**National Park Service**

**US Department of the Interior**

**National Park Service Commercial Services Program Denver, Colorado**

**National Park Service**

**Commercial Services Program**

**Environmental Audit Operating Guide**

Version 7.0

**Foreword**

This is the seventh edition (Version 7.0) of the *National Park Service* (NPS) *Commercial Services Program* (CSP) *Environmental Audit Operating Guide* (Guide), effective November 1, 2017. The Guide will be used to conduct environmental audits of NPS concessions facilities and operations from the effective date until it is revised.

The primary audience for the Guide is audit team members who conduct environmental audits for the NPS CSP. The Guide describes policies and protocols for conducting environmental audits and is intended to be used as a reference for how CSP operates the environmental audit program. The Guide is not intended to describe all environmental requirements applicable to NPS concession contracts.

NPS personnel who are engaged in the administration of concession contracts must be knowledgeable about and apply the provisions of Title 36 of the Code of Federal Regulations (36 CFR) Part 51, NPS *Management Policies*, as well as the contract and its Operating Plan and Maintenance Plan exhibits. In the event of any inconsistency between the Guide and the National Parks Omnibus Management Act of 1998, 36 CFR Part 51, or the contract, the latter document or documents prevail.

This document is for internal guidance only, and does not impose mandatory requirements for the NPS, its contractors or concessioners. This document does not create any rights, substantive or procedural, that are enforceable by law by any party.

To keep the Guide concise, some topics are supplemented with appendices that provide greater detail.

The Guide addresses issues of relevance to auditors, such as the audit planning process and steps that should be taken during the pre-audit, site visit, and post-visit phases of each audit. The appendices include explanations of the audit criteria in more detail, documents that support and explain the relationship between the CSP environmental audit program and the NPS Environmental Audit Program (which governs audits of national park operations), and tools and guidance to assist auditors in completing an environmental audit.

The Guide will be reviewed periodically and updated as necessary to address policy and program changes. The Environmental Audit Coordinator (Coordinator) and staff welcome comments, clarifications, and/or suggested improvements. Please direct them to:

National Park Service Commercial Services Program

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# Introduction

## NPS Commercial Services Program Environmental Audit Program Background and Purpose

In 1916, the Organic Act established the National Park Service (NPS) to “promote and regulate the use of the…national parks…[their] purpose [being] to conserve the scenery and the natural and historic objects and the wildlife therein 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.” This legislative mandate challenged the NPS to be an accountable, active, and responsible steward, while also providing visitor services and carrying out associated operations in national parks that can potentially impact resources both inside and outside park boundaries.

Given that federal and state environmental protection laws and regulations are designed to ensure that adverse resource impacts are minimized, the Department of the Interior (DOI) recognized a need for improved systems to measure compliance of facilities, including federal agencies and others (e.g., concessioners and contractors). The DOI established an internal environmental audit program in 1997 (DOI Audit Policy) that mandates that DOI bureaus, including the NPS, develop and implement an environmental audit program for “all lands, facilities, and operations.” The NPS has interpreted this directive to include NPS concessioners.

The Commercial Services Program (CSP) established a concession environmental audit program in 1999 and has been conducting environmental audits ever since. CSP adopted the NPS Environmental Audit Program (EAP) Operating Guide, which was developed by the NPS for auditing park operations and facilities, in support of the DOI Audit Policy.

CSP recognized the need to develop and implement a concessions specific audit program to account for various programmatic and procedural issues related to concessions that differ from park operations. These differences include the following:

NPS EAP audits of park operations are conducted under regionally managed programs, whereas CSP environmental audits of concessioners are centrally administered. While each region uses the *NPS EAP Operating Guide* as a minimum standard, it has been implemented differently in each region. Potentially, a business holding concession contracts in different regions would be subject to different protocols and criteria if it were audited by regionally managed programs. Having a single national program to audit concessioners allows for a comprehensive and consistent national environmental performance baseline for all concessioners.

Concession activities are authorized by a legally binding contract that stipulates the legal responsibilities and requirements for a concessioner. Environmental audits review concession contract requirements and ensure that audit recommendations are consistent with and reinforce those requirements.

Environmental audits provide useful information to the NPS for developing new concession contracts and managing current concession contracts. Accordingly, environmental audits are scheduled in consideration of concession contract effective and renewal dates.

Most concession contracts are awarded to small businesses that may not have the technological or financial resources afforded by some larger concessioner companies. As a result, environmental audits of concession operations emphasize compliance assistance and best management practice (BMP) recommendations to concessioners and park concession staff. Developing useful and consistent compliance assistance tools is more easily and efficiently accomplished through a distinct national-level audit program.

To verify that the approach and criteria used for auditing concessioners does not conflict with other environmental programs, a third party compared the environmental audits to the Board of Environmental, Health, and Safety Auditor Certifications (BEAC) *Standards for Auditing* and the American Society for Testing and Materials (ASTM) *Environmental Auditing Guidelines*, both of which are nationally recognized audit standards. The conclusion was that the environmental audits generally conform to the BEAC and ASTM standards with no significant disparities or contradictions.

## Disclaimer

Notwithstanding anything to the contrary in the NPS CSP Environmental Audit Operating Guide (Guide), Guide and its appendices, this material is not intended to describe all environmental requirements that may be applicable to NPS concession contracts, nor is it intended to suggest that all environmental authorities cited herein may be applicable to concessions. In addition, this document establishes internal guidance only and does not impose mandatory requirements on the NPS, its contractors or concessioners. This document does not create any rights, substantive or procedural, that are enforceable by law by any party.

## Authorities

The authorities for environmental audit policy and procedures are as follows:

* **NPS, Title 36 of the Code of Federal Regulations (36 CFR) Part 51 (Concession Contracts).** Part 51 contains regulations pertaining to the preservation of the parks and administration of concession operations.
* **DOI, Policy, “Environmental Auditing,” *Departmental Manual* 515, Chapter 2 (515 DM 2).** Mandates that the NPS develop and implement an environmental auditing program for “all lands, facilities, and operations.” The NPS has interpreted this directive to include concessioners.
* **NPS, *Management Policies*, Chapter 10, “Commercial Visitor Services.”** Authorizes commercial visitor services through concession contracts or Commercial Use Authorizations (CUAs). Section 10.2.4.10, “Environmental Program Requirements,” provides authority for the NPS to require concessioners to meet environmental compliance objectives, and to conduct environmental compliance audits of all commercial visitor services at least every three to five years, in accordance with this Guide.
* **NPS, Commercial Services Guide Chapter on Environmental Management.** Requires that concessions facilities have an environmental audit conducted by a third party and in accordance with the environmental audit program developed and implemented by the CSP Program for concessions that is consistent with the NPS EAP for parks.
* **NPS, Contractual Agreements.** Concession contracts, CUAs, or leases require compliance with environmental laws.

## How to Use the Guide

The Guide documents programmatic responsibilities and procedures for conducting environmental audits of NPS concession facilities and services. Concessioner-assigned facilities, operations, and services are not included in park audits. However, in some cases, operational responsibilities may be shared between park and concession staff. Accordingly, to the greatest extent possible, the management and implementation of the CSP environmental audit program is consistent with the *NPS EAP Operating Guide*, although certain environmental audit program management and field procedures differ from the NPS EAP.

Relying solely on information in the Guide does not guarantee compliance with applicable laws. Strategies, procedures, and proposed solutions for compliance issues should be discussed with the appropriate federal, state, and/or local regulatory agencies as well as with park staff. It remains the responsibility of concession staff to ensure that they are in compliance with all applicable laws and regulations.

### Guide Organization

The Guide consists of four primary sections, plus associated appendices. The focal point of the Guide is the Auditor’s Handbook, which consists of Sections 2.0, 3.0, and 4.0 and is supported by information in the appendices.

The Auditor’s Handbook provides environmental audit team members with guidance and general procedures for conducting environmental audits. It is divided into three main sections:

* Section 2.0, Environmental Audit Planning, which defines the scope of environmental audits and audit team roles and responsibilities.
* Section 3.0, Conducting a Standard Environmental Audit.
* Section 4.0, Conducting a Telephone or Paper Environmental Audit.

Guide appendices support and augment the Auditor’s Handbook and provide specific tools for auditors.

### Guide Audience

Environmental audit team members are the primary intended audience for the Guide. However, the Guide can also be useful for NPS staff and NPS concessioner representatives. Nevertheless, the Guide is not intended to describe all environmental requirements applicable to NPS concession contracts. Concessioners remain responsible for determining and complying with all applicable laws and regulations.

The Guide has been designed to provide a relatively comprehensive reference for NPS CSP auditors. However, keep in mind that it is built upon the foundation of the NPS EAP. Therefore, those reading this Guide should also be familiar with the *NPS EAP Operating Guide* and understand how the CSP environmental audit program for concessioners relates to the NPS EAP for parks.

## Definition of Terms

The terms defined in this section are useful for understanding procedures explained in the Guide. Acronyms and abbreviations commonly used by CSP are also provided.

### Glossary

Many terms are identical or very similar to those given in the *NPS EAP Operating Guide*. Definitions that are specific to CSP and are not defined in the *NPS EAP Operating Guide* are denoted with an asterisk (\*).

**Applicable Laws\*:** Applicable laws are defined under concession contract language found in the Federal Register (FR) (Vol. 65, No. 87, May 2000) and consist of “the laws of Congress governing the Area, including, but not limited to, the rules, regulations, requirements and policies promulgated under those laws (e.g., 36 CFR Part 51), whether now in force, or amended, enacted or promulgated in the future, including, without limitation, federal, state and local laws, rules, regulations, requirements and policies governing nondiscrimination, protection of the environment and protection of public health and safety.”

**Audit Criteria:** The regulatory and policy standards developed or adopted by the NPS EAP and CSP, against which audited entities are evaluated during an audit; summarized in the EnviroReference Sheet definition below.

**Audit Finding:** A documented conclusion of conditions at the audited entity’s facilities or property at the time of the audit, based on objective and verifiable evidence gathered during the audit and based on a comparison of that evidence against the audit criteria. Audit findings may relate to individual occurrences of non-compliance, or they may relate to a single issue that impacts all concession facilities, services, or operations.

**Audit Handler\*:** An audit team member who assists in all aspects of the pre-audit, audit, and post-audit activities as requested by the audit team leader.

**Audit Logistics Plan\*:** A plan developed by the audit team to prepare for and manage an audit.

**Audit Protocol:** A list of issues or questions designed to help address objectives related to applicable audit criteria. The NPS EAP and NPS CSP EAP audit protocols are contained primarily within the set of documents known as EnviroCheck Sheets and EnviroReference Sheets. (See EnviroCheck Sheet and EnviroReference Sheet definitions below.)

**Audit Program Manager\*:** The designated person in CSP responsible for day-to-day aspects of the environmental audit program (e.g., scheduling, template development, auditor selection/approval).

**Audit Report:** The report generated upon completion of the audit, detailing audit findings, and exceptional practices.

**Audit Schedule:** The schedule developed by the Audit Program Manager and the Environmental Audit Coordinator (Coordinator) for auditing concessioners during the year.

**Audit Scope:** A description of what is to be audited. The audit scope includes a definition of the audited entity, audit period under review, and audit criteria.

**Audit Team Leader (ATL):** The audit team member who has demonstrated technical knowledge of audit criteria, has been approved by the Audit Program Manager to lead an audit, and assumes overall responsibility and authority for completing an environmental audit. Section 2.3.2 describes ATL qualifications in more detail.

**Audit Team:** A group of individuals consisting of an ATL and at least one other auditor, responsible for conducting an audit and preparing the audit report.

**Audited Entity\*:** The concession whose contractually assigned or defined facilities, services, activities, and operations are evaluated under an environmental audit.

**Auditor:** An audit team member qualified to conduct a CSP environmental audit. Section 2.3.2 describes auditor qualifications in more detail.

**Auditor-in-Training\*:** Individuals who have not completed required audit training and do not have appropriate experience qualifications. Auditors-in-training may attend any portion of the audit and work with the audit team to gather evidence, understand concession operations, and learn about the audit process, auditing techniques, and audit criteria.

**Baseline Environmental Audit:** The initial environmental audit conducted of an audited entity, in conformance with this Guide and including the minimum audit criteria described herein.

**Best Management Practice (BMP)\*:** Policies and practices that apply the most current and advanced means and technologies available to undertake and maintain a superior level of environmental performance that is reasonable for use in the operations conducted under the contract. BMPs are expected to evolve over time.

**Closed Audit Finding\*:** The status granted when a compliance issue identified in an audit report (i.e., an audit finding) no longer exists.

**Concessioner\*:** An individual, corporation, or other legally recognized entity that holds a concession contract authorized under the National Parks Omnibus Management Act of 1998 (Title IV of Public Law 105-391) or the NPS Concession Policies Act of 1965 (Public Law 89-249, 79 Stat. 969), and managed by CSP.

**Concession Contract\*:** A binding written agreement between the NPS Director and a concessioner authorized under one of the statutes cited in the preceding definition and implemented in accordance with 36 CFR Part 51. A concession contract authorizes a concessioner to provide necessary and appropriate visitor services within a park area under specified terms and conditions.

**Contract Category\*:** The designation of a concession contract under the National Parks Omnibus Management Act of 1998 that defines the concessioner’s ability to obtain a compensatory interest for constructing capital improvements on government lands. Categories include Category I, Category II, and Category III contracts.

**Coordinator\*:** The designated person in CSP responsible for overall environmental audit program management and providing guidance on the environmental audits. This individual should be an NPS employee rather than the consultant conducting the third-party environmental audit.

**Corrective Action:** An action taken by the audited entity to address issues identified in an audit finding.

**EnviroCheck Sheet:** Tools used to conduct an EAP audit. NPS EnviroCheck Sheets include a list of questions based upon audit criteria. Auditors use NPS EnviroCheck Sheets as a guide to assure each audit criterion area is minimally evaluated. Each NPS EnviroCheck Sheet provides instructions to the auditor on what to look for, who to interview, and what records to review. Note: These are not all encompassing and do not reflect state, tribal, regional, or local requirements, although the audit scope does include these requirements and auditors are expected to identify and evaluate against them

**EnviroReference Sheet:** Tools used to conduct a concessions environmental audit. The documented audit protocol for the NPS EAP and CSP. EnviroReference Sheets include a list of issues or questions designed to address the audit objectives based on audit criteria and organized by service type. Auditors should use EnviroReference Sheets to assure that each audit criterion area is thoroughly evaluated. Each EnviroReference Sheet provides guidance on interpreting regulatory and non-regulatory audit criteria as well as instructions for the auditor on what to evaluate, who to interview, and which records to review. Note that the EnviroReference Sheets are not all-encompassing and are not intended to describe every environmental requirement applicable to NPS concession contracts.

**Environmental Audit:** A systematic, periodic, objective, and documented evaluation of an NPS concession in accordance with the Guide.

**Environmental Management Program (EMP)\*:** A comprehensive, documented program developed and implemented by a concessioner to achieve environmental management objectives. For the purposes of CSP, an EMP is intended to be equivalent to an Environmental Management System (EMS) (see Environmental Management System definition below). Development and implementation of an EMP is required by contract and other NPS policy for all Category I and II contracts. According to NPS *Management Policies*, Chapter 10, Section 10.2.4.10, an EMP:

* Should be appropriate to the size and nature of the operation.
* Must account for all concession activities with potential environmental impact.
* Must be updated at least annually.
* Must be approved by the Superintendent.
* EMPs are evaluated by the audit team at the same time they conduct the environmental audit.

**Environmental Management Systems (EMS):** The systems and procedures in use by a unit of the NPS, designed to help park staff identify, manage, and consider all activities of the unit that may have an environmental impact, and select the most significant ones to address.

**Environmental Purchasing\*:** The acquisition of environmentally preferable products. Environmentally preferable products are products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider raw materials, production, manufacturing, packaging, distribution, reuse, operations, maintenance, and/or disposal. “Environmental purchasing” is also known as “green procurement.”

**Exceptional Practice\*:** Activities undertaken that are not often used by park concession operations and that demonstrate a concessioner’s commitment to environmental excellence.

**Executive Summary:** Part of the audit report that summarizes the audit and audit results.

**Isolated Finding\*:** An audit finding that is not indicative of a programmatic issue and/or is not pervasive throughout the concessioner’s operation.

**Open Issues:** An issue that cannot be resolved without an auditor obtaining additional information.

**Park:** Any one of the hundreds of areas of land and water administered as part of the national park system. The term is used interchangeably with “unit,” “park unit,” “area,” and “park area.”

**Period under Review:** The time interval under which conditions at the audited entity are evaluated against the audit criteria. Start and end dates are specified to define this time interval.

**Routine Audit:** An audit conducted in accordance with the Guide after the baseline audit. Routine audits take place if the concessioner has not changed and the required services under the current contract are similar to the previous contract. A routine audit may still take place if required services have changed, as long as the majority of services have not changed in type or scope. The determination of whether a concessioner has changed or if required services have changed in type or scope will be made by CSP on a case-by-case basis. If the concessioner has changed, even if the services have not, a new baseline audit will be performed.

**Superintendent’s Compendium:** A document that provides the public and park employees with the special designations, closures, public use limits, permit requirements, and other restrictions imposed under the discretionary authority of the Superintendent.

**Standard Operating Procedure (SOP):** A procedure used to carry out a specific activity or operation. SOPs are usually documented and filed or posted in a readily accessible location for employee review.

### Acronyms and Abbreviations

Table 1‑1 lists the acronyms and abbreviations used throughout the Guide. Many terms are identical or very similar to those provided in the *NPS EAP Operating Guide*. Acronyms and abbreviations that are specific to CSP and are not defined in the *NPS EAP Operating Guide* are denoted with an asterisk (\*).

Table 1‑1. Acronyms, Abbreviations, and Definitions

| ACRONYM / ABBREVIATION | DEFINITION |
| --- | --- |
| **36 CFR** | Title 36 of the Code of Federal Regulations |
| **515 DM 2** | Departmental Manual 515, Chapter 2 |
| **Audit** | Environmental Audit |
| **AQ\*** | Audit Questionnaire |
| **ASTM\*** | American Society for Testing and Materials |
| **BEAC\*** | Board of Environmental Health and Safety Auditor Certifications |
| **BMP** | Best Management Practice |
| **CFC** | Chlorofluorocarbon |
| **CFR** | Code of Federal Regulations |
| **CONCID\*** | Concessioner Identification Number |
| **CUA** | Commercial Use Authorization |
| **DM** | Departmental Manual |
| **DO** | Director’s Order |
| **DOI** | Department of the Interior |
| **DOT** | Department of Transportation |
| **EAP** | Environmental Audit Program |
| **EAR** | Environmental Audit Report |
| **EMP\*** | Environmental Management Program |
| **EMS** | Environmental Management System |
| **EO** | Executive Order |
| **EPA** | U.S. Environmental Protection Agency |
| **FAR** | Federal Acquisition Regulation |
| **FR** | Federal Register |
| **FY** | Fiscal Year |
| **Guide\*** | NPS CSP Program Environmental Audit Operating Guide |
| **HAZCOM** | Hazard Communication |
| **NPS** | National Park Service |
| **NRC** | National Response Center |
| **OSHA** | Occupational Safety and Health Administration |
| **PDF** | Portable Document Format |
| **POC** | Point of Contact |
| **RCRA\*** | Resource Conservation and Recovery Act |
| **SOP\*** | Standard Operating Procedure |
| **SPCC** | Spill Prevention, Control, and Countermeasures |
| **WASO** | Washington Support Office |

# Environmental Audit Planning

This section of the Guide describes the various components that characterize the scope of each environmental audit, such as defining audited entities, types of audits, audit criteria, audit frequency, and period under review. Additionally, this section provides an overview of the environmental audit team, including roles and responsibilities and auditor qualifications.

## Understanding the Scope of an Environmental Audit

A clearly defined scope is critical to a successful audit. The environmental audit scope depends on:

* Which concessioner and which associated facilities and services will be audited.
* Which audit type (i.e., standard versus non-standard audit) will be used.
* The audit criteria against which to audit the concessioner.
* The period under review for each concessioner.

### Audited Entities

CSP is responsible for auditing operations authorized by a concession contract that provide visitor services in national parks. A concessioner may be authorized to provide visitor services under multiple concession contracts at one or multiple parks, with most contracts authorizing provision of services at a single park. However, each contract requires a separate audit.

Typically, audits under CSP are scheduled on a park-by-park basis—not on an individual concession basis—to conserve travel costs, minimize disruption to park operations, and allow for park- wide concession environmental management issues to be more easily identified. This does not mean that in every case, every concession contract in a park is audited in a single visit. The coordinator, who is responsible for overall management and guidance of CSP environmental audits, works in collaboration with parks and regions to determine an annual environmental audit schedule that factors in park planning, contract expiration and award dates, and funding.

The scope of concession facilities, services, and operations being audited consists of the following:

* Concessioner-operated facilities within park boundaries.
* Concession services and operations taking place within park boundaries.
* Concessioner-owned and concessioner-operated facilities outside park boundaries that are specifically mentioned in the concession contract.
* Concession services and operations taking place outside park boundaries that are specifically mentioned in the concession contract; for example, if a concession contract requires composting and the concessioner composts outside park boundaries.

In some cases, operational responsibilities may be shared between park and concession staff (e.g., the park owns a fuel storage tank and NPS staff are responsible for corrosion and spill/overfill protection, but concession staff are responsible for conducting daily fuel and inventory control). In these cases, the audit team should audit only those operations that are the concessioner’s responsibility and document how operational responsibility was determined.

If park or concession staff responsibility for a facility, service, or operation cannot be definitively determined, the audit team should include the facility, service, or operation within the audit scope. Otherwise, it is possible that neither an NPS EAP nor a CSP environmental audit would address potential environmental issues connected to that facility, service, or operation.

## Audit Types

Audits conducted by CSP can take the form of a standard environmental audit, or a non-standard audit (e.g., telephone, paper, or hybrid). In certain cases, concessions contracts may be conditionally exempted from an audit. These determinations are made by the Coordinator based on the size, complexity, contract category, and potential for the operations environmental impact of the concession operation. A description of these audit types is provided in the subsections below.

*Standard Audit*: Standard audits are consistent with DOI policy and the NPS EAP. They include a site visit as well as pre- and post-visit phases and are described in more detail in Section 2.0. Standard audits are used for category I contracts and moderate to large category I contracts.

*Non-Standard Audit*: Non-standards audits are also consistent with DOI policy and the NPS EAP, however they do not include a site visit conducted by a third-party environmental auditor. Non-standard audits include telephone, paper, cruise ship, or hybrid audits. Non-standard audits are used for concession contracts that do not have facilities assigned within park boundaries or for those operations that do not warrant audit site visits due to their small size, less complex operations, and/or lesser potentials for environmental impact. Alternatively, if access to concession operation is challenging, particularly for backcountry operations or those operations that have no assigned facilities in the park (e.g., river guiding, hunting, mountaineering guiding).

Some concession operations (e.g., cruise ships) are subject to comprehensive environmental evaluations through a third-party auditor (e.g., U.S. Coast Guard) and as such, that environmental evaluation may serve in place of an NPS CSP environmental audit. In these cases, the audit team conducts and audit with an abbreviated scope focused primarily on DOI, NPS, and concession contract environmental requirements.

Finally, some concessions operations have such a small footprint in the park, such as the provision of visitor convenience items provided by Hospitality Associations or WiFi contracts. In these cases, the audit coordinator supported by the environmental audit team collects sufficient information to determine that the concession contract warrants a conditional exemption. The conditional exemption should be re-confirmed on a 10-year interval, which coincides with the usual frequency of a contract renewal or issuance. The site visit or conditional exemption form can be found in Appendix 2 and is for reference and *optional use*.

Although the non-standard audit typically has a reduced level of effort for both the audit team and concessioner, the process involves the same basic elements as a standard audit, except that data collection is accomplished remotely through telephone interviews and sharing of electronic documentation. Information shared through mail, fax, and email, and potentially second-hand observations via photographs, take the place of an in-person inspection.

*Telephone Audit*: Telephone audits are described in more detail in Section 4.0.

*Paper Audit*: Paper audits are described in more detail in Section 4.0.

*Cruise Line Audit*: Because cruise ships are subject to comprehensive environmental evaluations through a third-party audit authority (e.g., U.S. Coast Guard) and due to the transient nature of cruise line concession operations in parks and the complexity of such vessel operations, they present a unique challenge. As a result, an alternate audit process is implemented whereby a questionnaire is used to gather information on general and specific contract requirements from each cruise line company operating in the waters within national parks. CSP auditors review the audit questionnaire (AQ) and develop an audit report summarizing the findings of the questionnaire review.

*Conditionally Exempt*: Some concessions may not warrant an audit due to negligible potential for environmental impact (e.g., a small business supplying only firewood). In these cases, the audit coordinator collects sufficient information to justify and document these concessions as conditionally exempt. The conditionally exempt justification should be verified at least every ten years.

### Audited Criteria

Environmental audit criteria are summarized in the NPS EAP EnviroCheck Sheets provided in Appendix 3 and concession specific NPS CSP EnviroReference Sheets provided in Appendix 4. Auditors use applicable EnviroCheck and/or EnviroReference Sheets as the minimum audit criteria against which to compare the activities and operations of concessions and may formulate additional audit findings based on applicable regulation and requirements as needed. Environmental audit criteria include:

* *Federal laws*, including, but not limited to, those specified in 515 DM 2.
* *Applicable Executive Orders* (EOs) regarding environmental issues (e.g., EOs specified in 515 DM 2). These are applicable if compliance with an EO is required in the concession contract or if the EO states it is applicable to concessions.
* *Federal regulations* administered by U.S. agencies such as the Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), and Department of Transportation (DOT), in accordance with their authority.
* *Applicable state and tribal environmental laws and regulations*. More stringent state environmental requirements supersede federal environmental requirements.
* *Applicable regional and local environmental codes and ordinances*. More stringent regional and local requirements supersede federal and state environmental requirements. For instance, regional boards and authorities may establish more stringent air quality and/or water quality standards, or the local Fire Marshall may have specific codes for the siting, construction, and operation of aboveground fuel storage tanks.
* *Applicable DOI, NPS, and park policies and procedures*, which include the DM, NPS Management Policies, Director’s Orders (DOs), and Superintendent’s Compendium.
* *Concession contract requirements*, which may include an EMP (per 65 FR 26052-26086), and other contract requirements regarding environmental issues. Note: These requirements are primarily located in the operating and maintenance plans included as exhibits to contracts.

State, regional, and local criteria that relate to federal audit criteria depend on the location of the concession contract being audited. Compiling these audit criteria is the responsibility of the audit team. The determination of these audit criteria by the audit team does not preclude the entity being audited from understanding and complying with all applicable laws and regulations.

NPS EnviroCheck Sheets include the topic areas identified in Table 2‑1. Not all topic areas will apply to each concession operation. The ATL identifies applicable topic areas during the audit and ensures that all team members are familiar with the criteria being evaluated. Note: Respiratory Protection Program EnviroCheck Sheets have been removed from CSP audit scope since they it is a safety-related topic area.

Table 2‑1. NPS EAP EnviroCheck Sheet Topics

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

CSP EnviroReference Sheets (see Appendix 4) have been developed to augment the NPS EAP protocols, and focus on concession service types (e.g., food and beverage services). They refer to applicable NPS EAP EnviroCheck Sheets for each concession service type and provide additional requirements unique to concession facilities and services. The concession service types addressed by CSP EnviroReference Sheets are identified in Table 2‑2.

Table 2‑2. NPS CSP EnviroReference Sheet Topics

| NPS CSP ENVIROREFERENCE SHEET TOPICS |
| --- |
| Automobile Services |
| Bathhouse, Laundry, Shower, and Swimming Pool Operations |
| Food and Beverage Services |
| Lodging Management |
| Marina Operations |
| Medical Clinics |
| Pack Animal and Other Guided Tours |
| Retail Operations |

### Audit Frequency and Period under Review

The audit frequency is every three to five years (contingent upon funding availability). Auditors are required to review only those activities that occurred during the pre-determined period under review. The audit period under review is used to balance interest in obtaining an adequate review of concession facilities and operations with the need to limit audit scope because of time and resource constraints.

*Baseline Audit Period under Review*: The period under review for baseline (initial) audits of concessions is January 1st of the previous calendar year to the last day of the audit site visit or telephone audit. For example, a baseline concession audit occurring August 15-19, 2022, would have a period under review of January 1, 2021, through August 19, 2022.

*Routine Audit Period under Review*: The period under review for routine audits (i.e., audits of concessions conducted after the baseline audit, See Routine Audit under Definitions), in which the business has not changed since the last environmental audit, is the first day after the previous audit concluded to the last day of the present audit. For example, a routine concession audit occurring August 15-19, 2022, with a baseline audit that occurred October 10-14, 2017, would have a period under review of October 14, 2017, through August 19, 2022.

## The Environmental Audit Team

This section describes the roles and responsibilities of the audit team and the audit team support staff as they relate to the audit coordinator, the audited entity (i.e., the concessioner), and park staff involved in concession management. (A checklist of park staff and concessioners’ roles and responsibilities is included in Appendix 1.)

### Roles and Responsibilities

Before discussing the roles and responsibilities of the audit team and audit team support, it is important to understand some of the roles and responsibilities of the coordinator, given that the coordinator is the primary CSP point of contact (POC) for all environmental audit-related issues.

#### Coordinator Responsibilities

The Coordinator is the primary POC for all CSP environmental audit-related issues, and therefore should be apprised of all notable environmental audit issues that are encountered. Responsibilities include:

* Notify park staff of upcoming environmental audits.
* Confirm the audit scope, including the concession to be audited and audit type (i.e., standard vs. non-standard audit).
* Act as initial POC between the audit team and park staff.
* Respond to audit issues as they are presented by the audit team.
* Receive, review, approve, and distribute the Preliminary Environmental Audit Report (P.EAR).
* Receive, review, approve, and distribute the Final Environmental Audit Report (F.EAR).
* Solicit feedback from concessioner, park, and NPS regional staff on the audit process.
* Solicit corrective action completion status reports from park staff on a periodic basis.
* Serve as the POC regarding follow-up on corrective action implementation.

#### Audit Team Responsibilities

The audit team, which is typically composed of at least an ATL and an auditor, is responsible for conducting an audit in accordance with the Guide. This includes evaluating concession operations as required under the audit scope and preparing the draft and final audit report.

As representatives of CSP, the audit team members are also responsible for meeting the following goals:

* Conduct the audit as an open process, disclose all that is found and adhere to the most current confidentiality policies of all parties involved. Promote education and awareness to concession and NPS staff at the audited entity, wherever possible.
* Share lessons learned from other environmental audits.

*Audit Program Manager:* The Audit Program Manager is responsible for the day-to-day management of the environmental audit program. The Audit Program Manager oversees the overall processes, scheduling, template development, and auditor assignments. Responsibilities include:

* Coordinating the development of the audit schedule.
* Approving audit team sizes and audit team members.
* Developing and approving audit budgets.
* Ensuring audit team participants, including the ATL, are qualified to conduct the audit of the concession to which they are assigned.

*Audit Team Leader*: The ATL serves as the primary POC between the audit team and the coordinator, and between the audit team and park staff. As the person ultimately responsible for successful audit completion in accordance with the Guide, the ATL must be on site during the entire audit site visit for standard audits, participate in all significant interviews for telephone audits, and lead the process for paper audits. Responsibilities include:

* Developing a detailed audit logistics plan, to include audit schedule and scope, with park staff.
* Ensuring applicable audit criteria have been identified, including researching possible more stringent state and local laws and regulations as well as NPS regional and park policies, and documenting these in a regulatory summary.
* Reviewing the concession contract and developing (or coordinating the development of) a summary to help understand general concession operations and identifying key environmental requirements.
* Assigning responsibility for covering audit criteria and audit protocols (i.e., EnviroCheck Sheets/EnviroReference Sheets) to members of the audit team.
* Coordinating travel logistics for the audit team (site visits only).
* Preparing, or coordinating the preparation of, the In-Brief and Exit-Brief presentations (site visits only).
* Ensuring all relevant pre-audit data is collected and distributed to the audit team for review.
* Managing audit activities, such as executing site visit logistics or coordinating telephone or paper interviews.
* Managing the audit budget, as provided by the Audit Program Manager.
* Contributing to the audit team as an auditor.
* Reviewing and verifying audit findings developed by the auditors.
* Preparing and submitting the P.EAR to the audit handler on time; coordinating and participating in the audit comment teleconference (optional) between park staff, concession staff, and the audit team.
* Preparing and submitting the Final Audit Report to the audit handler on time.
* Submitting all documentation to the audit handler for inclusion in the official concession audit file (including field notes).

*Auditor*: Auditors are responsible for supporting the ATL in successfully completing the audit. Responsibilities include:

* Following ATL directions.
* Reviewing pre-audit information distributed by the ATL.
* Reviewing assigned audit criteria, audit protocols, and applicable state and local regulations.
* Confirming travel and lodging reservations.
* Gathering audit evidence.
* Providing the ATL with supportable audit findings for the areas to which they are assigned.
* Providing assistance or input to the ATL in addressing park or concessioner comments on the Preliminary and F.EARs.
* Providing all necessary audit documents, including field notes, to the ATL for inclusion in the official concession audit file once the F.EAR is submitted.

*Audit Handler*: Audit handlers are responsible for supporting the audit team in successfully completing the audit. An audit handler is not always assigned to an audit or audit season. This is at the discretion of the Audit Program Manager. Responsibilities, as requested by the audit team, include:

* Assisting in the preparation of pre-audit documentation.
* Assisting in the gathering of all relevant pre-audit data—such as the regulatory summary, concession contract summary, and audit logistics plan—and distributing it to the audit team for review.
* Assisting in the preparation of the P.EAR and transmittal documents.
* Posting the P.EAR to the NPS collaboration site and Shared Drive.
* Developing email communication for the coordinator to distribute.
* Participating as requested by the ATL during the audit comment process.
* Assisting in the preparation of the F.EAR and transmittal documents.
* Transmitting the F.EAR to the coordinator for distribution.
* Receiving all audit documentation for inclusion in the official concession audit file.

#### Audit Team Support Responsibilities

Audit team support members are optional additional staff who may assist the audit team during any step of the audit process. Since they may not have the training, experience, and/or qualifications of audit team members, they are considered audit team support.

*Observer*: Observers may be present during the audit process for different reasons but are not considered part of the audit team. Observers may be auditors-in-training, technical experts who are not qualified to be auditors, or others, such as NPS staff from another park or the Washington Support Office (WASO). Any finding noted by observers must be physically observed by an auditor on the audit team and reviewed by the ATL prior to being included in a P.EAR.

An auditor-in-training works with the audit team to improve their understanding of the environmental audit process, environmental regulatory criteria, BMPs, and sustainable practices as they apply to concessions. They receive instruction and direction from the ATL.

Others, such as WASO staff, NPS staff from other parks, or the coordinator, may be present during the audit process to learn more about how concession audits are conducted or to evaluate the audit team’s performance.

*Reviewer*: Reviewers conduct a quality check of the Preliminary and F.EARs prior to the report being sent to the coordinator and are responsible for:

* Conducting a technical quality review on Preliminary and F.EARs.
* Conducting an editorial quality review on Preliminary and F.EARs.
* Submitting reviewed Preliminary and F.EARs to the ATL in a timely manner.

### Qualifications

Only qualified audit team members participate in environmental audits. Audit team qualifications include technical knowledge, training, and proficiency in the NPS EAP EnviroCheck Sheets, CSP EnviroReference Sheets, and additional CSP audit protocols and procedures not included in the CSP EnviroReference Sheets. The qualifications of the assigned audit team should be commensurate with the scope and location of the audit and the specific intricacies of the concession operation and contract requirements.

Audit team members must be independent of the concession being audited. For the purpose of CSP, ‘independence’ means that the audit team member is not providing and has not provided services to the concessioner (i.e., through parent company management or other relationships) that could influence the objective environmental assessment of the concession. Audit team members must maintain the following personal attributes and skills:

* Objectivity
* Independence
* Knowledge of audit criteria
* Technical credibility
* Communication skills
* Diplomacy skills
* Familiarity with operations being reviewed
* Competence with environmental audit tools and techniques.

Environmental auditors must also have CSP-approved training and environmental audit experience, as summarized in Table 2‑3. The Audit Program Manager is responsible for confirming whether an individual meets these qualifications.

#### Environmental Audit Team Qualifications

Table 2‑3. Environmental Audit Team Qualifications

| TEAM MEMBER | TRAINING/EXPERIENCE | OTHER QUALIFICATIONS |
| --- | --- | --- |
| ATL | * 32-hour environmental audit training, or equivalent documented experience on Commercial Services or NPS environmental audits and NPS EAP.
* Annual auditor training on Commercial Services environmental audits, or equivalent documented experience that includes any NPS EAP updates.
 | * Exceptional understanding of Commercial Services environmental audits, including scope, benefits, regulatory risks, and legal issues.
* Strong knowledge of Commercial Services and associated policies and procedures.
* Strong knowledge of NPS concession operations and associated environmental considerations.
* Thorough understanding of regulatory requirements addressed in the NPS EAP and Commercial Services EnviroReference Sheets.
* Proven ability to lead a team and manage a budget.
 |
| Auditor | * 32-hour environmental audit training, or equivalent documented experience on Commercial Services or NPS environmental audits and NPS EAP.
* Annual auditor training on Commercial Services environmental audits, or equivalent documented experience that includes any NPS EAP updates.
 | * Familiar with Commercial Services environmental audit scope, benefits, risks, and legal issues.
* Familiar with regulatory requirements addressed in the NPS EAP EnviroCheck Sheet and the Commercial Services EnviroReference Sheet that the auditor has been assigned to use.
 |

Audit team support members who are Observers must have all the personal attributes and skills listed above if they have contact with park or concession staff. They must be aware of their limited role in the audit.

Audit team support members who are Reviewers must understand how the P.EAR and F.EARs are developed and must be familiar with auditing processes and editing techniques.

# Conducting a Standard Environmental Audit

This section of the Guide describes how the coordinator and the audit team conduct a standard environmental audit. Roles and responsibilities regarding preparations that park and concession staff should take to participate in an environmental audit are described in Appendix 1.

## Pre-Audit Activities

The audit process begins with scheduling concession audits (i.e., developing the annual audit schedule) at the beginning of the fiscal year. Preparation for each audit site visit begins about six weeks in advance of the site visit, and includes contacting the region, parks, and concession staff; collecting pre- visit data; confirming the audit scope; arranging audit logistics; preparing the In-Brief presentation; and conducting pre-audit final preparations. Table 3‑1 provides a timeline for pre-audit activities, which is also provided in the Pre-Audit Checklist in Appendix 5 of this Guide. Detailed information on the pre-audit process is provided in the subsections below.

Table 3‑1. Pre-Audit Timeline

| TIMELINE | RESPONSIBLE PARTY(IES) | TASK(S) |
| --- | --- | --- |
| 6 weeks before site visit | Coordinator | * Notify the park POC that pre-audit materials (including the AQ) are available on the CSP collaboration site.
 |
| 6 weeks before site visit | ATL | * Confirm audit dates and audit scope with park POC.
* Ensure the most current concession contracts, including operating plans and maintenance plans, are available.
* Coordinate site visit logistics with park POC.
* Coordinate with auditors on team travel plans (e.g., flights, lodging, car rentals).
* Assign audit criteria to auditors.
* Develop audit logistics plan.
 |
| 2 weeks before site visit | ATL | * Ensure completed AQ and other pre-audit information is available on the CSP collaboration. Park POC will have saved this information on the site as appropriate.
* Finalize travel plans in coordination with audit team (e.g., flights, lodging, car rentals).
* Prepare In-Brief.
* Review concession contract and develop summary of key environmental requirements, forward to auditors (contract summary will be completed pre-season, this is supplemental and as needed, to that summary).
* Prepare state, local, park/NPS or regional environmental regulatory and policy summaries; forward to auditors.
 |
| 1 week before site visit | ATL | * Confirm auditors have reviewed required information.
* Confirm audit logistics with park POC.
 |
| 1 week before site visit | ATL and Auditors | * Review AQ, concession contract summary of key environmental requirements; state, local, park/NPS or regional environmental regulatory and policy summaries; and previous audit reports, if applicable.
* Review assigned audit criteria.
 |
| 2 days before site visit | ATL | * Ensure all documentation and equipment required for the site visit is available.
 |

#### Contact Park Staff (6 weeks prior to the site visit)

Typically, six weeks in advance of the audit, the coordinator sends official notification to the park Superintendent of proposed environmental audit(s); a request for the following pre-audit data is included.

*AQ:* The AQ (Appendix 7) requests information on concession facilities, services, and operations, as well as environmental program information. The coordinator sends pre-audit information in a pre-audit email (Appendix 6) to the park POC. The park POC is responsible for pulling the AQ from the NPS collaboration site and distributing to each concession being audited, collecting the completed AQs, and saving them back to the NPS collaboration site folder no later than two weeks before the site visit.

*Additional Information*: In addition to the information requested in the AQ, there may be additional concession information that is helpful for completing the audit, which is either forwarded to the ATL prior to the site visit or is made available during the site visit. This type of information may include general background information on the concession not found in the concession contract documentation as well as the concessioner’s EMP. These documents should be available to the audit team at least two weeks prior to the site visit.

#### Confirm Audit Scope (6 weeks prior to the site visit)

After the ATL has contacted the park POC and the AQ is available on the NPS collaboration site for the park POC to forward to the concessioners, the ATL contacts the park POC to confirm the audit scope in terms of the size and complexity of each concession’s operations, audit type, and audit criteria. The audit scope encompasses the following:

*Audited Entities*: For concessions to be audited, as indicated by the Coordinator, the ATL identifies those concession facilities, services, and operations that fall under the audit scope. Facilities and operations that take place outside of park boundaries should not be audited unless they are specifically mentioned in the concession contract.

*Audit Type*: The ATL confirms that the standard audit type is appropriate for each concession. Any consideration for modifying the standard audit type to a non-standard audit type must be made in coordination with, and approved by, the coordinator.

*Audit Criteria*: The ATL verifies that the audit team has the necessary qualifications in the audit criteria areas applicable to the concession being audited, including non-federal audit criteria. If the assigned audit team does not have the necessary qualifications, the ATL discusses potential changes to the audit team with the Audit Program Manager.

*Audit Period Under Review*: The ATL confirms that the concession is undergoing a baseline or routine audit, as designated by the coordinator, in order to establish the period under review. If it is unclear whether a concession should be undergoing a baseline or routine audit, the ATL works with the Coordinator and Audit Program Manager to make this determination.

#### Determine and Assign Applicable Audit Criteria (6 weeks prior to the site visit)

Identifying applicable audit criteria is based on the ATL’s understanding of the concession operation. The ATL assigns auditors responsibility for applicable environmental topic areas and concession service types based on their qualifications. The ATL may assign secondary responsibility for applicable environmental topic areas and concession service types for large and/or complex concession operations. These instances may require that the audit team split into sub-teams during the site visit in order to ensure that all applicable data is collected.

The ATL should also inform auditors as to whether a routine audit is to be conducted. If this is the case, the ATL should forward a copy of the F.EAR from the previous audit to the auditors.

Applicable audit criteria categories include the following:

*NPS EnviroCheck Sheets*: The ATL will obtain the most current set of NPS EnviroCheck Sheets, organized by environmental topic area, to be used for the site visit. Based on their understanding of concession operations, the ATL can determine which NPS EnviroCheck Sheets may or may not be applicable.

*CSP EnviroReference Sheets*: The ATL will obtain the most current set of CSP EnviroReference Sheets, organized by concession service type, and add them to the NPS EnviroCheck Sheets to be used for the site visit.

*Current Federal Requirements*: Federal standards, such as laws, regulations, and EOs, are the basis for compliance focused NPS and CSP EnviroReference Sheets. Prior to each audit, the ATL should contact knowledgeable parties to determine whether they are aware of any federal regulatory, interpretative, or EO changes that have been implemented since the most recent update of the Guide and forward this information to the audit team. Note: EOs clearly define federal facility requirements. Unless stated in the concession contract or stated in the EOs, EOs are not applicable to concessions.

*State, Tribal, Regional, and Local Requirements*: Concessions may be subject to state, tribal, regional, and local requirements in addition to federal requirements. The ATL should determine how state, tribal, regional, and local regulations differ from federal standards. If the more stringent state, tribal, regional, or local requirements apply, the ATL should forward this information to the audit team and ensure that they evaluate concessions against these more stringent criteria.

*DOI and NPS Policies and Procedures*: These include DOI and NPS policies, such as NPS Management Policies and DOs. Unlike EOs, DOI and NPS policies always apply to concession activities. The ATL should determine if new DOI or NPS policies and procedures have become effective since the most recent update of the Guide and forward this information to the audit team.

*Concession Contract*: The concession contract, including certain exhibits such as the operating and maintenance plans, may have specific environmental requirements for concessions pertaining to solid waste management, hazardous materials management, and pesticide management, among other topic areas. The ATL should obtain the most current versions of the concession contracts, including exhibits, and develop a summary of environmental requirements for the audit team.

*Other Requirements*: In some cases, concession requirements may be located in documents other than those listed above, including, but not limited to the Superintendent’s Compendium, park General Management Plan, park memoranda, or park SPCC Plan. The ATL should work with the park POC to identify, obtain, and review these documents prior to the environmental audit site visit.

Park-approved documents may also specify concession environmental requirements. Such documents may include, but are not limited to the concessioner EMP, concessioner SPCC Plan, or concessioner Integrated Pest Management Plan. The ATL should obtain these documents from the park POC prior to the audit and have the audit team review them in advance of the site visit.

#### Develop Audit Logistics Plan (6 weeks prior to the site visit)

The ATL, in consultation with the park POC, develops an audit logistics plan (see Appendix 8) summarizing the environmental audit purpose, concession(s) to be audited, period under review, auditors assigned, audit criteria responsibilities, site visit schedule, and travel logistics.

The site visit schedule section of the audit logistics plan provides the opportunity to prioritize site visit activities based on potential environmental risk (e.g., more time may be spent at a lodging operation than a bicycle rental facility). The audit team will review all concession operations with the potential for environmental liability. The level of effort expended at different facilities and concession operations is based on the ability of that review to help achieve CSP goals, as well as the complexity of the operation and its potential to impact the environment. For example, dividing an audit team comprised of four or more members into smaller teams may be required to complete all site visit work within the limitations of the site visit schedule. It is desirable to have smaller teams of two, so that concession staff are not overwhelmed by the number of auditors. Each smaller team should have adequate qualifications, and the ATL should designate a secondary ATL for each smaller team. For parks where there are multiple concessions, an audit team of four or more auditors might be divided by concession. In the case of a large concession with multiple facilities, services, and operations at multiple locations, the audit team might be divided based on service types or locations.

The ATL should inquire of the park POC as to audit team workspace availability; room availability for presentations; copier, fax, telephone, and internet access; and park and concession operating hours during the site visit. If meeting space and other items are not available, the ATL should coordinate with the park POC to consider alternate solutions for portions of the site visit that require these types of spaces and resources.

Audit team travel logistics such as flights, rental cars, and lodging should be included in the audit logistics plan for easy reference by the audit team. It is recommended that travel logistics be arranged in advance, especially when lodging may not be available due to seasonal demands. It is appropriate for the audit team to stay at lodging provided by the concession that is being audited, provided no special treatment is accepted by the audit team.

#### Prepare In-Brief (2 weeks prior to site visit)

The ATL prepares an In-Brief presentation for both park and concession staff. The presentation provides background information about the audit team, communicates the objectives of the environmental audit, and describes the audit scope, schedule, and reporting process. Depending on the audit schedule, the ATL may need to prepare separate In-Brief presentations for park staff and concession staff. A template In- Brief presentation is found in Appendix 9 of this Guide.

#### Complete Audit Team Preparations (1 week prior to site visit)

At least one week before the site visit, the ATL should conduct a final check to ensure that auditors are prepared for the site visit. The ATL should:

* Contact the park POC to ensure that park and concession staff are ready for the site visit.
* Ensure audit logistics are finalized.
* Check that auditors understand their roles and responsibilities.
* Ensure auditors have reviewed the completed AQ, concession contract environmental requirements summary, environmental regulatory and policy summary, assigned audit criteria (i.e., NPS EnviroCheck Sheets and CSP EnviroReference Sheets), the F.EAR for the previous audit completed (if applicable), and other information forwarded for review.
* Ensure that the following is available during the site visit:
	+ *Equipment*: auditor notebooks, cameras, computers, and projector.
	+ *Hardcopy documents*: Sign-in sheets.
	+ *Electronic files*: In-Brief presentation, blank databases, NPS EnviroCheck Sheets and CSP EnviroReference Sheets, concessioner contract, Exit-Brief template presentation.

### Site Visit Activities

The site visit is the most extensive portion of a standard environmental audit; the audit team has the most interaction with concession and park staff during this phase of the audit. The site visit is not simply an inspection of concession facilities, services, and operations; it should be regarded as an exchange of information between the audit team, park staff, and concession staff. The audit team works to understand each concession’s compliance issues and to identify BMP opportunities, while at the same time-sharing knowledge with concession and park personnel on environmental issues and corrective action opportunities.

There is no specific timeline for completion of the environmental audit site visit because time spent on site will vary based on the size of the audit team, the number of concessions to be audited, and the size, complexity, and location of each concession. Typical audit site visits for multiple concessions are completed in a week or less. It is rare for an audit site visit to extend beyond one week. An overview of site visit activities is given in Table 3‑2.

Table 3‑2. Environmental Audit Site Visit Process

| GETTING STARTED | COLLECTING AUDIT DATA | DEVELOP AND REPORT RESULTS |
| --- | --- | --- |
| 1. Conduct Audit In-Brief
 | 1. Review audit questionnaire
2. Conduct Interviews
3. Conduct document review
4. Make observations
 | 1. Site Visit Reporting
2. Emergency Conditions
3. Daily Report/Progress Report Summary
4. Developing Preliminary Results
5. Conduct Audit Exit-Brief(s)
 |

#### Conduct In-Brief

The site visit begins with an In-Brief presentation, which provides an opportunity to introduce the audit team to park and concession personnel, orient the park and concessioner(s) to the environmental audit process, and allow the audit team to get to know and gather general information on the park and concession(s). The In-Brief presentation specifically covers the following information:

* Relationship between the environmental audit program and CSP.
* Identification of concessions to be audited.
* Background information on audit team members.
* Audit purpose and objectives.
* Audit criteria and period under review.
* Audit scope and process.
* Audit site visit schedule and logistics.
* Audit report process and schedule.
* Corrective Action Tracker (CAT) and process.
* Assistance resources available from CSP.

The In-Brief presentation should take no longer than one hour. The audit team should use the In-Brief presentation as an opportunity to confirm the site visit schedule with park and concession staff. Changes may be needed to accommodate concession staff schedules and to account for new information on the size and complexity of concession facilities, services, and operations, as well as logistical considerations and other unanticipated issues. The audit team should not start the detailed data collection phase of the site visit during the In-Brief presentation.

It is best if the ATL and park POC can coordinate a single In-Brief presentation for all applicable park and concession personnel to minimize audit team time spent in meetings. (Usually, this meeting occurs at park headquarters.) In cases in which not all parties are available at the same time for the In-Brief presentation, or in which travel to the meeting location may be a hardship for concession staff, additional In-Brief presentations may be scheduled. In these instances, a separate In-Brief presentation should occur upon arrival at the concession facilities, prior to conducting audit interviews, document reviews, and inspections. Note: if presenting a separate In-Brief at a concession facility, the audit team may want to consider providing an informal presentation instead of the formal presentation given to park staff at headquarters.

Table 3‑3. In-Brief and Exit-Brief Attendees

| TITLE | PRESENCE REQUIRED OR RECOMMENDED |
| --- | --- |
| Audit team | Required |
| Auditor-in-training | Required |
| Park Superintendent | Highly Recommended |
| Park POC | Required |
| Park Concession Chief | Highly Recommended |
| Other park concession personnel | Recommended |
| Other park personnel | Recommended |
| Concession POC(s) | Required |
| Concession Environmental Manager(s) | Required |
| Concession Facilities Manager(s) | Highly Recommended |
| Concession General Manager(s) | Highly Recommended |

While it is recommended that others attend the In-Brief to maximize educational opportunities and to ensure logistical coordination, it is not required. The ATL should request that all In-Brief presentation attendees fill out a sign-in sheet that includes each attendee’s name, title, organization, telephone number, and email address.

#### Collect Audit Data

After the In-Brief presentation, auditors typically start collecting audit data by traveling to each concession location according to the site visit schedule.

*Site Visit Schedule*: The key to a successful audit is flexibility. It is not uncommon for plans to change several times during the period of the audit site visit. If any site visit schedule changes are made, the park POC and affected concession staff should be notified as soon as possible.

*AQ Review*: Before beginning the detailed audit data collection process by observing concession operations, it is often useful to review the concession AQ with the concession POC and other relevant concession personnel. The AQ review allows auditors to obtain clarification on information contained in the document, such as the concession’s hazardous waste generator status. Auditors should avoid allowing discussions to get bogged down in data collection at this point, as data collection might be more efficient to conduct during observations of concession operations. If the audit team is not careful, what is planned as a simple overview and clarification exercise can take longer than expected. This can compromise the site visit schedule and leave the concessioner and park POC feeling frustrated with the audit process from the start.

*Collecting Detailed Audit Data*: There are three ways in which audit data is gathered:

* Physical observations.
* Interviews.
* Record and document reviews.

Each of these data collection methods, discussed in more detail in the subsections below, is used to develop supportable audit conclusions that may eventually be written as audit findings. At least two of the three data collection methods listed above should be used in generating audit conclusions. The NPS EnviroCheck Sheets and CSP EnviroReference Sheets provide guidance on applicable areas, staff to interview, and records to review.

While EnviroCheck Sheets have been assigned to each audit team member during pre-audit planning, it is likely that during the site visit, information relevant to another auditor’s EnviroCheck Sheets will be discovered. This information should be recorded by the auditor who discovered it and passed along to the auditor responsible for that EnviroCheck Sheet at the earliest opportunity.

*Physical Observation*: Auditors observe assigned buildings and lands, storage areas, and work practices and operations. Auditors should record detailed information on each observation that does not appear to meet the audit criteria. This information includes specific locations where the observations were made, clear descriptions of what was observed, and quantitative data on issues observed (e.g., numbers and sizes of containers). Auditors should also take photographs of key observations, trying not to photograph individuals if they are not needed to demonstrate the key observation.

When conducting data gathering through physical observations, auditors must use prudent and safe work practices. They must not enter unsafe areas (e.g., unstable buildings, confined spaces, or areas with potentially uncontrolled physical or chemical hazards). Auditors should try not to disturb materials and equipment they are observing; instead, they should ask concession staff to move pieces of equipment or containers if necessary to inspect them. Auditors should ask if it is acceptable to go into new areas or to open cabinets and lockers.

If a concession staff member indicates that an area cannot be inspected due to safety or security concerns, because it is a personal rather than a company area, or for any other reason, the auditor should accept this explanation, document the issue in his or her notebook, and move on. If the auditor feels entry into the area is within the scope of the audit and is important for the integrity and completeness of the environmental audit, the issue should be discussed with the ATL so that it can be elevated for consideration by the park POC, concession POC, and their respective managers. For general reference, it is appropriate to inspect employee housing common areas. It is also appropriate to inspect employee housing personal areas if a concern has been raised and the park POC or concession POC requests that this inspection take place.

*Interviews*: Auditors conduct interviews with concession staff to gather information on concession facilities, services, and operations. Interview objectives are to:

* Discuss employee responsibilities to understand the degree to which they are defined and delegated.
* Understand how environmental programs are implemented.
* Confirm implementation of concessioner-documented policies and SOPs.
* Assess concessioner training effectiveness.
* Educate concession staff on how environmental performance can be improved.
* Verify issues identified from physical observations or record and document reviews.

Auditors should document the name and title of the person interviewed and attempt to document their contact information (e.g., telephone number and email address). Guidelines for conducting interviews are shown in Table 3‑4.

Table 3‑4. Interview Guidelines

| SUGGESTION | EXAMPLE |
| --- | --- |
| Ask both open-ended and specific questions. | *Open-ended*: “Can you please describe what happens when you change the oil?”*Specific*: “If I understand you correctly, you carry an open five-gallon bucket across the driveway, and then pour it into the 250-gallon tank, right?” |
| Avoid leading questions. | *Leading question*: “You don’t mix anything with the used oil, do you?” |
| Obtain definitive answers to questions. | *Ask different individuals the same question*: Ask all employees whether they have received spill response training.*Ask the same question in different ways*: “Have you received spill response training?”; “Did someone here teach you how to respond to a fuel spill?” |
| Avoid questions of judgment or blame. | *Judgment/blame question*: “So it’s your fault that the hazardous waste storage area is a mess, right?” |

*Record and Document Reviews*: Auditors review concession records and documents to:

* Assess compliance with current applicable laws; DOI, NPS, or park policy; and the concession contract.
* Understand the concessioner’s EMP.
* Verify the issues identified by interviews or observations.

Each NPS EnviroCheck Sheet and CSP EnviroReference Sheet identifies records and documents that auditors should review as applicable. Key documents or portions of key documents may be copied for reference purposes. It is often useful to copy the cover page and table of contents of a document. Information contained in the records and documents reviewed should not be shared with other concessions.

During the site visit, the auditor responsible for CSP EnviroReference Sheet on EMPs should conduct a review of the concessioner’s EMP (if it exists) and should evaluate the EMP for compliance with concession contract requirements and applicable provisions of NPS *Management Policies*, Chapter 10.

*Recording Audit Data*: All audit data is recorded by each auditor. Recorded audit information should be legible, written in ink, and recorded in a professional manner that maintains objectivity and avoids inflammatory language. Pages should be neatly removed from the notebook if necessary, and corrections should be neatly crossed out rather than scratched out or erased.

The front page of each notebook section for a specific concession should include the following information:

* Auditor’s name.
* Company or agency representation (e.g., XYZ Consulting, CSP).
* Concessioner Identification Number (CONCID).
* Date(s) of site visit.

Each page within the notebook section for a specific concession should have the following information in the upper right-hand side:

* Auditor’s initials.
* CONCID.
* Date of that page entry.
* Page number/total pages (e.g., 5/22).

Photographs provide an excellent record to help document an audit conclusion. Each audit team should have a digital camera and should attempt to take photographs of all observations that support a preliminary audit finding or exceptional practice.

*Providing Compliance Assistance while Collecting Data*: While auditors are gathering information to develop audit findings, they should also educate concession and park staff on how other concessions have successfully addressed similar environmental issues or offer ideas on how these issues could be addressed. However, auditors must remember that although CSP has a strong interest in educating and aiding concession staff during audits, this effort cannot be allowed to compromise the ability of the audit team to fully complete the audits. The audit team should ensure that they adhere to their site visit schedule to complete all concession audits; however, auditors should note compliance questions and information requested by concession staff and seek to assist them after the site visit. Note: Providing compliance and BMP assistance does not preclude the concession from understanding and being in compliance with all applicable laws at all times.

#### Site Visit Reporting

Concessioner POCs, other concession personnel, and park personnel are often interested in obtaining information from the audit team firsthand during the audit. Because the audit process is an open exchange between auditors, park staff, and concession personnel, the audit team should point out preliminary audit findings and exceptional practices as they are identified, rather than waiting for distribution of the P.EAR. Site visit reporting includes:

* Reporting emergency conditions.
* In-progress reporting to park and concession staff.
* Presenting the Exit-Brief.
* Audit team debriefings.

*Reporting Emergency Conditions*: Emergency conditions include practices or situations that could reasonably be expected to cause death, serious physical harm to persons or the environment, or immediate loss of concession or NPS structures or resources before the danger can be eliminated through normal procedures. Emergency conditions may include past and present spills of hazardous substances to the environment, old and unstable chemicals, and imminent fire hazards, among others.

The audit team should make no attempt to correct emergency conditions, but should immediately report them to the Superintendent, the park POC, and the responsible concession manager or supervisor. If possible, this report should be made by the ATL. If the ATL is not readily available, the auditor should report the concern so that information is provided in a timely manner.

If there is a release of oil or any hazardous substance, the audit team must immediately notify the responsible concession manager, supervisor, or designee; the Superintendent; and the park POC. The responsible concession manager, supervisor, or designee in turn must call the **National Response Center (NRC) at 1-800-424-8802**, as well as other appropriate regulatory agencies. If this does not occur, the audit team should tell the park POC to make this call. If this does not occur in a timely manner, the audit team should inform the coordinator that they are notifying the NRC of the release, as required by regulation.

*In-Progress Reporting*: As preliminary audit findings and exceptional practices are identified by the audit team they should be communicated verbally to the responsible concession staff and the park POC. This may occur informally in the field as data collection is occurring, or during more formal debriefings to concession and/or park staff, if scheduled (e.g., daily). If the audit team is not certain about details of a preliminary audit finding or exceptional practice, they should still inform concession and park staff about these concerns but add a caveat that additional research needs to be carried out.

*Developing Preliminary Audit Findings and Exceptional Practices*: Based on data collected, the audit team should develop preliminary conclusions in the field about concession operations related to audit criteria. These take one of three forms: audit findings, BMPs, and exceptional practices.

*Audit Findings*: Audit findings are developed when the audit team concludes that concession staff are not meeting compliance audit criteria. Audit findings are assigned a level of Priority 1, 2, or 3.

* Priority 1 audit findings represent non-conformances with laws and regulations that pose (i) immediate actual or potential harm to human health or the environment, or (ii) the potential for significant liability. The concessioner has 90 days from the date of the preliminary environmental audit report to close Priority 1 findings.
* Priority 2 audit findings represent non-conformances with laws and regulations that do not pose an immediate threat to human health or the environment. The concessioner has 180 days from the date of the preliminary environmental audit report to close Priority 2 findings.
* Priority 3 audit findings represent non-conformances with DOI, NPS, or park policy, or with the concession contract, that do not pose an immediate threat to human health or the environment. The concessioner has 180 days from the date of the preliminary environmental audit report to close Priority 3 findings.

For seasonal operations the audit team, in coordination with park and concession staff, will determine an appropriate deadline for all audit findings to occur during the operating season, generally 30 to 45 days after season opening.

Priority 2 and 3 audit findings may be further assigned a ranking as an “isolated” instance. An isolated audit finding is a finding in which the nonconformance observed is solitary and most other operations, locations, or facilities comply with the audit criteria and demonstrate that the audited entity has made an effort and understands the audit criteria.

For routine audits, Priority 1, 2, and 3 audit findings may further be designated as “repeat” audit findings. Repeat audit findings occur when the same issue is documented in both the current audit and previous audit, regardless of whether the citation is exactly the same.

*BMPs*: BMPs are recommended practices from industry, regulatory agencies, or other sources, including the expertise of the auditors, which may result in improved compliance, pollution prevention, and/or minimized compliance responsibilities. BMPs may also help the NPS meet its goals of promoting environmental management and demonstrate commitment to environmental stewardship and sustainability. BMPs are not required to be implemented, but concession staff are strongly encouraged to implement them as a means to further protect park resources. The resources and time needed to implement BMPs varies; some may be implemented in the short-term with few resources, while others may be implemented if a longer timeline and more resources are available. BMPs identified by the audit team may not be technically and economically feasible at the time of the site visit; however, concession staff should continue to evaluate the feasibility of implementing the BMPs over time. Note: while BMPs are important to note during the audit, they are not incorporated into the audit database as findings, nor are they included in the audit reports.

*Exceptional Practices*: Exceptional practices are products used or activities undertaken that are not often seen at park concession operations and that demonstrate a concessioner’s commitment to environmental protection beyond compliance. In addition, exceptional practices are approved by the coordinator. This provides a final verification that the exceptional practice is truly exceptional, that it is not a contract requirement or otherwise required of the concession operation, and it is not common to other concession operations.

*Audit Team Debriefings*: Audit findings, BMPs, and exceptional practices developed during the site visit are considered ‘preliminary’ since they are developed based on information available in the field, when there may not be time or resources (e.g., internet access) available to research the applicability of specific audit criteria. Even so, the audit team should strive to provide the most accurate and complete information at this preliminary stage.

The process of developing preliminary audit findings, BMPs, and exceptional practices should be collaborative among auditors. This process typically occurs during audit team debriefings, which should take place periodically (e.g., at the end of each day) to discuss the day’s activities, progress made relative to the site visit schedule, and any adjustments that may need to be made for the remainder of the site visit.

During the audit team debriefings, individual auditors should present their preliminary audit findings, BMPs, and exceptional practices from their assigned NPS EnviroCheck Sheet topic areas. If the audit team was split up into smaller teams during the day, auditors with primary responsibility for the same NPS EnviroCheck Sheets should compare conclusions and determine if the preliminary audit findings, BMPs, and exceptional practices affect the concession programmatically, or are limited to specific locations and types of operations. Auditors having secondary responsibilities, and other individuals who may have gathered information on the same topic area, should also provide input at this time, especially since some NPS EnviroCheck Sheet topic areas overlap.

The results of this onsite collaboration should be a ‘master list’ of preliminary audit findings, BMPs, and exceptional practices that can be reported to park and concession staff during the Exit-Brief presentation. The master list can be used to assist in developing the audit findings during the post-visit portion of the audit. It is highly recommended that the audit team, to the greatest extent possible, strive to develop audit findings, BMPs, and exceptional practices during the site visit, since the issues are fresh in auditors’ minds. Development and documentation of audit findings and exceptional practices is a formal and rigorous practice (BMPs are more informal). A complete description of this process can be found in Appendix 12.

*Presenting the Exit-Brief*: The final site visit activity is the Exit-Brief presentation. In coordination with the park POC and concessioner staff the audit team will determine if a formal or informal exit brief is appropriate.

* *Informal Exit-Brief*: During an informal exit-brief the audit team provides a verbal summary to the concessioner and park POC of general observations, potential audit findings, BMPs, and exceptional practices. This format is intended to provide general, higher-level observations and not specific findings. The audit team should ensure the concessioner and park POC understand the limitations of an informal exit-brief and that more formal, detailed findings will be provided in the preliminary environmental audit report. If desired the audit team may prepare an exit-brief presentation after the audit site visit is concluded and provide it to the concessioner and park POC for their records and information. A separate informal exit-brief presentation should take place for each concession operation audited if more than one.
* *Formal Exit-Brief*: During the Exit-Brief presentation, the audit team gives a formal presentation of preliminary audit findings, BMPs and exceptional practices observed during each individual concession site visit.

Unlike the In-Brief presentation, which may be handled in a single meeting with all concession staff from different operations and park participants in attendance, a separate Exit-Brief presentation should take place for each concession, so that audit findings, BMPs, and exceptional practices can be discussed confidentially. One summary Exit-Brief presentation highlighting higher priority audit findings, viable BMPs, and exceptional practices should be developed for the park Superintendent, who most likely will not be able to attend each concession’s Exit-Brief presentation. Each Exit-Brief presentation should be no more than one hour long. Larger, more complex concession operations may have longer Exit-Brief presentations due to questions from the audience. The ATL should take this into account when scheduling Exit-Brief presentation times with the park POC.

Key topics that should be covered during the Exit-Brief presentation include:

* Concessions and associated facilities, services, and operations that were audited.
* Audit criteria applicable to concessions.
* Audit findings.
* BMPs.
* Exceptional practices.
* Open issues.
* Audit reporting process and schedule.
* Assistance resources available from CSP.

The audit team should summarize important issues and avoid detailing every preliminary audit finding, BMP, and exceptional practice during the Exit-Brief presentation. However, the audit team should be ready to provide more details upon request, as well as compliance and BMP assistance for areas of particular interest to concession or park staff.

For some smaller concessions and/or in instances in which scheduling and logistical concerns exist, a formal Exit-Brief presentation may not be necessary. Instead, the audit team can choose to present an informal Exit-Brief at the end of a site visit. An informal Exit-Brief simply involves a wrap-up discussion following the collection of audit data, touching on what concession staff may expect to see in the environmental audit report.

During the Exit-Brief presentation, be sure to provide a sign-in sheet or otherwise document attendance. Generally, many of the same individuals attend both the In-Brief and the Exit-Brief, in which case simply noting attendance is sufficient. Individuals that did not attend the In-Brief should provide their name, title, organization, telephone number, and email address.

Individuals who are required or recommended participants at the Exit-Brief presentation, are the same individuals required or recommended to participate in the In-Brief presentation. These individuals are identified in Table 3‑3, which appeared earlier in this section. A sample Exit-Brief presentation is provided in Appendix 10 of this Guide.

## Post Visit Activities

Post-visit activities may stretch out over two months. Activities include preparing the P.EAR(s); soliciting and responding to comments on the P.EAR(s); tracking and monitoring audit finding corrective actions; and preparing the F.EAR(s). Table 3‑5 and Table 3‑6 lay out the key elements of post-visit activities. The timeline in Table 3‑6 represents the standard timing for the post-visit process.

The process is standardized so that schedules are consistent among all environmental audits, and there is a clear endpoint to the audit report process. Although the steps in the post-visit process should not substantially change from one audit to the next, it is possible for the schedule to vary depending upon specific circumstances. Details on the post-visit process are provided in the subsections that follow.

Table 3‑5. Environmental Audit Post-Site Visit Process

| REPORT | DESCRIPTION |
| --- | --- |
| P.EAR | * Resolve open issues.
* Develop and submit P.EAR.
 |
| Comment Period | * Solicit concession and park staff comments on P.EAR.
 |
| F.EAR | * Document and incorporate concession and park staff comments.
* Develop and submit F.EAR.
 |

Table 3‑6. Post-Site Visit Timeline (Standard Audit Process)

| TIMELINE | RESPONSIBLE PARTY(IES) | TASK(S) |
| --- | --- | --- |
| Within 3 weeks of site visit | Audit Team | * Prepares audit findings and exceptional practices for P.EAR, including closing open issues remaining from the site visit.
 |
| Within 3 weeks of site visit | ATL | * Assembles and reviews P.EAR.
* Ensures P.EAR undergoes a quality review.
* Prepares the CAT (if applicable).
* Submits P.EAR to audit handler.
* Posts P.EAR and CAT on NPS collaboration site (e.g., MS Teams Site).
* Prepares transmittal document for Coordinator.
 |
| Within 3 weeks of site visit | Audit Handler | * Submits transmittal document to Coordinator.
 |
| Within 3 weeks of site visit | Coordinator | * Sends notification of availability of P.EAR package to park POC.
 |
| Within 3 weeks of site visit | Park POC | * Reviews and approves P.EAR package.
* Sends P.EAR package to concessioner POC.
 |
| Within 5 weeks of site visit | Concessioner POC | * Reviews P.EAR.
* Completes appropriate cells in CAT to record comments on audit findings identified in the P.EAR.
* Sends completed CAT to Park POC.
* Prepares to participate in comment teleconference.
 |
| Within 5 weeks of site visit | Park POC | * Reviews P.EAR.
* Receives the CAT from Concessioner POC.
* Completes appropriate cells in CAT to record comments on audit findings and respond to concessioner responses from the P.EAR package.
* Forwards to the ATL in preparation for the comment teleconference.
* Coordinates comment teleconference date and time with concessioner and CSP staff.
 |
| Within 5 weeks of site visit | ATL | * Leads comment teleconference.
* Audit team support (auditor or audit handler).
* Documents and updates the CAT with park, concessioner.
* CSP staff comments on P.EAR.
 |
| Within 7 weeks of site visit | ATL | * Addresses concession and park staff comments on P.EAR.
* Prepares draft F.EAR.
* (Optional) Submits a draft F.EAR to park and concessioner to review integrated comments.
* Ensures draft F.EAR undergoes quality review.
* Submits draft F.EAR to audit handler.
* Posts F.EAR on SharePoint and prepares F.EAR transmittal document for coordinator.
 |
|  Within 7 weeks of site visit | Park POC | * (Optional) Reviews draft F.EAR and provides any additional comments to the ATL.
 |
|  Within 7 weeks of site visit | Concessioner POC | * (Optional) Reviews draft F.EAR and provides any additional comments to the park POC.
 |
| Within 9 to 10 weeks of site visit | Audit Handler | * Posts F.EAR on SharePoint and the NPS collaboration site (e.g., MS Teams Site) and prepares transmittal documents for Coordinator.
 |
|  Within 9 to 10 weeks of site visit | Coordinator | * Sends memo on behalf of Chief of Concessions (CSP Chief) to park Superintendent and carbon copies Regional Concession Chief, Regional Environmental Coordinator, and park POC.
* Sends memo to park POC notifying them that the F.EAR is available on SharePoint.
 |
|  Within 9 to 10 weeks of site visit | Park POC & Park Superintendent | * Sends F.EAR to concessioner POC.
 |
| Within 10 weeks of site visit | Audit Team | * Submits all audit documents to audit handler (e.g., In-Brief and Exit-Brief presentations and sign-in sheets, auditor notebooks, concession documents gathered during the site visit, and photographs).
 |

#### Prepare and Submit P.EAR

*Developing Complete Audit Findings and Exceptional Practices*: The most time-intensive portion of post-visit activities is the development of well-documented and properly constructed audit findings and exceptional practices. For instances in which an audit team has visited multiple concessions at one park, auditors should plan to spend a substantial portion of their time during the week(s) following the site visit preparing audit findings for all concessions.

The audit team must research and resolve open issues related to preliminary audit findings and exceptional practices identified during and after the site visit to develop complete audit findings and exceptional practices. The audit team may need to follow-up with teleconference interviews with concession staff to verify information collected during the site visit or obtain copies of concession documents to fill in data gaps. However, it is highly recommended that the audit team gather this information on site if possible. The audit team may also need to conduct additional research on federal, state, tribal, regional, local, or park requirements. Some common federal environmental agency hotlines and information resources that the audit team may use in conducting its research can be found on the NPS Concessions website [here](https://www.nps.gov/subjects/concessions/hotlines.htm).

*Assembling the P.EAR*: The P.EAR is a document in a portable document format (PDF) with multiple sections. The sections are:

* Executive Summary.
* Priority 1, 2, and 3 Audit Findings.
* Exceptional Practices.
* Assistance Resources.
* Photos (if applicable).

*Sample Audit Report*: The sample audit report, presented in Appendix 11, is a PDF document that includes current template wording for the executive summary, two example audit findings, , and associated photos relevant to the F.EAR. This is just a sample to provide a short example of a final environmental audit report. Note that transmittal memos, emails, and audit templates are updated annually. Audit team members should access NPS collaboration site for current versions.

The executive summary provides background information on CSP; the audit scope; statistical data on concession audit findings and exceptional practices; and instructions for commenting on the P.EAR. The photo section displays photographs taken during the audit site visit of audit findings and exceptional practices observed by the audit team.

The ATL, with the assistance of the auditors, completes each concession’s P.EAR, ensures the report undergoes Quality Review, and forwards it to the audit handler. Completion of the P.EAR by the audit team should occur within three weeks of the completion of the site visit.

*Submitting the P.EAR*: The P.EAR is uploaded in electronic format to the NPS collaboration site and the park POC is notified by the coordinator. Upon receiving the report, the park POC should review it and provide any comments or changes to the audit team. Once the changes have been made by the audit team, the park POC forwards the P.EAR, including the CAT to the concessioner POC immediately.

#### Comments on the P.EAR

Concession and park staff have an opportunity to provide comments on the Preliminary Audit Report. Once the P.EAR has been distributed, the park POC coordinates a teleconference to take place among park, concession, and the audit team. Alternatively, before the end of the site visit, the ATL can arrange a date and time for this teleconference. A CAT, which lists each audit finding, is provided as part of the P.EAR package and is used to capture concessioner and park comments in preparation for the comment teleconference. The concessioner should fill out the CAT and submit it to the park POC at least one day prior to the teleconference. During the comment teleconference, the ATL will review each audit finding and offer any further explanation as to the basis for the audit finding. Audit team support may participate on this teleconference to document comments for the ATL.

Based on the comment teleconference, the ATL responds to park and concessioner comments by making appropriate modifications to the P.EAR and CAT, which become the draft F.EAR. Audit findings and exceptional practices may be modified based on information provided.

Audit findings may be considered closed if concession staff have adequately addressed the audit finding of concern. Isolated audit findings that have been closed prior to the issuance of the F.EAR are removed from the F.EAR to demonstrate that CSP recognizes the concessioner’s understanding of and efforts to meet the audit criteria, despite a noncompliance being identified during the audit. However, Priority 1 audit findings are never removed from the F.EAR, even if they have been closed.

Audit findings may be voided if it is determined that the audit criteria had not been correctly applied. Voided audit findings are not included in the F.EAR. Exceptional practices may also be voided if they are not applicable to the scope of the audit.

#### Prepare F.EAR

*Assembling the F.EAR*: Like the P.EAR, the F.EAR is a PDF document with multiple sections. The sections are:

* Executive Summary.
* Priority 1, 2, and 3 Audit Findings (with any applicable P.EAR comments).
* Exceptional Practices.
* Assistance Resources.
* Photos.

The ATL, with the assistance of the auditors and audit handler as requested, completes each concession’s F.EAR, and forwards it to the audit handler. Once completed, the audit handler forwards the F.EAR to the CSP Chief for review and approval.

*Submitting the F.EAR*: Once the F.EAR is approved by the CSP Chief, it is submitted electronically to park staff, and then to each concessioner through a formal routing process, described below. This process ensures that all parties are aware of the audit, that proper chain of command has been followed, and that associated chain of command emphasis can be applied to the importance of addressing audit findings.

On behalf of the CSP Chief, the Coordinator forwards a signed memo from the CSP Chief to the park Superintendent to apprise them of the completion of the F.EAR. The memo requests that the park Superintendent coordinate with the park POC to forward the F.EAR to the concessioner POC. The Regional Concession Chief, Regional Environmental Coordinator, and park POC are carbon copied on the correspondence to the park Superintendent.

Additionally, the Coordinator advises the park POC that the F.EAR has been saved to the NPS collaboration site and requests that they coordinate with the park Superintendent in forwarding the F.EAR to the concessioner POC.

As the last step, the park Superintendent, in coordination with the park POC, forwards the F.EAR to the concessioner POC.

Figure 3‑1. Distribution of F.EAR



*Turn in Notebooks and Documents to be Filed*: The audit handler should coordinate the collection of auditor notebooks and all other audit-related documents (e.g., updated concession contracts, the AQs, and concession documents collected during the site visit) following distribution of the F.EAR for each concession. If notebooks and audit-related documents are shipped to the WASO Denver office, they should be shipped via a tracked delivery method.

## After the Environmental Audit

Distribution of the F.EAR completes the environmental audit but does not complete the process. This is because it is a CSP goal to close audit findings to close the audit; therefore, concession staff are expected to inform park staff of progress made in taking corrective actions. After distribution of the F.EAR, the CSP program will send up to two bi-monthly reminder emails to the park POC, who is responsible for verifying whether concession staff have closed audit findings, as well as for forwarding these updates to the coordinator and updating the CAT. Once concession staff has closed all compliance audit findings, the audit process is complete.

# Conducting a Telephone or Paper Environmental Audit

The telephone audit and the paper audit are a type of non-standard audit and may be used in place of a standard audit when approved by the coordinator. The Coordinator and Audit Program Manager gather required information and make the determination to conduct a non-standard audit. Some of the criteria considered when making this determination include:

* Size and complexity of the concession operation (e.g., concession operations that have minimal or no facilities within in park boundaries, or concession operations that have minimal environmental impacts).
* Logistical issues (e.g., difficulty in conducting a cost-efficient standard audit due to remote location).
* Change in understanding of concession operations (e.g., it is determined that the concession operations are less complex than originally thought by CSP in reviewing the contract).
* Demonstration by the concessioner that they undergo regular, comprehensive environmental audits by a government-sanctioned third party (i.e., U.S. Coast Guard), and those regular audits cover, at a minimum, all CSP audit criteria.

The process of planning and conducting a telephone or paper audit is similar to standard audits and can also be divided into three phases: pre-audit activities, audit activities, and post-audit activities. The audit team members are the same as well, the audit team in comprised of an ATL and an auditor. The steps involved in each of these phases are outlined below in Table 4‑1 and Table 4‑2 and described in the subsections that follow. Note: The primary difference between a telephone and paper audit is if the concessioner has been involved in an environmental audit previously.

Table 4‑1. Telephone Environmental Audit Process

| PHASES | RESPONSIBLE PARTY(IES) | TASK(S) |
| --- | --- | --- |
| Notification | Coordinator | * Notify park staff of environmental audit. If the concessioner has never participated in an environmental audit under the CSP Audit Program, then the concessioner will participate in a telephone audit.
 |
| Confirmation and Preparation | Audit Team | * Develop AQ.
* Confirm audit scope.
* Post to collaboration site for distribution.
* Work with park POC to arrange teleconference audit logistics.
 |
| Audit | Audit Team | * Brief introduction.
* Data collection, including:
* Phone interviews.
* Record, document, and photo review.
* Conclude call.
 |
| Comments and Reporting | Audit Team and Audit Handler | * Generate P.EAR and F.EAR in same manner as a standard environmental audit, including the comment period for the P.EAR.
 |

## Telephone Audit Pre-Teleconference Activities

Pre-teleconference activities for a telephone audit generally mirrors pre-audit activities for a standard audit, and include notifying park staff of the audit, establishing the audit team, administering the AQ, refining and confirming the audit scope, and developing an audit logistics plan.

### Confirm Audit Scope

The Coordinator and ATL make initial contact with the concessioner POC undergoing the telephone audit in the same manner and with the same objectives as those for standard audits. This involves checking in with park staff to notify them of the proposed environmental audit(s) and schedule and obtaining general information on the scope of concession facilities, services, and operations in the park.

### Determine and Assign Applicable Audit Criteria

Data are collected from concession staff undergoing the telephone audit primarily during the teleconference, although concession staff can submit any additional documentation or information in advance of the scheduled teleconference audit.

*AQ*: As with the standard audit, the ATL will forward the AQ to the park POC, and the park POC will forward the AQ to the concession POC. However, the AQ for a telephone audit is simplified with questions tailored for the specific concession operation and contract being audited. The concession POC has the option, but is not required, to return the AQ prior to the schedule telephone audit.

*Additional Information*: In addition to information requested in the AQ, concession staff may submit further information considered helpful for completing the audit, which will be forwarded to the ATL. This type of information may include general background information on the concession that is not found in the concession contract documentation as well as information on the EMP, if applicable.

### Develop Audit Logistics Plan

After the Coordinator has contacted the park POC and forwarded a copy of the AQ for concession staff to complete, the ATL contacts the park POC to confirm the schedule and audit scope. At this time, the ATL also confirms that the telephone audit method, originally determined by the coordinator during the planning process, is appropriate for the concession. Any decision to switch to the standard audit method must be made in coordination with, and with approval from, the coordinator.

The ATL, in consultation with the park POC, confirms audit logistics. However, unlike a standard audit, the audit team can accomplish this task through discussions and email, rather than developing an audit logistics plan.

The most important logistical considerations for the telephone audit are arranging which concession personnel should be interviewed and setting up the interview schedule.

### Audit Criteria

Identifying applicable audit criteria and assigning auditor responsibilities for applicable environmental topic areas and concession service types is conducted in the same manner for telephone audits as it is for standard audits. The ATL assigns auditor responsibility for applicable environmental topic areas and concession service types based on their qualifications.

## Telephone Audit Activities

Although there are no site visit activities for a telephone audit, it involves many of the same steps as the standard environmental audit, including presenting an abbreviated and informal In-Brief; collecting data; reviewing the EMP, if applicable; and developing preliminary audit findings and exceptional practices. However, unlike a standard audit, the audit team does not attempt to present potential audit findings or exceptional practices over the phone at the close of the audit interview.

Telephone audit activities primarily involve teleconferences with concession and park personnel. Depending upon the size and complexity of the concession’s operations and personnel availability, the audit may involve only one teleconference. However, while unlikely, multiple calls may be necessary to contact all the concession and park staff necessary to obtain a clear understanding of concession activities.

When conducting teleconferences, the audit team should follow the questions in the AQ to minimize the amount of time spent on the phone.

The audit team needs to be cautious in the way a telephone audit is conducted. Since the exchange will not include face-to-face contact, questions should be as clear as possible. The audit team should take care to explain the scope and context of the questions, due to the compressed time spent with the concessioner as compared with a site visit. In addition, the audit team should be mindful of the amount of paperwork requested, to lessen the burden on the resources of both park and concession staff.

### Conduct In-Brief

Prior to collecting audit data, the ATL should conduct an abbreviated and informal In-Brief presentation via teleconference to introduce the audit team to park and concession personnel, and orient park and concession staff to the environmental audit process. Through the informal In-Brief presentation, the ATL should ensure that concession staff understand, at a minimum, which facilities, services, and operations are being audited; what the audit criteria are; and why it was decided that the concession should undergo a telephone audit rather than a standard audit.

### Gather Audit Data

AQ Review: Following the informal In-Brief, the ATL should proceed through the questions on the AQ with concession staff. The AQ review is essential for the audit team, concession, and park staff to stay focused on the task of collecting data relevant to the environmental audit. To this end, the audit team should proceed through the AQ in order.

*Collecting Detailed Audit Data*: There are two ways in which audit data are gathered during telephone audits:

* Interviews.
* Record, photo, and document reviews.

Since physical observations are not possible during telephone audits, only one of the two data collection methods listed above is needed to generate audit conclusions; however, at least two auditors must agree with the conclusion for it to appear in an audit report.

*Interviews*: Auditors should collect audit data in a manner similar to the interview process for the standard environmental audit. During the teleconference, auditors should ask concession staff in-depth questions about their operations and applicable environmental program areas, as detailed in the AQ.

*Record and Document Reviews*: Through the AQ review and audit data collection interviews, auditors may identify key concession records and documents that should be reviewed to understand the status of the concession’s environmental operations and activities. Examples of the type of documents to be reviewed are emergency action plans, SOPs, hazardous waste manifests, and training and inspection logs.

The ATL should request copies of key documents from the park POC. Transmission of these documents, by express mail, fax, or email, should occur within one week of the request. In many cases, the collection of these key documents will occur during the pre-audit planning phase, at the time that the AQ is collected. Auditors should be conscious of the burden that collecting, copying, and submitting these documents imposes on park and concession staff. The audit team as a group must weigh the need for the documentation against this burden to determine if the need for the documentation to conduct the audit accurately and completely is justified. The need for multiple documents may be an indicator that a standard environmental audit is more appropriate for the concession than a telephone audit.

The audit team may also choose to review photographs to better understand concession facilities, services, and operations. If audit team members determine that visual evidence is needed to understand or come to a conclusion about concession activities, the ATL may request that the park POC take photographs and send them to the audit team for review. Photographs may provide general information or be directed at a particular operation of interest.

*Recording Audit Data*: All audit data should be recorded by the audit team in the AQ, in a manner like that used for standard audits.

*Providing Compliance Assistance while Collecting Data*: While auditors are gathering information to develop audit findings, they should also educate concession and park staff on how other concessions have successfully addressed similar environmental issues or offer other ideas on how these issues could be addressed. This should be carried out similarly to how it is done for standard audits.

### Reporting Emergency Conditions

Emergency conditions and in-progress reporting should be conducted in the same general manner as for the standard environmental audit. In the unlikely event that emergency conditions are detected by audit team members during the teleconference, these should be reported immediately to the park POC and the responsible concession manager or supervisor. Since the audit team is not on site to physically observe perceived emergency conditions, it is not recommended that the audit team inform the park Superintendent directly, unless necessary.

### Conduct EMP Review

The EMP review, if applicable, should be conducted similarly to how it is carried out for the standard audit.

### Develop Preliminary Audit Findings, BMPs, and Exceptional Practices

Preliminary audit findings, BMPs, and exceptional practices are developed in the same manner as for the standard environmental audit.

### Conduct Exit-Brief

Unlike a standard environmental audit, the audit team is not expected to detail potential audit findings, BMPs, and exceptional practices in an Exit-Brief presentation for each concession audited. Due to the nature of the telephone audit, the Exit-Brief presentation will be a simple wrap-up discussion detailing next steps in the audit process and soliciting final questions or concerns from the concession or park POC.

## Telephone Audit Post-Conference Activities

Post-audit activities occur for telephone audits in the same manner as for the standard environmental audit.

## After the Telephone Audit

Corrective action and reporting on progress toward closing the telephone audit occurs in the same manner as for the standard environmental audit.

Table 4‑2. Paper Environmental Audit Process

| PHASES | RESPONSIBLE PARTY(IES) | TASK(S) |
| --- | --- | --- |
| Notification | Coordinator | * Notify park staff of environmental audit. If the concessioner has participated in an environmental audit under the CSP Audit Program in the past, then the concessioner will participate in a paper audit.
 |
| Confirmation and Preparation | Audit Team | * Develop AQ.
* Confirm audit scope.
* Post to collaboration site for distribution.
 |
| Audit | Audit Team | * Collect written response from concessioner with park comments.
 |
| Comments and Reporting | Audit Team and Audit Handler | * Generate P.EAR and F.EAR in same manner as a standard environmental audit, including the comment period for the P.EAR.
 |

## Paper Pre-Audit Activities

Pre-teleconference activities for a paper audit generally mirrors pre-audit activities for a standard audit, and include notifying park staff of the audit, establishing the audit team, administering the AQ, and refining and confirming the audit scope.

### Confirm Audit Scope

The Coordinator and ATL make initial contact with the concessioner POC undergoing the paper audit in the same manner and with the same objectives as those for standard audits. This involves checking in with park staff to notify them of the proposed environmental audit(s) and obtaining general information on the scope of concession facilities, services, and operations in the park.

### Determine and Assign Applicable Audit Criteria

Data are collected from concession staff undergoing the paper audit primarily through the completion of the AQ, although concession staff can submit any additional documentation or information.

*AQ*: As with the standard audit, the ATL will forward the AQ to the park POC, and the park POC will forward the AQ to the concession POC. However, the AQ for a paper audit is simplified with questions tailored for the specific concession operation and contract being audited. For a paper audit, the concession POC must return the completed AQ to the park POC who will forward to the ATL.

*Additional Information*: In addition to information requested in the AQ, concession staff may submit further information considered helpful for completing the audit, which will be forwarded to the ATL. This type of information may include general background information on the concession that is not found in the concession contract documentation as well as information on the EMP, if applicable.

### Audit Criteria

Identifying applicable audit criteria and assigning auditor responsibilities for applicable environmental topic areas and concession service types is conducted in the same manner for paper audits as it is for standard audits. The ATL assigns auditor responsibility for applicable environmental topic areas and concession service types based on their qualifications.

## Paper Audit Activities

Although there are no site visit activities for a paper audit, it involves many of the same steps as the standard environmental audit, including collecting data; reviewing the EMP, if applicable; and developing preliminary audit findings and exceptional practices.

Since the exchange of information will not include face-to-face contact, questions should be as clear as possible. In addition, the audit team should be mindful of the amount of paperwork requested, to lessen the burden on the resources of both park and concession staff.

### Gather Audit Data

*AQ Review*: Once the completed AQ is received, the ATL should review the responses to the questions on the AQ.

*Collecting Detailed Audit Data*: If necessary, the audit team can request copies of records and documents, or photos.

Since physical observations are not possible during paper audits, at least two auditors must agree with the conclusion for it to appear in an audit report.

*Record and Document Reviews*: Through the AQ review, auditors may identify key concession records and documents that should be reviewed to understand the status of the concession’s environmental operations and activities. Examples of the type of documents to be reviewed are emergency action plans, SOPs, hazardous waste manifests, and training and inspection logs.

The ATL should request copies of key documents from the park POC. Transmission of these documents, by express mail, fax, or email, should occur within one week of the request. In many cases, the collection of these key documents will occur during the pre-audit planning phase, at the time that the AQ is collected. Auditors should be conscious of the burden that collecting, copying, and submitting these documents imposes on park and concession staff. The audit team as a group must weigh the need for the documentation against this burden to determine if the need for the documentation to conduct the audit accurately and completely is justified. The need for multiple documents may be an indicator that a standard environmental audit is more appropriate for the concession than a paper audit.

The audit team may also choose to review photographs to better understand concession facilities, services, and operations. If audit team members determine that visual evidence is needed to understand or conclude about concession activities, the ATL may request that the park POC take photographs and send them to the audit team for review. Photographs may provide general information or be directed at a particular operation of interest.

*Recording Audit Data*: All audit data should be recorded by the audit team in the AQ, in a manner like that used for standard audits.

### Conduct EMP Review

The EMP review, if applicable, should be conducted similarly to how it is carried out for the standard audit.

### Develop Preliminary Audit Findings, BMPs, and Exceptional Practices

Preliminary audit findings, BMPs, and exceptional practices are developed in the same manner as for the standard environmental audit.

## Paper Audit Post-Conference Activities

Post-audit activities occur for paper audits in the same manner as for the standard environmental audit.

## After the Paper Audit

Corrective action and reporting on progress toward closing the paper audit occurs in the same manner as for the standard environmental audit.