

**National Park Service
Craters of the Moon National Monument & Preserve**



Environmental Management System Manual

January 29, 2013

Approved: /s/ Dan Buckley

Superintendent

 1-29-2013

Date

Craters of the Moon National Monument and Preserve (CRMO) Environmental Management System Manual Revision History and Distribution List

1. The Environmental Management System (EMS) Manual (Manual) will be reviewed periodically by the Environmental Management Team (EMT). The current version was first drafted in 2005, with the most recent version finalized in January 2013.
2. The most current version of the EMS Manual will be made available to all park staff via computer on the park's share drive.
3. Paper copies of the EMS Manual will be made purposely limited (see #2 above).

CRMO EMS Manual

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1. This Manual describes the Environmental Management System (EMS) in place at Craters of the Moon National Monument & Preserve (CRMO).
2. The CRMO EMS addresses all eight Elements of the Model NPS EMS and conforms to the NPS requirements contained therein.
3. This Manual documents our overall EMS activities and our current EMS targets. Section 2 and 3 describe the process we follow to choose our current year's targets.
4. Each section contains the following: Purpose, Scope, Procedures, Responsibilities, and Appendix.

As we embark on implementing the Environmental Management System (EMS) at Craters of the Moon National Monument & Preserve (CRMO), it is important to consider what we have achieved in advance of the National Park Service implementation of EMS. Following is a partial list of actions already taken in recent years prior to 2005 to make operations at the park more environmentally sound:

- Replacing light fixtures with lower wattage bulbs
- Widespread use of recycled plastic lumber
- Consultations with N.R.E.L., Bonneville Power Administration, Lost River Electric Cooperative and others in design and construction of facilities and evaluation of alternative energy sources
- Conversion of landscaped areas from lawns to native vegetation to conserve water
- Solar powered pump for domestic well
- Reduction in trash receptacles and conversion from individual cans to dumpsters to improve efficiency in trash collection and eliminate one dump truck from vehicle fleet
- Working with local communities and agencies in disposing of excess property to extend useful life of surplus equipment and materials
- Conducted an assessment of asbestos in all buildings, and removed some of the materials with known asbestos content
- Replacing cleaning products with "green" products
- Long-term recycling of aluminum containers and white paper products and trial recycling of other materials

Numerous projects aimed at weather proofing buildings to reduce energy requirements.

- Replacement of 2-cycle all-terrain (four & six wheelers) with 4-stroke models.
- Purchase of some fleet vehicles with better fuel efficiency.
- Replacement of 2-cycle snowmobiles with 4-stroke models.

1.0 Environmental Commitment Statement (ECS)

1.1 Purpose

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

1.2 Scope

The ECS governs our EMS activities at CRMO.

1.3 Procedures

1. Our ECS is prepared by the CRMO Environmental Management Team (EMT). It receives the full commitment of CRMO's management, including the Superintendent. Section 4 of this Manual contains a list of EMT team members.
2. The final version and updates to the ECS are communicated to all NPS personnel and affected stakeholders at CRMO. The communication process is described in Section 7 of this Manual.
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. A copy of the ECS is provided in the Appendix to this section.

1.4 Responsibilities

1. The EMT reviews the ECS annually. During the January 2013 meeting the EMT met to ensure that it is current and that it fully expresses our environmental management priorities at CRMO.
2. The Superintendent reviews and approves updates to the ECS by signing each final version of the ECS.

1.5 Appendix

1. Craters of the Moon National Monument & Preserve Environmental Commitment Statement

ENVIRONMENTAL COMMITMENT STATEMENT
Craters of the Moon National Monument & Preserve

We at Craters of the Moon National Monument & Preserve (CRMO) 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 resources with which we are entrusted, CRMO will provide environmental leadership by example. We 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. We 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 continue to 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.

We will strive for continual improvement in environmental management.

We at CRMO will provide leadership in working with park suppliers, vendors, contractors, visitors, and patrons to comply with these same principles.

Signed,

/s/ Dan Buckley
Superintendent
Craters of the Moon National Monument & Preserve

January 29th 2013
Date

2.0 Facility Activities and Environmental Impacts

2.1 Purpose

CRMO will assess our facility interactions, activities, and environmental impacts. Additional procedures included in this section govern the ranking of those interactions, activities, and impacts to determine which are significant to the environment at CRMO.

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.

2.2 Scope

All interactions and activities that occur within the boundaries of CRMO (including those of third parties, contractors, and concessionaires) are subject to the procedures described in this section.

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

2.3 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 applicable laws, regulations, and policies including open audit findings; and applicable NPS Washington Area Support Office (WASO) and Region goals. 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 an Interactions and Impacts Analysis. 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 the Appendix of this section.
3. Interactions, impacts, legal requirements, and other issues will be reviewed on an annual basis 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 regulatory and non-regulatory findings which were identified by our NPS environmental audit report. We will use the experience gained by accomplishing such targets to reduce findings and strengthen our EMS in subsequent years to include other, perhaps more complex, facility interactions and associated environmental impacts.

2.4 Responsibilities

1. It is the responsibility of the EMT to conduct an Interactions and Impacts Analysis.

2. The EMT will summarize the analysis and will brief park management on its contents and all new proposed objectives and targets.
3. The results of the analysis will be included in the Appendix to this section of the Manual.

2.5 Appendix

This Appendix contains the following:

1. Interactions and Impacts Analysis Summary.
2. Our Significant Impact Ranking, which is used to evaluate facility interactions, activities, and their impacts on chosen targets.
3. A partial listing of our legal and other requirements and where these resources may be found in both hard copy and electronic versions. *Note: This list will be developed over time as the park EMT develops greater understanding and has more resources available to implement this program.*
4. Recent Audit findings
5. Interactions and Impacts Analysis Ranking System

Interactions and Impacts Analysis

Facility Activity	Interaction	Impact
Office Activities/Office Supplies	Use of paper products, computers, energy, supplies, janitorial products, and other office-type products.	Use of natural resources, hazardous materials is a potential impact to the health of employees and the environment, use of fossil fuels and non-renewable resources, solid waste contributes to landfill, energy use impacts air quality and pollution.
Hazardous Material (HM) Storage, Handling, and Use	Staff and contractors store, handle, and use HM in a variety of tasks (i.e., maintenance activities such as cleaning, degreasing, painting, and corrosion prevention).	Potential impact on staff health through absorption, ingestion, inhalation, or injection of HM if improperly stored, handled, or used; possible fire hazards from incorrect storage of corrosives with flammable substances; possible environmental releases (liquid spills, vapors) from products not stored or handled properly; costly and time-consuming disposal of spent/used materials contaminated through incorrect separation; potential for disposal of waste products in landfills.

Facility Activity	Interaction	Impact
Fleet and Equipment/Fuel Use	Use of fuel in park fleet and equipment including passenger cars, heavy equipment, light vehicles, lawn mowers, and visitor vehicles	Use of fuel contributes to air quality degradation, depletes non-renewable resources, requires storage and transportation that presents risks to the environment.
Energy Use/Electricity use in Facilities	Energy is used in every facility including the visitor center, maintenance building, well pump, and other facilities.	Energy use and the production of energy contributes to air quality impacts and pollution and depletes natural resources.
Water Use	Wells are used for irrigation of maintained landscapes around visitor center, and for restrooms and other utility areas.	Well pumps require energy to operate, chemicals to treat, and must be monitored to ensure water quality and consumption meet requirements.
Solid Waste	Visitors and park staff contribute to solid waste. Opportunities exist to incorporate waste reduction and recycling messages into interpretation and park education.	Solid waste contributes to the filling of local landfills, requires transportation, and prevents useful materials from being reused or recycled into new products which saves natural resources.
Interpretation	Visitors contribute to solid waste; require fuel use for tours, paper products and inks for handouts, publications, and school programs.	Potential to reduce visitor impacts would reduce solid waste in the park and educate visitors on sustainability in the park.
Integrated Pest Management	The park uses integrated pest management practices to control exotic and invasive species.	Some pest control methods have potential risks to the user and the environment. However, the non-use of integrated pest management practices also has potential impacts of the spread of exotic and invasive species and impacts to native species.

Significant Impact Ranking

Facility Activity	Regulatory	Severity	Frequency	Financial	Stakeholder	Total
Office Activities/Office Supplies	2	4	5	4	1	16
Hazardous Material (HM) Storage, Handling, and Use	5	4	5	1	2	17
Fleet and Equipment/Fuel Use	3	4	5	5	1	18
Energy Use/Electricity use in Facilities	2	4	5	5	3	19
Water Use	2	4	5	4	4	19
Solid Waste	2	4	5	4	3	18
Interpretation	1	3	3	2	4	13

Integrated Pest Management	3	3	2	2	3	13
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**Government Mandates and Legal Requirements
Related to Environmental Management Systems (EMS)**

<p><i>Resource Conservation and Recovery Act</i> In Section 6002 of the Resource Conservation and Recovery Act of 1976 (RCRA) (46 USC6962), Congress acknowledged the importance of recycling in helping to manage the nation’s solid waste and recognized that recycling is not merely the collection of materials, but includes the manufacture of products by consumers. The RCRA section 6002 established the government’s buy-recycled program, which uses Federal purchasing power to stimulate the demand for products made with recovered materials.</p>
<p><i>Pollution Prevention Act of 1990</i> Section 6604 of the Pollution Prevention Act of 1990 requires identification of opportunities to use Federal procurement to encourage source reduction.</p>
<p><i>Energy Policy Act of 1992</i> The Energy Policy Act of 1002 (EPAct) directs the Department of Energy, in association with other agencies, to “identify and designate those energy-efficient products that offer significant potential savings.” EPAct also calls for “Guidelines to encourage the acquisition and use [of these products] by all Federal agencies.”</p>
<p><i>Solid Waste Sites in Units of the National Park System</i> 36 CFR Part 6 (January 23, 1995), Solid Waste Sites in Units of the National Park System, stipulates that concessionaires, commercial use authorizations, and contractors will comply with acquisition, recycling, and waste minimization goals established by the NPS.</p>
<p>The President Executive Order 13423 of January 24, 2007 Strengthening Federal Environmental, Energy, and Transportation Management By the authority vested in me as President by the Constitution and the laws of the United States of America, and to strengthen the environmental, energy, and transportation management of Federal agencies, it is hereby ordered as follows: Section 1. Policy. It is the policy of the United States that Federal agencies conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner. Sec. 2. Goals for Agencies. In implementing the policy set forth in section 1 of this order, the head of each agency shall: (a) improve energy efficiency and reduce greenhouse gas emissions of the agency, through reduction of energy intensity by (i) 3 percent annually through the end of fiscal year 2015, or (ii) 30 percent by the end of fiscal year 2015, relative to the baseline of the agency’s energy use in fiscal year 2003; (b) ensure that (i) at least half of the statutorily required renewable energy consumed by the agency in a fiscal year comes from new renewable sources, and (ii) to the extent feasible, the agency implements renewable energy generation projects on agency property for agency use; (c) beginning in FY 2008, reduce water consumption intensity, relative to the baseline of the agency’s water consumption in fiscal year 2007, through life-cycle cost-effective measures by 2 percent annually through the end of fiscal year 2015 or 16 percent by the end of fiscal year 2015; (d) require in agency acquisitions of goods and services (i) use of sustainable environmental practices, including acquisition of biobased, environmentally</p>

preferable, energy-efficient, water-efficient, and recycled-content products, and (ii) use of paper of at least 30 percent post-consumer fiber content; (e) ensure that the agency (i) reduces the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of by the agency, (ii) increases diversion of solid waste as appropriate, and (iii) maintains costeffective waste prevention and recycling programs in its facilities;

(f) ensure that (i) new construction and major renovation of agency buildings comply with the *Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings set forth in the Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding (2006)*, and (ii) 15 percent of the existing Federal capital asset building inventory of the agency as of the end of fiscal year 2015 incorporates the sustainable practices in the Guiding Principles;

(g) ensure that, if the agency operates a fleet of at least 20 motor vehicles, the agency, relative to agency baselines for fiscal year 2005, (i) reduces the fleet's total consumption of petroleum products by 2 percent annually through the end of fiscal year 2015, (ii) increases the total fuel consumption that is non-petroleum-based by 10 percent annually, and (iii) uses plugin hybrid (PIH) vehicles when PIH vehicles are commercially available at

You can learn more about the executive order at:

<http://www.whitehouse.gov/news/releases/2007/01/20070124-2.html>

The President

Executive Order 13514 of January 24, 2007

Federal Leadership in Environmental, Energy, and Economic Performance

By the authority vested in me as President by the Constitution and the laws of the United States of America, and to establish an integrated strategy towards sustainability in the Federal Government and to make reduction of greenhouse gas emissions a priority for Federal agencies, it is hereby ordered as follows:

Section 1. Policy. In order to create a clean energy economy that will increase our Nation's prosperity, promote energy security, protect the interests of taxpayers, and safeguard the health of our environment, the Federal Government must lead by example. It is therefore the policy of the United States that Federal agencies shall increase energy efficiency; measure, report, and reduce their greenhouse gas emissions from direct and indirect activities; conserve and protect water resources through efficiency, reuse, and stormwater management; eliminate waste, recycle, and prevent pollution; leverage agency acquisitions to foster markets for sustainable technologies and environmentally preferable materials, products, and services; design, construct, maintain, and operate high performance sustainable buildings in sustainable locations; strengthen the vitality and livability of the communities in which Federal facilities are located; and inform Federal employees about and involve them in the achievement of these goals.

It is further the policy of the United States that to achieve these goals and support their respective missions, agencies shall prioritize actions based on a full accounting of both economic and social benefits and costs and shall drive continuous improvement by annually evaluating performance, extending or expanding projects that have net benefits, and reassessing or discontinuing under-performing projects.

Finally, it is also the policy of the United States that agencies' efforts and outcomes in implementing this order shall be transparent and that agencies shall therefore disclose results associated with the actions taken pursuant to this order on publicly available Federal websites.

The new Executive Order requires agencies to measure, manage, and reduce greenhouse gas emissions toward agency-defined targets. It describes a process by which agency goals will be set and reported to the President by the Chair of CEQ. The Executive Order also requires agencies to meet a number of energy, water, and waste reduction targets, including:

- 30% reduction in vehicle fleet petroleum use by 2020;
- 26% improvement in water efficiency by 2020;
- 50% recycling and waste diversion by 2015;
- 95% of all applicable contracts will meet sustainability requirements;
- Implementation of the 2030 net-zero-energy building requirement;

- Implementation of the stormwater provisions of the Energy Independence and Security Act of 2007, section 438; and
- Development of guidance for sustainable Federal building locations in alignment with the Livability Principles put forward by the Department of Housing and Urban Development, the Department of Transportation, and the Environmental Protection Agency.

The Federal Acquisition Regulation

The Federal Acquisition Regulation (FAR) has been revised in recent years to facilitate implementation of environmental purchasing. The modifications are intended to improve the Federal government’s purchase and use of recycled content, energy efficient, biobased, and environmentally preferable products and services.

Department of the Interior Acquisition Policy Release 97-2 (DIAPR), Environmental Contracting Initiatives

DIAPR 97-2 implements Federal acquisition policy requirements involving environmental initiatives. It addresses environmentally preferable and energy-efficient products and services, energy conservation, pollution prevention, and ozone-depleting substances.

WASO Environmental Management Program’s Regulatory Assistance (CFR 29, 40, 49)

<http://pfmd1.nps.gov/EMP/hazmat/index.cfm?pageid=24>

National Park Service, Pacific West Region, Directive PW-051, Environmentally Preferable Purchasing Policy

PW-051 directs parks in the Pacific West Region to develop a program to prevent and reduce waste through affirmative procurement; educate park employees on the opportunities to purchase EPA designated Comprehensive Procurement Guideline (CPG), biobased, and other environmentally preferable products; purchase and use products and materials which are made from recycled content or which have other environmental attributes; conduct acquisitions which incorporate environmental considerations into all aspects of planning, development of workplans and specifications, and contract administration; and conduct procedures for monitoring, reviewing, and reporting on each park’s environmentally preferable purchasing program as outlined in the guideline, *Environmental Purchasing in the National Parks: A How-to Guide*.

National Park Service, Pacific West Region, Directive PW-048, Sustainable Design and Construction Practices

PW-048 directs parks to implement sustainable design and construction practices during facility planning, design, construction, and operation to meet the following goals: Consume less energy and natural resources over the life of the facility; ensure that resources such as water, air, and land are as clean or cleaner at the end of use as at the beginning; ensure that the viability, integrity, and diversity of natural systems are protected, undiminished, and maintained; ensure that natural sound-scapes and dark skies are undiminished; use green technologies and products that have less negative impacts on human health and the environment; reduce the material entering landfills; and ensure compliance with all natural and cultural requirements.

Energy Policy Act of 2005

Section 102 extends the annual federal energy reduction goal from FY2006 to FY2015, and amends the reporting baseline from 1985 to 2003.

Section 104 directs agencies to purchase Energy Star and FEMP-designated products when procuring energy-consuming products, except when it is not cost effective or doesn’t meet functional requirements of the agency. Agencies must also incorporate energy-efficient specifications in procurement bids and evaluations, and requires agencies to only purchase premium efficient electric motors, air conditioning, and refrigeration equipment.

Section 109 requires new Federal buildings to be designed 30% below ASHAE standards or International Energy Code to the extent that technologies employed one life-cycle cost-effective. In addition, sustainable design principles are to be applied to new and replacement buildings. All agencies must identify new building in their budget requests and identify those that meet or exceed the standard.

Section 203 requires that renewable electricity consumption by the Federal government cannot be less than 3% in FY 2007 to FY 2009, 5% in FY 2010 to FY 2012, and 7.5% in 2013 and thereafter. It establishes double credit for renewables that are produced on the site or on Federal lands and used at a Federal facility or produced on Native American lands.

Regulatory and Other Environmental Information Resources

Source	Data	Address/Park Location
Internet	Federal environmental laws and regulations, guidance	www.epa.gov
Internet	State environmental laws and regulations, guidance	www.state.id.us
Internet	Federal regulatory assistance	www.fedcenter.gov
Internet	DOI environmental policies	www.doi.gov
Internet	DOI environmental guidance - Office of Environmental Policy and Compliance (environmental compliance, NEPA, NRDA)	www.doi.gov/oepe
Internet	Greening the Government Executive Order 13123	www.eere.energy.gov/femp/resources/exec13123.html
Internet	Executive Orders	www.whitehouse.gov/search/site/Executive%20Orders
Internet	OSHA regulations	www.osha.gov/SLTC/hazardcommunications/index.html
Internet	DOI environmental guidance – Property Acquisition and Management (environmentally preferable purchasing)	www.doi.gov/pam
Internet	General environmental information	www.cleanstuff.com
InsideNPS	PWR EMS/Green Maintenance	www.inside.nps.gov – Regions – PWR – Facility Management - EMS

Interactions and Impacts Analysis Ranking System

The following components make up our Interactions and Impacts Analysis ranking system. Each facility interaction is assessed and, based upon a summation of the following criteria, is ranked for each criteria and totaled to estimate the overall impact of the activity.

1. We assign a ranking score to from 1- 5 each impact based on the following four criteria:
 - a. *Regulatory* – How regulated is the activity or impact?
 - 1- Not regulated
 - 2- Rarely regulated
 - 3- Regulated, but with little enforcement or repercussion
 - 4- Regularly regulated with some repercussion
 - 5- Highly regulated
 - b. *Severity* – What is the severity of the impact?
 - 1- Minimal severity or aesthetic impact only
 - 2- Minimal to moderate
 - 3- Moderate impact to water, air, or land quality
 - 4- Moderate to substantial
 - 5- Substantial impact to water, air or land quality, or detrimental to the health of humans, flora, or fauna
 - c. *Frequency* – What is the overall frequency or probability of the impacts occurring?
 - 1- Low frequency
 - 2- Low to moderate
 - 3- Moderate frequency
 - 4- Moderate to high
 - 5- High frequency
 - d. *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 modest
 - 3- Associated costs are negligible
 - 4- Associated costs are likely to save the park money and/or provide a financial payback
 - 5- Correcting the impact is likely to save the park a significant amount of money and/or provide a financial payback
 - e. *Stakeholders* – How would stakeholders (public, partners, and concessionaires’) react to, or be affected by, the impact?
 - 1- Neutral or disinterested
 - 2- Mildly concerned
 - 3- Concerned
 - 4- Somewhat concerned
 - 5- Greatly concerned

2. Once ranking scores have been assigned, we add up the rows. Impacts with higher ranking scores can be considered significant impacts, and are worthy of addressing through our EMS. Impacts with lower ranking scores, while perhaps not considered to be significant impacts, can be addressed through our EMS at the discretion of the EMT due to feasibility to correct the impact, available funding, or other reasons.

3.0 Goals, Objectives, and Targets

3.1 Purpose

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

3.2 Scope

This section contains a description of how we choose our goals, objectives, and targets for the significant impacts previously identified in Section 2.

Goals, objectives, and targets are identified and reviewed during this process to maintain and improve park operations, minimize park impacts to the ecosystem, and demonstrate environmental leadership.

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

3.3 Procedures

1. The EMT will refer to the contents of the Significant Impact Ranking Analysis in Section 2 to identify those significant impacts which are to be considered through the imposition of goals, objectives, and targets.
2. In addition, the EMT will refer to the list of open environmental audit findings as part of the process of determining appropriate goals, objectives, and targets. 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 a goal, objective, or target if that finding is selected.
3. The goals, objectives, and targets will be listed in separate tables and will be included in the Appendix to this section. Any information used to substantiate the choice of goals, objectives, and targets will be documented in the Appendix.
4. The EMT will develop an Environmental Management Plan (EMP) to identify how to achieve each target. It will detail who is responsible for each of the targets identified, and what resources are available for their achievement. It will outline dates by which these targets are to be accomplished. The EMP should be updated as goals, objectives, and targets change, or progress is made.

3.4 Responsibilities

1. The EMT will select the EMS goals, objectives, and targets for the year.
2. The EMT will draft an EMP for identified targets.

3.5 Appendix

1. The Environmental Management Plan
2. Goals considered during the EMS implementation, but tabled as potential future goals.

Although not incorporated into current goals, the following are goals to be considered in the future:

- Reducing fossil fuel consumption by gradually converting to alternative fuel vehicles
- Decreasing solid waste disposal by reducing generation by park staff and visitors
- Cleaning up of existing and preventing future dump sites on the National Preserve
- Carpool program and incentives
- Office paper reduction (set all printers capable of double sided printing to default to that setting)

4.0 Roles, Responsibilities, and Accountability

4.1 Purpose

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

4.2 Scope

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

4.3 Procedures

1. The EMT will compile a listing of all personnel on the EMT.
2. The EMT will compile a general listing of personnel with environmental management responsibilities.
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 and job specific performance requirements in personnel position descriptions. Performance is to be measured using Service criteria and procedures. Supervisors will be responsible for ensuring environmental management responsibilities are incorporated into position descriptions.
7. Failure to complete designated environmental responsibilities in a satisfactory manner may be grounds for disciplinary action, in accordance with Service policies and procedures, depending upon the severity and persistence of the behavior.

4.4 Responsibilities

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

4.5 Appendix

1. CRMO Environmental Management Team.
2. Environmental Management Roles and Responsibilities of positions at CRMO.

CRMO Environmental Management Team

Position	Name
Park Superintendent	Dan Buckley
EMT Leader/Coordinator	Dwayne Moates
EMT Member	Marci Garrison
EMT Member/Climate Friendly-Lead)	John Apel (Climate Friendly Lead)
EMT Member	Darren Parsons
EMT Member	Ted Stout
EMT Member	Dave Durbin
EMT Member	Todd Stefanic (collateral -SOFR.)
EMT Member	Karl Pearson
EMT Member	Steven Bekedam
NHA Liaison	Rhonda Morris

Environmental Management Roles and Responsibilities

Position	Responsibility
Superintendent <i>Dan Buckley</i>	General manager of Craters of the Moon National Monument & Preserve with overall responsibility for the management of park programs, operations, and internal/external relationships.
HazCom Specialist, Operational Leadership <i>Darren Parsons</i>	HazCom trainer, utility operator, coordinates and implements many of the park's facility management programs
Interpretation	Communicate messages of park stewardship and sustainability to park visitors.
Facility Manager <i>Dwayne Moates</i>	Manages park facility maintenance operations and programs.
Administrative Officer <i>Marci Garrison</i>	Performs or coordinates major procurement and purchasing actions, which usually include green procurement considerations.
Resource Program Manager <i>John Apel</i>	Coordinates and implements many of the park's cultural and natural resource management programs. Climate Friendly -Lead
Safety Committee Chairmen and (collateral duty Safety Officer) <i>Todd Stefanic</i>	Conduct safety inspections of park buildings and make recommendations to Superintendent of safety related corrections needed.
All Employees	Have individual work site responsibility for implementing work activity related facets of the park environmental management program and for complying with environmental requirements.
Recycling coordinator <i>Rhonda Morris and</i>	Coordinates recycling efforts throughout park
Vegetation Ecologist <i>Steven Bekedam</i>	Supervision of noxious weed program and shares in responsibility of many natural resource programs

5.0 Document Control, Recordkeeping, and Reporting

5.1 Purpose

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

5.2 Scope

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

5.3 Procedures

1. Environmental management-related documents for CRMO are maintained through a file management system. The central file is maintained at the park headquarters, maintains

accountability for key operations, assures timely and efficient access to environmental policy and records, and maintains security where necessary. Electronic files are kept when appropriate.

2. Certain files such as logs and inspection and monitoring reports and generated and/or 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.
3. The Environmental Documents and Records table, provided in the appendix, lists all of the key documents, records, and reports used, generated, and/or submitted by the park. The table is updated annually to ensure all employees have access to appropriate environmental management-related documents and policies.

5.4 Responsibilities

1. The EMT is responsible for overseeing and making any required changes to the document control, recordkeeping, and reporting procedures.
2. The EMT is responsible for keeping the Environmental Documents and Records table current.

5.5 Appendix

1. Environmental Documents and Records generated at CRMO.

Environmental Documents and Records

Document	Location
EMS Manual	Shared Drive, Facility Managers office
General Management Plan	Library, Park website
Environmental Audit Results/Findings	EMP Website - http://pfmd1.nps.gov/EMP/hazmat/
Wilderness Management Plan	N/A
Fire Management Plan	Superintendent's, Ranger and Resource Management offices, park website
Integrated Solid Waste Alternatives Plan	Shared Drive, Facility Managers office
Energy Report	Facility Managers office, Energy reporting website
Training Records	OPF Shadow file/Admin office/Compliance Checklist

Document	Location
Pesticide Use Log	Resource Management Office
Safety Plan	Shared Drive
NEPA Documents	Central Files, Resource Management Office
Cultural Resource Documents (106 Reviews, etc)	Resource Management Office

6.0 Communication

6.1 Purpose

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

6.2 Scope

This section details the CRMO approach to general internal (park staff and volunteers) and external (visitors, partners, stakeholders) communication.

6.3 Procedures

1. The EMT will utilize general internal and external communication opportunities.
2. Internal communication will ensure that all staff and volunteers 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 and volunteers with key information and to provide a venue for personnel to provide input on environmental performance. Methods of communication will include informal and formal training, staff meetings, SOPs, 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 CRMO.
5. External communication will be maintained through formal National Park Service public announcements, the park website (www.nps.gov/crmo), 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 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.

6.4 Responsibilities

1. The EMT is responsible for maintaining the communication strategy.

6.5 Appendix

1. Internal and external communication strategy for environmental management-related issues.

Environmental Management Communication Strategy

Audience	Communication Type / Mechanism	Content
Park Personnel and Volunteers	<ul style="list-style-type: none"> • Formal Training • Internal Email • Staff Meetings • Bulletin Boards • Annual Reports • Memorandums • Shared Drive • New Employee Checklist • Informal Training 	<ul style="list-style-type: none"> • Information about park programs, policies, and issues • News of incidents & actions • General orientation, as well as job-specific requirements • SOPs • Regulation Updates • Technical Issues
Partners and General Public	<ul style="list-style-type: none"> • Briefings/presentations • Publicly distributed environmental documents (EIS/EA, GMP, etc.) • Signs and Postings • Formal and Informal Meetings • Website (www.nps.gov/crmo) • Brochures and Park Publications • Press Releases • Site Bulletins • Leave No Trace Handouts • Kiosks 	<ul style="list-style-type: none"> • Park Environmental Management Information • Park Policies and Regulations • Park Information and Announcements • Closings • Other Special Notices
Regulatory Agencies	<ul style="list-style-type: none"> • Informal: telephone calls, e-mail, site visits • Formal: compliance inspections and audits, written correspondence, reporting 	<ul style="list-style-type: none"> • Inquiry, Information sharing, problem resolution • Reporting • Technical Assistance on specific topics as they arise • Compliance information

7.0 Training

7.1 Purpose

To provide a system to manage the environmental training needs of personnel at CRMO; 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 and reduce their potential environmental impacts.

7.2 Scope

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

7.3 Procedures

1. The EMT will identify and seek training to enable personnel at CRMO to safely, competently, and legally fulfill their environmental management responsibilities.
2. Different methods of training can be utilized at CRMO, including traditional classroom, on-site, or online training. Training may be offered through internal park programs, Region, and Service programs, commercial trainers, and partnering agency programs.
3. Training records are kept with Administration and Division Chiefs.
4. The summary Environmental Training Matrix will be updated to reflect the current park activities and needs. At a minimum, the matrix will detail the type and frequency of training required by CRMO staff in their various positions. As Goal 1 identified in Section 3 is further developed, the training Matrix will be updated with training requirements and details.
5. 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.

7.4 Responsibilities

1. Individual responsibilities for determining training requirements and maintaining training records lie with supervisors.
2. Maintaining the Environmental Training Matrix lies with the EMS.

7.5 Appendix

1. The CRMO Environmental Training Matrix.

Environmental Training Matrix

Employees	Training	Trainer/Type	Frequency	Mandated?
All Employees	Fire Extinguisher Training	Karl Pearson	Annual	Yes
Most Employees	CPR/First Aid/AED	Karl Pearson	Every 2 years	No
Most Employees	Green Procurement	Online – www.golearn.gov	Initial	No
All Employees	HazCom	Darren	Annual	Yes
	New Employee Safety Checklist	Supervisor Orientation	Initial	No
Resource Management	Pesticide Applicator Licensee & Renewal Training	Off-site Classroom	Initial testing, with 16 hours renewal training every two years	Yes
Facility Management	Water Operator Trainings	Off-site Classroom	Annual (CEV Credits)	Yes
FM, LE and possible others	HazMat Spill Awareness	BLM and online	Annual	Yes
FM	Confined Space	Facility Manager	Annual	Yes
FM, Resources, LE	Hearing Conservation	Facility Manager and Audiologist	Annual	Yes
FM and residents	Lead Paint Safety	Facility Manager and Housing Officer	Annual	Yes
FM	Asbestos	Facility Manager and certified trainer	Annual	Yes
FM	Equipment Operation	Facility Manager	Annual	Recommended
FM	Lockout-Tagout	Facility Manager	Annual	Yes
All employees	Hazardous Waste Management	Facility Manager	Annual	Yes
FM, LE	Respiratory Training	Facility Manager and Doctor	Annual	Yes
	PPE	Supervisor	Annual	
All	Operational Leadership	Maintenance Mechanic	Annual	Yes
All	Defensive Driving	On line	Annual	Yes
All	I-100 Intro to ICS	On-line	One-time	Yes
Division Chiefs	I-700 Intro to NIMS	On-line	One-time	Yes

8.0 Monitoring, Measurement, Corrective Action, and Management Review

8.1 Purpose

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

8.2 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 ECS.

8.3 Procedures

Environmental Performance Review (EPR)

1. We will conduct an annual Environmental Performance Review (EPR) (otherwise known as an internal EMS audit). 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 Section 3 of this Manual. It will also determine if the EMS has been effective during the year, and if not, why and how the park can improve it. The results of the EPR will be documented and a copy included in the Appendix to this section.
2. If no progress has been made towards the stated goals, objectives, and targets, the EMT will determine the reasons why, and will either modify the goals to reflect more achievable targets, or implement new operating procedures that will encourage appropriate personnel at CRMO to achieve our stated goals. A Corrective Action Form will be filled out and acted upon to ensure efforts towards achieving a specific goal, objective, or targets are re-directed. A copy of the Corrective Action Form will be included in the Appendix to this section.

Monitoring and Measurement

3. The EMT will supplement the EPR review by conducting appropriate monitoring and measurement throughout the year. This monitoring and measurement will be designed to allow the EMT to gauge how well the park is doing in achieving the goals, objectives, targets, and general environmental management in the park. It is 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 that their final achievement is unlikely. Methods of monitoring and measuring park environmental management success and the success of our goals, objectives, and targets are listed in the Appendix to this section.
4. At yearly intervals, the EMT will meet to review the progress made towards achieving the park EMS goals, objectives, targets, and other requirements the park is obliged to meet under applicable laws, regulations, and policies.

External EMS Audits

5. Every three years the park will receive an external EMS audit to review the effectiveness of the park’s EMS. At the time of initial implementation, guidelines and information about this audit had yet to be announced. It is assumed it will be incorporated into the park’s Environmental Audit conducted by the region every three years. This section will be expanded as new information is available.

Environmental Audit was conducted June 20th 2007 at that time the EMS was reviewed.

8.4 Responsibilities

1. The EMT will update the Monitoring and Measurement Table as new reporting requirements are announced.
2. The EMT Lead will be responsible for coordinating the Annual Environmental Performance Review.

8.5 Appendix

1. The Monitoring and Measurement table
2. A draft Corrective Action Form to be used to correct actions regarding the targets identified in Section 3.
3. Future records may include summaries from the Annual Environmental Performance Review.

Monitoring and Measurement

Review Event	Frequency	Responsibility	Next Review
Safety Audit	Annual	Supt	FY13
Asbestos Waste Records	As needed	Dwayne	As needed
Fuel Tank Inspections	Annually	EPA/Dwayne	2015
Water Sampling	2x/month	FM Darren	ongoing
Water Quality Comprehensive Analysis	Annual	FM Darren	
Public Health Survey	Every 3 years	(Regional office)	FY 13
IDEQ	Annual	IDEQ	FY13
Energy Reporting/Utility Bills	Annual	Dwayne/Marci	October
Fuel Log	Ongoing	Nancy	
NHA			
Environmental Audit	Every 3 years	Regional Office	2013
Solid Waste Records (by dumpster)	Ongoing	Dwayne	
Pesticide Use Log	As use occurs	RM office	
Pesticide Use Proposals	As needed	Reviewed and approved by NPS by use & species	
Air quality Measurements		RM office, QAQC	
Air Emissions Reports		Natural Resources WASO	
Night Sky Monitoring			

Corrective Action (CA) Form

CA Requested by:
Date Requested:
Location or Area of Deficiency/Non-Conformance
Source of Finding:
Statement of the Issue:
Issue Analysis, Including Root Cause:
Corrective Action Initiated:
Review of CA Effectiveness:
Changes as a Result of CA: Date:

Signed: _____ Title: _____ Date: _____