STEAMTOWN NATIONAL HISTORIC SITE ENVIRONMENTAL MANAGEMENT PLAN

December, 2006 Revision



Date of Plan: January 1, 2006

Steamtown National Historic Site Environmental Management Plan (EMP)

January 1, 2006

Steamtown National Historic Site (STEA) Environmental Management Plan documents the park's Environmental Management System. The Plan's development and revision history and distribution list are as follows:

- 1. The current version was prepared in January 1, 2006 and represents the first draft of the EMP.
- 2. The Plan will be reviewed annually by the Environmental Management Team (EMT).
- 3. The Plan is distributed to the members of the EMT and to the Superintendent.
- 4. Previous hard copy versions of the Plan are returned to the EMT and recycled. Previous electronic copies of the EMP are deleted.

Prepared by: STEA Environmental Management Team

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Approved by:		Date:	
	Superintendent		

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INTRODUCTION TO THE STEAMTOWN NATIONAL HISTORIC SITES ENVIRONMENTAL MANAGEMENT PLAN

- 1) This Plan describes the Environmental Management System (EMS) in place at Steamtown National Historic Site (STEA).
- 2) The STEA EMS includes all eight Elements of the Model National Park Service EMS and conforms to the minimum requirements contained therein.
- 3) The Plan documents the overall EMS activities and the current EMS targets. Sections 2 and 3 describe the process followed to choose the current year's targets.
- 4) Each section contains the following sections: Purpose; Scope; Procedure; Responsibilities; Appendix; and Related Documentation and Records.

SECTION 1 ENVIRONMENTAL COMMITMENT STATEMENT (ECS)

Purpose

The purpose of this section is to describe the scope of the Environmental Commitment Statement (ECS), the procedure used to develop and distribute it, and responsible parties. Included is the latest edition of our ECS.

Scope

The ECS governs the EMS activities at STEA.

Procedure

- 1. The ECS is prepared by the STEA Environmental Management Team (EMT). The ECS is signed by the Superintendent and has the full commitment of STEA management. (Section 4 of this EMS Manual contains a list of EMT members and their contact information).
- 2. The ECS is communicated to all personnel at STEA. The communication process is described in Section 6 of this Manual.
- 3. The guidelines of Element A of the Model NPS EMS have been followed in preparing the ECS. Those guidelines are considered in determining how the EMS can enhance environmental management activities at the park.
- 4. In addition to the procedures described in Section 5, a copy of the ECS is posted at key locations throughout the park (including all visitor centers and the park headquarters building). A copy of the ECS is provided in the appendix to this section.

Responsibilities

- 1. The EMT reviews the ECS annually to ensure that it is current and fully expresses the park's environmental management priorities.
- 2. The Superintendent reviews any new version of the ECS.
- 3. The Superintendent signs the current final version of the ECS to demonstrate his or her management commitment and provides a signed copy to the EMT.
- 4. The EMT posts the ECS on the park web site and on employee bulletin boards.

STEA EMS	Date of Original Doc:	Revision Date:	Revision No.
Document Control System	11/07/2005	11/07/2005	1
Doc Name: Environmental	Document Number:	Prepared By:	Approved By:
Commitment Statement	STEA-EMS-001	Mark A. Brennan	Harold "Kip" Hagen

STEAMTOWN NATIONAL HISTORIC SITE

ENVIRONMENTAL COMMITMENT STATEMENT

The purpose of Steamtown National Historic Site is to preserve and use the site and collection of rail-related artifacts to further public understanding and appreciation of the role that steam railroading and related developments had on the history of America. As the steward of this diverse and special mission, our goal is to become a leader in protecting the park's environment. Therefore, Steamtown National Historic Site will:

- Comply with all applicable Federal, State, and local environmental laws, regulations, Executive Orders, and Department of the Interior environmental policies;
- Integrate and implement environmentally sensitive Best Management Practices including pollution prevention into all of our operations;
- Consider the environmental impacts in planning, purchasing and operating decisions;
- Provide environmental training and educate our staff on how to comply with environmental laws and be environmentally responsible on and off the job;
- Assign clear responsibility to our staff for environmental activities and hold them accountable for their environmental performance, recognizing superior effort when it is demonstrated;
- Seek opportunities to promote environmental compliance and stewardship to the visitors and neighboring communities we serve;

	ompliance performance regularly at both operational and and implement opportunities for environmental usiness.
Superintendent Steamtown National Historic	

SECTION 2 FACILITY ACTIVITIES AND ENVIRONMENTAL IMPACTS

Purpose

This section contains the procedures followed to assess the facility activities and environmental impacts. Additional procedures included in this section describe how those activities and impacts are ranked to determine which are significant to the environment at STEA. An understanding of these facility activities and environmental impacts is important in determining the focus of the EMS, and where positive change in environmental management can be expected.

Scope

All activities that occur at STEA (including the Lackawanna County Trolley Museum, Eastern National Museum Store, the K-4 Locomotive Project and any other third partie, contractors, and concessionaires are subject to assessment.

Procedure

- 1. The EMT annually reviews STEA facilities and operations including, but not limited to: current activities and impacts; environmental compliance requirements stemming from all applicable laws, regulations, and policies including open audit findings; NPS, WASO and regional goals; and other objectives and direction, including those established by DOI. Activities are also reviewed in light of the park's mission, the ECS, recent performance results, and input from park partners.
- 2. The park EMT completes an interactions and impacts analysis. In assessing these interactions, a scoring system is used to determine the most significant impacts to the park and therefore potential areas of focus in the EMS.
- 3. Interactions, impacts, legal, and other requirements are reviewed on an annual basis, in conjunction with the senior management review, to determine if there are any changes that should be reflected in the EMS.

Responsibilities

- 1. It is the responsibility of the EMT to conduct the facility activities and environmental impacts assessment.
- 2. The EMT summarizes the assessment and briefs park management on its content and proposed goals, objectives and targets.
- 3. The results of the assessment are included in the appendix to this section of the Manual.

4. The EMT briefs park management upon achievement of specific EMS targets.

5. Appendix

This appendix contains two documents.

Facility Interaction Assessment.

STEA EMS	Date of Original Doc:	Revision Date:	Revision No.
Document Control System	11/07/2005	11/07/2005	1
Doc Name: Facility Interaction	Document Number:	Prepared By:	Approved By:
Assessment	STEA-EMS-002	Mark A. Brennan	Harold "Kip"
			Hagen

Facility Interaction Assessment

Facility Activity	Interaction(s)	Impact(s)
1. Administrative Facility Operations (offices, storage areas, etc.) 1. Office Storage Building 2. Maintenance of Way Building 3. Locomotive Shop & Roundhouse 4. Visitor Center 5. History Museum 6. Technology Museum 7. Theater 8. Museum Store 9. Trolley Museum 10. K-4 Project	Staff uses electricity, fuel, water (e.g., restrooms) and a variety of consumable products. This generates wastewater and solid, universal, and occasionally hazardous wastes.	Consumptive use of power, water and raw materials. Wastes generated create disposal costs and environmental risks (water or air pollution) if not handled and disposed of properly.
2. Building Maintenance (Carpentry, electrical, flooring, roofing, painting, plumbing, etc.) All areas.	Building maintenance activities use electricity, water, fuel, raw materials and chemical products. This generates solid, universal, and hazardous wastes.	Consumptive use of raw materials, power, fuel, and water. Use of chemical products and generation of wastes contribute to employee health and safety risks. Wastes generated create disposal costs and environmental risks (water or air pollution) if not handled and disposed of properly.

Facility Activity	Interaction(s)	Impact(s)
3. Custodial	Cleaning park facilities	Consumptive use of power,
All Buildings	uses electricity, fuel, water	fuel, water and raw
	and a variety of chemical	materials. Wastes generated
	products and generates	create disposal costs and
	wastewater, solid wastes	environmental risks (water
	and hazardous wastes.	or air pollution) if not
		handled and disposed of
		properly.
4.	Park LE staff use toxic	Consumptive use of raw
Firearms Management	substances (lead bullets)	materials. Deposition of lead
	and other products. This	in soil creates disposal costs
	generates solid and	and storm water, water and
	hazardous wastes.	hazardous waste concerns if
		not handled and disposed of
_	G. 60	properly.
5.	Staff use gasoline and	Consumptive use of raw
Fuel Use & Storage	diesel fuel to operate	materials and chemical
(propane, acetylene,	vehicles, equipment and	products. Spills, leaks, or
natural gas, gasoline,	locomotives.	fire can cause water, soil,
kerosene and diesel fuel)		and/or air pollution
	CA CC	concerns.
6. Hazardous Waste	Staff generate, handle, and store hazardous waste	Proper hazardous waste
		disposal is labor intensive
Management	at several designated accumulation sites and	and costly. Leaks, spills, or
	additional satellite	fire can cause water, soil, and air pollution concerns.
	accumulation sites. Park	Hazardous waste that is
	staff also handles	illegally dumped on
	hazardous waste that is	parkland is difficult to
	illegally dumped on	reduce or eliminate, often
	parkland.	involve unknown substances,
	pur munu.	and can cause water, soil,
		and/or air pollution.
7.	Staff purchase and use a	Consumptive use of
Procurement and	wide variety of products	electricity, fuel, water and
Purchasing	and equipment that use	raw materials. Supplies,
	electricity, water, fuel,	materials and equipment
	chemical substances and	constitute a major operating
	raw materials. This	cost, so life span and
	generates solid and	efficiency of products
	hazardous wastes.	purchased has significant
		budgetary implications.

Facility Activity	Interaction(s)	Impact(s)
8. Property Management & Disposal (vehicles, computers, etc.)	Park staff store excess, obsolete, or unserviceable property and equipment, often outdoors, pending disposal. (Note: <u>Use</u> of property & equipment is covered under other categories.)	Storage of old property, and equipment creates opportunities for spills and leaks. Disposal costs the park operating dollars and generates solid and hazardous wastes.
9. Real Property Disposal & Demolition	The park has a significant number of obsolete, abandoned structures and rolling stock which contain chemical or toxic substances that could otherwise be restored. Documenting and removing these structures is a tedious and costly proposition.	Benign neglect of abandoned structures and rolling stock may allow release of toxic substances into the environment. Vandalism or fire, as well as planned demolition of abandoned structures create public safety, air quality, wastewater, storm water, solid wastes, and hazardous wastes concerns.
10. Roads, Trails, Tracks, Parking Lots, & Grounds	The park operates and maintains 10 miles of roads and 7 miles of tracks, and grounds. Employees use and install a variety of substances and materials, mow lawns, repair tracks, and maintain drainage-control.	Consumptive use of fuel, electricity, water and raw materials; use of chemical or toxic substances can create storm water runoff issues; and generate solid and hazardous wastes. Spills & leaks can cause water, soil, and air pollution concerns.
11. Solid & Universal Waste Management	The park operation generates solid and universal wastes. Park visitors contribute a significant volume of solid waste to the park wastes stream. Park staff store and dispose of solid and universal wastes.	Proper handling and disposal is labor intensive and costly. Leaks, spills, or fire can cause water, soil, and air pollution concerns.

Facility Activity	Interaction(s)	Impact(s)
12.	Operation of park utility	Consumptive use of raw
Utility Systems (water, gas, electric, telephone, etc.)	systems uses electricity, water, fuel, raw materials and chemical products. These activities generate air emissions, wastewater, storm water, solid, universal, and hazardous wastes.	materials, power, fuel, and water. Use of chemical products and generation of wastes contribute to employee health and safety risks. Wastes generated create disposal costs / environmental risks (water or air pollution) if not handled and disposed of properly. Spills & leaks can cause water, soil, and air pollution concerns.
13. Vehicle & Equipment Use & Maintenance	Operation and maintenance of on and off road motorized vehicles, steam and diesel locomotives & equipment uses fuel, electricity, water, chemical substances, and raw materials. These activities generate air emissions, wastewater, solid wastes, and hazardous wastes.	Consumptive use of fuel, electricity, water and raw materials. Use of chemical products and generation of wastes contribute to employee health and safety as well as environmental risks. Wastes generated create disposal costs / environmental risks (water or air pollution) if not handled and disposed of properly. Spills & leaks can cause water, soil, and air pollution concerns.
14. Electrical Energy Use	Staff (and visitors) use electrical energy for lighting, heating, air conditioning, pumping water, operating appliances and power tools, among other things.	Consumptive use of electrical energy and raw materials used to generate electrical energy; generation of air emissions at power stations has impacts upon the air, land, and water; power distribution infrastructure has a visual impact upon landscapes, land values, and alternative use impacts (e.g., rights-of-way).

Impact Assessment and Scoring

STEA EMS	Date of Original Doc:	Revision Date:	Revision No.
Document Control System	11/07/2005	11/07/2005	1
Doc Name: Impact Assessment &	Document Number:	Prepared By:	Approved By:
Scoring	STEA-EMS-003	Mark A. Brennan	Harold "Kip"
_			Hagen

Records

The following components make up the interactions and impacts *Analysis Ranking System*.

Each facility activity is assessed and based upon a summation of the following criteria, is deemed significant or not. Activities that received a score or 9 or higher will be given initial priority for the development of Environmental Management Plan objectives.

A ranking score is assigned to each impact based on the following four criteria:

- A. <u>Severity:</u> What is the severity of the impact?
- 1. Minimal severity or aesthetic impact only
- 2. Moderate impact to water, air or land quality
- 3. Substantial impact to water, air or land quality or detrimental to human health, or flora and fauna
 - B. <u>Frequency:</u> What is the overall frequency or probability of the impacts occurring?
- 1. Low frequency/less than once a year
- 2. Moderate frequency/more than once a year and less than once a month
- 3. High frequency/monthly or more frequent
 - C. Financial: What is the overall economic effect of correcting the impact?
- 1. Correcting the impact is likely to save the park money with a payback
- 2. Associated costs are negligible or modest
- 3. Correcting the impact is likely to be prohibitively expensive
 - D. <u>Stakeholders:</u> How would stakeholders react to, or be affected by, the impact?
- 1. Neutral or disinterested
- 2. Mildly concerned
- 3. Greatly concerned

Once ranking scores have been assigned, the rows are added up. Activities that received a score or 9 or higher can be considered significant impacts worthy of addressing through the EMS.

Impact Assessment and Scoring

Facility Activity	Severity	Frequency	Financial	Stakeholder	Total
1. Administrative					
Facility Operations					
2. Building Maintenance					
3. Concessioners and					
Permittees					
4. Custodial					
5. Firearms					
Management					
6. Fuel Use & Storage					
7. Hazardous Waste					
Management					
8. Procurement &					
Purchasing					
9. Property					
Management &					
Disposal					
10. Real Property					
Disposal & Demolition					
11. Roads, Trails,					
Tracks, Parking Lots &					
Grounds					
12. Solid & Universal					
Wastes					
13. Utility Systems					
14. Vehicle &					
Equipment Use &					
Maintenance					
15. Electrical Power Use					

Related documentation

The parks 2006 Final Environmental Audit Summary Report conducted at STEA provides additional data related to the STEA EMS. Specifically, it identifies opportunity for environmental improvement at STEA that the NPS Audit Program has identified based on a broad set of environmental criteria. These findings are required to be resolved. As such they have also aided in identifying EMS targets:

The items below will be updated when the 2006 audit results are delivered.

- 1. Audit findings 3, 18, 19, 22-29, 44-48 Hazardous Waste Management
- 2. Audit findings 2, 3, 14-17, 20, 21 Hazardous Material Storage
- 3. Audit finding 40, 41 Green Procurement
- 4. Audit finding 32 Solid Waste Management
- 5. Audit finding 36 Energy Management

SECTION 3. GOALS, OBJECTIVES, AND TARGETS

Purpose

To describe the process used by the STEA EMS to choose appropriate goals, objectives and targets for the EMS.

Scope

This section contains a description of how goals, objectives and targets were chosen for the significant impacts previously identified in Section 2.

Goals, objectives, and targets are identified and reviewed during this process to maintain and improve park operations, preserve, conserve, and protect park resources, and demonstrate environmental leadership.

These goals, objectives, and targets are practical, realistic, and provide clear direction for park environmental management activities. Chosen goals, objectives and targets will normally be achieved within the calendar year.

Procedure

- 1. The EMT uses the significant ranking table in Section 2, <u>Facility Activities and Environmental Impacts</u>, to identify those significant impacts to be addressed through the imposition of goals, objectives and targets.
- 2. In addition to 1 above, the EMT uses the list of open environmental audit findings as part of the process to determine appropriate goals, objectives, and targets.
- 3. The goals, objectives and targets are listed in separate tables and included in the appendix to this section. Any information used to substantiate the choice of goals, targets and objectives will be incorporated or referenced in this section.
- 4. The EMT develops an action plan (i.e., targets) for each identified goal and objective. The action plan describes how the specific goals and objectives will be achieved. It details who is responsible for each of the goals and objectives identified, and what resources are available for their achievement. It outlines dates by which these goals and objectives are to be accomplished.
- 5. The EMT will meet at least quarterly to review progress toward the accomplishment of goals, objectives and targets.

Responsibilities

1. The EMT selects the EMS goals, objectives, and targets for the year and establishes an action plan to accomplish them.

2. Appendix

— The appendix contains the following:

Goals, Objectives and Targets (Action Plan)

STEA EMS	Date of Original Doc:	Revision Date:	Revision No.
Document Control System	11/07/2005	11/07/2005	1
Doc Name: Environmental Goals,	Document Number:	Prepared By:	Approved By:
Objectives & Targets Action Plan	STEA-EMS-004	Mark A. Brennan	Harold "Kip" Hagen

Environmental Goals, Objectives & Targets Action Plan FY 2007

Facility Activity: Goals and Tasks	Responsible Party	Existing or New Program Area	Budget	Estimated Level of Effort (time)	Complete Date and Report Due
1. FUEL USE & STORAGE: Goal I: Fully review and revise SPCC and Waste Management Plan.	Mark Birtel	Existing			
Objectives: a. Ensure annual preventive maintenance is performed on major tank leak detection system.	Ralph Coury Mark Birtel	Existing			
b. Conduct and document monthly tank inspections of designated tank.	Ralph Coury Mark Birtel	Existing			
c. Conduct and document bi- annual inspections of designated tanks.	Ralph Coury Mark Birtel	Existing			
d. Maintain records of tank maintenance and inspections.	Ralph Coury Mark Birtel	Existing			

Facility Activity: Goals and Tasks e. Acquire and stage spill equipment at designated locations	Responsible Party Mark Birtel Ralph Coury	Existing or New Program Area Existing	Budget	Estimated Level of Effort (time)	Complete Date and Report Due
2. HAZARDOUS WASTE MANAGEMENT Goal I: Achieve and document full compliance with RCRA requirements. Objectives: a. Update Hazardous Waste Management Plan b. Coordinate and document weekly inspections of hazwaste accumulation sites c. Improve compliance with storage limits and aisle space requirements by scheduling more frequent hazwaste disposal pickups by contractor(s) (i.e., routinely pick up wastes before disposal costs exceed \$2,500 to simplify contracting)	B. Klobucar Ralph Coury B. Klobucar Mark Birtel B. Klobucar Ralph Coury B. Klobucar Ralph Coury	Existing Existing Existing Existing			

		1	T	T	T 1
Facility Activity:	Responsible	Existing or	Budget		Complete
Goals and Tasks	<u>Party</u>	New			Date and
		Program			Report
		Area			<u>Due</u>
		<u> </u>			
d. Simplify & improve park's					
hazwaste labeling & log-in	B. Klobucar				
process					
e. Develop/implement park's					
hazardous waste "cradle to	B. Klobucar				
grave" tracking database	D. Ixiobucai				
grave tracking database					
f Conduct basis ba					
f. Conduct basic hazwaste	EMC III				
training for park staff	EMS Team				
involved in generating,					
handling or storing					
hazwastes.					
Goal II: Reduce the volume					
of hazardous wastes	EMS Team				
generated by 5% over FY 07					
baseline.					
buseinie.					
Objectives:					
Objectives.					
a. Confirm baseline volume					
of hazardous wastes	B. Klobucar				
generated in FY06	Ralph Coury				
	D 771 1				
b. Identify and implement	B. Klobucar				
ways to reduce haz waste	EMS Team				
(e.g., purchases aerosol can					
puncturer, aqueous parts					
washer)					
c. Reduce source of wastes by	EMS Team				
establishing product					
purchasing guidelines (see					
next goal).					
110.11 5041).					

Facility Activity: Goals and Tasks 3. PROCUREMENT & PURCHASING	Responsible Party	Existing or New Program Area	<u>Budget</u>	Estimated Level of Effort (time	Complete Date and Report Due
Goal I: Reduce wastes generated through improved procurement practices.	B. Belotti EMS Team				
Objectives:					
a. Develop Authorized Use List of products approved for purchase and use by park staff	B. Belotti				
b. Conduct employee awareness training on green products	B. Belotti EMS Team				
c. Create a Green Procurement SOP and provide management emphasis to this initiative	B. Belotti				
4. PROPERTY DISPOSAL & DEMOLITION					
Goal I: Reduce/prevent impacts from personal & real property awaiting disposal / demolition.	Walt Kuharchick Mark Birtel				
Objectives:					
a. Develop and implement pre-disposal checklist for old vehicles (draining fluids, etc.)	Walt Kuharchick				
b. Develop and implement checklist/ inspection process for park building and rolling stock units (hazmat removal, etc.)	M. Birtel EMS Team				
c. Establish regular cycle for disposing of excess vehicles	Walt Kuharchick				

Facility Activity: Goals and Tasks	<u>Responsible</u> <u>Party</u>	Existing or New Program Area	<u>Budget</u>	Estimated Level of Effort (time)	Complete Date and Report Due
5. SOLID & UNIVERSAL WASTE MANAGEMENT					
Goal I: Achieve and document compliance with applicable Universal Waste accumulation start date and storage time requirements.	B. Klobucar Ralph Coury				
Objectives:					
a. Consolidate used fluorescent tube waste storage areas	B. Klobucar Ralph Coury				
b. Establish and maintain a Universal Waste compliance & tracking (database)	B. Klobucar EMS Team				
Goal II: Complete new Integrated Solid Waste Alternative Program and begin steps to move toward a "trash free" park	B. Klobucar				
Objectives:	B. Klobucar				
a. Review & Finalize ISWAP	EMS Team				
b. Identity several representative STEA visitor facilities to implement "trash free" programs during the Summer of 2007					

Facility Activity: Goals and Tasks d. Develop Marketing Strategy for "pack it in, pack it out" test cases (signs, slogans, press releases)	Responsible Party Mark Brennan EMS Team	Existing or New Program Area	<u>Budget</u>	Estimated Level of Effort (time	Complete Date and Report Due
6. ELECTRIC ENERGY USE Goal I: Reduce park wide electric energy consumption by 5% in FY 07.	Ralph Coury				
Objectives: a. Review FY05 & FY06 elec. bills to establish baseline of use	Ralph Coury				
b. Review previous energy audits of all park facilities	Ralph Coury				
c. Replace old bulbs w/ compact fluorescent bulbs	Ralph Coury				
d. Install energy saving devices	Ralph Coury				
e. Develop and implement employee energy-savings awareness campaign	Mark Brennan EMS Team				

Related documentation

The following table contains information taken from Executive Order 13123:

Sec. 201. Greenhouse Gases Reduction Goal. Through life-cycle cost-effective energy measures, each agency shall reduce its greenhouse gas emissions attributed to facility energy use by 30 percent by 2010 Compared to such emissions levels in 1990.

Sec. 202. Energy Efficiency Improvement Goals. Through life-cycle cost-effective measures, each agency shall reduce energy consumption per gross square foot of its facilities, excluding facilities covered in section 203 of this order, by 30 percent by 2006 and 40 percent by 2010 relative to 2003.

Sec. 204. Renewable Energy. Each agency shall strive to expand the use of renewable energy within its facilities and in its activities by implementing renewable energy projects and by purchasing electricity from renewable energy sources.

Sec. 205. Petroleum. Through life-cycle cost-effective measures, each agency shall reduce the use of petroleum within its facilities. Agencies may accomplish this reduction by switching to a less greenhouse gas-intensive, non-petroleum energy source, such as natural gas or renewable energy sources; by eliminating unnecessary fuel use; or by other appropriate methods. Where alternative fuels are not practical or life-cycle cost-effective, agencies shall strive to improve the efficiency of their facilities.

Sec. 207. Water Conservation. Through life-cycle cost-effective measures, agencies shall reduce water consumption and associated energy use in their facilities to reach the goals set under section 503(f) of this order. Where possible, water cost savings and associated energy cost savings shall be included in Energy-Savings Performance Contracts and other financing mechanisms.

SECTION 4 ROLES, RESPONSIBILITIES AND ACCOUNTABILITY

Purpose

To assign roles, responsibilities, and accountability to personnel charged with both specific EMS and general environmental management activities within STEA.

Scope

Sound environmental practices, like sound safety practices, are considered everyone's job at STEA. This responsibility is incorporated into all position descriptions as a general performance element on environmental management.

Procedure

- 1. The EMT compiles a detailed listing of all personnel on the EMT.
- 2. The EMT lists all personnel involved with the STEA EMS.
- 3. The EMT completes all associated Manual tables identified in the appendix to this section.
- 4. The roles and responsibilities identified in this section conform to the established personnel system based on relevant documentation.
- 5. The EMT reviews position descriptions and job responsibilities for all personnel. Critical environmental responsibilities are identified and incorporated into position descriptions and annual performance plans for key employees.
- 6. The EMT identifies key roles and responsibilities for appropriate third parties (future concessionaires, contractors, etc.) operating in the park. These roles and responsibilities are incorporated into appropriate contract documents.
- 7. Employees are informed of their designated environmental responsibilities when they start their job. They are made aware of these responsibilities and associated environmental practices at the time of assignment though an initial park orientation training and specific job orientation provided by their supervisors.
- 8. Duties are assessed by supervisors in the course of day-to-day activities. Supervisors are responsible for correcting staff on an ad hoc basis when improper procedures are observed.
- 9. Supervisors are responsible for conducting formal annual performance evaluations for staff under their administration. This performance evaluation considers performance related to the general performance element and job- specific performance requirements in personnel position descriptions, as well as personnel success in meeting EMS goals. Performance is to be measured using Service criteria and procedures.
- 10. Failure to complete designated environmental responsibilities in a satisfactory manner may be grounds for disciplinary action and termination dependant upon the severity and persistence of the behavior, in accordance with Service policies and procedures.

Responsibilities

The EMT updates the tables detailing EMT and other EMS personnel.

Appendix

The appendix contains the following:

A table listing the members of the STEA EMT.

STEA EMS	Date of Original	Revision Date:	Revision No.
Document Control System	Doc: 11/07/2005	11/07/2005	11/07/2005
Doc Name: Environmental	Document	Prepared By:	Approved By:
Management Team	Number:	Mark Brennnan	Harold "Kip"
_	STEA-EMS-005		Hagen

Environmental Management Team

Position	Name	Contact Information
Team Leader	Superintendent	(w) 570-340-5183
	Kip Hagen	(h) 570-226-5167
		(c) 570-241-8150
		Radio Call # 100
		Kip_Hagen@nps.gov
Deputy Team Leader	Law Enforcement	(w) 570-340-5195
	Supervisor	(h) 570-586-8743
	Roger Cleven	(c) 570-466-3976
		Radio Call # 510
		Roger Cleven@nps.gov
Team Member	Chief, Interpretation	(w) 570-340-5244
	Mark A. Brennan	(h) 570-281-3396
		(c) 570-840-1281
		Radio Call #400
		Mark_Brennan@nps.gov
Team Member	Barbara Klobucar	(w) 570-340-5286 or 5250
	Exhibit Specialist	(h) 570-785-9445
		(c) 570-561-9775
		Radio Call # 365
		Barbara_Klobucar@nps.gov
Team Member	Purchasing Agent	(w) 570-340-5190
	Brenda Belotti	(h) 570-451-1664
		Radio Call # N/A
		Brenda_Belotti@nps.gov
Team Member	Interpretive Ranger	(w) 570-340-5306
	Ken Ganz	(h) 570-586-5701
		Radio Call # 403
		Bill Clark@nps.gov
Team Member	Law Enforcement Officer	(w) 570-340-5196
	John Bruce	(h) 570-842-4123
		Radio Call # 517

		John Bruce@nps.gov
Team Member	Maintenance Mechanic	(w) 570-340-5306
	Nick Lorenzetti	(h) 570-383-2619
		Radio Call # 345
Team Member	Maintenance Mechanic	(w) 570-340-5254
	Supervisor	(h) 570-693-0471
	Walter Kuharchick	(c) 570-241-8309
		Radio Call # 350
		Walter_Kuharchick@nps.gov

This table details the roles and responsibilities associated with the targets identified in Section 4, 1 through 10.

STEA EMS	Date of Original	Revision Date:	Revision No.
Document Control System	Doc:		
-	11/07/2005	11/07/2005	11/07/2005
Doc Name: EMS Roles &	Document	Prepared By:	Approved By:
Responsibilities	Number:	Mark A. Brennan	Harold "Kip
_	STEA-EMS-006		Hagen

EMS Roles and Responsibilities

Position	Responsibility
Superintendent	Superintendent of Steamtown National Historic Site with overall
Harold "Kip"	responsibility for the management of park programs, operations,
Hagen	and internal/external relationships. Serves as EMT Team Leader.
Chief,	EMT document and record management systems administrator.
Interpretation	
Mark A. Brennan	
Maintenance	Assignment?
Mechanic	
Supervisor	
Walter	
Kuharchick	
Exhibit Specialist	Manages the day to day Hazardous Waste operations of the
Barbara	Locomotive Shop and Roundhouse. Serves as SPCC Coordinator
Klocubar	and EMT member.
Purchasing Agent	Responsible for all contracting and purchasing. Serves as EMT
Brenda Belotti	purchasing and contracting specialist. Serves as EMT member.
Interpretive	Assignment?
Ranger	
Ken Ganz	
Law Enforcement	Assignment?
Ranger	
John Bruce	
Maintenance	Assignment?
Mechanic	
Nick Lorenzetti	
Law Enforcement	Serves a Deputy EMT Leader
Supervisor	Assignement?
Roger Cleven	

SECTION 5 DOCUMENT CONTROL, RECORDKEEPING AND REPORTING

Purpose

To describe the procedures to be followed to ensure a comprehensive document and record management system is implemented and maintained at STEA. This system will ensure all appropriate personnel have access to documents and records necessary to manage environmental activities at STEA.

Scope

This section describes how to manage environmental documents and records at STEA.

Procedure

- 1. EMS documents for STEA are maintained through a formal file management system. The central EMS documents file is maintained at the Chief of Interpretations office. This file contains all key environmental documents and records generated by the STEA EMS. The EMT Record Keeper is responsible for maintaining the file. In addition, key EMS documents are included in various appendices in this Manual.
- 2. Environmental records for STEA are maintained through a formal environmental records management system which conforms to Service and regional standards. The system is designed to ensure compliance with all reporting requirements mandated by law, regulation, and policy; maintain accountability for key operations; assure timely and efficient access to environmental data; and maintain security where necessary. The system consists of both hard copy and electronic files (where allowed by law).
- 3. Each EMS document and record receives a label containing specific information that will help in its control and file management.
- 4. Certain files such as logs and inspection and monitoring reports are generated, and/or required to be maintained, in operational areas. These reports are maintained at the point of use and are under the administrative control of the operational area supervisor. Some of these operational files may be designated as "is important". These files are duplicated and copies or originals are maintained in the central file.
- 5. The EMS documents and environmental records tables, provided in the appendix, list all of the key documents, records, and reports used, generated, and/or submitted by the park. The documents and records requirements listed in this table are reviewed and the table updated at least annually. A copy of the summary table is in the appendix to this section.

Responsibilities

- 1. The EMT is responsible for overseeing and making any required changes to the document control, recordkeeping and reporting procedure.
- 2. The EMT Record Keeper is responsible for keeping the environmental document, records, and reporting control table current.

3. Appendix

The appendix contains the following:

A table listing the STEA EMS documentation and records.

STEA EMS Document Control System	Date of Original Doc: 11/07/2005	Revision Date: 11/07/2005	Revision No. 11/07/2005
Doc Name: EMS	Document	Prepared By:	Approved By:
Documentation & Records	Number:	Mark Brennan	Harold "Kip"
	STEA-EMS-07		Hagen

EMS Documentation & Records

Document	Location	Document Number	Party Responsible for Update
EMT information	Interpretation Office		Mark Brennan
EMS planning activities, implementation and operation procedures	Interpretation Office		Mark Brennan
EMS Roles and responsibilities	Interpretation Office		Mark Brennan
External Audits EPA/OSHA/Prism	Park Headquarters & Supervisors Offices		Responsible Supervisors
Internal Audits	Interpretation Office		Mark Brennan
Annual Management Reviews	Interpretation Office		Mark Brennan

<u>Document</u>	<u>Location</u>	Document Number	Party Responsible for Update
Oil Spill Information	Locomotive Shop & MOW Building		Barb Klobucar Ralph Coury
Energy Audit Information	MOW Building		Ralph Coury
Manifests (Hazardous Waste, Universal Waste, Biohazard Waste)	Locomotive Shop & MOW Building		Barb Klobucar Ralph Coury
Lead Test Documents	Locomotive Shop		B. Klobucar Mark Birtel
Asbestos Containing Materials Documents	Locomotive Shop		B. Klobucar Mark Birtel
Hazardous Waste, Universal Waste, and Current Tracking Inventory	Locomotive Shop & MOW Building		B. Klobucar Ralph Coury
Hazardous Waste Analysis	Locomotive Shop & MOW Building		B. Klobucar Ralph Coury
404 Permits	Locomotive Shop		Mark Birtel
Air Emissions Statement	Locomotive Shop		Mark Birtel
Training Records	All Supervisors Offices		All Supervisors

<u>Document</u>	Location	Document Number	Party Responsible for Update
IPM Database (park's pesticide use log)	MOW Building		Walt Kuharchick
Pennsylvania Pesticide Use Report	MOW Building		Walt Kuharchick
EMS SOPs	Interpretative Office		Mark Brennan
STEA Hazardous Waste Management Plan	Locomotive Shop		B. Klobucar
SPCC Plan	Locomotive Shop		B. Klobucar
Integrated Solid Waste Alternatives Plan	Locomotive Shop		B. Klobucar
Concession evaluations	Interpretive Office		Mark Brennan

4. Related documentation

STEA Records Management applies to all government records in all offices at Steamtown National Historic Site.

STEA EMS Document Control System	Date of Original Doc: 09/01/2004	Revision Date:	Revision No. n/n
Doc Name: EMS Documentation	Document Number: STEA-EMS-07	Prepared By: Mark A. Brennan	Approved By:

SECTION 6 COMMUNICATION

Purpose

To ensure that all appropriate parties that require information to manage environmental activities at STEA receive that information in a timely manner; to publicize the successes of the STEA environmental management system and to involve all interested parties in environmental management at the park.

Scope

This section details the STEA approach to conduct communications internally (within park boundaries) and externally (outside park boundaries). Information relating to the communication required to achieve the identified goals, objectives and targets is also included.

Procedure

- 1. The EMT uses general internal and external communication.
- 2. Internal communication ensures that all staff and appropriate partners operating in the park are kept up to date on environmental matters, and are provided with the necessary information to perform their duties. Internal communication methods provide a venue for personnel to provide input on environmental performance.
- 3. Methods of internal communication include training classes, staff meetings, written policies and procedures, formal and informal talks, internal e-mails and memos, weekly "tailgate" notes, and others.
- 4. External communication ensures the appropriate sharing of information with all parties interested in the operation of STEA.
- 5. External communication is maintained through formal National Park Service public announcements, the general Service website (www.nps.gov) and the park website, press releases, briefings/presentations, public interfaces, written correspondence, and other casual information sharing. All public announcements conform to Service protocol and regional standards. External parties vary considerably; they can be park support groups or interested visitors requesting information on park greening practices and energy and water conservation.
- 6. The EMT designs and implements specific communication needs relating to the achievement of the identified goals, objectives, and targets.

Responsibilities

1. The EMT is responsible for maintaining the communication strategy.

- 2. EMT members write informational pieces on EMS progress and provides to proper channels for distribution.
- 3. The Superintendent or designated individual reviews all external documentation prior to release.

Appendix

The appendix contains the following

1. A table detailing both the general internal and external EMS communication strategy.

Doc Name: EMS	Document	Prepared By:	Approved By:
Communications Strategy	Number:	Mark A. Brennan	Harold "Kip" Hagen
	STEA-EMS-08		

EMS Communication Strategy

Audience	Communication Type / Mechanism	Content	Responsibility
Park Personnel	Informal personal contacts	Information about park programs, policies, and issues	Environmental Management Team
Park Personnel	Weekly Tailgate Notes	News of incidents & actions; briefs on park programs and policies	Supervisors
Park Personnel	Written policies & procedures	Park policies and procedures	Superintendent
Park Personnel	All-Employee memoranda and/or e- mail messages	Park policies and procedures	Superintendent & Division Chief's
Park Personnel	Training sessions and Tailgate meetings	General orientation, as well as job-specific requirements	Supervisors
Park Personnel	All-hands meetings	Training/policies/procedur es/goals	Superintendent
Partners and community groups	Personal briefings/ presentations See General Public section	Information about park programs, policies, and issues to develop constituency and support, coordinate actions with partners and resolve problems	Superintendent and other designated staff.

Regulatory Agencies	Informal: telephone calls, e-mail, site visits Formal: compliance inspections, written correspondence	Inquiry, Information sharing, problem resolution Transmission of required reports. Response to official inquiries or notices.	Superintendent and other designated staff.
General Public	Informal personal contacts Press releases Educational programs Interpretive exhibits Environmental fairs	Sharing information about park programs, policies, issues and accomplishments to develop constituency and support	Superintendent & Public Affairs Officer

SECTION 7 TRAINING

Purpose

To provide a system to manage the environmental training needs of personnel at STEA; to ensure the right environmental information is given to the right individual to enable them to carry out their duties to the best of their abilities.

Scope

This training section describes how the environmental training program at STEA is managed.

Procedure

- 1. The EMT ensures that the personnel at STEA are provided with the knowledge and skills to safely, competently, and legally fulfill their EMS and other environmental responsibilities.
- 2. Individual division chiefs and supervisors annually assess all positions under their control at STEA to determine the associated training requirements for these positions. Park management coordinates such a review with the supervisors and the EMT.
- 3. Supervisors report to the EMT on a periodic basis (no less than annually) with regard to the training requirements for personnel under their supervision and the status of training for those individuals.
- 4. Based on the assessment under 2 above, training for specific individuals or work units is scheduled by supervisors and coordinated through the Deputy Team Leader.
- 5. Different methods of training may be utilized at STEA including traditional classroom, field and distance learning and Tele Conferencing. Training is offered through internal park programs, regional and Service programs, and commercial trainers.
- 6. All training conducted at STEA complies with training standards developed by the region and the Service.

7. Every effort is made to invite, or partner with, third parties within the park such as contractors and concessionaires where appropriate to leverage training resources and to encourage collaboration and foster understanding by all parties with the park.

Responsibilities

- 1. Individual responsibilities for determining training requirements and maintaining training records are described in section 7, item 1 of this section.
- 2. Overall coordination of environmental training at STEA lies with the EMT.

Appendix

The appendix contains the following:

1. The STEA environmental training matrix.

Environmental Training Matrix

Division:	Position Title/Series/Grade:
(Supervisor):	Employee Name (optional):

✓ Training Needed	Frequency	Trainer/Responsible Party	✓ Training Needed	Frequency	
ENVIRONMENTAL		<u> </u>			
Clean Air Act / Air emissions		Birtel/Coury			
Clean Water Act / P2 & conservation	Annual	Birtel/Coury			
Energy Conservation orientation	Annual	Coury			
RCRA SOP	Annual	Birtel/Coury			Ī
Fuel Storage and Delivery Systems	Annual	Birtel/Coury			
Green Procurement	Annual	Belotti			
Hazardous Waste Mgt Procedures	Annual	Klobucar/Coury			Ī
Hazardous Waste Manifesting	Initial	Klobucar/Coury			
HAZCOM	Annual	Birtel/Coury			
HAZWOPER	Annual	Birtel/Coury			
Integrated Pest Management	Annual	Coury			
P2 & Source Reduction orientation	Annual	Birtel/Coury			
Recycling Program orientation	Annual	Birtel/Coury			
Solid Waste Mgt orientation	Annual	Birtel/Coury			
SPCC Plan	Annual	Birtel/Coury			
Spill Response SOP	Annual	Birtel/Coury			
Other					
DOT	3 Years	Birtel/Coury			
Lead Paint Safety	Annual	Birtel/Coury			
Asbestos Awareness	Initial	Birtel/Coury			
Bloodborne Pathogen/HBV	Annual	All Supervisors			
Respiratory Protection, LE	Annual	Cleven			
Respiratory Protection, non-LE	Annual	Birtel/Coury			
Chemicals (used for cleaning)	Annual	Coury			

Doc Name: EMS	Document	Prepared By:	Approved By:
Environmental Training	Number:	Mark A. Brennan	Harold "Kip" Hagen
Matrix	STEA-EMS-09		

Records

- 1. The summary environmental training matrix (contained in the appendix to this section) will be updated to reflect current park needs. At a minimum the matrix will detail the type and frequency of training required by STEA staff in their various positions. It will also include who is responsible for administering the training.
- 2. In order to ensure that all the appropriate training has been received by the individual in a particular position, detailed records of who has received environmental training will be maintained by the designated supervisor.

SECTION 8 MONITORING, MEASUREMENT, CORRECTIVE ACTION, AND MANAGEMENT REVIEW

Purpose

To ensure the best opportunity to achieve the set goals, objectives and targets and other environmental management responsibilities within STEA; to correct efforts where needed and provide guidance and assistance to those involved in achieving positive outcomes in environmental management in the park.

Scope

This section describes the various assessments undertaken to ensure the performance of the environmental management activities, and those of other parties operating within the park, meet the standards set in the EMS Plan.

Procedure

- 1. The EMT conducts an annual Environmental Performance Review (EPR). The EPR will be led by the EMT leader and will determine whether the park has achieved the environmental goals, objectives and targets described in Section 3 of this Manual. The results of the EPR will be documented and a copy included in the appendix to this section and maintained on file in the Record Keeper's office.
- 2. If no progress has been made towards the stated goals, objectives and target, the EMT determines why, and implements new operating procedures that encourage appropriate personnel at STEA to achieve the stated environmental goals, objectives and targets.
- 3. The EMT meets monthly to review how well the park is doing in achieving the goals, objectives and targets, and other EMS requirements. These reviews are designed to allow for "mid-course" corrections to be effected if it is determined that suitable progress towards achieving the goals, objectives, and targets has not been made and their final achievement is unlikely.

The goals, objectives and targets action plan will be updated after the quarterly review.

- 4. On a quarterly basis the EMT provides the Superintendent a copy of the updated action plan which details the progress made towards achieving the park EMS goals, objectives and targets.
- 5. Area supervisors conducts or coordinates weekly inspections of hazardous waste storage areas, and periodic inspections of the maintenance shops.
- 6. A designated Buildings & Utilities (B&U) employee conducts monthly inspections of fuel tanks throughout the park.
- 7. EMT members may conduct site specific inspections and audits at any time.
- 8. The park Safety Committee, which generally meets quarterly, conducts inspections of various park facilities and reports their findings to the Deputy Team Leader.
- 9. All employees are encouraged to report environmental and safety concerns to their supervisor through a documented reporting system. Reported concerns are forwarded to the Deputy Team Leader and the park Safety Officer for review and investigation, if needed.
- 10. Every three to five years the park receives a follow-up audit from the region using the NPS Environmental Audit protocol. The Deputy Team Leader coordinates the audit with appropriate regional personnel.
- 11. As necessary and required by permits or established by an SOP, additional day-to-day or regulatory driven monitoring and measurements are completed and documented by the responsible party. Records are maintained in accordance with established document and record control requirements.

Responsibilities

The specific responsibilities for monitoring and reporting are dependent on the involvement of individuals in specific goals, objectives and targets. The overall responsibility for ensuring the monitoring and reporting activities lies with the EMT.

Appendix

The appendix contains the following:

The monitoring and measurement summary matrix (including overall EMS and specific goals, objectives and target responsibilities).

STEA EMS	Date of Original	Revision Date:	Revision No.
Document Control System	Doc:	11/07/05	
	11/07/2005		
Doc Name: Monitoring &	Document	Prepared By:	Approved By:
Measurement	Number:	Mark Brennan	Harold "Kip" Hagen
	STEA-EMS-10		

Monitoring and Measurement

Review Event	Frequency	Responsibility	Results Due To
Individual site inspections or audits	Weekly	Supervisors	Record Keeper
Annual Performance Review (EMS assessment)	Annually	EMT	Superintendent and Record Keeper
Review of goals, objectives, & targets - action plan updated	Quarterly	EMT	Superintendent and Record Keeper
Inspections of hazardous waste storage areas	Weekly	B. Klobucar	Weekly
Fuel tank inspections	Monthly	Mark Birtel Ralph Coury	Designated Supervisors
Inspections of various park facilities	Monthly	Safety Committee	Safety Officer
Concession evaluation	Annually	Deputy EMT Team Leader	Record Keeper
Energy audit	Annually	Ralph Coury	Record Keeper
Environmental Audit	Every 3-5 yrs	Regional Office	Superintendent and Record Keeper

Records

- 1. EPR summaries will be included in the appendix to this section.
- 2. Any documents developed during monitoring and measurement activities will be included in the appendix to this section.
- 3. Any required corrective action forms will be included in the appendix to this section.