

National Park Service
US Department of the Interior

Concession Environmental Management Program
Denver, Colorado



Preliminary Environmental Audit Report



Recreation Resource Management (CURE001)

June 26, 2007

Prepared for:

Curecanti National Recreation Area
102 Elk Creek
Gunnison, CO 81230

Prepared by:

NPS Concession Environmental Management Program
WASO Concession Program
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I. Executive Summary

PRELIMINARY ENVIRONMENTAL AUDIT REPORT EXECUTIVE SUMMARY

I. INTRODUCTION

This Preliminary Environmental Audit Report documents the audit findings of the baseline environmental audit for facilities and services provided by Recreation Resource Management (the Concessioner) in Curecanti National Recreation Area (the Park) under the concession contract for CURE001. The audit team conducted the site visit from May 22-24, 2007. Key representatives participating in the environmental audit included those identified below:

	NAME	TITLE
Audit Team	Oguz Mandaci	Auditor (PRIZIM Inc.)
	Dana Mooney	Audit Team Leader (PRIZIM Inc.)
Concessioner	Mary Blevins	Manager
CoEMP	Michael Garner	Concession Environmental Audit System (CEAS) Coordinator
Park	Kathleen Gonder	Administrative Officer

The audit period under review was January 1, 2006 to May 24, 2007. Only those Concessioner facilities and operations within the Park boundary and directly related to the CURE001 contract were audited against audit criteria found in the *draft NPS Environmental Audit Program Operating Guide* (January 2006) and the *draft Concession Environmental Audit System Operating Guide* (May 2004). The environmental audit is a “snapshot in time” and does not guarantee that all environmental issues were identified. The Concessioner is required to be in compliance with all Applicable Laws and regulations at all times, regardless of identified findings and deadlines to close them.

II. AUDIT FINDINGS

Audit findings are areas of non-compliance with Applicable Laws.

- **Priority 1** findings represent non-conformances with laws and regulations that pose immediate actual or potential harm to human health or the environment, or the potential for significant liability exists. They are required be closed within 90 days¹ of distribution of the Preliminary Environmental Audit Report.
- **Priority 2** findings represent non-conformances with laws and regulations that do not pose an immediate threat to human health or the environment. They are required to be closed within 180 days¹ of distribution of the Preliminary Environmental Audit Report.
- **Priority 3** findings represent non-conformances with Executive Orders; DOI, NPS, or park policy; or the concession contract that do not pose an immediate threat to human health or the environment. They are required to be closed within 180 days¹ of distribution of the Preliminary Environmental Audit Report.

Audit findings may be assigned a severity ranking of isolated if it is determined that the non-conformance was observed only once or twice during the site visit. The Concessioner can use this ranking when developing corrective action plans and assigning resources. Audit findings noted as “isolated” will be removed from the report if they are closed prior to the final report being distributed.

¹ If the Concessioner is closed for the season on this date, then these audit findings should be addressed within one month after the start of the next operating season.

This environmental audit identified fifty-two audit findings.

The audit findings were in the following areas:

Audit Findings by Topic Area and Priority

Topic Area - NPS EnviroCheck Sheet	Audit Findings Open & Closed						Audit Findings Closed Only					
	Priority					Total	Priority					Total
	1	2	2I	3	3I		1	2	2I	3	3I	
CFC and Halon Management		1				1						0
Emergency Planning and Reporting		3				3						0
Fuel Storage Management		9		4		13						0
Hazard Communication		4				4						0
Hazardous Materials Management		2		1		3						0
Hazardous Waste		2				2						0
Pesticide Management				3		3						0
Respiratory Protection Program		2				2						0
Solid Waste Management				1		1						0
SPCC Planning		1				1						0
Storm Water Management		3				3						0
Universal Waste Management		1				1						0
Used Oil		1				1						0
Topic Area - NPS CEAS EnviroCheck Sheet												
Environmental Management Systems (EMS)				1		1						0
Gas and Service Stations				12	1	13						0
Total	0	29	0	22	1	52	0	0	0	0	0	0

1 - Priority 1

2 - Priority 2

3 - Priority 3

2I - Priority 2 Isolated

3I - Priority 3 Isolated

Photographs are provided to help Park and Concessioner staff identify some of these audit findings. See the Photos section of this Preliminary Environmental Audit Report for more information.

III. BEST MANAGEMENT PRACTICES

Best management practices (BMPs) are recommended practices from industry, regulations, or other sources that may result in:

- Improved compliance (e.g., it could be a BMP to develop standard operating procedures to help ensure compliance, even though they are not required);
- Pollution prevention and/or minimized compliance responsibilities (e.g., it could be a BMP to eliminate the use of solvents); or
- Helping the NPS meet its goals to promote environmental management and demonstrate commitment to environmental stewardship and sustainability (e.g., it could be a BMP to work in tandem with the NPS on its environmental management system).

The resources and time needed to implement BMPs varies. Some may be implemented in the short-term with few resources. Others may be implemented if a longer timeline and more resources are available.

BMPs identified in this Preliminary Environmental Audit Report are not required to be implemented. These BMPs may not be technically and economically feasible at this point in time for the current concession operation. However, the Concessioner can evaluate the technical and economic feasibility of these BMPs, and is highly encouraged to implement them, where appropriate, as a means to further protect park resources.

This environmental audit identified fifteen BMP opportunities. The BMPs were in the following areas:

Best Management Practices by Topic Area

Topic Area - NPS EnviroCheck Sheet	Time and Resources to Implement		
	Potentially Low	Potentially High	Total
CFC and Halon Management	1		1
Environmental Purchasing	1		1
Hazardous Materials Management	5		5
Hazardous Waste	1		1
Universal Waste Management	3		3
Used Oil	1		1
Topic Area - NPS CEAS EnviroCheck Sheet			
Environmental Management Systems	1		1
Food Service		1	1
Retail Operations		1	1
Total	13	2	15

IV. EXCEPTIONAL PRACTICES

Exceptional practices are products used or activities undertaken not often seen at park concession operations that demonstrate the Concessioner’s commitment to environmental protection beyond compliance.

The environmental audit did not identify any Exceptional practices.

V. NEXT STEPS – COMMENTING ON THE PRELIMINARY ENVIRONMENTAL AUDIT REPORT

The Park and Concessioner should review and comment on the Preliminary Environmental Audit Report.

1. The Concessioner should comment on the audit findings, BMPs, and any other section of the Preliminary Environmental Audit Report using the “Preliminary Environmental Audit Report Comment Form” (in MS Word) that accompanies this Preliminary Environmental Audit Report. **The Concessioner should submit its comments – in MS Word if possible – to the Park by Aug. 28, 2007.**
2. The Park should comment on the Concessioner’s comments, audit findings, BMPs, and any other section of the Preliminary Environmental Audit Report using the same “Preliminary Environmental Audit Report Comment Form” that the Concessioner used. **The Park should**

submit its and the Concessioner's comments – in MS Word – to Michael Garner, CEAS Coordinator, at michael_garner@nps.gov (303/987-6911) by Aug. 31, 2007.

VI. FOR MORE INFORMATION

Further information on the CEAS and audit scope, and a general explanation of audit findings and recommended corrective actions are provided in the document titled *Concession Environmental Audit System Protocol and Background*, which is available on the Concession Program Website at concessions.nps.gov/program3.cfm.

The *GreenLine* CD, which was given to the Park and the Concessioner during the audit site visit, has resources to assist in addressing audit findings and researching BMPs, in addition to general information on the CoEMP.

The CoEMP has established a technical assistance telephone line (*GreenLine* Assistance Number: 303/987-6913) and email address (NPS_GreenLine@nps.gov) available to Park staff and the Concessioner to provide support throughout the audit and corrective action process as well as questions regarding the CoEMP in general.

Additionally, the CoEMP publishes a bi-annual environmental *GreenLine* Newsletter that provides information on on-going environmental programs, issues and topics. Copies can be requested via the *GreenLine* Assistance Number or email address.

II. Priority 1, 2, and 3 Regulatory Audit Findings

These audit findings are based upon Applicable Laws and are required to be addressed by the Concessioner.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-001	
Priority:	2 Regulatory	
Citation:	5 CCR 1001-19(III)	
Topic Area:	CFC and Halon Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	CW	Concessionwide
	CW	Concessionwide

Audit Finding:

Concessioner staff had not submitted an ozone-depleting substance (ODS)-containing equipment registration form and fee with the State of Colorado.

Recommended Corrective Action:

Ensure that a registration form and fee are submitted per Colorado regulations.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-002
Priority:	2 Regulatory
Citation:	29 CFR 1910.38(a)-(d)
Topic Area:	Emergency Planning and Reporting
Photo Number:	None
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

An emergency action plan (EAP) to address incidental and nonincidental hazardous substance spills and releases had not been developed to meet regulatory requirements. For example:

- Concessioner staff responding to nonincidental types of spills would need to be appropriately trained, and the Concessioner must have an Emergency Response Plan developed and implemented;
- The Concessioner Risk Management Plan did not outline emergency procedures (e.g., reporting and evacuation) for other emergencies such as a fire or flood;
- The Concessioner Risk Management Plan did not outline any procedures for staff to operate critical operations;
- The Concessioner Risk Management Plan did not include procedures to account for all employees after an evacuation;
- The Concessioner Risk Management Plan did not outline any procedures to perform medical duties (if any); and
- The Concessioner Risk Management Plan did not include contact information for employees to find out more information about emergency procedures.

Recommended Corrective Action:

Develop an EAP that covers incidental and nonincidental hazardous substance spills and releases. The EAP should include, at a minimum:

- Procedures for reporting a fire or other emergency;
- Procedures for emergency evacuation, including type of evacuation and exit route assignments;
- Procedures to be followed by employees who remain to operate critical concessioner operations before they evacuate;
- Procedures to account for all employees after evacuation;
- Procedures to be followed by employees performing rescue or medical duties; and
- The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.

Train employees on the EAP:

- Upon initial assignment (i.e., when a new employee is hired);
- Whenever the employee's responsibilities or designated actions under the plan change; and
- Whenever the plan is changed (e.g., when the EAP is changed regarding incidental spill thresholds).

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Assistance Resources:

For more information on developing an EAP, refer to the GreenLine CD. Click on Assistance Resources, then Environmental Management Topic, then Emergency Response Planning and Reporting, then Guidance for Developing an Emergency Action Plan.

Notes:

Audit Finding Notes

Response procedures for "Minor Oil Spills" included in the Spill Prevention and Emergency Response Plan in the Concessioner Risk Management Program's Appendix 6 outlined that Concessioner staff would respond to spills that flow into waterways and spills that require outside contractors for assistance. This type of spill is commonly referred to as nonincidental.

Recommended Corrective Action Notes

In order to ensure that the Concessioner has an effective EAP:

- Review the list of hazardous substances maintained at Concessioner facilities;
- Determine incidental release thresholds for hazardous substances that are stored and/or used in quantities that could spill or release above such amounts (e.g., gasoline, cleaning chemicals); and
- Document these incidental release thresholds in the EAP.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-003	
Priority:	2 Regulatory	
Citation:	40 CFR 370.20 (c)	
Topic Area:	Emergency Planning and Reporting	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	CW	Concessionwide

Audit Finding:

Concession staff had not submitted a material safety data sheet (MSDS) to the Gunnison Emergency Response Commission, Colorado Emergency Planning Commission (CEPC), and local fire department for those hazardous chemicals (gasoline) stored in excess of 10,000 pounds (approximately 1,300 gallons of gasoline) at any one time.

Recommended Corrective Action:

Concessioner staff shall complete the following:

- Submit MSDS to Gunnison Emergency Response Commission, CEPC, and fire department;
- Maintain information on correspondence with above organizations regarding reporting requirements; and
- Submit a copy of the MSDS for gasoline to the Park (in accordance with concession contract requirements).

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

Concessioner staff currently were storing 12,000 gallons of gasoline at Elk Creek and 1,000 gallons of gasoline at Lake Fork.

Recommended Corrective Action Notes

Contact: Jack Cobb
CEPC
720/852-6603

Contact: Scott Morrill
Gunnison Emergency Response Commission
970/641-2481

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-004	
Priority:	2 Regulatory	
Citation:	40 CFR 370.20 (d)	
Topic Area:	Emergency Planning and Reporting	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	CW	Concessionwide

Audit Finding:

Concession staff had not submitted Tier 2 reports annually for the storage of hazardous chemicals (gasoline) in excess of 10,000 pounds (approximately 1,300 gallons of gasoline).

Recommended Corrective Action:

Concessioner staff shall complete the following:

- Fill out and submit the Colorado Tier II report;
- Maintain a copy in Concessioner records; and
- Submit a copy of the Tier II report to the Park (in accordance with concession contract requirements).

Assistance Resources:

For more information on submitting a Tier II report to Colorado, visit <http://www.cdphe.state.co.us/el/sara/tierIIreports.html>.

Notes:

Audit Finding Notes

Concessioner staff currently were storing 12,000 gallons of gasoline at Elk Creek and 1,000 gallons of gasoline at Lake Fork.

Tier 2 reporting is a function of the Emergency Planning and Community Right-to-Know Act (EPCRA).

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-005	
Priority:	2 Regulatory	
Citation:	40 CFR 280.31(b)	
Topic Area:	Fuel Storage Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

All underground storage tank (UST) systems equipped with cathodic protection systems were not inspected for proper operation by a qualified cathodic protection tester within six months of installation and at least every three years thereafter.

Recommended Corrective Action:

Inspect all UST systems equipped with cathodic protection systems for proper operation by a qualified cathodic protection tester within six months of installation and at least every three years thereafter.

Maintain all records related to the UST system in one location.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: There were no records available to indicate that the UST cathodic protection system had been tested within six months of installation which was unknown at the audit site visit. Additionally, the Concessioner was not aware of any testing of the cathodic protection system in the last three years.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-006	
Priority:	2 Regulatory	
Citation:	40 CFR 280.31(c)	
Topic Area:	Fuel Storage Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

Underground storage tank (UST) systems with impressed current cathodic protection systems were not inspected every 60 days to ensure the equipment was running properly.

Recommended Corrective Action:

Inspect UST systems with impressed current cathodic protection systems every 60 days to ensure the equipment is running properly.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-007	
Priority:	2 Regulatory	
Citation:	40 CFR 280.34(b)	
Topic Area:	Fuel Storage Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

The following information had not been maintained for the two 6,000-gallon underground storage tanks (USTs):

- Documentation of operation of corrosion protection equipment;
- Documentation of UST system repairs; and
- Recent compliance with release detection requirements.

Recommended Corrective Action:

Maintain the following information:

- Documentation of operation of corrosion protection equipment;
- Documentation of UST system repairs;
- Recent compliance with release detection requirements; and
- Results of the site investigation conducted at permanent closure.

Maintain all above records in one central location.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: The current Concessioner staff were new to the operations at Elk Creek and Lake Fork as of May 2007. Current Concessioner staff had been unable to locate any UST records from prior years.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-008	
Priority:	2 Regulatory	
Citation:	40 CFR 280.41(b)	
Topic Area:	Fuel Storage Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

Underground piping that routinely contained regulated substances was not monitored for releases.

Recommended Corrective Action:

Monitor underground piping that routinely contains regulated substances so that it meets one of the following requirements:

- Pressurized Piping. Underground piping that conveys regulated substances under pressure must:
 - (i) Be equipped with an automatic line leak detector conducted in accordance with 40 CFR 280.44(a).
 - (ii) Have an annual line tightness test conducted in accordance with 40 CFR 280.44(b) or have monthly monitoring conducted in accordance with 40 CFR 280.44(c).

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: The Concessioner was unsure whether the leak detection system used for the underground storage tanks (Veederroot T65 35) was set up to monitor for leaks in the piping.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-009
Priority:	2 Regulatory
Citation:	7 CCR 1101-14 Section 2-2-10; CRS 8-20.5-102
Topic Area:	Fuel Storage Management
Photo Number:	None
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	75235 CURE001 - EC Elk Creek Marina

Audit Finding:

It was not confirmed that notification for all underground storage tank (UST) systems, including certification of installation for new UST systems had been submitted to the implementing agency. Additionally, Concessioner staff had not annually renewed the certification with the State of Colorado.

Recommended Corrective Action:

Ensure that the State of Colorado has the appropriate notification forms for the two 6,000-gallon USTs and that they are informed of the change in operator (from the previous Concessioner to the current Concessioner) that occurred in January 2006.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

Park staff indicated that the appropriate forms had been submitted to the State of Colorado when the USTs were installed, yet the Concessioner did not have a copy of those forms and was not aware that any such forms existed.

Since the two USTs were installed, there has been a change in operator from the previous Concessioner to the current Concessioner. This update should have been made during an annual registration renewal.

Recommended Corrective Action Notes

Contact the State of Colorado and confirm that the original forms were submitted to the State when the tanks were installed in the 1990's. Maintain a copy of that form in Concessioner records. Also, inform Colorado that a change in operator has occurred. Colorado may request that an updated form be submitted to reflect the change in operator. Maintain a copy of all communications with the State and any forms submitted to the State.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-010	
Priority:	2 Regulatory	
Citation:	7 CCR 1101-14 Section 3-2-5	
Topic Area:	Fuel Storage Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

Concessioner staff were not able to demonstrate that the 1,000-gallon gasoline aboveground storage tank (AST) located at Lake Fork was registered with the State of Colorado.

Recommended Corrective Action:

Ensure the AST is registered with the State of Colorado.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-011	
Priority:	2 Regulatory	
Citation:	Colorado 3-4-2 (a)(4)(B)	
Topic Area:	Fuel Storage Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

Prior to refueling the aboveground storage tank (AST) located at Lake Fork, the fuel deliverer did not document and maintain in Concessioner files the current tank ullage (available capacity of the tank) and the amount of gasoline delivered.

Recommended Corrective Action:

Ensure that each time the AST is refueled, the fuel deliverer sticks the tank to determine the available ullage in the AST, and documents this ullage and the amount of fuel delivered.

Maintain these records at Lake Fork for at least six months after the refueling date.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-012	
Priority:	2 Regulatory	
Citation:	Colorado 3-5-1 (a) and Colorado 3-5-2	
Topic Area:	Fuel Storage Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

Monthly visual inspections of the aboveground storage tank (AST) and its secondary containment located at Lake Fork were not performed or documented.

Recommended Corrective Action:

Ensure that a monthly visual inspection is performed for the AST at Lake Fork. Look for signs of leakage or damage to all connections, seams, and fittings. Install an alarm or find another means to determine if there is free liquid in the interstitial area of the tank.

Document what items were visually inspected, the date, and the individual performing the inspection. Maintain documentation for at least one year.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-013
Priority:	2 Regulatory
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30 4.6.1.4
Topic Area:	Fuel Storage Management
Photo Number:	None
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	75235 CURE001 - EC Elk Creek Marina

Audit Finding:

It was unknown whether the two 6,000-gallon underground storage tanks (USTs) were equipped with overflow prevention equipment that:

- Automatically shut off the flow of liquid into the tank when the tank was no more than 95 percent full;
- Alerted the transfer operator when the tank was no more than 90 percent full by restricting the flow of liquid into the tank or triggering the high-level alarm; and
- Other methods approved by the authority having jurisdiction (e.g., local fire department).

Recommended Corrective Action:

Determine whether the above equipment is installed and functioning properly on the two 6,000-gallon USTs. If the equipment is not available, install the equipment.

Maintain documentation in one central UST file.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: The two 6,000-gallon USTs were connected to a leak detection system (Veederroot T65 35). It was unknown whether the tanks had equipment installed to alert the fuel delivery driver when the fuel tank capacity reached 90% and had equipment installed to shut the flow to the tank when the fuel capacity reached 95%.

Recommended Corrective Action Notes

None

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CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-014	
Priority:	2 Regulatory	
Citation:	29 CFR 1910.1200(e)	
Topic Area:	Hazard Communication (HAZCOM)	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	CW	Concessionwide

Audit Finding:

A written hazard communication (HAZCOM) program had not been developed, implemented, and maintained in the workplace.

Recommended Corrective Action:

Develop, implement, and maintain a written HAZCOM program that addresses all Occupational Safety and Health Administration (OSHA)-specified elements. This includes, but is not limited to:

- A list of hazardous chemicals;
- The methods the employer will use to inform employees of the hazards of non-routine tasks and the hazards associated with chemicals contained in unlabeled pipes in their work areas;
- Labels and other forms of warning (e.g., how each container of hazardous chemicals will be labeled or tagged with the identity of the hazardous chemical and appropriate hazard warnings);
- How material safety data sheets (MSDSs) will be obtained in the workplace for each hazardous chemical used;
- The location and availability of the written HAZCOM program, including the required list(s) of hazardous chemicals and MSDSs; and
- Employee information and training (e.g., how employees will be trained on the HAZCOM program, physical and health hazards of the work area, measures employees can take to protect themselves from these hazards, the labeling system, MSDSs).

If the Concessioner produces, uses, or stores hazardous chemicals such that others (e.g., contractors, NPS) are potentially exposed to these hazardous chemicals, the written HAZCOM program is also required to include the following per 29 CFR 1910.1200 (e)(2):

- How MSDSs will be provided to others;
- How precautionary measures are taken to protect others; and
- How the labeling system is communicated to others.

The HAZCOM program should be available, upon request, to all employees on all work shifts per 29 CFR 1910.1200 (e)(4).

Assistance Resources:

For more information on developing a HAZCOM program, refer to the GreenLine CD. Click on Assistance

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Resources, then Environmental Management Topic, then Hazard Communication, then Guidance for Developing a Written Hazard Communication (HAZCOM) Program.

Notes:

Audit Finding Notes

This audit finding addresses the lack of a WRITTEN HAZCOM program. Other associated HAZCOM audit findings address the lack of IMPLEMENTATION of certain aspects of a HAZCOM program.

A HAZCOM program is not required if the only hazardous chemicals used are consumer products that are used in the same manner that a consumer would use them (i.e., where the duration and frequency of use, and therefore the exposure, is not greater than what a consumer would reasonably be expected to experience). Since the Concessioner uses various types of chemicals within their daily operations including gasoline, carburetor cleaner, muriatic acid and various cleaning materials such as bleach, its chemical use would not be considered similar to what a consumer would reasonably be expected to experience; therefore, the Concessioner is not exempt from the HAZCOM Standard.

CURRENT CONCESSIONER PRACTICES:

A written Hazard Communication plan was not developed and implemented.

A list of hazardous material was not properly maintained. A hand-written list of chemicals was observed at Pappy's Restaurant and Lake Fork Retail Store. The lists were based on the personal thoughts of the preparer, they were not based on labels and/or MSDSs

Recommended Corrective Action Notes

In general, chemicals labeled by the manufacturer with the words "CAUTION," "WARNING," "DANGER," "POISON," or the skull and crossbones symbol are hazardous chemicals. These include, but are not limited to, cleaning chemicals, paints, oils, and solvents.

HELPFUL TIPS:

Designate an individual to develop and implement the HAZCOM program.

Review and update the written HAZCOM program, as needed (e.g., periodically and/or when operations change).

Reference the HAZCOM program in the Concessioner's Environmental Management Program (once developed).

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CURE001

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Audit Finding Number:	CURE001-05-2007-015
Priority:	2 Regulatory
Citation:	29 CFR 1910.1200(f)
Topic Area:	Hazard Communication (HAZCOM)
Photo Number:	CURE001-05-2007-P001
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

Each container of hazardous chemicals in the workplace was not labeled, tagged, or marked with the following information:

- Identity of the hazardous chemical(s) contained therein; and
- Appropriate hazard warnings.

For example:

- A white plastic bucket was observed with no label in the flammable cabinet at the maintenance yard;
- Three unlabeled 55-gallon drums were observed at the maintenance yard, one of which had a sign of leakage;
- An unlabeled plastic white bottle was observed on one of the blue drums at the maintenance yard;
- A red flammable container was observed next to the flammable cabinet at the maintenance yard. The cap was not on. It was noted that the container was partially full with water;
- Two red and one blue unlabeled drums were stored at the back of the maintenance yard. The blue drum had signs of leakage;
- The carbon dioxide cylinder in use at Pappy's Restaurant had a worn label;
- Two unlabeled spray bottles were observed in Pappy's Restaurant washing room;
- An unlabeled bucket was observed in Pappy's Restaurant washing room under a shelf on which detergents are stored;
- Unlabeled partially full buckets were observed in Pappy's Restaurant washing room;
- An unlabeled spray bottle was observed in the maintenance room for the showers at Elk Creek; and
- An spray bottle that contained purple liquid was observed in the shower maintenance room at Lake Fork. The bottle had a worn label.

Recommended Corrective Action:

Ensure that each container of hazardous chemicals in the workplace is labeled, tagged, or marked with the following information:

- Identity of the hazardous chemical(s) contained therein; and
- Appropriate hazard warnings, or alternatively, words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information that is immediately available to employees under the HAZCOM program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

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Ensure that labels or other forms of warning are legible, in English, and prominently displayed on the container, or are readily available in the work area throughout each work shift.

If the Concessioner becomes newly aware of any significant information regarding the hazards of a chemical, revise the labels for the chemical within three months of becoming aware of the new information.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

The Concessioner had not developed, implemented, and maintained a written HAZCOM program in the workplace.

In general, chemicals labeled by the manufacturer with the words "CAUTION," "WARNING," "DANGER," "POISON," or the skull and crossbones symbol are hazardous chemicals. These include, but are not limited to, cleaning chemicals, paints, oils, and solvents.

Recommended Corrective Action Notes

The Concessioner may use signs, placards, process sheets, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers, as long as the alternative method identifies the containers to which it is applicable and conveys the identity of the hazardous chemicals contained therein and appropriate hazard warnings. The written materials shall be readily accessible to the employees in their work areas throughout each work shift.

If the Concessioner has employees who speak other languages, the Concessioner may add the information in their languages to the material presented, as long as the information is presented in English as well.

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Audit Finding Number:	CURE001-05-2007-016	
Priority:	2 Regulatory	
Citation:	29 CFR 1910.1200(g)	
Topic Area:	Hazard Communication (HAZCOM)	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	CW	Concessionwide

Audit Finding:

Material safety data sheets (MSDSs) were neither available in the workplace for each hazardous chemical used nor were readily accessible to employees. For example, MSDSs were not available for:

- Gasoline stored at both Elk Creek and Lake Fork;
- Bug Stop stored at the Elk Creek marina store;
- Raid Wasp and Hornet Killer at Pappy's Restaurant; and
- Water Putty stored at the maintenance yard.

Recommended Corrective Action:

Obtain an MSDS for each hazardous chemical used in the workplace. Ensure MSDSs are readily accessible to employees on all work shifts.

Assistance Resources:

To find MSDSs for hazardous chemicals, visit one of the following websites:

- www.ehs.cornell.edu
- <http://siri.org/msds/index.php>
- www.msds.com
- www.setonresourcecenter.com/MSDS_Hazcom/default.asp
- www.sigmaaldrich.com
- <https://new.fishersci.com/wps/portal/CMSTATIC?pagename=msds>.

Notes:

Audit Finding Notes

The Concessioner had not developed, implemented, and maintained a written hazard communication (HAZCOM) program in the workplace.

In general, chemicals labeled by the manufacturer with the words "CAUTION," "WARNING," "DANGER," "POISON," or the skull and crossbones symbol are hazardous chemicals. These include, but are not limited to, cleaning chemicals, paints, oils, and solvents.

CURRENT CONCESSIONER PRACTICES:

Various MSDSs were observed for some of the chemicals in use at Pappy's Restaurant. The MSDSs were affixed on the wall. Most of them were worn, but they were still legible. There were two MSDSs for sodium hypochlorite. Other MSDSs were for grease

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remover, oven and grill cleaner, and a general purpose cleaner. MSDSs for all chemicals in the store were not available.

Recommended Corrective Action Notes

MSDSs can be obtained from each hazardous chemical manufacturer, distributor, or the Internet. Usually manufacturers of chemicals include a toll-free number on the label of the product, at which they can be contacted. They can also be reached at their websites.

MSDSs for each hazardous chemical should be made "readily accessible" to employees on all work shifts per 29 CFR 1910.1200 (g)(8). This requires that employees have access to the information when they need it. Compliance with this requirement may be accomplished in many different ways; the employer must decide what is appropriate for the particular workplace. For example, a Concessioner may provide actual paper copies of MSDSs or may choose to have them available by a "fax on demand" system. While a fax-on-demand system is allowed, the Concession Environmental Management Program (CoEMP) recommends maintaining paper copies to ensure access to MSDSs in the event that there is an interruption of service of phone lines or electricity.

HELPFUL TIPS:

Update the MSDS file(s) in conjunction with the list of hazardous chemicals whenever a new chemical is introduced to the workplace.

Review the MSDS file(s) periodically (at least annually) to ensure that it is kept up-to-date. This review can be carried out at the same time as the list of hazardous materials is being updated.

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CURE001

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Audit Finding Number:	CURE001-05-2007-017
Priority:	2 Regulatory
Citation:	29 CFR 1910.1200(h)
Topic Area:	Hazard Communication (HAZCOM)
Photo Number:	None
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

Hazard communication (HAZCOM) training and information were not effectively provided to all employees who would encounter hazardous chemicals in their work areas at the time of their initial assignments and whenever a new physical or health hazard on which the employees had not previously been trained was introduced into their work areas.

Recommended Corrective Action:

Provide employees with information and training on hazardous chemicals in their work areas at the time of their initial assignment and whenever a new physical or health hazard on which the employees have not previously been trained is introduced into their work areas. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and material safety data sheets (MSDSs).

Inform employees of the location and availability of the written HAZCOM program, including the required list(s) of hazardous chemicals and MSDSs.

Develop and implement employee training that includes, but is not limited to:

- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
- The physical and health hazards of the chemicals in the work area;
- The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and
- The details of the HAZCOM program developed by the employer, including an explanation of the labeling system and the MSDS, and how employees can obtain and use the appropriate hazard information.

Assistance Resources:

For more information on conducting HAZCOM training, refer to the Concession Environmental Management Program (CoEMP) GreenLine CD. Click on Assistance Resources, then Environmental Management Topic, then Hazard Communication, then Guidance for Conducting Hazard Communication (HAZCOM) Training.

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Notes:

Audit Finding Notes

The Concessioner had not developed, implemented, and maintained a written HAZCOM program in the workplace.

In general, chemicals labeled by the manufacturer with the words "CAUTION," "WARNING," "DANGER," "POISON," or the skull and crossbones symbol are hazardous chemicals. These include, but are not limited to, cleaning chemicals, paints, oils, and solvents. Gasoline, muriatic acid, bleach, and carburetor cleaner are some of the materials for which the employees needed to be trained.

Recommended Corrective Action Notes

HELPFUL TIPS:

Document the date(s) HAZCOM training is provided and those employees that were trained (via attendance sheets).

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CURE001

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Audit Finding Number:	CURE001-05-2007-018	
Priority:	2 Regulatory	
Citation:	29 CFR 1910.101(b)	
Topic Area:	Hazardous Materials Management	
Photo Number:	CURE001-05-2007-P003	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description:	85529	CURE001 - Elk Creek EC Restaurant/Bar
and Number	93812	CURE001 - Elk Creek Concessionaire Maintenance EC

Audit Finding:

Compressed gas cylinders were not secured to prevent them from falling or being knocked over. For example:

- Two carbon dioxide cylinders (one in use and one spare) stored at Pappy's Restaurant were not secured.
- One oxygen and one acetylene cylinder at the maintenance yard were stored together and tied with one rope to a nearby shelf.

Recommended Corrective Action:

Secure compressed gas cylinders to prevent them from falling or being knocked over. Secure each cylinder separately rather than using one chain to secure them together.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

The compressed carbon dioxide cylinders observed at Pappy's Restaurant and the maintenance yard did not have tags indicating whether they were full, in use, or empty. Labeling each cylinder as full, in use, or empty is a best management practice.

The oxygen and acetylene cylinders were said to be in use approximately once per day.

Recommended Corrective Action Notes

One way in which to secure a compressed gas cylinder is by chaining it around the body. If this method is chosen, the compressed gas cylinder should be secured by chaining it approximately one-third down from the top of the cylinder. It is preferable to chain each cylinder individually, rather than chain several cylinders as a group (i.e., gang chain them).

Industrial suppliers provide perforated tags to indicate the status (full, in use, empty) of compressed gasses.

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CURE001

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Audit Finding Number:	CURE001-05-2007-019		
Priority:	2 Regulatory		
Citation:	29 CFR 1910.106(d)(7)(iii)		
Topic Area:	Hazardous Materials Management		
Photo Number:	CURE001-05-2007-P002		
Responsible Party:	Manager		
Deadline to Close Audit Finding:	12/24/2007		
Date Audit Finding Closed:	Not yet closed		
Location/Asset Description:	75235	CURE001 - EC Elk Creek Marina	
and Number	93812	CURE001 - Elk Creek Concessionaire Maintenance EC	

Audit Finding:

There were no "No Smoking" signs posted to prevent open flames and smoking in flammable and combustible liquid storage areas. For example:

- A flammable storage cabinet located at the maintenance yard was not labeled with a No Smoking sign; and
- Two flammable cabinets located at Elk Creek Marina were not labeled with a No Smoking sign.

Recommended Corrective Action:

Post No Smoking signs to prevent open flames and smoking in flammable and combustible liquid storage areas.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

A small cabinet at Elk Creek Marina did have a "Keep Fire Away" sign posted.

Recommended Corrective Action Notes

None

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Audit Finding Number:	CURE001-05-2007-020	
Priority:	2 Regulatory	
Citation:	40 CFR 261.5 (g)(3)	
Topic Area:	Hazardous Waste	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	CW	Concessionwide

Audit Finding:

Old and unused containers of hazardous chemicals and flammable materials had not yet been assessed and disposed of as hazardous waste.

Recommended Corrective Action:

Conduct a cleanout of flammable storage cabinets and determine what products may be used on-site or donated and used off-site by other organizations.

Confer with the State of Colorado to determine whether a one-time cleanout and disposal of hazardous waste is allowed in Colorado. This will ensure that the Concessioner remains a conditionally exempt small quantity generator (CESQG) of hazardous waste and that the (potentially) large amount of hazardous waste that is disposed of from the cleanout does not impact the Concessioner's hazardous waste generator status.

Obtain an Environmental Protection Agency (EPA) hazardous waste identification number when disposing of hazardous waste off-site.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

The hazardous chemicals had primarily been left from the previous Concessioner. In talking with the Concessioner, staff were going to try and use as much as possible but anticipated that some of the hazardous chemicals and flammable materials would need to be disposed of properly.

Recommended Corrective Action Notes

When donating any hazardous chemical to an outside organization, ensure a letter accompanies the donation indicating that the acceptance of the donated materials releases the Concessioner from any disposal fees associated with the hazardous chemical and that the hazardous chemical should be disposed of in a proper manner.

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CURE001

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Audit Finding Number:	CURE001-05-2007-021	
Priority:	2 Regulatory	
Citation:	40 CFR 262.11	
Topic Area:	Hazardous Waste	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	CW	Concessionwide

Audit Finding:

Hazardous waste characterizations were not conducted for each waste stream generated by the Concessioner. For example, it was not determined whether rags soiled with fuel or solvent and used absorbent pads contaminated with fuel were hazardous waste.

Recommended Corrective Action:

Determine if the waste is excluded from regulation under 40 CFR 261.4.

If the waste is not excluded from regulation under 40 CFR 261.4, determine if the waste is listed as a hazardous waste in subpart D of 40 CFR part 261.

If the waste is not listed in subpart D of 40 CFR part 261, determine whether the waste is identified in subpart C of 40 CFR part 261 by either:

- Testing the waste according to the methods set forth in subpart C of 40 CFR part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
- Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

Assistance Resources:

To determine whether waste streams are hazardous waste, visit <http://www.epa.gov/epaoswer/hotline/training/hwid05.pdf>.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES:

Based on Concessioner staff interviews, there were unused flammable and hazardous chemicals stored throughout the maintenance yard area. If the items are considered unusable, they are considered waste and must be disposed of properly.

The Concessioner reported that in the event of an incidental fuel spill, contaminated absorbent pads would be placed and maintained in a closed 55-gallon drum until a proper disposal method was determined. No soiled rag or contaminated absorbent pad had been generated yet.

Recommended Corrective Action Notes

40 CFR 261.4 describes exclusions to hazardous waste regulations (e.g., materials which are not solid wastes, solid wastes that are not hazardous wastes, hazardous wastes exempted from certain regulations).

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Subpart D of 40 CFR part 261 gives a list of solid wastes that are considered hazardous wastes.

Subpart C of 40 CFR part 261 describes the characteristics of a solid waste that would make it a hazardous waste (i.e., ignitability, corrosivity, reactivity, toxicity).

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CURE001

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Audit Finding Number:	CURE001-05-2007-022
Priority:	2 Regulatory
Citation:	29 CFR 1910.134(c)(2)(i)
Topic Area:	Respiratory Protection Program
Photo Number:	None
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

The information contained in Appendix D of the Respiratory Protection Standard (29 CFR 1910.134) ("Information for Employees Using Respirators When Not Required Under the Standard") was not provided to voluntary respirator users (e.g., those employees using dust masks).

Recommended Corrective Action:

Provide voluntary respirator users with the information contained in Appendix D of the Respiratory Protection Standard (29 CFR 1910.134) ("Information for Employees Using Respirators When Not Required Under the Standard").

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

Respirators [including filtering facepieces (dust masks)] were voluntarily used by employees. There was no required respirator use at the workplace, nor was required respirator use anticipated to be implemented at the workplace in the future.

Recommended Corrective Action Notes

The Concessioner must provide the information contained in Appendix D of 29 CFR 1910.134 to employees in a respiratory protection program where respirator use is VOLUNTARY.

It is recommended that employees voluntarily using filtering facepieces use those that have been National Institute of Occupational Safety and Health (NIOSH)-certified.

Demonstrate that employees voluntarily using respirators have received Appendix D of the Respiratory Protection Standard by documenting their names and maintaining this information on file.

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Audit Finding Number:	CURE001-05-2007-023
Priority:	2 Regulatory
Citation:	29 CFR 1910.134(d)(1)(iii)
Topic Area:	Respiratory Protection Program
Photo Number:	None
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

A complete hazard evaluation had not been conducted to identify and evaluate the respiratory hazards in the workplace. Potential respiratory hazards included cleanup from incidental spills of fuel or other hazardous chemicals.

Recommended Corrective Action:

Identify and evaluate the respiratory hazard(s) in the workplace. This evaluation should include a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form. Where the Concessioner cannot identify or reasonably estimate the employee exposure, the Concessioner shall consider the atmosphere to be immediately dangerous to life or health.

If the hazard evaluation identifies workplace hazards that would require a respiratory protection program, identify and implement feasible engineering control measures or other means (e.g., contracting work) to eliminate the need for a respiratory protection program.

If there are contractors working at Concessioner facilities where respiratory hazards exist, ensure that the contractors are suitably qualified and use respirators under their own compliant respiratory protection program.

If engineering controls or other means are not feasible to eliminate the respiratory hazards, develop and implement a respiratory protection program in accordance with 1910.134(c) that includes:

- Providing respirators which are applicable and suitable for the purpose intended;
- A written respiratory protection program with work-specific procedures;
- Selection of respirators;
- Medical evaluations;
- Fit testing;
- Respirator use;
- Maintenance and care of respirators;
- Breathing air quality and use;
- Identification of filters, cartridges, and canisters;
- Training and information;
- Program evaluation; and

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- Recordkeeping.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

If the Concessioner does not establish a policy prohibiting voluntary use of respirators, additional requirements under the Respiratory Protection Standard (29 CFR 1910.134) would apply.

HELPFUL TIPS:

Document the hazard evaluation to demonstrate the applicability of a respiratory protection program.

If no respiratory hazards are identified in the workplace, or if respiratory hazards identified in the workplace do not require employee respirator use, develop, document, and implement a policy specifying that respirators are not required based upon this hazard evaluation. In addition, the Concessioner can develop, document, and implement a policy that voluntary respirator use is not permitted to completely eliminate the need for a respiratory protection program.

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CURE001

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Audit Finding Number:	CURE001-05-2007-024	
Priority:	2 Regulatory	
Citation:	40 CFR 112.3 and Concession Contract CURE001 Operating Plan, XIV, Section G.	
Topic Area:	SPCC Planning	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

A spill prevention control and countermeasure (SPCC) plan had not been developed for the 1,000-gallon gasoline aboveground storage tank (AST) located at Lake Fork Marina.

Recommended Corrective Action:

Develop and document an SPCC plan. Ensure that it contains the following information:

- Discussion of the Concessioner's conformance with requirements listed in the SPCC regulations;
- Description of the physical layout of the Concessioner operations including a diagram which marks the location and contents of each oil storage container (the diagram must include completely buried tanks that are otherwise exempt from the SPCC Plan and must also include all transfer stations and connecting pipes);
- Description of the types of oil in each container and each container's storage capacity;
- Prevention measures to avoid discharges including procedures for routine handling of products (loading, unloading, transfers);
- Description of discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of discharge;
- Explanation of countermeasures for discharge discovery, response, and cleanup (both Concessioner's capability and those that might be required of a contractor);
- Description of methods of disposal of recovered materials;
- List of contacts and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom the Concessioner has an agreement for response, and all appropriate Federal, state, and local agencies who must be contacted in case of a discharge;
- Information and procedures to enable a person reporting a discharge to relate information on the exact address or location and phone number of the Concessioner, the date and time of the discharge, the type of material discharged, estimates of the total quantity discharged, the source and cause of the discharge, a description of all affected media, any damages or injuries caused by the discharge, actions being used to stop, remove, and mitigate the effects of the discharge, whether an evacuation may be needed, and the name of individuals and/or organizations who have also been contacted (these procedures must be organized in the SPCC plan in a manner that is easy to use during an emergency);
- Prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the Concessioner as a result of each type of major equipment failure (loading and unloading equipment, tank overflow, rupture, leakage);
- Inspection and testing procedures for containers;

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- Provision of an oil spill contingency plan; and
- A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

Also ensure the SPCC plan:

- Has the full approval of management at a level of authority to commit the necessary resources to fully implement the SPCC plan;
- Is certified by a Professional Engineer (PE) who is familiar with SPCC regulations (optional); and
- Is maintained on-site and available for review by the Regional Environmental Protection Agency (EPA) Administrator.

Assistance Resources:

For more information on SPCC Plans, visit www.epa.gov/oilspill.

Also, refer to the GreenLine CD. Click on Assistance Resources, then Environmental Management Topic, then SPCC Planning, then Understanding the Spill Prevention Control and Countermeasure (SPCC) Plans file.

Notes:

Audit Finding Notes

An SPCC plan is required for facilities that store 1,320 gallons of oil product in aboveground storage containers 55-gallons or greater and which also have a potential to reasonably discharge into navigable waters or shorelines.

The concession contract also requires that an SPCC plan be developed and implemented.

Recommended Corrective Action Notes

None

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CURE001

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Audit Finding Number:	CURE001-05-2007-025	
Priority:	2 Regulatory	
Citation:	COR-011045 (Lake Fork) and COR-011044 (Elk Creek)	
Topic Area:	Storm Water Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1
	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

Concessioner staff had not conducted biannual evaluations of the Storm Water Management Plan.

Recommended Corrective Action:

Conduct a biannual evaluation of the Storm Water Management Plan to ensure the plan meets the permit requirements and is effective in minimizing storm water run-off from the marina.

Maintain documentation of each biannual evaluation in the appropriate location (Elk Creek and Lake Fork).

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

An evaluation of the storm water management plan is required to be conducted two times each year in accordance with storm water permit requirements. The evaluation helps ensure the storm water management plan meets all of the storm water permit requirements and that storm water run-off is effectively being managed.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-026	
Priority:	2 Regulatory	
Citation:	COR-011045 (Lake Fork) and COR-011044 (Elk Creek)	
Topic Area:	Storm Water Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1
	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

The Concessioner's Storm Water Management Plan did not meet the storm water permit requirements for Elk Creek or Lake Fork. Specifically, the Storm Water Management Plan:

- Discussed air quality issues related to marine vessel motor emissions;
- Did not evaluate all potential activities and equipment stored at each marina that could impact storm water quality;
- Did not develop site-specific best management practices that would be implemented to minimize and prevent storm water run-off associated with marina operations.

Recommended Corrective Action:

Review and revise as appropriate the Storm Water Management Plan to ensure that it meets all storm water permit requirements.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-027	
Priority:	2 Regulatory	
Citation:	COR-011045 (Lake Fork) and COR-011044 (Elk Creek)	
Topic Area:	Storm Water Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1
	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

Concessioner staff had neither developed nor reported to the State of Colorado an annual storm water report per storm water permit requirements.

Recommended Corrective Action:

Develop and submit an annual storm water report to Colorado per storm water permit requirements.

Maintain a copy of each annual report submitted to Colorado in the appropriate location (Elk Creek and Lake Fork).

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

Both Elk Creek and Lake Fork were issued storm water permits from the State of Colorado. The permits are effective July 1, 2006 through June 30, 2011. Both marinas have a standard classification code of 4469 requiring them to have a storm water permit and storm water management plan as part of their permit requirements.

The last annual report was due February 15, 2007.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-028	
Priority:	2 Regulatory	
Citation:	40 CFR 273.8	
Topic Area:	Universal Waste Management	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	CW	Concessionwide

Audit Finding:

Universal waste (fluorescent lamps) were disposed of in the regular trash.

Recommended Corrective Action:

Prohibit disposing of universal waste in the regular trash.

Assistance Resources:

For information on shipping used fluorescent lamps off-site, visit <http://www.wmlamptracker.com/wmdefault.cfm>.

Notes:

Audit Finding Notes

All generators of universal waste must ensure that the waste is properly managed and disposed of in a appropriate manner regardless of the quantity of universal waste or hazardous waste generated by the concessioner.

The term "universal waste lamps," as used in this audit finding, refers to the definition described in 40 CFR 273. Examples of common universal waste lamps include, but are not limited to fluorescent, high intensity discharge (HID), neon, mercury vapor, high pressure sodium, and metal halide lamps that are hazardous wastes.

The "Universal Waste Rule" was designed to reduce the amount of hazardous waste items in the municipal solid waste stream, encourage recycling and proper disposal of certain common hazardous wastes, and reduce the regulatory burden on businesses that generate these wastes. These "universal wastes" include batteries [such as nickel-cadmium (Ni-Cad) and small sealed lead acid batteries, but not alkaline batteries], mercury-containing thermostats, mercury-containing lamps (such as fluorescent, HID, neon, mercury vapor, high pressure sodium, and metal halide lamps), and agricultural pesticides. Certain states may also classify additional hazardous wastes as "universal wastes."

CURRENT CONCESSIONER PRACTICES:

The Concessioner stored fluorescent lamps elsewhere throughout the facilities individually. Accumulation of the lamps was not performed safely and securely.

The Concessioner donated the batteries to Interstate Battery. The contractor picked up used or dead batteries on average every two weeks.

Aerosol cans and pesticide containers were disposed of in regular trash.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Recommended Corrective Action Notes

The Concessioner should handle its fluorescent lamps, mercury-containing waste equipment, electronic devices, and aerosol cans as universal waste. These wastes should be segregated from each other and accumulated in proper containers that would prevent any spill or breakage. Each accumulation container should be labeled for its content, such as "Universal Waste fluorescent lamps", "Used fluorescent lamps", or "Waste fluorescent lamp", as well as include the accumulation start date. Universal waste can be accumulated in the facility for up to one year. The Concessioner should contact a transporter that is authorized to transport universal wastes. The waste should be transported to a facility that is authorized to handle universal wastes. The Concessioner should verify these conditions are met.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-029	
Priority:	2 Regulatory	
Citation:	40 CFR 279.22(c)	
Topic Area:	Used Oil	
Photo Number:	CURE001-05-2007-P004	
Responsible Party:	Marine Mechanic	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	93812	CURE001 - Elk Creek Concessionaire Maintenance EC

Audit Finding:

Three 55-gallon containers used to store used oil were not labeled or marked clearly with the words "Used Oil."

Recommended Corrective Action:

Clearly label or mark containers and aboveground tanks storing used oil with the words "Used Oil."

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: Two used oil drums were located on a spill containment pad undercover in the maintenance yard maintenance area. A third 55-gallon drum was stored outside awaiting pick up by a vendor.

Recommended Corrective Action Notes

If used oil is mixed with a hazardous waste, it is usually considered a hazardous waste and must be managed accordingly.

If used oil is labeled or marked "Waste Oil," it is considered hazardous waste and must be managed accordingly.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-030
Priority:	3 Regulatory
Citation:	Federal Register Vol. 65, No. 87 26052-26086, Concession Contract, Sec. 6(b)(1)
Topic Area:	Environmental Management Systems
Photo Number:	None
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

The Concessioner did not have an Environmental Management Plan (EMP) that meets the NPS Concession's requirements for an EMP.

Recommended Corrective Action:

Develop an EMP that includes addressing audit findings, ensuring regulatory compliance, and implementing best management practices related to environmental management. Elements that should be included in the documented EMP include, but are not limited to, the following:

- An environmental policy (stating the Concessioner's commitment to comply with applicable laws and incorporate best management practices into its operations);
- Goals and targets [including short-term (e.g., annual) and long-term goals and targets];
- Responsibility and accountability for environmental tasks (e.g., defined in job descriptions), including designation of an Environmental Program Manager;
- Documentation (including plans, procedures, manuals and other environmental documentation);
- Document Control and Information Management System (such as where environmental documentation is kept and who is in charge of maintaining it);
- Reporting (such as those required by applicable laws to be prepared and/or submitted to the Park and/or environmental regulatory agencies);
- Communication (such as how the environmental policy, goals, targets, and responsibilities and accountability would be communicated throughout the Concessioner's organization. This can be done through email, staff meetings, postings, or other means);
- Training (such as environmental training that will take place, who will be trained, how often training will take place, and how training will be documented. This includes training required by applicable laws, such as hazard communication training); and
- Monitoring, Measurement, and Corrective Action (such as Concessioner strategies to monitor its environmental performance via internal or third party audits and/or assessments).

Review the EMP at least annually to verify the status of goals and targets, and amend, revise, or improve the EMP, as needed.

Assistance Resources:

For more information on how to develop an EMP, refer to the GreenLine CD. Click on Assistance

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Resources, Environmental Management Topic, Environmental Management System, Marina, Guidance for Developing an Environmental Management Plan for Marinas.

Notes:

Audit Finding Notes

The Concessioner had developed a Concessioner Risk Management Program which included components of an EMP such as the Management's Policy Statement as well as information on training.

Recommended Corrective Action Notes

The Concessioner may want to consider combining the "Documentation" and "Document Control and Information Management System" EMP elements when developing, documenting, and implementing its EMP.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-031		
Priority:	3 Regulatory		
Citation:	Concession Contract CURE001 Operating Plan pg 30		
Topic Area:	Fuel Storage Management		
Photo Number:	None		
Responsible Party:	Manager		
Deadline to Close Audit Finding:	12/24/2007		
Date Audit Finding Closed:	Not yet closed		
Location/Asset Description:	85528	CURE001 - Lake Fork Marina Store LFC1	
and Number	75235	CURE001 - EC Elk Creek Marina	

Audit Finding:

Signs discouraging "topping off" of gasoline located in each fuel dispensing area were not posted per concession contract requirements.

Recommended Corrective Action:

Post signs in prominent locations in and around each fuel dispensing area that discourage Concessioner staff from "topping off" fuel tanks.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-032		
Priority:	3 Regulatory		
Citation:	Concession Contract CURE001 Operating Plan pg 30		
Topic Area:	Fuel Storage Management		
Photo Number:	None		
Responsible Party:	Manager		
Deadline to Close Audit Finding:	12/24/2007		
Date Audit Finding Closed:	Not yet closed		
Location/Asset Description:	85528	CURE001 - Lake Fork Marina Store LFC1	
and Number	75235	CURE001 - EC Elk Creek Marina	

Audit Finding:

A list of Concessioner staff trained and authorized to refuel Park visitor vessels was not posted in a prominent and visible location at the Elk Creek and Lake Fork marina stores.

Recommended Corrective Action:

Prepare a list of Concessioner staff who are authorized to refuel Park visitor vessels and post the list in a location in each marina store in a prominent and visible location.

Submit each list to Park staff.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-033	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30 4.6.2.1	
Topic Area:	Fuel Storage Management	
Photo Number:	CURE001-05-2007-P006	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

A sign or marking indicating its contents and hazard warnings was not applied to the aboveground storage tank (AST) containing gasoline.

Recommended Corrective Action:

Apply a sign or marking to the AST containing gasoline, or located where it can be readily seen, such as on the shoulder of an accessway or walkway to the tank. Mark the sign with the words Gasoline and Flammable.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: The gasoline AST did not have any markings to indicate the contents or any warnings associated with the contents.

Recommended Corrective Action Notes

HELPFUL TIPS: To make an easy sign, print a sign on the computer and laminate the sign to protect against the elements. Paste to the AST.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-034	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30 4.6.4	
Topic Area:	Fuel Storage Management	
Photo Number:	CURE001-05-2007-P005	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

The aboveground storage tank (AST), temporarily out of service during the winter season, was not secured against tampering.

Recommended Corrective Action:

For those tanks that are temporarily out of service, ensure that the tank is secured against tampering.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: The Concessioner shuts down its operations beginning in mid-September and does not reopen its operations until May. The AST located at Lake Fork is located on the marina. Neither the marina nor the facility is fenced or otherwise secured against tampering.

Additionally, the Concessioner indicated that the current type of emergency vent allows individuals to siphon fuel out from the tank. Also, the fill port was not provided with a lock.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-035	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 11.10.7	
Topic Area:	Gas and Service Stations	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1
	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

Owners or operators offered their vessel or marine craft for fueling when communication was not established between the fueling attendant and the person in control of the vessel or craft receiving the fuel so as to determine the vessel's fuel capacity, the amount of fuel on board, and the amount of fuel to be taken on board.

Recommended Corrective Action:

Ensure that owners or operators offering their vessel or marine craft for fueling have communication established between the fueling attendant and the person in control of the vessel or craft receiving the fuel so as to determine the vessel's fuel capacity, the amount of fuel on board, and the amount of fuel to be taken on board.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: Concessioner staff indicated that non-employees were not allowed to refuel tanks and that only Concessioner staff were authorized to refuel tanks.

Concessioner staff indicated they asked each person on-board how much fuel they wanted to have put into the vessel fuel tank. For portable on-board tanks, Concessioner staff visually judged how much fuel was needed and did not establish any communication with the vessel operator.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-036
Priority:	3 Regulatory
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 11.5.3
Topic Area:	Gas and Service Stations
Photo Number:	CURE001-05-2007-P007
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	75235 CURE001 - EC Elk Creek Marina

Audit Finding:

A clearly identified emergency electrical disconnect readily accessible in case of fire or physical damage at any dispensing unit was not provided on the Elk Creek marina.

The disconnect was not identified by an approved sign stating EMERGENCY PUMP SHUTOFF in 50-millimeter (2-inch) red capital letters.

Recommended Corrective Action:

Ensure that a clearly identified emergency electrical disconnect that is readily accessible in case of fire or physical damage at any dispensing unit is provided on the marina. The disconnect should be interlocked to shut off power to all pump motors from any individual location and should be manually reset only from a master switch.

Each such disconnect should be identified by an approved sign stating EMERGENCY PUMP SHUTOFF in 50-millimeter (2-inch) red capital letters.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: A shut-off valve was provided for the fuel dispensing units on the Elk Creek marina, yet the valve was not signed and was located underneath a marina pier wood plank that had to be removed first to access the valve.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-037	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 11.5.5	
Topic Area:	Gas and Service Stations	
Photo Number:	CURE001-05-2007-P008	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

Conspicuous NO SMOKING signs were not posted within sight of the customer being served at the marina fuel dispensing facility.

Recommended Corrective Action:

Post conspicuous NO SMOKING signs within sight of the customer being served.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: The fuel dispensers located at Elk Creek marina did have No Smoking signs, but they were faded and difficult to read.

Recommended Corrective Action Notes

HELPFUL TIPS: Print out a No Smoking sign on the computer, laminate it, and paste it in all locations in and around the fuel dispensing area. Alternatively purchase No Smoking signs and post in all locations in and around the fuel dispensing area.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-038	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 4.3.6.3	
Topic Area:	Gas and Service Stations	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

It was not determined whether there was a means provided to either automatically stop the flow of liquid into the aboveground storage tank (AST) when the liquid level in the AST reached 98 percent capacity or to restrict the flow of liquid into the AST to a maximum flow rate of 9.5 Liters/minute (2.5 gallons per minute) when the liquid in the AST reached 95 percent capacity.

Recommended Corrective Action:

Ensure a method is provided to automatically stop the flow of liquid into the AST when the liquid level in the AST reaches 98 percent capacity or to restrict the flow of liquid into the AST to a maximum flow rate of 9.5 Liters/minute (2.5 gallons per minute) when the liquid in the AST reaches 95 percent capacity.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: The AST located at Lake Fork had a Red Jacket system installed on the tank to sound an audible alarm when the liquid level in the AST reaches 90 percent of capacity. Concessioner staff were unable to demonstrate that a method to stop the flow of liquid into the tank was available and functioning.

Recommended Corrective Action Notes

HELPFUL TIPS: Ensure the Red Jacket system is also functioning properly and that the audible and automatic shut-off equipment function properly together.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-039	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 4.3.7.1	
Topic Area:	Gas and Service Stations	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

The aboveground storage tank (AST) located at Lake Fork was not enclosed with a chain link fence at least 1.8 meters (6 feet) high.

Recommended Corrective Action:

Enclose ASTs with a chain link fence at least 1.8 meters (6 feet) high. Because the tank is located on a small marina, a chain link fence directly surrounding the tank is not a very feasible solution. Work with Park staff and come to an agreement that satisfies this National Fire Protection Association (NFPA) requirement.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

A chain link fence helps protect the ASTs from the public.

CURRENT CONCESSIONER PRACTICES: There was no fencing around the tank, marina, or facility. The public could access the AST at any time.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-040	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 5.2.2	
Topic Area:	Gas and Service Stations	
Photo Number:	CURE001-05-2007-P012	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

Piping carrying fuel was not located to protect it from physical damage. Specifically, double-walled piping used for refueling the 1,000-gallon aboveground storage tank (AST) located at Lake Fork hooked along the length of the dock had portions of the piping laying underneath the water line.

A small scratch was noted on the piping.

Recommended Corrective Action:

Maintain piping so that it is protected from physical damage.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: The fuel delivery vehicle parks along the boat ramp of the marina. The fuel delivery individual attaches the pipe to the fuel delivery vehicle and attaches the other end of the pipe to the AST. After the AST is refilled with gasoline, the piping is removed from the AST as well as the fuel delivery vehicle. Extra length of piping is stored on the marina at the side of the marina store.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-041
Priority:	3 Regulatory
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 5.2.5
Topic Area:	Gas and Service Stations
Photo Number:	CURE001-05-2007-P009
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	75235 CURE001 - EC Elk Creek Marina

Audit Finding:

Each fill pipe for the two 6,000-gallon underground storage tanks (USTs) at Elk Creek was not identified by color code or other marking to identify the product for which it was used.

Recommended Corrective Action:

Identify each fill pipe by color code or other marking to identify the product for which it is used.

Maintain the color code or marking in legible condition.

Gasoline is typically associated with the color white.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: The fill pipe covers for the two USTs were painted a faded reddish color.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-042	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 6.5.2	
Topic Area:	Gas and Service Stations	
Photo Number:	CURE001-05-2007-P010	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

A listed emergency breakaway device designed to retain liquid on both sides of the breakaway point was not installed on each hose dispensing Class I (gasoline) liquid at the Elk Creek marina.

Recommended Corrective Action:

Install a listed emergency breakaway device designed to retain liquid on both sides of the breakaway point on each hose dispensing gasoline.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

"Listed" is defined by the National Fire Protection Association (NFPA) as equipment, materials, or services included in a list published by an organization that is acceptable to the authority having jurisdiction over the Concessioner. In general, UL-approved emergency breakaway devices are "listed."

CURRENT CONCESSIONER PRACTICES: The fuel hose at Lake Fork did have an emergency breakaway device installed on the hose.

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-043	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 6.6.5	
Topic Area:	Gas and Service Stations	
Photo Number:	CURE001-05-2007-P011	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

Dispensing nozzles used at the Lake Fork marine motor fuel dispensing facility were not of the automatic-closing type without a latch-open device.

Recommended Corrective Action:

Provide dispensing nozzles that are of the automatic-closing type without a latch-open device at marine motor fuel dispensing facilities.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-044	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 9.2.1	
Topic Area:	Gas and Service Stations	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

Accurate daily inventory records were not maintained and reconciled for the aboveground storage tank (AST) at Lake Fork for indication of possible leakage from the tank.

Recommended Corrective Action:

Maintain accurate daily inventory records and reconcile the amount of product sold or used to the amount of inventory on hand for the liquid fuel storage tank for indication of possible leakage from the AST. Keep records on the premises or make them available to the authority having jurisdiction for inspection within 24 hours of a written or verbal request.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

Reconciliation should include comparing the amount of product sold or used to the amount of inventory on hand for all liquid fuel storage tanks.

CURRENT CONCESSIONER PRACTICES: For the upcoming season, Concessioner staff planned to document the amount of fuel sold but were not planning to reconcile the quantity of fuel sold with the quantity of fuel present in the tank.

Concessioner staff were not able to find any reconciliation records from the last operating season (May 2006-September 2006).

Recommended Corrective Action Notes

None

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-045	
Priority:	3 Regulatory	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 9.2.3.3	
Topic Area:	Gas and Service Stations	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1

Audit Finding:

Portable containers of 45 Liter (12 gallon) capacity or less were filled while they were in or on a motor vehicle or marine craft.

Recommended Corrective Action:

Ensure that portable containers of 45 Liter (12 gallon) capacity or less are not filled while they are in or on a motor vehicle or marine craft.

Place portable containers in a secondary containment plastic tub lined with absorbent pads, place the tub on the marina dock and refuel the portable container in accordance with National Fire Protection Association (NFPA) and concession contract requirements.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES: Concessioner staff indicated they maintained the small 12-gallon or less portable fuel tanks used primarily for out-board marine motors in place as they refueled the tank.

Recommended Corrective Action Notes

None

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CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-046		
Priority:	3 Regulatory		
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 9.2.5.4		
Topic Area:	Gas and Service Stations		
Photo Number:	None		
Responsible Party:	Manager		
Deadline to Close Audit Finding:	12/24/2007		
Date Audit Finding Closed:	Not yet closed		
Location/Asset Description: and Number	85528	CURE001 - Lake Fork Marina Store LFC1	
	75235	CURE001 - EC Elk Creek Marina	

Audit Finding:

Warning signs were not conspicuously posted in the fuel dispensing area at Elk Creek and Lake Fork that incorporated the following or equivalent wording:

"W A R N I N G

- It is unlawful and dangerous to dispense gasoline into unapproved containers.
- No smoking.
- Stop motor.
- No filling of portable containers in or on a motor vehicle.
- Place container on ground before filling."

Recommended Corrective Action:

Conspicuously post warning signs in the dispensing area that incorporates the following or equivalent wording:

"W A R N I N G

- It is unlawful and dangerous to dispense gasoline into unapproved containers.
- No smoking.
- Stop motor.
- No filling of portable containers in or on a motor vehicle.
- Place container on ground before filling."

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

HELPFUL TIPS: Consider making a sign and printing it out on a computer, laminating the sign, and posting it in the fuel dispensing area. Alternatively, the signs may be purchased.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-047
Priority:	3 Regulatory
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30 6.6.3.5
Topic Area:	Hazardous Materials Management
Photo Number:	CURE001-05-2007-P013
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

Storage cabinets did not have adequate spill containment. Hazardous chemicals were observed to be stored on the bottom of flammable storage cabinets. For example, paint and waterseal were found stored in the bottom of a flammable storage cabinet located in the maintenance yard.

Recommended Corrective Action:

Remove the stored containers and materials from the bottom of the cabinet to ensure that the containment system has sufficient capacity to contain 10 percent of the volume of containers allowed or the volume of the largest container, whichever is greater.

Assistance Resources:

None

Notes:

Audit Finding Notes

CURRENT CONCESSIONER PRACTICES:

The bottom shelf was used for storing containers and materials.

Recommended Corrective Action Notes

HELPFUL TIPS:

The bottom of the cabinets are not to be used for storing containers or supplies. They are built to contain spills from the stored containers. Storing containers or materials in the containment systems reduces the volume available to contain spills.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-048
Priority:	3 Regulatory
Citation:	NPS-77, Natural Resources Management, Integrated Pest Management, Program Guidance I A
Topic Area:	Pesticide Management
Photo Number:	None
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

A Pesticide Use Proposal was not annually submitted to the Park for the use of pesticides. Pesticides for which a Pesticide Use Proposal had not been annually submitted included:

- Raid - wasp and hornet;
- Bugout - ant and roach spray;
- Bugstop - insect spray;
- Decon mice poison; and
- Hepacide - disinfectant cleaner.

Recommended Corrective Action:

Compile a list of pesticides that are proposed to be used by the Concessioner (e.g., Raid, Bugout) and any other pesticides that are being or will be potentially used by the Concessioner. Submit this list to the Park and request permission to use these pesticides prior to actually using them. Coordinate with the Park to ensure that the Park can meet the December 31st deadline for pesticide approval. If the request is granted, direct Concessioner staff to use pesticides according to manufacturer and Park directions. If the request is not granted, prohibit use and dispose of pesticides according to Applicable Laws.

Once permission is granted for pesticides currently being used, ensure that permission is obtained from the Park Integrated Pest Management (IPM) Coordinator before any other pesticides are purchased in the future.

Assistance Resources:

None

Notes:

Audit Finding Notes

NPS-77 reads "This section of the Guideline applies to any pesticide use within the National Park System, except for cleaning solutions used in restrooms, restaurants, etc., and includes but is not limited to . . . Concessioners . . ."

CURRENT CONCESSIONER PRACTICES:

The Concessioner was purchasing over-the-counter pesticides from local retail stores. The Concessioner was not providing the Park with any information on the type, quantity of pesticides used on Park property.

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CURE001

Curecanti National Recreation Area

Recommended Corrective Action Notes

Before the Concessioner uses additional or different pesticides, another Pesticide Use Proposal should be submitted to the Park and permission granted before the pesticides are applied.

Proactively discuss non-chemical pest management options with the Park that could be used at Concessioner facilities.

The Park IPM Coordinator is Ken Stahlnecker, Chief of Resource Stewardship and Science. He can be reached at 970/641-2337 ext. 225.

The Pesticide Use Proposal should be submitted first and permission granted by the Park to use the pesticides before the Concessioner purchases the pesticides.

Annual Park approvals for pesticide use expire on December 31st. Parks are required to enter their IPM information on the NPS Intranet site.

Emergency pesticide reviews can be obtained via telephone or e-mail from Regional IPM Coordinators or from the Washington Office IPM staff.

HELPFUL TIPS:

Develop, document, and implement a procedure to annually request permission from the Park to use certain types of pesticides, even if they are the same pesticides used from year to year. Retain any documentation from the Park regarding these requests and responses on file.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-049
Priority:	3 Regulatory
Citation:	NPS-77, Natural Resources Management, Integrated Pest Management, Program Guidance IV D
Topic Area:	Pesticide Management
Photo Number:	None
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

An annual report documenting the types and amounts of pesticides used (i.e., a Pesticide Use Log) was not submitted to the Park so that the Park could report its pesticide use data by the April 15th deadline. Pesticides for which a Pesticide Use Log was not submitted to the Park include:

- Raid - wasp and hornet;
- Bugout - ant and roach spray;
- Bugstop - insect spray;
- Decon mice poison; and
- Hepacide - disinfectant cleaner.

Recommended Corrective Action:

Submit an annual Pesticide Use Log to the Park. The Pesticide Use Log should include the following information:

- Pesticide name, including the Environmental Protection Agency (EPA) Pesticide Product Registration Number if applicable;
- Amount of pesticide used;
- Location pesticide was used; and
- Pests targeted.

Coordinate with the Park to ensure that the Park can meet its April 15 deadline for reporting the previous year's actual pesticide use.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

NPS-77 reads "This section of the Guideline applies to any pesticide use within the National Park System, except for cleaning solutions used in restrooms, restaurants, etc., and includes but is not limited to . . . Concessioners . . ."

CURRENT CONCESSIONER PRACTICES:

The Concessioner was purchasing over-the-counter pesticides from local retail stores. The Concessioner was not providing the

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CURE001

Curecanti National Recreation Area

Park with any information on the type, quantity of pesticides used on Park property.

Recommended Corrective Action Notes

Other information that is useful to track in the Pesticide Use Log includes the following:

- Date pesticide was used;
- Person applying the pesticide; and
- Additional notes on pesticide application.

Instead of developing its own Pesticide Use Log form or using Pesticide Use Log forms in other assistance materials, the Concessioner may be able to obtain similar forms from the state's Pesticide Board.

Non-chemical pesticides management efforts proposed to be undertaken by the Concessioners should be discussed with the Park.

The Park Integrated Pest Management (IPM) Coordinator is Ken Stahlnecker, Chief of Resource Stewardship and Science. He can be reached at 970/641-2337 ext. 225.

Actual pesticide reporting must be done through the NPS Intranet.

HELPFUL TIPS:

Document, maintain on file, and implement a procedure to submit an annual Pesticide Use Log to the Park at the end of each calendar year.

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CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-050
Priority:	3 Regulatory
Citation:	NPS-77, Natural Resources Management, Integrated Pest Management, Program Guidance IV F
Topic Area:	Pesticide Management
Photo Number:	CURE001-05-2007-P014
Responsible Party:	Manager
Deadline to Close Audit Finding:	12/24/2007
Date Audit Finding Closed:	Not yet closed
Location/Asset Description: and Number	CW Concessionwide

Audit Finding:

Pesticides were stored with other substances. For example, various containers of pesticides were stored with other hazardous materials at:

- Pappy's Restaurant;
- Elk Creek Retail Store; and
- Lake Fork Retail Store.

The locations of pesticide storage facilities were not carefully chosen. For example:

- The Park Integrated Pest Management (IPM) Coordinator, the structural fire crew, and the Safety Officer were not aware of the locations and contents of the pesticide storage areas;
- MSDSs and labels for each pesticide stored by the Concessioner were not in the possession of the IPM Coordinator, the Safety Officer, and the structural fire crew; and
- The keys and/or combination to the pesticide storage facilities were not available in case of an accident.

Recommended Corrective Action:

Store pesticides separately from other substances and post proper warning signs. For example, consider placing all pesticides stored at Pappy's Restaurant in a plastic tub and label the tub with the words "Caution: Pesticides".

Assistance Resources:

None

Notes:

Audit Finding Notes

NPS-77 reads "This section of the Guideline applies to any pesticide use within the National Park System, except for cleaning solutions used in restrooms, restaurants, etc., and includes but is not limited to . . . Concessioners . . ."

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Storing pesticides with cleaning fluids, paints, solvents, or other chemical substances unnecessarily increases the opportunities for accidents, fires, etc.

CURRENT CONCESSIONER PRACTICES:

The Concessioner purchased pesticides from local retail stores. The pesticides were not stored separately from other substances.

Recommended Corrective Action Notes

The Park IPM Coordinator is Ken Stahlnecker, Chief of Resource Stewardship and Science. He can be reached at 970/641-2337 ext. 225.

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Recommended Corrective Action Notes

The waste assessment will provide data on the type (e.g., aluminum, plastic, glass), amount (e.g., tons, pounds), and source (e.g., restaurant, visitors, marina) of the wastes. Local university students may assist the Concessioner in this process.

Maintain all recyclable items in clearly marked containers.

Small-scale in-vessel compost systems are available and may be appropriate for the size of the Concession operation. However, the short operational season may preclude composting as an option. Alternatively, investigate opportunities to donate food waste to local farmers or research feasibility of partnering with local governmental agencies to donate food waste to existing compost facilities/systems managed by local entities.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

Audit Finding Number:	CURE001-05-2007-052	
Priority:	3 Regulatory - Isolated	
Citation:	NPS Director's Order 58 Chapter 5 Sec. F, NFPA 30A 11.10.8	
Topic Area:	Gas and Service Stations	
Photo Number:	None	
Responsible Party:	Manager	
Deadline to Close Audit Finding:	12/24/2007	
Date Audit Finding Closed:	Not yet closed	
Location/Asset Description: and Number	75235	CURE001 - EC Elk Creek Marina

Audit Finding:

A sign with the following legends printed in 50-millimeter (2-inch) red capital letters on a white background was not conspicuously posted at the marine dispensing area:

“Before Fueling:

- (1) Stop all engines and auxiliaries.
- (2) Shut off all electricity, open flames, and heat sources.
- (3) Check all bilges for fuel vapors.
- (4) Extinguish all smoking materials.
- (5) Close access fittings and openings that could allow fuel vapors to enter enclosed spaces of the vessel.

During Fueling:

- (1) Maintain nozzle contact with fill pipe.
- (2) Wipe up spills immediately.
- (3) Avoid overfilling.
- (4) Fuel filling nozzle must be attended at all times.

After Fueling:

- (1) Inspect bilges for leakage and fuel odors.
- (2) Ventilate until odors are removed.”

Recommended Corrective Action:

Ensure that a sign with the following legends printed in 50-millimeter (2-inch) red capital letters on a white background shall be conspicuously posted at the marine dispensing area:

“Before Fueling:

- (1) Stop all engines and auxiliaries.
- (2) Shut off all electricity, open flames, and heat sources.
- (3) Check all bilges for fuel vapors.
- (4) Extinguish all smoking materials.
- (5) Close access fittings and openings that could allow fuel vapors to enter enclosed spaces of the vessel.

During Fueling:

- (1) Maintain nozzle contact with fill pipe.
- (2) Wipe up spills immediately.
- (3) Avoid overfilling.

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(4) Fuel filling nozzle must be attended at all times.

After Fueling:

(1) Inspect bilges for leakage and fuel odors.

(2) Ventilate until odors are removed.“

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Audit Finding Notes

None

Recommended Corrective Action Notes

None

III. Best Management Practices (BMPs)

These BMPs are good business practices.
Concessioners are not required but are encouraged to address these BMPs, as appropriate.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-053-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	40 CFR 82.161(a)
Topic Area:	CFC and Halon Management
Photo Number:	None

Best Management Practice (BMP):

As a BMP, consider obtaining a copy of the Environmental Protection Agency (EPA) technician certification for individuals who repair, maintain, or evacuate ozone-depleting substance (ODS)-containing equipment and maintain this certification in files.

Consider documenting an ODS management policy that includes the following:

- Only technicians who have been certified through an EPA-approved certification program will repair and maintain ODS-containing equipment;
- Only properly certified and labeled equipment will be used for repair and maintenance work on ODS-containing equipment; and
- All service records describing repair and maintenance work and disposal records for ODS-containing equipment will be maintained to document that ODS-containing equipment has been properly disposed.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Concessioner ODS-containing equipment included a commercial refrigerator and freezer in Pappy's Restaurant as well as smaller refrigerators in the Elk Creek and Lake Fort marina stores. None of the ODS-containing equipment contained greater than 50 pounds of refrigerant. The refrigerator in Pappy's Restaurant contained 7 pounds of R-22 refrigerant. The freezer in Pappy's Restaurant contained 8 pounds of R 404A refrigerant.

Concessioner staff utilized West Elk Appliance to service all of its ODS-containing equipment.

Chlorofluorocarbons (CFCs) are chemicals that have been identified as stratospheric ODSs.

Excerpt from the regulation:

"Certified equipment is a statement signed by the owner of the equipment or another responsible owner and setting forth

- (1) The name and address of the purchaser of the equipment, including the county name;
- (2) The name and address of the establishment where each piece of equipment is or will be located;
- (3) The number of service trucks (or other vehicles) used to transport technicians and equipment between the establishment and job sites and the field;
- (4) The manufacturer name, the date of manufacture, and if applicable, the model and serial number of the equipment; and
- (5) The certification must also include a statement that the equipment will be properly used in servicing or disposing of appliances and that the information given is true and correct."

Technicians servicing equipment containing ODSs must be trained and certified by an EPA-approved technician certification program for the type of equipment they are servicing (e.g., small appliance, high pressure, low pressure).

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CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-054-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	General
Topic Area:	Environmental Management Systems
Photo Number:	None

Best Management Practice (BMP):

As a BMP, consider communicating environmental messages to Park guests. For example:

- Require all slipholders to sign a form prohibiting them from washing their boats or performing any maintenance that may generate used oil while docked at the marina or while out on the lake;
- Post emergency phone numbers and location of nearest phone on the sewage pump-out tank located at the Elk Creek Marina; and
- Post a sign asking marina users to take their recyclable items home for recycle.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

None

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CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-055-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	NPS Concession Environmental Management Program
Topic Area:	Environmental Purchasing
Photo Number:	None

Best Management Practice (BMP):

As a BMP, consider identifying and implementing additional opportunities to expand the types of environmentally preferable items purchased where economically feasible and appropriate. These environmentally preferable products could include, but are not limited to:

- Green-tip fluorescent bulbs;
- Propylene glycol antifreeze for Concessioner vehicles;
- Lead-free fishing sinkers (made out of steel, tungsten-nickel alloy, tin, etc.);
- Re-refined motor oil and retread tires for vehicles;
- Carpet made of recycled content and/or carpet squares for all carpeted areas (as carpet needs replacing);
- Organic, shade grown, or fair trade certified coffee;
- Additional organic and/or locally produced food;
- Disposable bowls, plates, and cups that are made of unbleached paper or are easily biodegradable;
- Bulk condiments for the restaurant;
- Sheets and towels for guest rooms that are made of organic or recycled cotton;
- Unbleached or easily biodegradable disposable cups for guest rooms; and
- Retail bags, paper napkins, and post cards that contain post-consumer recycled content.

Document environmentally preferable purchases so that performance can be tracked against internally set goals. As appropriate, document research and/or decisions that demonstrate why certain environmentally preferable products were not purchased.

Educate visitors on environmentally preferable products used throughout Concessioner facilities via signs, posters, Concessioner employees, and other means.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

No environmental purchasing program was in place. The purchase of environmentally preferable material was minimal.

In identifying and implementing opportunities to expand the types of environmentally preferable products purchased, several criteria should be considered:

- Whether the environmentally preferable products are economically feasible, appropriate, and consistent with the mission and/or merchandise themes of the Park; and
- Whether the environmentally preferable products could be replaced incrementally as maintenance and service warrant or as part of a comprehensive retrofit.

It is understood that all elements in the BMP may not be implemented if they are not economically or technically feasible. However, the Concessioner should demonstrate that goals are in place to ensure that:

- Products that will improve the Concessioner's environmental purchasing efforts will be considered for purchase; and

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- Strategies that will improve the Concessioner's environmental purchasing efforts will be considered for implementation.

Using POST-consumer recycled materials is better for the environment than using PRE-consumer recycled materials since it helps close the consumer recycling "loop."

CURRENT CONCESSIONER PRACTICES:

Current environmentally preferable items being used included the following:

- Concessioner used propylene glycol antifreeze;
- Button-operated electric dryers and motion sensitive faucets were in place at the shower facilities in Elk Creek and Lake Fork;
- Office paper with 30% post-consumer material was observed at the Elk Creek Retail Store Office;
- A few biodegradable towel and bath tissue rolls were available at the retail stores at Elk Creek and Lake Fork; and
- Ketchup and mustard were served in bulk containers at Pappy's Restaurant.

The Concessioner had already researched some environmental purchasing opportunities proposed in this audit finding including:

- Office papers;
- Bath tissue;
- Paper towel; and
- Detergents.

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CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-056-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	BMP based on 29 CFR 1910.106(e)(9)(i)
Topic Area:	Hazardous Materials Management
Photo Number:	None

Best Management Practice (BMP):

As a BMP, consider moving flammable storage cabinets indoors during the off-season. Chemicals were stored in uncontrolled conditions at the facility during winter. Specifically, flammable storage cabinets (e.g., Elk Creek marina) were located outside throughout the year in extreme temperatures.

Examples of items stored in flammable storage cabinets included Rust Stop and oil.

Assistance Resources:

None

Notes:

The facility is located in a area that is exposed to harsh weather conditions in winter. No inspection of the facility was conducted during this time. Freezing, thawing, and heating of containers and chemicals may cause breakage and spill.

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CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-057-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	BMP related to 29 CFR 1910.106 (e)(9)(i)
Topic Area:	Hazardous Materials Management
Photo Number:	CURE001-05-2007-P013

Best Management Practice (BMP):

As a BMP, consider establishing procedures by which containers of hazardous chemicals are stored properly and are used within a reasonable period of time so as to minimize the occurrence of leaks resulting from old containers.

Clean up the spills from the chemicals. Develop Standard Operating Procedures to clean up minor spills which occur during storage and operations, and train employees on the procedures.

Assistance Resources:

None

Notes:

Containers of hazardous chemicals were found leaking or stored improperly. For example, an antifreeze container was found leaking in a flammable storage cabinet located in the maintenance yard. Additionally, several paint containers were found improperly stored on their sides in the same flammable storage cabinet.

Storage of flammable and hazardous materials, as well as solvents and oil products, on the floor poses a risk of spilling. Also, storing containers in a position other than upright also poses a risk of the contents spilling. The proximity of the facilities to water sources increases the possible impact of such spills significantly.

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CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-058-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	NPS Concession Environmental Management Program
Topic Area:	Hazardous Materials Management
Photo Number:	CURE001-05-2007-P015

Best Management Practice (BMP):

As a BMP, consider storing all flammable materials in flammable storage cabinets, and store all hazardous chemicals either in a location that is not directly over water, or consider purchasing plastic tubs and storing the items in the plastic tubs. If a hazardous chemical should leak, the liquid would be captured in the plastic tub rather than fall onto the floor and potentially leak into the lake.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Hazardous chemicals and flammable materials were found stored in both marina stores over water.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-059-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	NPS Concession Environmental Management Program
Topic Area:	Hazardous Materials Management
Photo Number:	CURE001-05-2007-P006

Best Management Practice (BMP):

As a BMP, consider removing items stored directly around and on top of the aboveground storage tank (AST) located at Lake Fork. Specifically, relocate all items that present a barrier to gaining access to the tank including removing all wood items from around the tank.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Currently, there were several items on top of and laying directly next to the AST. These included a wooden picnic bench, a sheet of plywood, a plastic cooler, a chair, one flammable storage cabinet, and one general storage cabinet.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-060-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	NPS Environmental Audit Program Operating Guide
Topic Area:	Hazardous Materials Management
Photo Number:	None

Best Management Practice (BMP):

As a BMP, consider maintaining records that track the amount of used cooking oil donated to local organizations.

Assistance Resources:

None

Notes:

Documentation was not available on the quantity of used cooking oil donated to a local resident.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-061-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	NPS Environmental Audit Program Operating Guide
Topic Area:	Hazardous Waste
Photo Number:	None

Best Management Practice (BMP):

As a BMP, maintain a monthly hazardous waste generation log to track monthly generation of hazardous waste and to help ensure the Concessioner does not exceed Colorado conditionally exempt small quantity generator (CESQG) monthly hazardous waste generation rates (100 kilograms or 220 pounds) and does not accumulate on-site more than 1,000 kilograms or 2,200 pounds at any one time.

Communicate with employees that any hazardous waste placed in the hazardous waste storage containers should be logged.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

It was observed that the flammable cabinet at the maintenance yard stored a significant number of chemical containers. It was reported by the Concessioner during the audit that most of these containers were left by the previous Concessioner, and they were going to be disposed of. If the chemicals are not in use, they are considered waste. The Concessioner should determine which chemicals are going to be disposed of. The Concessioner should also determine the characteristic of the wastes according to their hazard level. In addition to the unused or leftover material, waste Safety Kleen solvents, soiled absorbent pads, and waste paint and thinner are some of the wastes to be considered during characterization.

Using the data obtained from characterization and tracking, develop pollution prevention strategies to minimize waste. Product substitution and process modification are two of the strategies to consider for reducing waste.

The Concessioner could not confirm that it was a CESQG of hazardous waste under Colorado regulations. The Concessioner stated in the audit questionnaire that it was a CESQG by generating less than 220 pounds (100 kilograms) of hazardous waste per month.

The Concessioner would be considered a CESQC if they generate 100 kilograms (220 pounds) or less of hazardous waste in one month. If the Concessioner generates more than 100 kilograms of hazardous waste per month [up to 1,000 kilograms (2,220 pounds)], they would be considered a small quantity generator. If the Concessioner generates more than 1,000 kilograms per month, they would be considered a large quantity generator.

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CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-062-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	BMP based on 40 CFR 273.13
Topic Area:	Universal Waste Management
Photo Number:	CURE001-05-2007-P016

Best Management Practice (BMP):

As a BMP, manage lamps in a way that prevents releases:

- Purchase green tip fluorescent lamps, which contain less mercury compared to the lamps currently in use (note: although green tip lamps have less mercury, they should still be recycled);
- Store used lamps in containers that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Containers must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions; and
- Immediately clean up and place in a container any lamp that is broken or any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps and must lack evidence of leakage, spillage, or damage. Properly dispose of any broken mercury-containing lamp via hazardous waste disposal.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Universal waste lamps were managed in a way that increased the risk of breakage and release of mercury to the environment. For example, used fluorescent lamps were stored in Pappy's Restaurant stockroom on wooden rafters with a plastic bag filled with items on top of the used lamps.

The Concessioner stated in the audit questionnaire that it was a conditionally exempt small quantity generator (CESQG) by generating less than 220 pounds of hazardous waste per month, making this audit finding a best management practice. If the Concessioner generated greater than 220 pounds of hazardous waste per month, its generator status would change to a small quantity generator (SQG), upgrading the audit finding to a Priority 2 since it would be a small quantity handler (SQH) of universal waste.

The term "universal waste lamps," as used in this audit finding, refers to the definition described in 40 CFR 273. Examples of common universal waste lamps include, but are not limited to fluorescent, high intensity discharge (HID), neon, mercury vapor, high pressure sodium, and metal halide lamps that are hazardous wastes.

The "Universal Waste Rule" was designed to reduce the amount of hazardous waste items in the municipal solid waste stream, encourage recycling and proper disposal of certain common hazardous wastes, and reduce the regulatory burden on businesses that generate these wastes. These "universal wastes" include batteries [such as nickel-cadmium (Ni-Cad) and small sealed lead acid batteries, but not alkaline batteries], mercury-containing thermostats, mercury-containing lamps (such as fluorescent, HID, neon, mercury vapor, high pressure sodium, and metal halide lamps), and agricultural pesticides. Certain states may also classify additional hazardous wastes as "universal wastes."

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-063-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	BMP based on 40 CFR 273.14
Topic Area:	Universal Waste Management
Photo Number:	CURE001-05-2007-P017

Best Management Practice (BMP):

As a BMP, clearly label or mark universal waste batteries (i.e., each battery) or a container in which the batteries are contained with any one of the following phrases: "Universal Waste -- Battery(ies), or "Waste Battery(ies)," or "Used Battery(ies)".

Clearly label or mark each universal waste lamp or a container or package in which such lamps are contained with one of the following phrases: "Universal Waste -- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".

Assistance Resources:

None

Notes:

Universal wastes were not labeled or marked. For example:

- Unused batteries accumulated in a black storage cabinet at the maintenance yard did not have a label or sign indicating the contents; and
- Used fluorescent lamps were not labeled or provided with signage to indicate the storage of multiple lamps in one container or area.

Provide similar labeling, as required by regulation, for other universal wastes that may be generated at the location (e.g., mercury-containing high intensity discharge lamps, nickel-cadmium batteries) [40 CFR 273.14(a) and (d)].

The Concessioner stated in the audit questionnaire that it was a conditionally exempt small quantity generator (CESQG) by generating less than 220 pounds of hazardous waste per month, making this audit finding a best management practice. If the Concessioner generated greater than 220 pounds of hazardous waste per month, its generator status would change to a small quantity generator (SQG), upgrading the audit finding to a Priority 2 since it would be a small quantity handler (SQH) of universal waste.

The term "universal waste lamps," as used in this audit finding, refers to the definition described in 40 CFR 273. Examples of common universal waste lamps include, but are not limited to fluorescent, high intensity discharge (HID), neon, mercury vapor, high pressure sodium, and metal halide lamps that are hazardous wastes.

The "Universal Waste Rule" was designed to reduce the amount of hazardous waste items in the municipal solid waste stream, encourage recycling and proper disposal of certain common hazardous wastes, and reduce the regulatory burden on businesses that generate these wastes. These "universal wastes" include batteries [such as nickel-cadmium (Ni-Cad) and small sealed lead acid batteries, but not alkaline batteries], mercury-containing thermostats, mercury-containing lamps (such as fluorescent, HID, neon, mercury vapor, high pressure sodium, and metal halide lamps), and agricultural pesticides. Certain states may also classify additional hazardous wastes as "universal wastes."

Universal waste batteries were taken off-site by Interstate Battery.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-064-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	BMP based on 40 CFR 273.16
Topic Area:	Universal Waste Management
Photo Number:	None

Best Management Practice (BMP):

As a BMP, provide all employees who handle or have responsibility for managing universal waste with information that describes proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.

Transfer used batteries to the maintenance yard and store properly until they are picked up by Interstate Battery.

Assistance Resources:

None

Notes:

All Concessioner employees who handled or had responsibility for managing universal wastes were not provided with information that described proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility. For example, employees were not provided with information on how to clean-up a spill from:

- A broken fluorescent lamp; and
- A leaking battery.

The Concessioner stated in the audit questionnaire that it was a conditionally exempt small quantity generator (CESQG) by generating less than 220 pounds of hazardous waste per month, making this audit finding a best management practice. If the Concessioner generated greater than 220 pounds of hazardous waste per month, its generator status would change to a small quantity generator (SQG), upgrading the audit finding to a Priority 2 since it would be a small quantity handler (SQH) of universal waste.

The term "universal waste lamps," as used in this audit finding, refers to the definition described in 40 CFR 273. Examples of common universal waste lamps include, but are not limited to fluorescent, high intensity discharge (HID), neon, mercury vapor, high pressure sodium, and metal halide lamps that are hazardous wastes.

The "Universal Waste Rule" was designed to reduce the amount of hazardous waste items in the municipal solid waste stream, encourage recycling and proper disposal of certain common hazardous wastes, and reduce the regulatory burden on businesses that generate these wastes. These "universal wastes" include batteries [such as nickel-cadmium (Ni-Cad) and small sealed lead acid batteries, but not alkaline batteries], mercury-containing thermostats, mercury-containing lamps (such as fluorescent, HID, neon, mercury vapor, high pressure sodium, and metal halide lamps), and agricultural pesticides. Certain states may also classify additional hazardous wastes as "universal wastes."

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-065-BMP
Time and Resources to Implement:	Best Management Practice - Potentially Low
BMP Source:	BMP based on 40 CFR 261.6(a)(3)
Topic Area:	Used Oil
Photo Number:	None

Best Management Practice (BMP):

As a BMP, consider recycling all used oil filters (i.e., terne-plated and non terne-plated).

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Due to limited recycling facilities in the area, the Concessioner was currently disposing of all used oil filters in the general trash.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-066-BMP
Time and Resources to Implement:	Best Management Practice - Potentially High
BMP Source:	Food Service Facilities Model Shop Report, Air Force Center for Environmental Excellence
Topic Area:	Food Service
Photo Number:	None

Best Management Practice (BMP):

As a BMP, consider investigating the feasibility of starting a composting operation for Pappy's Restaurant's food and green wastes. Implement if feasible.

If on-site composting is not possible, research opportunities to partner with local or state businesses and agencies to conduct composting.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Concessioner staff did not compost food waste. Food waste was disposed of in the regular trash.

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

BMP Number:	CURE001-05-2007-067-BMP
Time and Resources to Implement:	Best Management Practice - Potentially High
BMP Source:	NPS Concession Environmental Management Program
Topic Area:	Retail Operations
Photo Number:	None

Best Management Practice (BMP):

As a BMP, consider if technically and economically feasible, printing environmental education messages on bags given to Park visitors to hold purchases. Some environmental messages that could be printed on the bags include, but are not limited to:

- "Please use this bag to carry your trash."
- Park and environmental facts and stories.

Assistance Resources:

None identified - refer to the GreenLine CD.

Notes:

Currently, Concessioner staff issued either a plastic white bag or a brown paper bag. Both bags did not have any wording printed on the bags.

Concessioner staff indicated that bags are provided to guests only for multiple item purchases or when guests ask for a bag.

IV. Exceptional Practices

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Recreation Resource Management, Inc.

CURE001

Curecanti National Recreation Area

The Concession Environmental Management Program (CoEMP) recognized that there were a number of best management practices (BMPs) adopted and implemented by this concessioner. Although the Audit Team observed a number of BMPs during the site visit, not all of the practices observed rose to the level of an "exceptional practice."

The criteria used to identify an exceptional practice are:

- The practice is exemplary and not consistently adopted or applied by other concessioner operations; and
- The practice is not required by Applicable Laws. Applicable Laws, as defined under the Standard Concession Contract, are "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.

Based upon these criteria, no exceptional practices were recorded during the environmental audit of this concessioner. However, BMPs adopted and implemented by the concessioner are recorded and recognized in the "Finding Notes" field under individual audit findings, as applicable.

V. Photos

Preliminary Environmental Audit Report – June 26, 2007
Recreation Resource Management (CURE001)
Curecanti National Recreation Area

Photo: CURE001-05-2007-P001

**Audit Finding Number or
BMP Number:** CURE001-05-2007-017



Photo: CURE001-05-2007-P002

**Audit Finding Number or
BMP Number:** CURE001-05-2007-018



Photo: CURE001-05-2007-P003

**Audit Finding Number or
BMP Number:** CURE001-05-2007-019



Photo: CURE001-05-2007-P004

**Audit Finding Number or
BMP Number:** CURE001-05-2007-029



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Photo: CURE001-05-2007-P005

**Audit Finding Number or
BMP Number:** CURE001-05-2007-031



Photo: CURE001-05-2007-P006

**Audit Finding Number or
BMP Number:** CURE001-05-2007-032
CURE001-05-2007-056



Photo: CURE001-05-2007-P007

**Audit Finding Number or
BMP Number:** CURE001-05-2007-038



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Recreation Resource Management (CURE001)

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Photo: CURE001-05-2007-P008

**Audit Finding Number or
BMP Number:** CURE001-05-2007-039



Photo: CURE001-05-2007-P009

**Audit Finding Number or
BMP Number:** CURE001-05-2007-041



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Photo: CURE001-05-2007-P010

**Audit Finding Number or
BMP Number:** CURE001-05-2007-042



Photo: CURE001-05-2007-P011

**Audit Finding Number or
BMP Number:** CURE001-05-2007-043



Photo: CURE001-05-2007-P012

**Audit Finding Number or
BMP Number:** CURE001-05-2007-045



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Photo: CURE001-05-2007-P013

**Audit Finding Number or
BMP Number:** CURE001-05-2007-047
CURE001-05-2007-059



Photo: CURE001-05-2007-P014

**Audit Finding Number or
BMP Number:** CURE001-05-2007-050



Photo: CURE001-05-2007-P015

**Audit Finding Number or
BMP Number:** CURE001-05-2007-057



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Photo: CURE001-05-2007-P016

**Audit Finding Number or
BMP Number:** CURE001-05-2007-062



Photo: CURE001-05-2007-P017

**Audit Finding Number or
BMP Number:** CURE001-05-2007-063

