



NPS Commercial Services Environmental Audit Program Information

May 2024

Agenda

- Scope of an environmental audit
 - Scope of the audit
 - Types of environmental audits
 - Environmental audit criteria
- Site audits
- Environmental audit finding priority scheme
- Post-visit process and timeline
- Final audit report
- Closing out the environmental audit
- Telephone audits
- Paper audits

Introduction

- Who we are:
 - NPS Commercial Services
 - Regional concessions chiefs
 - Park concession specialists
 - Contractor audit teams
- What we do:
 - Work with parks and concessioners to provide independent third-party environmental audits and compliance assistance

Scope of an Environmental Audit

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

Scope of the Audit

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

Environmental Audit Types

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



Environmental Audit Types (continued)



- **Non-standard audits:**
 - **Telephone/Paper audit:** Telephone and paper audits are the most common non-standard audit type used for Category III and some Category II concessioners. Telephone audits are conducted for new contracts to establish a baseline, and paper audits may be conducted after a baseline (telephone) audit.
 - **Cruise Ship Audits:** Some concessions (e.g., cruise ships) are subject to comprehensive environmental evaluations through a third-party auditor (e.g., the U.S. Coast Guard) that may replace a standard NPS Commercial Services environmental audit.
 - **Coming soon! Hybrid Audits:** Hybrid audits blend site visits and telephone audits. The auditor is remotely joining via video call to support park and concession staff in making observations and collecting information onsite.

Environmental Audit Types (continued)

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



Environmental Audit Criteria

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

What's in Scope?

- Air Quality
- Emergency Planning and Reporting
- Environmental Purchasing
- Fuel Storage Management
- Hazard Communication
- Hazardous Materials Management
- Hazardous Waste
- Integrated Pest Management
- Laboratory Chemical and Waste Management
- Ozone Depleting Substances
- Solid Waste Management
- Spill Prevention, Control, and Countermeasure (SPCC) Planning
- Storm Water Management
- Universal Waste Management
- Used Oil
- Wastewater Management

What's in Scope?

- Safety/Fire Inspections (structural fire checklist for auditors to complete)
- Other Environmental Issues
- Environmental Management Systems (content/implementation)
- Hazard Communication and Hazardous Materials Management (OSHA, DOT)
- Emergency Plans
- Employee training (env, safety, fire)



Environmental Audit Finding Priority Scheme

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

Priority 3 Findings


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

Isolated Findings

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













Accessing Audit Documents

- Pre-audit, preliminary audit report, and final audit report documents are accessible through a SharePoint library.











2024 Commercial Services Environmental Audits
WASO-Park File Sharing Sites

Site Audits

 Big South Fork National River & Recreation Area	 Curecanti National Recreation Area	 Denali National Park & Preserve	 Glacier National Park
 Glen Canyon NRA	 Gulf Islands National Seashore	 Katmai National Park & Preserve	 Point Reyes National Seashore
 National Capital Region	 Rocky Mountain National Park	 Voyageurs National Park	 Yosemite National Park

Phone/Paper Audits

 Blue Ridge Parkway	 Canyonlands National Park	 Channel Islands National Park	 Chattahoochee River NRA
 Cumberland Island National Seashore	 Denali National Park & Preserve	 Glacier National Park	 Glacier Bay National Park & Preserve

Pre-Visit Park Staff Responsibilities

- Notify concessioner of upcoming audit and confirm the audit dates.
- Coordinate with the Audit Team Lead (ATL) to plan audit logistics.
- Liaison on behalf of NPS Commercial Services to ensure participation by concessioner staff and applicable park personnel (i.e., park superintendent).
- Forward blank audit questionnaire and pre-audit information to concessioner staff and provide deadline for completion.

Pre-Visit Park Staff Responsibilities (continued)

- Forward the most current copies of the contract, including operating and maintenance plans to the ATL.
- Forward copies of other relevant documents to the ATL, such as periodic evaluations discussing environmental issues or the Superintendent's Compendium (if applicable).
- Ensure the concessioner completes the audit questionnaire and assembles relevant environmental documentation (environmental plans, records, and permits) and forward to the ATL two weeks prior to the scheduled site visit.
- Communicate any questions or concerns about the audit to NPS Commercial Services as soon as possible.

Pre-Visit Concessioner Responsibilities

- Ensure key concession staff are available to participate in the environmental audit.
- Complete and submit to the park POC the audit questionnaire and associated environmental documentation (concessioner written plans, waste disposal records, etc.)—they are due at least two weeks before the site visit.
- Support the development of the audit schedule as appropriate.

Audit Logistics Plan

- The park POC will work with the audit team to confirm audit team workspace availability. This includes:
 - Room availability for presentations and document review
 - Projectors and internet access
 - Park and concession operating hours during the site visit
 - Providing audit team with directions/information needed for easy navigation during their time in the park.

Site Visits

- Focuses on an inspection of concession facilities, services, and operations.
- Provides an opportunity to exchange information between the audit team, park staff, and concession staff. The audit team works to understand compliance issues and identify opportunities for best management practices (BMP).
- A typical audit site visit duration is one day. Audits for multiple or complex concessions may take up to a week.

In-Brief

- A short presentation will highlight the audit and site visit process (approximately 30 minutes).
 - This can be conducted remotely the week before the site visit.
- Required attendees:
 - Audit team
 - Park Concession Specialist
 - Concession POC
 - Concession environmental manager
- Recommended attendees:
 - Park superintendent
 - Park safety officer
 - Park facility manager
 - Concession facilities manager
 - Concession general manager

Data Collection

- Physical observations including the audit team taking notes and photographs.
- Interviews with concession staff.
- Records and documents review.
- The concession and park staff should ask questions throughout the process. Audits provide an opportunity to better understand compliance issues, corrective actions, and BMPs.

Exit-Brief

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

Post-Visit Process

- Preliminary Audit Report is developed and submitted to the park POC who will forward it to the concession POC.
- A Corrective Action Tracker (CAT) will be provided for both concession and park staff to submit comments on the Preliminary Audit Report to the audit team.
- ATL, park POC, and concessioner POC will participate in the conference call scheduled during the Exit Brief to discuss comments. The CAT must be completed prior to the scheduled comment call.
- Final Audit Report is developed and submitted to the park POC who will forward it to the concession POC.
- Chief of Concessions Final Audit Report Memo is forwarded to the park superintendent, regional director, and regional environmental coordinator.

Post-Visit Timeline

- Within 3.5 weeks following the site visit:
 - Preliminary Audit Report is developed and forwarded to park POC.
 - Park POC reviews audit report and forwards to concessioner POC.
 - Concessioner POC reviews audit report.
- Within 5.5 weeks following the site visit:
 - Concessioner POC, upon reviewing the audit report, will document comments on the audit findings using the CAT, including findings they don't agree with, have questions about, and/or have completed corrective actions.
 - Park POC will confirm audit finding closures (if any) and respond to concessioner staff comments in the CAT.
 - Schedule comment call during Exit Brief to review the completed CAT, answer any questions, and close audit findings.
 - Park POC should be prepared to verify corrective action measures taken and documented on the CAT for closure of audit findings (if applicable) prior to the scheduled comment call.

Comments on Preliminary Audit Report

- Concessioner and park staff are expected to provide comments on the Preliminary Audit Report via the Corrective Action Tracker (CAT).
- During the comment call, the ATL will review each audit finding to:
 - Discuss and explain or modify any findings with which the concessioner POC does not agree.
 - Document and respond to comments from park and concessioner staff.
 - Close audit findings (if applicable).

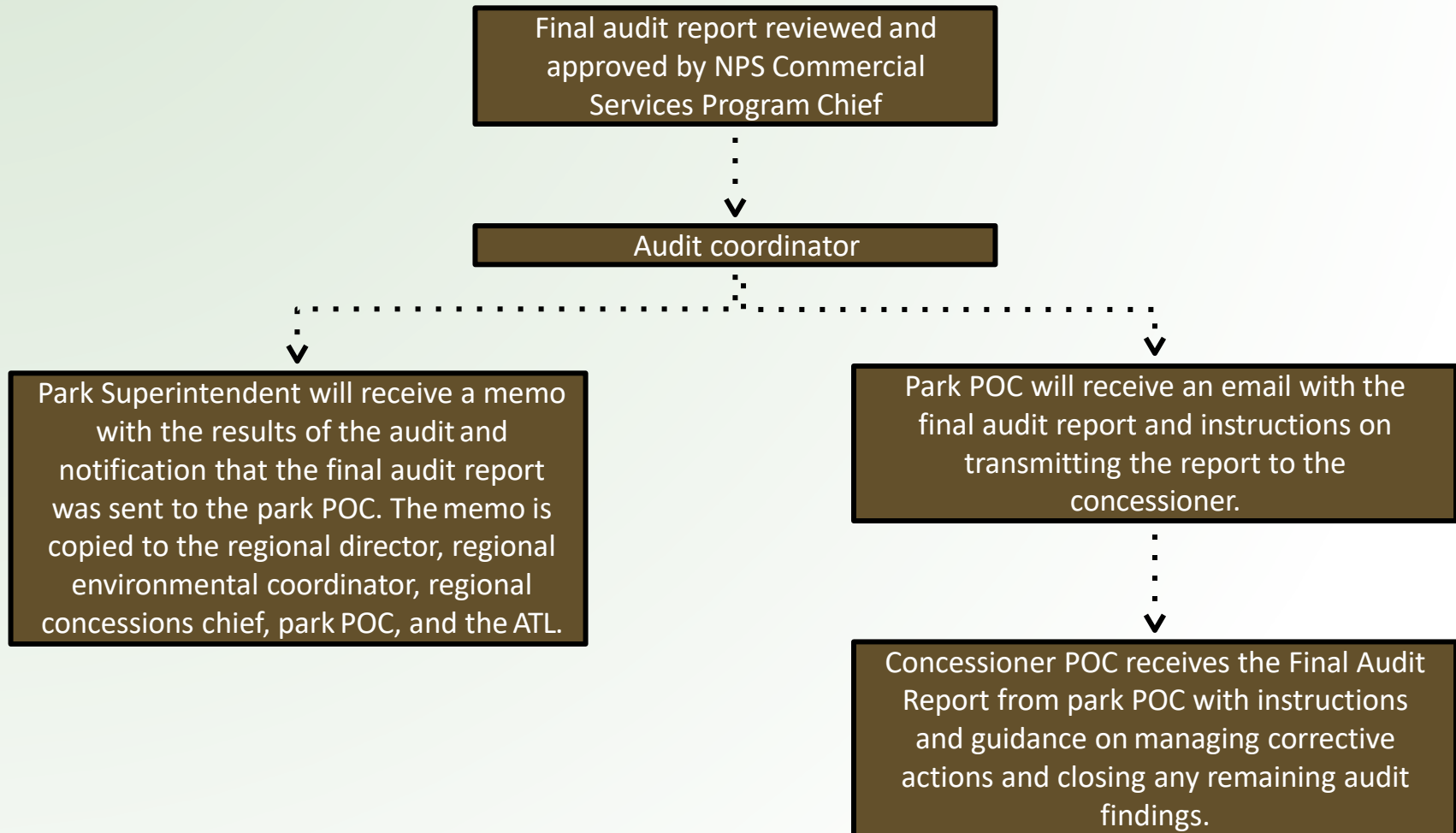
Comments on Preliminary Audit Report (continued)

- Isolated audit findings:
 - Concession employees adequately address the audit finding of concern.
 - Park POC must confirm corrective action taken.
 - Isolated findings that the audit team can confirm are closed will not appear in the Final Audit Report.
- Audit findings may be voided if it is determined that the audit criteria were not correctly applied.

Post-Visit Timeline (continued)

- Within two weeks following the comment call:
 - The Final Audit Report and Report Memo will be drafted and submitted to the Commercial Services Program Chief.
 - Once reviewed and signed, the memo and final audit report will be distributed.
- Bi-monthly request for corrective action:
 - Email request from WASO Commercial Services Program.
 - Park POC will respond by posting the latest version of the CAT to the SharePoint folder.
- After 180 days from issuance of the Preliminary Audit Report (deadline for closure of Priority 2 and 3 audit findings), NPS Commercial Services will request updates on corrective actions on an annual basis.

Final Audit Report Notification



Documenting Closed Findings

- Concessioner staff will prioritize and implement corrective action for each open finding.
- Once a finding(s) is addressed, park staff will verify the concessioner took adequate actions to address all aspects of the finding.
- Concessioner staff will document corrective action taken in the CAT for closed findings and submit it to park POC.
- Park POC will review the CAT received from the concessioner, verify closure (in person/via photographs/or other as appropriate), and document verification in CAT.
- Park POC will submit the latest version of the CAT to the ATL bi-monthly in response to the request for corrective action updates.
- The auditor will confirm that concessioner's corrective action adequately addresses all aspects of the finding and confirm closure.
- There will be three bi-monthly requests, and annual requests thereafter.

Closing Out the Environmental Audit

- Concessioners are responsible for identifying and implementing corrective actions for findings and document corrective action in the CAT.
- Park POC is responsible for verifying that concession staff have implemented corrective actions as documented in the CAT and posting the CAT to the SharePoint site.
- Auditors are responsible for verifying the corrective action adequately addresses the finding.
- After all findings are corrected and corrective actions are verified, the audit report is closed.

Open Findings and the AOR

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

Telephone Audit

Audit Phase	Description
Pre-Audit	<ul style="list-style-type: none"> • Park POC will confirm the audit scope and appropriateness of a telephone audit with ATL. • Park POC coordinates with ATL and concessioner staff to schedule the day and time of the telephone audit. • A telephone audit is convened via MS Teams call and generally requires one hour. • Park POC will forward the audit questionnaire to concessioner staff. (Concessioner staff can complete this questionnaire ahead of time, but it is not required. The questionnaire is intended to help prepare for the audit).
Audit	<p>A one-hour phone call to include:</p> <ul style="list-style-type: none"> • Brief introduction • Audit Questionnaire review • Data collection, including telephone interviews, records, documentation, and photo review • Opportunity for concessioner to ask questions for clarity or additional information • Conclusion of call
Post-Audit	<ul style="list-style-type: none"> • Concessioner POC or park POC will forward any necessary documentation that was not provided during the call to the ATL. • Process continues with the same closeout procedures as site audits.

Paper Audit

Audit Phase	Description
Pre-audit	<ul style="list-style-type: none"> • The park POC will confirm the audit scope and appropriateness of a paper audit with ATL. • The park POC will forward the audit questionnaire to concessioner staff for completion and request it be returned within one week.
Audit	<ul style="list-style-type: none"> • Concessioner staff will return the completed audit questionnaire and associated photos and documentation to the park POC. • The park POC will post the completed audit questionnaire and associated photos and documentation to the SharePoint site for the auditor for review. • The auditor will follow up as needed to ensure a comprehensive understanding of the operation and all information provided.
Post-Audit	<ul style="list-style-type: none"> • Process continues with the same closeout procedures as site audits.

Resources and Contact Information

- Concessions Specialist Toolbox (Parks)
- Concessions Tools and Information (Concessioners)
- Environmental audit questions:
cs_envaudits@nps.gov
- Audit Team Lead
- Environmental Audit Coordinator

Questions?