



Why Be Green?

"GREENING" FOR CONCESSIONERS MEANS:

- Using resources (e.g., energy, water, land) efficiently, seeking environmentally-preferable products, and minimizing waste;
- Complying with environmental regulations and implementing proactive programs that protect human health and the environment and foster environmental stewardship;
- Participating actively in educating the public about environmental stewardship and "greening" initiatives;
- Establishing partnerships with the NPS, local communities, and other interest groups to advance strategies and goals for addressing environmental challenges; and
- Continuously assessing the impacts of operations and activities on the environment and the communities in which parks operate with a goal of continuous improvement.

What do "greening" efforts mean for concessioners? For concessioners, "greening" efforts start by determining the environmental impacts of their activities. The most effective way of "greening" is targeting for change those activities with the greatest negative environmental impacts, or those where a small cost outlay will result in greatly increased environmental protection (i.e., the "biggest bang for the buck"). Usually concessioners already know what these activities are and can use creative solutions to move incrementally toward increased environmental protection.



Why "greening"? The Concession Environmental Management Program (CoEMP) knows concessioners are interested in minimizing impacts to the park environment, enhancing the park experience for visitors, and being community friendly businesses. But it also understands that concessioners are interested in seeing a positive return on their investments. These are not mutually exclusive concepts. Industry experience shows that while "greening" may involve

an initial capital expense, it can pay off in the long run through increased savings, increased revenue, and improved customer satisfaction.

Better Products. It's true. While in the past, some green products had a bad performance record, more and more "green" products made from recycled content materials and less toxic ingredients have performance records that equal or even surpass those of conventional products in terms of durability and energy or water efficiency. Initial costs for purchasing "green" products may seem expensive, but benefits such as reduced maintenance and increased product longevity often offset increased up-front expenses.

Take, for instance, composite lumbers (i.e., lumber manufactured from a mixture of recycled plastic, fiberglass, rice hulls, and/or sawdust). Costs for purchasing composite lumber are similar to premium decking lumber; however, it is not

cont'd on next page

This Issue :

Greening to Waste ... 3

Competition ... 4-5

EMP Environmental Policy ... 6

It's Not Easy Being "Green" ... 6

Are You All Set? .. 7

Coffee and Birds . 8

Don't Slip Up With Your Use of Oil . . 8

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GreenLine

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GreenLine is an official publication of the National Park Service (NPS) Concession Program for NPS concessioners. The newsletter provides a forum in which the NPS can share information with concessioners about the Concession Environmental Management Program, current environmental requirements, and Best Management Practices; it also identifies resources available to improve concessioner environmental performance and highlights success stories.

Guest articles have been reviewed by the NPS Concession Environmental Management Program and, if required, edited in collaboration with the original author.

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Notice: This newsletter is intended as an educational tool for concession operators in national parks. Every effort has been made to ensure the information presented is accurate, however the content does not constitute a complete reference to State, Federal, or local laws nor does it constitute National Park Service rulemaking, policy, or guidance. Relying solely on the information in the newsletter will not guarantee compliance with applicable regulations. Strategies, procedures, and proposed solutions for compliance issues should be discussed with the appropriate State, Federal, and/or local regulatory agencies; it remains the sole responsibility of operators to determine compliance with regulations. Inclusion in the newsletter is not an endorsement of a particular operator, product, or strategy.

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SAVE TIME Saving the Environment

The NPS Concession Environmental Management Program knows that many concessioners are making the move toward purchasing environmentally-preferable products and services. But we also know that finding a good "green" product or service takes time—time that concessioners may not have. Listed below are some tools that may help concessioners save time in identifying green products and services.



Green Seal (www.green seal.org) is a nonprofit organization dedicated to protecting the environment by promoting the manufacture and sale of environmentally-responsible consumer products. It has an Environmental Partners Program that provides assistance to businesses concerned about the environmental impact of their purchases. Members receive an "Office Green Buying Guide" and monthly "Choose Green Reports." Some of the over 40 back issues of "Choose Green Reports" that list environmentally-responsible product and service brands and sources are available to nonmembers at www.doi.gov/oe pc/gseal.html and www.dgs.state.pa.us/comod/QA/grrep.htm. Products covered include lighting, paints, and office furniture.



Environment Protection Agency (EPA) Environmental Protection Agency (EPP) Database
The EPP Database, compiled by the Environmental Protection Agency (EPA), is organized like a shopping mall where concessioners can choose the product or service of interest, review environmental standards and guidelines developed by government agencies and other groups, and view lists of vendors that meet those guidelines. Over 600 products and services are featured on the EPP Database, which can be accessed at <http://yosemite1.epa.gov/oppt/epstand2.nsf>.



Recycled Content Products (RCP) Database
The RCP database (www.ciwmb.ca.gov/RCP) contains product information from manufacturers, distributors, and other sources of recycled-content products from across the United States. Users can search for products by the brand name, company, or keyword, and specify minimum recycled and postconsumer recycled content percentages.

Why Be Green? cont'd from cover page
susceptible to rotting, cracking, and insect or water damage, and need not be painted or chemically treated, thereby minimizing maintenance costs. Composite lumber resembles real wood, has good traction, and often has 10-20 year warranties.

Customer Satisfaction. Park visitors now include a generation of environmentally-conscious citizens. These visitors expect national parks and their partners to be "green." Some parks and concessioners regularly receive comments on the lack of "green" programs such as recycling. By listening to and acting on visitor suggestions, parks and concessioners can develop and refine environmental programs that will improve environmental protection and customer satisfaction.

Liability. Being "green" can also mean preventing harmful environmental events

from occurring. Instituting "green" best management practices such as adopting controls to prevent hazardous material spills can result in cost savings if a spill or leak is avoided. Even meeting some seemingly inane regulatory requirements can be much less expensive than paying fines that may be assessed by regulatory agencies.

"Clean and green engenders growth, profit, and lasting competitive advantage."
Tom Peters, In Search of Excellence From The Bottom Line of Green is Black

Greener Concession Contracts. Developing and implementing an Environmental Management Program is a good first step to helping concessioners identify and understand environmental issues relative to their operations.

"Greening" shows that concessioners care about the environment; by making smart business decisions, they have an opportunity to further preserve, conserve, and protect park resources.

A Quick and Dirty Guide

to Hazardous and Universal Waste Generators

There are common audit findings that surface during environmental audits. One trend observed is that almost all parks and concessioners produce some type of hazardous and/or universal waste. Knowing what and how much of these wastes you produce is the first step to knowing how to comply with EPA regulations.



What is a waste? Concessioners have a waste if they plan on throwing out, burning, or recycling anything, or if they are storing materials that are no longer intended for use. A waste is a hazardous waste if it is "listed" in the Code of Federal Regulations (40 CFR 261, Subpart D), or if it is a "characteristic" waste (40 CFR 261, Subpart C). "Characteristic" hazardous wastes have at least one of the following characteristics:

- ignitable—flashpoint above 140°F
- corrosive—pH below 2 or above 12
- reactive—unstable under normal conditions
- toxic—leaches toxic chemicals above regulatory levels.

Concessioners can check the product's material safety data sheet (MSDS) for this

What's Your Hazardous Waste Generator Status?

Under the Resource Conservation and Recovery Act (RCRA), there are three classifications for facilities generating RCRA-defined hazardous waste. Each classification has increasingly more complex management requirements.

CESQG—The Conditionally Exempt Small Quantity Generator

A CESQG generates less than 220 lbs (100 kg) of hazardous waste, and less than 2.2 lbs (1 kg) of EPA listed acutely hazardous waste during any calendar month. A CESQG may not accumulate more than 2,200 lbs (1,000 kg) of hazardous waste on site at any one time. Many concessioners fall into this category.

SQG—The Small Quantity Generator

An SQG generates more than 220 lbs but less than 2,200 lbs of hazardous waste, and less than 2.2 lbs of acutely hazardous waste during any calendar month. An SQG may not accumulate greater than 13,200 lbs (6,000 kg) of hazardous waste on site at any one time. Larger concessioners or concessioners with many vehicle or facility maintenance activities may fall into this category.

LQG—The Large Quantity Generator

An LQG generates 2,200 lbs or more of hazardous waste, and/or more than 2.2 lbs of acutely hazardous waste during any calendar month. It is unlikely for concessioners to fall into this category.

kind of characteristic and waste classification information.

What are universal wastes? Universal wastes are common hazardous wastes that have less stringent EPA management requirements, so long as the wastes are managed in a particular way. In a nutshell, universal wastes are:

- waste pesticides
- burned out fluorescent light tubes
- used mercury-containing thermostats
- dead NiCad and sealed lead-acid batteries (e.g., many rechargeable batteries).

The key to understanding a concessioner's hazardous waste generator or universal



waste handler status is tracking the amount of hazardous and universal waste produced. Call the GreenLine Technical Assistance and Clearinghouse Line at 303/987-6913 to obtain tracking forms and instructions.

TAKENOTE Contact your state environmental regulatory agency (www.meritgroup.org/stateregagen.htm) to determine if hazardous



waste and/or universal waste definitions and generator classifications differ from federal definitions and classifications. If more stringent state regulations exist, these should be followed instead of federal regulatory standards.

What's Your Universal Waste Handler Status?

Under EPA's Universal Waste Rule, there are two classifications for facilities generating universal waste. As with hazardous waste generator categories, the more waste, the more complex the management requirements.

SQH or SQHUW—The Small Quantity Handler or Small Quantity Handler of Universal Waste

An SQH or SQHUW (the two are interchangeable) accumulates less than 11,000 lbs (5,000 kg) of universal waste at any one time. Concessioners are expected to fall into this category.

LQH or LQHUW—The Large Quantity Handler or Large Quantity Handler of Universal Waste

An LQH or LQHUW accumulates 11,000 lbs or more of universal waste at any one time. It is very unlikely for concessioners to fall into this category.

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Article by Pip Elles, Blue and Gold Fleet, LC.

Want to try a new technology that will help the environment, but just don't have the capital for it? Whether concessioners are interested in new clean diesel engines, alternative fuels, or have other ideas for cleaning up and protecting the environment, grant programs may exist to help fund new technologies that they are willing to implement.



The Blue and Gold Fleet, operator of the Alcatraz Island ferries, successfully competed for and won \$358,500 in grant monies to repower three older ferry/cruise vessels with low emission diesel engines as part of its ongoing "Clean Marine" Environmental Management Program. Powered by 20-year-old two-stroke engines, these vessels emitted 9.96 tons of nitrogen oxide (NOx) annually. By

replacing the old engines with efficient, electronically-controlled four-stroke engines, the NOx output was reduced by 60 percent! Additionally, the new engines realized a 16 percent fuel savings, a significant operational cost savings in this era of rising fuel prices!

Winning strategies in this highly competitive grant program centered on precise proposals and cost efficiencies in achieving the NOx reductions. The California Air Resources Board provided the matching grant funding for these repower projects, dedicating \$25 million statewide for the Carl Moyer Memorial Air Quality Standards Attainment Program. This year, funding increased to \$45 million. Other states are considering adopting similar programs. Federal grant opportunities include the Congestion Mitigation Air Quality (CMAQ) program, and a new U.S. Maritime Administration program on Low Air Emission Marine Power Plants (www.marad.dot.gov/nmrec/

conferences/nmrec_conf.html).

Partnerships between government and industry, along with the various clean air incentive funding programs, will accelerate the goal of long-term improvements in air quality as well as providing economic incentives to private operators. In addition, grant monies may be available for other environmental programs such as solid waste analysis, composting, pollution prevention, purchase of environmentally-preferable products, and others. Concessioners thinking of implementing other new technologies should contact their state environmental agency or local nonprofit organizations to learn about grant programs that may be available in their area. The U.S. Environmental Protection Agency may also provide funding via the Small Business Innovation Research Grant Program (202-260-7899, <http://es.epa.gov/ncerqa/sbir>).

For more information about Blue and Gold Fleet's efforts to obtain grant monies, contact Pip Elles at 415/705-5585 or pip@blueandgoldfleet.com.

Concession

Hiking the GreenPath



Article by John Huey, Delaware North Parks Services.

Sometimes, getting management to adopt an environmental policy is only the first hurdle in implementing an environmental management program. Often, a second challenge is having the policy spread throughout all divisions of a concessioner's operations. Delaware North Parks Services (DNPS), operating in multiple national parks such as Yosemite National Park (NP), Sequoia NP, and Grand Canyon NP, has been hiking the trail to educate staff about its environmental management program, *GreenPath*, for the last year.

John Huey, DNPS Director of Environmental Affairs, reports that DNPS management enthusiastically adopted an environmental policy, so that first hurdle was an easy one to clear. The ensuing

strategy for implementing *GreenPath* is to ensure environmental issues permeate the company's culture. Huey and other *GreenPath* partners at DNPS operations give *GreenPath*-specific training to DNPS managers, who then deliver job-specific *GreenPath* training to employees.

GreenPath training does not stop there. Employees receive *GreenPath* training not only from their managers, but also during new employee orientation and safety training specified by the Occupational Safety and Health Administration (OSHA). Just as on-the-job safety is first and foremost in employees' minds, DNPS strives to make employees aware of environmental issues and impacts associated with their operations and activities, and identifies measures that could help minimize negative resource impacts.

Adding environmental training topics into existing safety training is a cost-effective approach that other concessioners may want to emulate. The concessioner's

designated Environmental Program Manager may want to investigate creating a joint environmental and safety committee. After all, managing hazardous chemicals has both human and environmental health effects; if it harms one, it will most likely harm the other. However, remember that the environmental program is a program distinct from the safety program.

Huey has found formal *GreenPath* training to be an instrumental part of a larger strategy of educating DNPS staff on workplace-related environmental issues. The company culture, while already environmentally-oriented, is becoming more sensitive and attuned to environmental issues through specific *GreenPath* training.

To learn more about DNPS' *GreenPath*'s environmental training program, contact John Huey at 209/574-0585 or jhuey@dncinc.com.

Pl m A g w f W

Article by Bryan Mast, Crater Lake Company.

No one likes to deal with garbage—it's messy, it's smelly, and money spent to get rid of it is money down the drain. It also takes up landfill space—space that is rapidly disappearing in many parts of the country. This is just one reason why there has been such a great push by smart businesses as well as the American public and the government to reduce solid waste, whether it be through purchasing products with less packaging, recycling, composting, or other best management practices. But there are also ways to dry up the flow of solid waste through the use of creative solutions.

For instance, Crater Lake Company's solid waste hauler was getting all wet at the landfill. A flood of liquid would burst out of the compactor container as the door swung open, soaking workers! Not only did workers dislike getting drenched by sticky soda, but the liquids created a safety hazard by increasing the possibility of slipping when walking on wet floors. The extra liquid also added to Crater Lake Company's total tipping fees.

Feeling sympathetic to its solid waste hauler's plight, Crater Lake Company in Crater Lake National Park instituted the "Dump A Cup" program. Concessioner staff placed containers next to trashcans in the café, and signs showing a picture of a cup being emptied into these new containers were posted. Crater Lake Company encour-

aged guests to empty their cups into these containers, keeping liquids out of trash bags and ultimately out of compactors. The liquids could be safely disposed of down the drain.

This innovative program worked. The solid waste hauler's workers had dry feet, and Crater Lake Company had reduced the amount of liquid waste going to the landfill by almost two tons. Not only did Crater Lake Company reduce its solid waste tipping fees, but it ended up having lighter trash bags that were easier for workers to handle, and fewer sticky, wet floors that were a cleaning hassle and slip hazard for staff.



For more information about Crater Lake Company's "Dump A Cup" program, contact Bryan Mast at 541/594-2255 x3009.

Highlights

And the Winner is...

Article by Karen Hales, Yosemite Concession Services Corporation.

Many national park visitors expect parks and their concessioners to implement environmental practices such as recycling and conservation. Oftentimes, it is a given that concessioners would be environmentally-friendly since they operate within national parks. Being recognized for environmental achievements by an outside organization, however, tangibly shows the National Park Service and visitors that concessioners are environmental stewards.



Congratulations go to Yosemite Concession Services Corporation (YCS) in Yosemite National Park. YCS has not

only embraced recycling and conservation practices; it has been honored eight years in a row by the California Environmental Protection Agency's Integrated Waste Management Board for having one of the most productive waste recycling programs in the state. In

October 2000, the Board bestowed an additional honor, naming YCS as one of California's Top 10 businesses for its outstanding waste reduction and recycling practices.

YCS diverts an average of 40 percent of its waste annually through its Waste Reduction Program. The program includes 43 different materials and resulted in savings of \$107,840 in tipping fees for the year 2000. The recycling rate averages 25 percent of all waste produced, or 830 tons of recycled material annually. The general public can learn about YCS's recycling pro-

gram and other conservation efforts by visiting YCS's recycling center, which is built from sustainable materials.

Implementing recycling programs at concession operations is a win-win situation. It saves money in tipping fees. It diverts waste from entering landfills and therefore saves space. It supplies resources to companies specializing in manufacturing products from recycled products. It teaches visitors how to recycle at home. And it results in "good public relations" with the community and park visitors. Visitors are more likely to return if they leave knowing that the concessioner is doing a good job in protecting the environment. YCS's recycling awards are a sure way of attracting visitors back to its concessioner operations.

For more information on YCS's recycling programs, contact Mark Gallagher at 209/372-1095.

Seeing 20/20

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In many cases, the first element in developing an Environmental Management Program (EMP) is preparing an environmental policy statement. The policy statement articulates and demonstrates upper-level management commitment to environmental protection.

Michael Cobbold, Environmental Projects Coordinator for ARAMARK Parks and Resorts, discusses how his organization developed an environmental policy statement and why it has been effective for his organization.

W omp me me ?

Michael Cobbold: The signing of ARAMARK Parks and Resorts environmental policy statement in May 2000 didn't signal the start of the company's commitment to the environment. The company and its employees have been carrying out "green" activities for a long time. We've always tried to be in compliance with environmental regulatory requirements, plus we've tried to exceed existing requirements in some of our operations and activities.

But we discovered that the public and many of ARAMARK Parks and Resorts' own employees didn't know about these greening efforts, yet *wanted* to know about them. We figured that the environmental policy statement would describe the company's environmental vision, and would demonstrate and record our commitment, while providing guidance to employees and managers alike. It establishes credibility for other environmental programs and activities that are coming down the line.

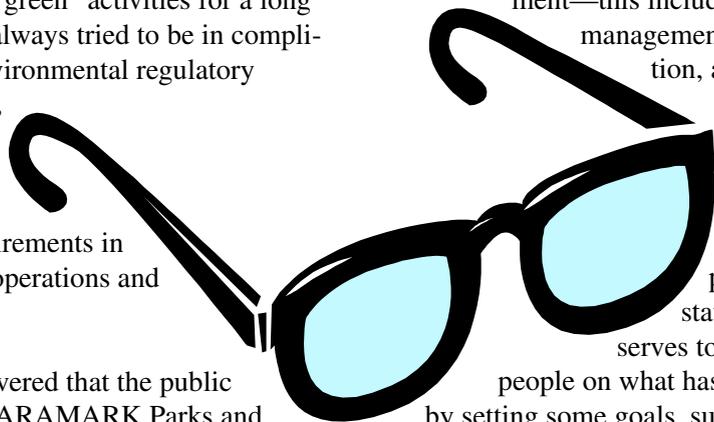
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Cobbold: Our company is very fortunate in that Gib Johnson, ARAMARK Parks

and Resorts division's Executive Vice-President, has always been interested in managing an environmentally-conscious company. Coming up with an environmental policy statement came naturally for Gib and the company. For other concessioners where environmental protection is important but not yet quite a top priority, it may be somewhat more difficult to get top management approval in crafting an environmental policy statement, but it is definitely possible.

W nme me ?

Cobbold: The environmental policy statement provides guidance for every single ARAMARK Parks and Resorts employee and manager. Conservation and Greening the Parks is an attitude that everyone is encouraged to embrace. First, the environmental policy statement outlines our vision toward the environment—this includes wise



management, conservation, and recycling. Second, the environmental policy statement serves to educate people on what has to be done by setting some goals, such as stressing environmental regulatory compliance, purchase of environmentally-preferable products, and resource conservation. Third, the environmental policy statement seeks to motivate employees to embrace the statement themselves, both on and off the job.

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More managers and employees are becoming aware of ARAMARK Parks and Resorts' formal commitment to environmental protection; both are asking more questions about our pro-

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There is a big push to be environmentally-friendly—to be "green," if you will. The Concession Environmental Management Program (CoEMP) understands that sometimes being green is challenging. For instance, in the last issue of *GreenLine*, Yellowstone National Park and its concessioners were praised in Concession Highlights for switching to environmentally-friendly cleaning products. Unfortunately, the CoEMP has since learned that some concessioners have had to revert to using conventional, less environmentally-friendly detergents. The reason? The green products were not performing to the concessioners' standards. Linens needed to be washed two times or else they turned gray in color; this, of course, led to a conflict between using greener detergents and conserving water.

Greening an operation is similar to taking "baby steps" where concessioners might not succeed on the first attempt, but with each step, concessioners gain more knowledge. Sharing this information with the NPS and other concessioners will allow all involved to benefit from lessons learned through trial and error, and help everyone move more quickly toward successful green operations.

Concessioners can be more certain of choosing appropriate green products if they conduct research to ensure that:

- greener products perform to acceptable standards;
- are competitively-priced; and
- do not offset environmental gains (e.g., safer cleaning products) in one area with losses in another (e.g., water conservation).

Concessioners should also ensure that staff is trained on the use and performance expectations for each product.

Organizations such as Green Seal (www.greenseal.org) (see article on "Save Time Saving the Environment" on page 2) exist to assist concessioners in choosing products that are suited for the variety of services they provide. Concessioners can also help ensure they are investing in the right product by asking manufacturers for substantive data on their green products compared with conventional products, obtaining customer references to verify product performance, requesting a guarantee policy and special prices in testing green products on a trial basis, and determining whether another organization has certified that the product is environmentally-preferable.

Seeing 20/20



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grams. More employees are suggesting ways that ARAMARK Parks and Resorts can manage wastes, improve recycling efforts, conserve energy, and buy environmentally-preferable products. Through our inquiries in these areas, vendors are also learning about ARAMARK Parks and Resorts' commitment to environmental protection and about new products and technologies.

the stage and tone for the rest of our environmental management program. So now we're trying to get things done! We're establishing minimum standards and goals that address the policy statement's goals. We're tracking what we're doing in the areas of utilities, solid waste, and recycling so that we have data on what changes will be taking place. Of critical importance is



getting "buy in," so programs that are good for the environment AND make good economic sense are being targeted first. Plus, we're putting an emphasis on disseminating information to our own employees and the public on the greening efforts within ARAMARK Parks and Resorts. Sharing "Success Stories" internally is especially important.

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The environmental policy statement sets

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The environmental audit is an educational opportunity and provides an outlet to discuss environmental issues specific to concessioners. The better prepared concessioners are, the more time auditors can spend sharing information on improving current operations and practices. To minimize disruption of concession operations, there is some preparatory work that concessioners can carry out before the audit site visit:

- ✓ Identify individuals as Points of Contact (POC) for various environmental programs within the operation (e.g., hazard communication, hazardous waste management, energy conservation, and green procurement).
- ✓ Inventory environmental records and ensure that they are available for review (e.g., hazardous and solid waste manifests and receipts, emergency response plans, material safety data sheets (MSDSs), and training records).
- ✓ Identify activities that may generate waste (i.e., solid or hazardous) or pollution (e.g., air or water pollution); prepare a waste inventory that estimates generation rates for specific solid and liquid wastes.
- ✓ Complete pre-visit materials that the park will forward approximately one month prior to the audit site visit.

If you are interested in learning more about the CoEMP audit program, call the *GreenLine* Technical Assistance and Clearinghouse Line at 303/987-6913; concessioners can request a copy of the audit pre-visit materials to better understand and prepare for the audits.



Your Lifeline to Greening is Here

- ⇒ Got a burning question about the Concession Environmental Management Program (CoEMP) Audit Program?
- ⇒ Need technical assistance in addressing an audit regulatory compliance finding?
- ⇒ Want more information about Best Management Practices (BMPs)?
- ⇒ Don't know your regional, state, or NPS environmental assistance contacts?

If you have these, or any other questions related to the CoEMP, call the *GreenLine* Technical Assistance and Clearinghouse Line. Just dial 303/987-6913 to have concession staff discuss possible strategies or identify alternative resources to help answer your questions about environmental management.

Also be on the lookout for the CoEMP website that will include useful tools and resources for developing an Environmental Management Program (EMP), links to appropriate federal and state environmental agencies, and electronic copies of the *GreenLine* newsletter.

Free ENERGY STAR Training

Concessioners are invited to participate in free ENERGY STAR training! ENERGY STAR (www.energystar.org) assists concessioners in saving money by conserving energy. Training is offered via conference call and the Internet. Go to www.ecadmus.com/esip for more information on these and other training sessions:

- The Five-Stage Approach to Building Upgrades
- One-2-Five® Energy Management Diagnostic
- Benchmarking Tool/Portfolio Manager
- Cost Savings through ENERGY STAR Purchasing
- PC Power Management



Coffee and Bir —

What's the Connection?



Article by Gary Cummins, NPS Harpers Ferry Center.

Each year, more than 350 species of birds migrate to summer breeding grounds in North America, including the national parks, from winter habitat in Mexico, the Caribbean, and South America. Also, Americans consume more than 133 billion cups of coffee each year; some of which is sold and/or served by national park concessioners. So what's the connection?



Coffee plants grow beneath the forest canopy in a traditional coffee farm. Photo by Francisco Osuna, Elan Organic Coffees.

Migratory birds, such as the Ruby-throated hummingbird and Northern oriole, winter in areas where coffee is grown. Large agribusinesses bulldoze thousands of hectares of forest—bird habitat—in favor of planting sun-tolerant coffee species. While it is less costly to produce coffee in this manner, the drawbacks include accelerated soil erosion and acidification, increased chemical fertilizer and pesticide use, and toxic runoff, in addition to destruction of bird habitat. Some bird populations are in decline due to habitat destruction.

So what can be done? One thing is to promote "shade" or "shade-grown" coffees

wherever possible. While slightly more expensive than sun-grown coffee, shade coffee is more sustainable than sun-grown coffee. Shade coffee is grown in the traditional manner, where small-scale farmers cultivate coffee bushes under a forest canopy without reliance upon vegetation removal, landscape alteration, and chemicals. Rather than destroying bird habitat, shade coffee cultivation increases it. Conservation organizations are working to promote shade coffee by developing certification criteria that demonstrate which coffees benefit migratory birds. By support-

ing shade coffee, visitors to national parks can see how concessioners have made a real commitment to environmental protection.

National parks offer a splendid opportunity to increase awareness of sustainably-grown shade coffee. Concessioners have an opportunity to educate visitors by selling and serving shade coffee, along with providing information on shade coffee in brochures and posters. If only a fraction of the 200+ million annual national park visitors try shade coffee and are educated on its benefits, consumer awareness and demand will increase and help protect bird habitats.

For more information on shade coffee and where to purchase it, visit the U.S. Fish and Wildlife Service's site at <http://birds.fws.gov/imbd/coffee.html>, or the Songbird Foundation's website at www.songbird.org/coffee_connection.htm.

DON'T SLIP UP WITH YOUR USED OIL

Some recurring audit findings observed on environmental audits are those associated with used oil management. Used oil from vehicles and equipment is one of the most common maintenance-related wastes generated by parks and concessioners, but it is sometimes unknowingly mismanaged.



Mislabeled used oil container; should be labeled "Used Oil."

Used oil is any refined or synthetic oil that has been used and contaminated with impurities such as dirt, water, or metal shavings, and is not considered a hazardous waste. Waste gasoline, kerosene, antifreeze, petroleum solvents, cooking oil, refrigerant oil, and oil spill wastes are not considered used oil. To protect the environment and comply with EPA rules and regulations, there are some simple yet important steps to follow.

Concessioners should manage their used oil by ensuring that:

- Only used oil goes into used oil containers. If there are other contaminants, such as waste gasoline or antifreeze, the used oil may no longer be considered "used oil."
- Used oil is stored in containers that are in good condition and that can close

securely when not in use. Oil pans, empty soda bottles, and spackle buckets are not acceptable used oil containers.

- Used oil containers are stored out of the weather (e.g., in a building) and have secondary containment (e.g., sitting in a pan) that can contain potential spills and leaks.
- Containers and tanks holding used oil are labeled as "Used Oil." If they are labeled "Waste Oil," then the EPA assumes they contain a hazardous waste.

Concessioners may be able to recycle or reuse their used oil by:

- Taking it to a community hazardous waste collection center that accepts and recycles used oil from commercial businesses.
- Using a commercial waste hauler to take it off site to an EPA-approved refiner, processor, or oil burner.
- Burning it in onsite burners that meet EPA specifications and are approved by the NPS.
- Using onsite recycling equipment to filter and reuse it.

Keep records of how much used oil was generated, how it was disposed of, and obtain receipts and manifests from transporters and collection facilities. Also contact the state environmental agency (www.meritgroup.org/stateregagen.htm) to determine if state used oil regulations are more stringent than federal ones.

TIDBITS Environmental

Did you know that...

The average aluminum beverage can in the United States contains about 51% postconsumer recycled aluminum.

100% of all beer and soft drink cans are made of aluminum.

A 95% energy savings is gained when a can is made from recycled aluminum instead of virgin ore.

Sources: The Aluminum Association 1997, and The Can Manufacturers Institute 1997.