

To: Park POC  
From: Audit Coordinator  
Subject: Upcoming Environmental Audit of Park Concessioners; Reply Due: Month Day, Year

## OVERVIEW

Representatives from the National Park Service Commercial Services Program will be visiting your park to conduct concessioner environmental audits during the week of Month Day, Year. Per our schedule, a [baseline/routine](#) audit will be conducted for:

CONCID1 – Concessioner Name (**baseline** audit)

CONCID2 – Concessioner Name (**routine** audit)

CONCID3 – Concessioner Name (**baseline** audit)

The primary difference between a baseline audit (i.e., the first audit conducted of a concessioner under a specific concession contract) and a routine audit (i.e., a repeat audit conducted of a concessioner after the initial baseline audit has taken place) is the period under review. For a baseline audit, the period under review is January 1st of the previous calendar year through the last day of the audit. For a routine audit, the period under review includes the day after the previous audit through the last day of the current routine audit.

Within this folder is a customizable memo that you should forward to [each/the](#) concessioner to further explain the scope and goals of the environmental audit. Additionally, an Audit Questionnaire is attached to the template letter to be completed by [each/the](#) concessioner and returned to park staff. Please forward the completed Audit Questionnaire from [each/the](#) concessioner to the NPS Commercial Services Program by [Month, Day, Year](#).

Also included is a roles and responsibilities document that outlines what [each/the](#) party to the audit (park, concessioner, and NPS Commercial Services Program) will be responsible for at various points in the audit process. This document also provides a timeline for the audit process based on the current site visit schedule.

## AUDIT QUESTIONNAIRE – HELPFUL HINTS

The NPS Commercial Services Program recognizes that this document may initially seem overwhelming and that not all topic areas will be applicable to all concession operations. However, by having concessioner staff spend the time (approximately two to four hours) filling in the Audit Questionnaire, the audit team will be able to gain a better understanding of the concession operations prior to the site visit, which may help to reduce the amount of time spent onsite conducting the audit.

## PARK NEXT STEPS

1. Sample Memo to the Concessioner: Please customize the attached sample memo and forward it to [each/the](#) concessioner as soon as possible.
2. Audit Questionnaire. Send the completed Audit Questionnaire to [each/the](#) concessioner to be completed as soon as possible.
3. Additional Documents: The following are additional items that should also be submitted to the Commercial Services Program prior to the audit.
  - a. The most recent version of the operating and maintenance (O&M) plans for each concessioner, along with the current concession contract, if any recent updates have been made;
  - b. Site maps that may assist the audit team in understanding the locations of the concession operations, if available; and
  - c. Any other documents that may be relevant to the environmental audit, such as annual operational evaluations that describe environmental areas in which the concessioner needs to improve, the

Superintendent's Compendium which may include environmental management requirements, and the concessioner's Environmental Management Plan (EMP), if applicable.

Forward Information to NPS Commercial Services Program: Please forward the concessioner information to the Commercial Services Program no later than [Month, Day, Year](#). You may send this information electronically to [Audit Program Contact Name](#) at [Audit Program Contact Email](#) (this method is preferred), or via courier or mail to National Park Service Commercial Services, ATTN: [Audit Program Contact Name](#) 12795 W. Alameda Parkway, Lakewood, CO 80228.

1. Prepare for the Site Visit: The Audit Team Leader will be contacting you to provide additional information, and help finalize the plan and the proposed schedule. Please be prepared to suggest the most efficient and effective manner to audit the concessioner facilities and operations. The Audit Team Leader will also coordinate with you to schedule times and logistics for the In-Brief and Exit-Brief meetings. After the draft audit schedule has been confirmed, we recommend that you inform concessioner staff of the schedule and highlight the fact that the schedule is flexible and may change over the course of the audit. Also, please emphasize to concessioner staff that the environmental audit is an opportunity to improve operations, to enhance environmental performance and compliance, and that the audit team will be providing technical assistance and guidance during and subsequent to the audit site visit.
2. Participate in the Site Visit: You and other park staff with concession management responsibilities accompany the audit team during the site visit in order to learn more about the NPS Commercial Services Program environmental audits. Additionally, your participation will be important since you will be responsible for validating the concessioner's corrective actions for cited audit findings.

#### **FOR MORE INFORMATION**

Background information on why concessioners are required to undergo environmental audits can be found on the NPS Commercial Services website at [www.concessions.nps.gov/](http://www.concessions.nps.gov/).

If you have any questions about the process, such as how the concessioner should fill out the Audit Questionnaire, please do not hesitate to contact:

1. [Audit team leader name](#), the audit team leader, at [Audit Team Leader Phone](#) or
2. Myself, at the number below.

Best Regards,  
Audit Coordinator

## SAMPLE LETTER TO CONCESSIONER

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Concessioner Name  
Concessioner Address  
City, ST Zip

Dear Mr. or Mrs. Concessioner:

The National Park Service (NPS) Commercial Services Program has scheduled a [baseline/routine](#) environmental audit of your concession operation during the week of [Month, Day, Year](#). Environmental audits of concession operations are required by Department of the Interior (DOI) and NPS policies; as such, the NPS Commercial Services Program established an audit program to comply with this mandate. For a [baseline/routine](#) environmental audit, the audit team will review your business' operations from [Month, Day, Year](#) through the last scheduled day of the audit.

Since your facilities and operations have already undergone a baseline environmental audit, your operations will now undergo a routine environmental audit. The primary difference between a baseline audit (i.e., the first audit conducted of a concessioner under a specific concession contract) and a routine audit (i.e., a repeat audit conducted of a concessioner after the initial baseline audit has taken place) is the period under review. For a baseline audit, the period under review is January 1st of the previous calendar year through the last day of the audit. For a routine audit, the period under review includes the day after the previous audit through the last day of the current routine audit.

The audit evaluates your environmental performance while serving as an opportunity for you to learn how to improve your performance and compliance. It is also an opportunity for you to speak with the audit team and ask questions about environmental management practices that you may be considering or have already incorporated into your business. As such, park staff and the audit team will make a combined effort to work with you during the audit in order to provide recommended corrective actions as they are identified, and will provide technical follow-up assistance subsequent to the site visit.

Attached to this letter is a roles and responsibilities document outlining what each party to the audit (park, concessioner, and NPS Commercial Services Program staff) will be responsible for at various points during the audit process. This document also provides a timeline based on the scheduled first and last day of the site visit. Please note that these timeframes are tentative and subject to change.

### CONCESSIONER NEXT STEPS

1. Forward the Audit Questionnaire to the Park. Please complete and return the enclosed Audit Questionnaire to me. We understand that this document may be initially overwhelming and that some areas may not be applicable to your business. However, by filling out the Audit Questionnaire, the audit team will gain a better understanding of how to conduct the most efficient site visit and minimize disruption to your operations. Please return the completed Audit Questionnaire no later than [Month Day, Year](#).
2. Compile records and documents for the audit team. Please have the following documents (if applicable) and any other relevant environmental management documentation available for the audit team to review prior to their arrival onsite. In general, the audit team will request information dating back to [Month, Day, Year](#).
  - a. Emergency response plans (e.g., emergency action plan; emergency response plan; spill prevention, control, and countermeasures [SPCC] plan);
  - b. Aboveground and underground storage tank registrations and other maintenance documentation;

- c. Waste/recycling shipping forms/receipts (e.g., hazardous waste manifests, solid waste disposal records, recycling receipts, used oil shipping forms, contracts with disposal/recycling companies);
  - d. Pesticide use and disposal records, and certifications for certified pesticide applicators;
  - e. Grease trap maintenance records;
  - f. Staff or contractor certifications for those involved in refrigerant or chlorofluorocarbon (CFC) recovery or recycling;
  - g. Environmental purchasing records/plans; and
  - h. Environmental management plans and training records.
3. Prepare for participation in the Site Visit/Interview.
- a. Attend the In-Brief: The initial step of the site visit is an In-Brief; this meeting will last approximately one hour. During this meeting, concessioner representatives should be present to meet the audit team and receive an overview of the audit process and schedule. Key park staff with concession management responsibilities will also participate in the In-Brief. The park will let you know where and when the In-Brief will take place.
  - b. Review the Completed Audit Questionnaire with the Audit Team: At the beginning of your environmental audit, immediately following the In-Brief, the audit team typically spends one to two hours going over specifics about your Audit Questionnaire responses. This meeting allows the audit team to gain a better understanding of your facilities and services, and helps the audit team ensure that they clearly understand all of your responses as they relate to your operations.
  - c. Assist in Scheduling Meetings with Key Concessioner Staff: When reviewing the Audit Questionnaire with the audit team, please identify key concessioner staff with whom the audit team may need to discuss operating procedures, substantiate information already received, and gather additional data that may be needed. Please be ready to coordinate schedules so that the audit team has the opportunity to meet with these individuals during the site visit.
  - d. Accompany the Audit Team as They Visit Concessioner Facilities and Operations: During the site visit, you should have at least one representative accompany the audit team as the team examines the facilities and operations under your concession contract. This allows the audit team to ask questions, provide suggestions for improvement, and highlight best management practices as they are identified.
  - e. Attend the Exit-Brief: The last step of the site visit is the Exit-Brief which is scheduled for the last day of the site visit. This meeting typically lasts one hour, but the time frame will vary depending upon the size and complexity of the facility and the number of questions asked. At this meeting, the audit team will provide a preliminary summary of the audit to concessioner staff and key park staff involved in concession management. The exact time and whereabouts of the Exit-Brief will be finalized when the audit team is onsite.

### **FOR MORE INFORMATION**

For more information about environmental audits visit the NPS Commercial Services website at <http://www.concessions.nps.gov>.

If you have any questions about the process, such as how to fill out the Audit Questionnaire, please do not hesitate to contact me at [Park POC Phone Number](#) or [Park POC Email Address](#).

We hope your time spent preparing for the audit will help minimize any disruptions to your operations during the site visit. Thank you in advance for preparing for the audit.

Sincerely,

Park POC Name

Park POC Title

Enclosure: Audit Questionnaire