural Resource Specialist
Reports of Inspections - Heating oil tanks - Park Facilities	Maintenance Office Collateral Duty Safety Officer Office	Maintenance Work Leader Collateral Duty Safety Officer
Training Records	Operations Building	Support System Assistant
IPM Database (pesticide use logs)	Resource Office – Milanville	Natural Resource Specialist
UPDE Hazardous Communications Plan	Each Park Facility	Chief of Maintenance
Integrated Pest Management Plan	Resource Office – Milanville	Natural Resource Specialist
Green Procurement	Central Files	Administrative Clerk
Disposal Records	Central Files	Administrative Clerk
Solid Waste Plan	Chief of Maintenance Office	Chief of Maintenance
Emergency Action	Protection Office	Chief of Protection
Chemical Hygiene Plan	Annex Building/ Resource Management Lab	Natural Resource Specialist

4.0 Related Documentation

NA

5.0 Records

The following graphic depicts the elements of our document and record management label, attached either electronically or manually to each controlled document and record.



Section F: Communication

Purpose

To ensure that all appropriate parties requiring information to manage environmental activities at UPDE receive that information in a timely manner and to publicize the successes of the UPDE EMS and to involve all interested parties in environmental management at the park.

Scope

This section details the UPDE approach to conduct communications internally (within park boundaries) and externally (outside park boundaries).

Information relating to the communication required to achieve the identified goals, objectives, and targets is also included.

1.0 Procedures

1. The EMT will utilize general internal and external communication.
2. Internal communication will ensure that all staff and appropriate partners operating in the park are kept up to date on environmental matters and are provided with the necessary information to perform their duties.
3. Internal communication methods will be designed to provide park personnel with key information and to provide a venue for personnel to provide input on environmental performance. Methods of communication will include training classes, staff meetings (including a monthly safety and quarterly environmental meeting), fact sheets, formal and informal talks, internal emails and memoranda, and bulletin board postings.
4. External communication will ensure the appropriate sharing of information with all parties interested in the operation of UPDE.
5. External communication will be maintained through formal National Park Service public announcements, the general Service website (www.nps.gov) and park website, press releases, community meetings, public interfaces, external memoranda, and other casual information sharing. All public announcements will conform to Service protocol and Region standards. External parties vary considerably, from park support groups (e.g., Friends of the Park) to interested visitors requesting information on park greening practices and energy and water conservation, and park communications may require adjustments according to their intended audience.
6. The EMT will design and implement specific communication needs relating to the achievement of the identified goals, objectives, and targets.

2.0 Responsibilities

1. The EMT is responsible for maintaining the communication strategy.
2. The Superintendent or designated individual reviews all external documentation prior to release.

3.0 Appendix

The Appendix contains the following:

1. A table detailing both the general internal and external communication strategy and the specific strategy associated with achieving goals, objectives, and targets of the EMS.

EMS Communication Strategy

Audience	Communication Type / Mechanism	Content	Responsibility
General Internal Communication			
UPDE Staff	Informal personal contacts Written policies & procedures All-employee memoranda and/or e-mail messages Training sessions	Information about park programs, policies and issues Park policies and procedures Park policies and procedures General orientation, as well as job-specific requirements	Superintendent Assistant Superintendent Division Chiefs Front Line Supervisors
Regulatory Agencies	Informal: telephone calls, e-mail, site visits Formal: compliance inspection, written correspondence	Inquiry, information sharing, problem resolution Transmission of required reports. Response to official inquiries or notices	Superintendent Assistant Superintendent Collateral Duty Safety Officer
General Public	Informal personal contacts Press releases Educational programs Interpretive exhibits	Sharing information about park programs, policies, issues and accomplishments to develop constituency and support	Superintendent Assistant Superintendent Chief of Interpretation
UPDE Staff Managing HM	Draft email	Describes the need for new and appropriate procedures to correctly store, handle, and use HM	Maintenance Foreman

4.0 Related Documentation

NA

5.0 Records

NA

Section G: Training

Purpose

To provide a system to manage the environmental training needs of personnel at UPDE; to ensure that appropriate environmental information is given to the correct personnel to enable them to carry out their duties to the best of their abilities.

Scope

This training section describes how we manage our environmental training program at UPDE.

1.0 Procedures

1. The EMT will strive to provide personnel at UPDE are provided with the requisite knowledge to safely, competently, and legally fulfill their EMS responsibilities.
2. Individual Division Chiefs will annually assess all positions under their control at UPDE to determine the associated training requirements for these positions. Division Chiefs will coordinate such a review with the personnel department and the EMT.
3. Management will be invited to report to the EMT on a periodic basis (no less than annually, at a regular EMT meeting) with regard to the training requirements for personnel under their supervision and the status of training for those individuals.
4. Based on the assessment under 1.2 of this section, training will be scheduled by management (and coordinated through the EMT) for specific individuals.
5. Different methods of training can be utilized at UPDE, including traditional classroom, field practicum, and distance learning. Training will be offered through internal park programs, Region, and Service programs, and commercial trainers.
6. All training conducted at UPDE will comply with training standards developed by the Region and the Service.

2.0 Responsibilities

1. Individual responsibilities for determining training requirements and maintaining training records are described in Section 1.0 of this chapter.
2. Overall coordination of training at UPDE lies with the EMT.

3.0 Appendix

The Appendix contains the following:

1. The UPDE Environmental Training Matrix.

Environmental Training Matrix

Training	Type	Trainer	Trainees	Frequency
EMP Awareness	In-house	Collateral Duty Safety Officer	All	Initial hire; annual refresher
SOPs (specify)	In-house	Front Line Supervisor	Applicable Personnel	Initial hire
Green Procurement	In-house	Administrative Officer	Applicable Personnel	Initial hire; annual refresher
Lab Procedures	In-house	Biologist	Applicable Personnel	Interns, seasonals and VIPs
HAZWOPER	On – Site	Professional HAZWOPER Trainer	Designated Emergency Response Personnel	Annual
Energy Conservation	In – house	Chief of Maintenance	Applicable Personnel	Initial hires and summer employees
Bloodborne Pathogen	In – house	EMS Coordinator	All employees	Annual refresher
General Park Safety Issues	In – house	Collateral Duty Safety Officer	Applicable Personnel	Initial hires and summer hires
Integrated Pest Management SOP	In – house	Natural Resource Specialist	Applicable Personnel	Annual refresher

4.0 Related Documentation

NA

5.0 Records

1. The summary Environmental Training Matrix will be updated to reflect the current situation determined by the activities in sections 1.2 and 1.3 of this chapter. At a minimum, the matrix will detail the type and frequency of training required by UPDE staff in their various positions. It will also include who has been trained and who is responsible for administering the training.
2. In order to ensure that all the appropriate training has been received by a particular individual or position, detailed records of who has received environmental training will be maintained by the division and/or the personnel department. These individual training records will be kept as part of the employee's personnel file.

Section H: Monitoring, Measurement, Corrective Action, and Management Review

Purpose

To ensure we have the best opportunity to achieve our goals, objectives, targets, and other environmental management responsibilities within UPDE; to correct efforts where needed; and provide guidance and assistance to those involved in achieving positive outcomes in environmental management in the park.

Scope

This section describes the various assessments we undertake to ensure that the performance of our environmental management activities, and that of other parties operating within the park, meets the standards set in our EMS Plan.

1.0 Procedures

1. We will conduct an annual Environmental Performance Review (EPR). The EPR will be led by the EMT Team Leader and will determine whether the park has achieved the environmental goals, objectives, and targets described in Chapter C of this Plan. The results of the EPR will be documented and a copy included in the Appendix to this chapter and maintained on file in the Superintendent's office.
2. If no progress has been made towards the stated goals, objectives, and targets, the EMT will determine the reasons why, and will implement new operating procedures that will encourage appropriate personnel at UPDE to achieve our stated environmental goals, objectives, and targets.
3. The EMT meets bi-annually to review how well the park is doing in achieving the goals, objectives and targets and other EMS requirements. These reviews are designed to allow for "mid-course" corrections to be effected if it is determined that suitable progress towards achieving the goals, objectives and targets has not been made and their final achievement is unlikely. The goals, objectives and targets action plan will be updated after the quarterly review.
4. The Collateral Duty Safety Officer will conduct periodic inspections of hazardous waste storage areas and lab facilities.
5. A designated Maintenance employee will conduct monthly inspections of heating fuel tanks throughout the park.
6. The Park Collateral Duty Safety Officer conducts inspections of park facilities and will report finds to the Safety Committee and EMT.
7. All employees are encouraged to report environmental and safety concerns to their supervisor. Reported concerns are forwarded to the EMT for review and investigation.

8. Every three to five years the park should receive a follow-up audit from the region using the NPS Environmental Audit protocol. The EMT coordinates the audit with appropriate regional personnel.

2.0 Responsibilities

The specific responsibilities for monitoring and reporting are dependent on the involvement of individuals in specific goals, objectives, and targets. The overall responsibility for ensuring the monitoring and reporting activities described in Section 1.0 take place lies with the EMT.

3.0 Appendix

The Appendix contains the following:

1. The Monitoring and Measurement summary matrix (including overall EMS and specific goals, objectives, targets, and associated responsibilities).

Monitoring and Measurement

Review Event	Frequency	Responsibility	Results Due
Individual site inspections or audits	Various	Collateral Duty Safety Officer or designated park staff	To Safety Committee and EMT. Results to Record Keeper
EMS Assessment	Annually in October	EMT	To park Superintendent Results also to Record Keeper
Energy Audit	Annually	Chief of Maintenance	Completion of audit by October of each year. Recommendations for energy efficiencies and new projects by December 15, of each year.

Review Event	Frequency	Responsibility	Results Due
Inspection of hazardous waste storage area	Periodic	Collateral Duty Safety Officer	Periodic to the Safety Committee and EMT
Environmental Audit	Every 3-5 years	Regional Office	To Superintendent and Record Keeper
Heating fuel tank inspections	Monthly	Maintenance Staff	To Chief of Maintenance and Record Keeper

4.0 Related Documentation

NA

5.0 Records

1. EPR summaries will be included in the Appendix to this chapter.
2. Any documents developed during monitoring and measurement activities will be included in the Appendix to this chapter.
3. Any required Corrective Action Forms will be included in the Appendix to this chapter.