

# ANTELOPE POINT MARINA ENVIRONMENTAL MANAGEMENT PROGRAM

## PURPOSE

Antelope Point Marina has implemented an environmental management program (EMP) to demonstrate environmental leadership, commitment to continual improvement and environmental responsibility.

To ensure the development and maintenance of a complete and effective EMP, this manual has been prepared in compliance with the requirements of the National Park Service. This EMP manual is the central document, and the Risk Management team controls all EMP-related information and material and provides reference to all supporting documents.

## NOTICE

As part of the Environmental Policy's commitment to regulatory compliance, Antelope Point Marina has established a procedure for ensuring compliance with environmental regulations and other requirements. This procedure involves identifying, accessing, and communicating legal and other environmental requirements that are applicable to the activities within the EMS boundary.

Information necessary to ensure compliance is acquired through legal publications and other sources identified by the EMP responsible person (Brian Harrison – Risk Management). The relevant requirements are identified, accessed and communicated to all personnel, as necessary. At least once a year, the EMS responsible person (Brian Harrison – Risk Management) reviews the current national, state, and local legal requirements and other requirements to ensure ongoing compliance.

## EMP AREA 1 – ENVIRONMENTAL MANAGEMENT PROGRAM SCOPE

**Environmental Management Program Scope.** This documented Environmental Management Program (EMP) is developed in accordance with the Antelope Point Marina (APM) concession contract with the National Park Service (NPS) (CC-GLCA007-03), specifically Contract Section 6. The EMP complies with NPS EMP standards.

**Policy:** The management and staff of Antelope Point Marina are committed to managing resources in a sustainable manner consistent with our obligations to provide for multiple uses of these resources. APM has developed an Environmental Management Program to help institutionalize our approach to resource management and environmental protection.

People are a key element of our facility's ecosystem. APM is dedicated to protecting the health and safety of our employees and the users of our facility.

We are committed to achieving full compliance with all applicable environmental laws, regulations, and other relevant standards in all of our operations, and to minimizing the environmental impacts of our activities. We will verify our level of compliance through formal periodic audits and will take timely action to resolve any compliance issues. We will minimize our negative environmental impacts by using the principles of pollution prevention to eliminate potential pollution at its source. The number of environmental impacts will be reduced through development and implementation of a Green Procurement Program including renewable, reusable, recyclable, and recycled-content materials.

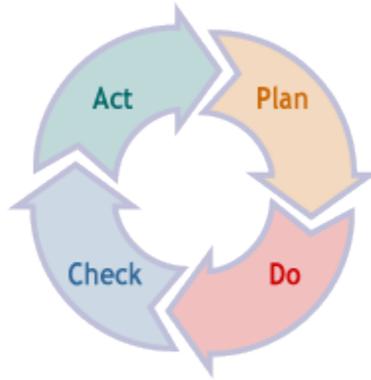
The General Manager will provide leadership for our Environmental Management Program, and the staff of our various locations and operational units will implement our system on an ongoing basis. We will seek to continually improve the performance of our Environmental Management Program to help achieve our goals of sustainable, multiple use with minimal environmental impacts.

We welcome input from external parties who use our facility for recreation or to obtain their livelihood. Our policy will be communicated to employees, vendors, stakeholders, and the public.

## ANTELOPE POINT MARINA ENVIRONMENTAL MANAGEMENT PROGRAM

Through successful use of our Environmental Management Program, we will become a demonstrated environmental leader in the industry and will institutionalize this management system so that it can be used effectively by our current and future employees and support staff.

**Goals and Targets:** APM annually establishes goals and targets to maintain and improve the company's environmental performance. These are identified in Table 1 below. These particular actions are in addition to the ongoing procedures otherwise described in this EMP. We also welcome other suggestions for improving the EMP to ensure that it responds to the needs of our employees, visitors, and the environment in which we operate.



**Table 1 – APM Annual EMP Objectives**

Goal	Target	Due Date
Reduce single-use plastics	Institute within retail and point of sale areas	12/31/2022
Reduce waste of overall operations	Institute on- trash recycling program.	12/31/2022
Minimize releases of contaminants to the environment	Train all employees by beginning of season	12/31/2022

# ANTELOPE POINT MARINA ENVIRONMENTAL MANAGEMENT PROGRAM

## EMP ELEMENT 2 – RESPONSIBILITY AND ACCOUNTABILITY

Antelope Point Marina has established the organizational structure, personnel roles and responsibilities, and resources needed to effectively implement the EMP.

**EMP Responsibilities.** The General Manager (GM) of APM is the designed Environmental Officer (EO). The GM is responsible for overall development, implementation and monitoring of this EMP. The GM also has other specific EMP responsibilities.

All APM employees are responsible for complying with applicable laws and regulations, NPS requirements and company policies and procedures. In addition to these general responsibilities, the GM is responsible for all land-side environmental operations. On the water, the Risk Management department is responsible for environmental management and safety. The Marina Manager is responsible for environmental protection practices in the water. Table 1 lists specific assignments.

**Table 2 – APM EMP Responsibilities**

<b>Position</b>	<b>Environmental Responsibilities</b>
GM (Environmental Officer) Ken Runnels	<ul style="list-style-type: none"><li>• General - EMP development and implementation.</li><li>• General - Environmental recordkeeping and reporting.</li><li>• Office – Facility maintenance and waste management</li><li>• General – Marina Operations</li><li>• General - Mooring Environmental damage avoidance</li></ul>
<u>HR/Payroll</u> Brian Harrison	<ul style="list-style-type: none"><li>• General - Spill Response</li><li>• General – Employee Training</li></ul>
<u>RISK MGMT</u> Renzo Burns Andrew Tom	<ul style="list-style-type: none"><li>• General – Record Keeping</li><li>• General – Spill Response</li><li>• General – Employee Training</li><li>• General – Emergency Action Plans</li><li>• General - Trash recycling program</li></ul>

All employees are held accountable to ensure everyone follows environmental practices. Performance relative to their environmental responsibilities is a part of each employee’s annual review. In addition, the GM is responsible for the results of the NPS EMP evaluation.

# ANTELOPE POINT MARINA ENVIRONMENTAL MANAGEMENT PROGRAM

## EMP ELEMENT 3 – TRAINING

Personnel must be competent to perform the tasks assigned to implement the EMP.

**Training and Qualifications.** APM has the following certification and training requirements to ensure environmentally safe operations. Certifications are tracked copies are maintained in the APM HR/RM Office. Training logs are completed to track APM participation. These logs are filed in the APMHR/RM office.

**Table 3 – APM EMP Training**

Training Topic	Type	Trainer	Employees Covered	Frequency
EMP Awareness	In-House	RISK MGMT	All	Initial Hire Annual
SOPs	In-House	RISK MGMT	Applicable Staff	Annual
Vessel Fuel Spill Response Plan	In-House	RISK MGMT	Applicable Staff	Annual
HAZWOPER	In-House	RISK MGMT.	Applicable Staff	Annual
4-Hour Environmental & Safety	In-House	RISK MGMT	ALL	Annual

## EMP ELEMENT 4 – DOCUMENTATION AND OPERATIONAL CONTROLS

APM has established and maintains plans and procedures to manage operations and emergencies associated with its EMP. APM ensures that environmental records are correctly identified, maintained and disposed of. Environmental records relevant to the EMP including training records and the results of audits and reviews are readily retrievable and protected against damage, deterioration and loss.

**Documentation and Operational Controls.** This EMP is developed and maintained by the GM. APM also has documented standard operating procedures (SOPs) and environmental emergency plans to ensure environmentally safe operations. SOPs and environmental and safety plans are listed below. The SOPs and emergency plans are developed and updated by the EMP as necessary in collaboration with applicable APM personnel. SOPs and emergency plans are maintained in the applicable APM safety file on board each vessel and in the office with master hardcopies and electronic versions in the APM GM’s office. SOPs and environmental plans are dated to ensure currency.

Other EMP documentation includes personnel certification and training records; regulatory reports; inspection logs and corrective action reports; and other EMP-related correspondence. These are maintained by the GM in the APM office as well as the Risk Management office.

**Table 4- APM Environmental Plans & Standard Operating Procedures**

Area	Title/Description	Version Date	Responsibility
<b>General</b>	Risk Management Plan		RISK MGMT
	Universal Waste Program		RISK MGMT
	HAZCOM Program		RISK MGMT
	Integrated Pest Management Site Plan		RISK MGMT
	SPCC Plan		RISK MGMT
<b>Office/Dock</b>	Green Purchasing Program		RISK MGMT
<b>Office</b>	Trash Recycling Program		RISK MGMT
<b>General</b>	EMP		GM

# ANTELOPE POINT MARINA ENVIRONMENTAL MANAGEMENT PROGRAM

Table 5 - APM Environmental Emergency Plans

Area	Title/Description	Version Date	Responsibility
<i>General</i>	Fuel Spill Response		GM/MM/RM
<i>General</i>	Emergency Action Plans		General Manager/ Risk MGMT

## EMP ELEMENT 5 - COMMUNICATION

EMP communication includes programs addressing internal and external parties. The purpose of internal communication is to ensure that environmental information is disseminated to all personnel and that all personnel feel they are able to participate in the EMS through available communication channels. Communication with individuals, groups, government, local businesses, and others outside of the EMP provides insight into how the environmental performance of operations within the EMP boundary is perceived externally.

**EMP Communication.** The EMP is available to staff in the GM's office and the Risk Management office. Employees are briefed on the EMP and associated SOPs and environmental plans through annual and monthly training programs.

Electronic copies of the EMP are provided to NPS who provide them to Park Dispatch. The EMP briefs NPS personnel annually regarding Antelope Point's EMP during the annual EMP review as well as during other check-in meetings.

The GM is responsible for all communications with regulatory agencies such as the USEPA, State and USCG. In emergency situations, the Marina Manager may communicate with these agencies on environmental matters as directed by the GM and described in SOPs and emergency plans.

EMP topics covering spills, handling waste and leave-no-trace practices are communicated to visitors by boat (captain or mate) and HAZWOPER team.

## EMP ELEMENT 6 - REPORTING

Antelope Point Marina has developed and implemented procedures for reporting internally within the organization, and externally to the park and regulatory agencies.

**EMP Reporting.** APM internal EMP reporting will be completed by the GM with information provided by the Marina Manager, Risk Management team and staff as appropriate. APM will complete all documents, reports, monitoring data, manifests, notices, and other documentation required to be submitted to regulatory agencies in accordance with Applicable Laws, and to the NPS in accordance with the contract and documented EMP (if applicable).

Any discharges, release or threatened release of hazardous or toxic substance, material or waste will be reported in a timely manner to the NPS. APM will provide timely written advance notice of, and the opportunity to participate in, communications with regulatory agencies regarding the concessioner's environmental activities.

## ANTELOPE POINT MARINA ENVIRONMENTAL MANAGEMENT PROGRAM

**Table 6 - APM EMP Reports**

Report	Recipient	Reporter	Frequency	Copy to NPS
<b>External Reports</b>				
EMP	NPS	GM	Initial and Annual	Yes
Inventory of Hazardous Materials	NPS	GM	Annual	Yes
Inventory of Waste Streams	NPS	GM	Annual	Yes
Other Regulatory Agency Reports	Applicable Agency	GM	As they Occur	Yes
Fuel Spill Reports	USCG/NPS	GM	As they Occur	Yes
Environmental Audit Corrective Action Report	NPS	GM	As they Occur	Yes
<b>Internal Reports</b>				
Vessel Environmental Inspection Report	GM	RM	Monthly	No
Vessel Waste Tracking Logs	GM	RM	Monthly	No

### EMP ELEMENT 7 – MONITORING, MEASUREMENT AND CORRECTIVE ACTION

Antelope Point Marina has developed and implemented inspection processes to identify environmental management issues and correct deficiencies identified through such inspections. APM effectively responds to environmental incidents. Antelope Point Marina has developed and implemented management review procedures to improve EMP performance over time.

**Monitoring, Measurement and Corrective Action.** APM has instated inspection and corrective action, emergency response and abatement and management review processes to maintain and improve its EMP.

Inspections and Corrective Action: APM has instituted an internal inspection program to ensure compliance with regulations and environment protection. Inspection schedules are maintained to ensure inspections are conducted as required and include frequency, inspector’s name, findings, and date completed. Environmental deficiencies are raked based on their severity as imminently dangerous, serious, and minor. Deficiencies are recorded and are reported to the GM. Imminently dangerous and serious deficiencies must be reported to the GM immediately. All deficiencies corrected as soon as possible. The GM sets corrective action timeframes. Imminently dangerous and serious deficiencies may require that operations be shut down until the issue is corrected. APM equipment, facilities and operations are also subject to external environmental inspections. These include USCG vessel inspections, NPS periodic inspections and NPS environmental audits. Table 7 outlines internal and external inspections.

**Table 7 – APM Environmental Inspections**

Inspection	Inspector	Frequency	Requirements	Documentation
<b>External Inspections</b>				
Vessel inspection	USGS	Annual	USGS	USGS Report
Periodic Operational Performance Inspection	NPS	Semi-annual	10-DIV (NPS)	Periodic Inspection Report
EMP Evaluation	NPS	Annual	10-EMP	RMP Evaluation Report
Environmental Audit	NPS	Once Every 3 to 5 yrs.	Concession Env. Audit Protocol	Concession Env. Audit Report
Property Inspection	RM	Monthly	Internal Check sheet	RMP Evaluation Report
<b>Internal Inspections</b>				

## ANTELOPE POINT MARINA ENVIRONMENTAL MANAGEMENT PROGRAM

Inspection	Inspector	Frequency	Requirements	Documentation
Fuel System Inspection	RM	Monthly	Internal Checksheet	Deficiency Record; Inspection Log
Vessel (Monthly)	Captains	Monthly	Internal Checksheet	Completed Check Sheet
Dock (see also RMP)	MM	Daily	Internal Checksheet	Deficiency Record Inspection Log
Environmental Audit	GM	Annual	Audit Protocol	Internal Env. Audit Report

Environmental Emergency Incident and Abatement: All emergency incidents fuel spills or damage to environmental resources from marina/customer failures are reported to the GM. Incidents are investigated and abatement based on timeframes that consider the issue and its severity. At minimum, all incidents are reviewed by the GM and Marina Manager. APM classifies incidents based upon their severity as defined in NPS standards. Serious incidents are reported to the park and USCG and serious incident investigations are conducted in coordination with the NPS.

Management Review: The GM annual reviews the EMP to ensure that it is current, that the EMP and associated procedures are effective and that any annual goals and targets for improvement were met. Included in this review is an analysis of internal and external inspection results, incident reports, APM procedural changes, and other input. The GM makes any necessary changes to the EMP based on this analysis and submits the updated EMP to the park for review and acceptance. The GM also updates and SOPs or Emergency Plans to reflect necessary improvements or changes. The GM orients staff on the updated RMP and SOPs and Emergency Plans through the APM training program.

### EMP ELEMENT 8 – OTHER CONTRACT REQUIREMENTS

In addition to the requirements outlined for other EMP elements, the concession contract may have additional environmental requirements in the contract, operating, or maintenance plans that are de facto standards.

**Other Contract Requirements.** Contract-specific requirements are:

N/A

### EMP ATTACHMENTS

The concessioner may opt to attach documentation such as training logs, SOPs and emergency plans, inspection forms and reports to the EMP.