

PISGAH INN  
2023  
ENVIRONMENTAL MANAGEMENT PLAN  
PARKWAY INN, INC.

PREPARED BY  
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# 0: TABLE OF CONTENTS

<b>Table Of Contents</b>	<b>2</b>
<b>Policy</b>	<b>3</b>
Statement of Environmental Policy and Commitment	3
<b>Goals and Targets</b>	<b>4</b>
Environmental Management Plan Goals	4
<b>Responsibilities and Accountability</b>	<b>5</b>
Performance Based Objectives for the Environmental Director	5
<b>Documentation</b>	<b>6</b>
Environmental Audits - Organization	6
Green Procurement	7
Policy	7
Pest Control Procedures	7
Animal Intrusion Technical Bulletin	9
Spill Response and Chemical Management	12
Equipment Using Refrigerant	13
<b>Document Control and Information Management System</b>	<b>15</b>
List of Documents	15
Phone Numbers and Environmental Organizations	15
Recycling, disposal, and hazmat	16
<b>Communication</b>	<b>17</b>
Guest Education	17
Employee Communication Policy	18
<b>Training</b>	<b>19</b>
Plan	19
<b>Monitoring, Measurement, and Corrective Action</b>	<b>20</b>

# 1: POLICY

## STATEMENT OF ENVIRONMENTAL POLICY AND COMMITMENT

Parkway Inn, Inc. is committed to operating concession facilities at The Blue Ridge Parkway to exceed National Park Service Environmental Management Objectives and goals for environmental sustainability and to provide an educational experience for park visitors. The company, including its employees, agents, and contractors, shall comply with all applicable laws pertaining to the protection of human health and the environment. The company shall incorporate environmental and cultural resource Best Management Practices (BMP's) in its operation, construction, maintenance, acquisition, provision of visitor services, and other activities performed at The Blue Ridge Parkway.

The Environmental Program is designed to address environmental policies, compliance, best management practices, and National Park Service "greening" strategies for concession operations at The Pisgah Inn. It shall identify plans, procedures, manuals, and other documentation maintained by the Pisgah Inn to meet the Environmental Management Objectives. The Environmental Management Plan is intended to be a comprehensive, "living document," with practices and procedures that support or are integrated with Park Service operations at the Blue Ridge Parkway. The EMP will be reviewed and updated at least annually to reflect improvements in company procedures and practices, changes in the physical plant, National Park Service recommendations and practices, results of internal or third-party audits of environmental program elements, and changes in environmental regulatory requirements. The plan will be submitted annually to The Blue Ridge Parkway Superintendent for review and approval. It is hoped that this document will be used by employees as a "reference manual" when an environmental question or situation arises.

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Susan Johnston, Managing Director

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Benjamin Kershner, Environmental Director

## 2: GOALS AND TARGETS

### ENVIRONMENTAL MANAGEMENT PLAN GOALS

1. To reduce energy consumption by 2% per season
2. To reduce water consumption by 2% per season
3. To reduce the mass of landfill waste produced by 2% per season
4. To increase recycling of aluminum, glass, plastic and paper by 2% per season

### 3: RESPONSIBILITIES AND ACCOUNTABILITY

The Environmental Director for the 2023 season is Benjamin Kershner

#### PERFORMANCE BASED OBJECTIVES FOR THE ENVIRONMENTAL DIRECTOR

Reports to:

- General Manager (this is a line position which has no direct authority over individual departments)

Objectives:

- INNOVATION:
  - To be able to develop, implement, monitor, document and revise Pisgah Inn's Environmental Program
  - To monitor and direct our toxic chemical reduction/elimination program.
- DOCUMENTATION:
  - To be able to record and demonstrate the effects of our EMP on our energy consumption and on our waste stream
  - To be able to manage environmental information including without limitation, plans, permits, certifications, reports, and correspondence.
  - To be responsible for monitoring our product selection and green procurement program.
- COMMUNICATION:
  - To be able to communicate the environmental policies, goals, targets, responsibilities and procedures throughout the organization.
  - To be able to actively participate in our Environmental & Safety Committee
- TRAINING:
  - To be able to revise and document the environmental training program, including identification of staff to be trained, training subjects, frequency of training and how training will be documented.
- STANDARDS:
  - To adhere to all Pisgah Inn environmental standards.
  - To be able to meet all Pisgah Inn employment standards.

## 4: DOCUMENTATION

In this section you will find the actual documentation portraying our environmental “greening” progress. The next section (5: Document Control and Information Management System) contains a complete list of environmental documents, where they are stored, and when they are updated.

### ENVIRONMENTAL AUDITS - ORGANIZATION

Each department will be audited periodically by the safety and environmental committee:

- Front Desk
- Gift Shop & Cafe
- Country Store
- Housekeeping
- Restaurant/Kitchen
- Maintenance
- Employee housing

### **POLICY**

It is the policy of Parkway Inn, Inc. to take steps to purchase only environmentally friendly products. We also expect our suppliers to be good environmental stewards. Any purchasing of foods, supplies, chemicals or other items must be driven by the level of impact on the environment. All items are investigated for their “green” content.

## **PEST CONTROL PROCEDURES**

It is the Policy of Pisgah Inn to refrain from using pesticides and/or chemicals that would in any way cause adverse or negative impacts on the environment.

To this end, Pisgah Inn, whenever possible, exclusively uses sanitation, hygiene, and maintenance techniques to control pests. Specifically, it is our policy to maintain all of our facilities in a clean and sanitary manner with the goal of eliminating anything that would attract pests. Further, our maintenance policies ensure tight fitting seals, doors, and screens. Any penetrations or avenues for egress or access (that could allow for pest intrusion) are immediately remedied. The goal is to avoid having to use any chemical pesticides.

In the event of a major pest control issue, the Park Service has an integrated pest management program. The Park Service should be contacted before any significant pest control action is taken. Even minor pest control actions involving the use of chemicals will be taken only under the direct supervision of the Environmental Director and the General Manager, and only as a last resort.



## **ANIMAL INTRUSION TECHNICAL BULLETIN**

<https://www.nps.gov/subjects/concessions/upload/Animal-Intrusion.pdf>

This technical bulletin is a revision to and rescinds the bulletin on the same topic issued October 5, 2017. This updated bulletin was developed in collaboration with the NPS Office of Public Health and revises several procedures based upon input from the field. It also updates several links to internet resources.

Concessioners, as private operators contracted with the National Park Service, are obligated under the terms of their contract to develop, maintain and implement risk management and integrated pest management (IPM) programs to provide facilities and services in a manner that is protective of human health and safety to the extent reasonable. This includes preventing animals such as mice and other rodents, bats, and insects, which can transmit disease from entering and nesting in facilities such as lodging, food and beverage outlets, and employee housing. Due to the nature of parks, occasionally these creatures get into concession facilities. This technical bulletin addresses procedures to be followed by concessioners and park personnel regarding rodents and bats, two of the most common animals that are encountered inside concession facilities.

### **Concessioner Program**

Per NPS policy, NPS Concessioner IPM programs must include policies and practices to:

- Exclude animals from facilities;
- Conduct inspections to ensure facilities are secure from animal intrusion;
- Train applicable employees on risks and actions to prevent, respond to, clean up, and abate animal intrusions;
- Provide awareness information to visitors on potential risks of animal exposure and preventive action;
- Report employee and visitor animal interactions to the NPS; and,
- Conduct any necessary animal intrusion response, clean up and abatement.

Information is available to concessioners on the NPS web site to assist them in developing and implementing their animal exclusion program. Resources are available directly to concessioners at [https:// www.nature.nps.gov/biology/ipm](https://www.nature.nps.gov/biology/ipm)

### **NPS Protocol for Animal Intrusion and People Interaction**

To ensure appropriate action is taken and accurate information is transmitted, the NPS has developed protocols for dealing with animal intrusions by bats and rodents, which should be followed by concessioners and park staff. The NPS Office of Public Health is an advisor and may assist in such situations. The protocols vary depending on the animal interaction and the scope of the incident.

### **Bats**

The primary disease of concern associated with bats is rabies, which can be transmitted when a bat bites or scratches a person. The possibility of a bite or a scratch must be considered if an employee or visitor wakes to find a bat in their bedroom and does not know definitively whether they might have been unknowingly bitten or scratched while sleeping. More information on bats and rabies can be found at <http://www.nps.gov/subjects/bats/bats-and-people.htm>. In addition, information including rack cards and fact sheets are available to NPS personnel from the InsideNPS Office of

Public Health rabies page or the Wildlife Health Branch disease surveillance and investigation page. Park staff are encouraged to download and share resources from these sites with their concessioners.

In the event of an interaction, the following actions are to be taken:

1. Upon notification of a bat interaction by a person (e.g., visitor or employee) in a concession facility, trained concession staff should investigate and capture the bat for rabies testing, if that can be done safely. Anyone involved in the capture should wear long sleeves and thick gloves, and place a container over the bat. The trained person should slide a stiff piece of cardboard between the container and surface on which the bat was captured to trap the bat in the container. If multiple bats are involved and it is not possible to know which particular bat was the concern, capturing and testing the bat for disease should not be conducted. The involved facilities (e.g., room(s)) should be closed until they are no longer accessible to bats and determined to be suitable for use again.
2. In the event of a potential human-bat exposure, the concessioner should promptly notify Public Health and provide the name and contact information for the person(s) with potential bat exposure, so that an assessment for rabies post-exposure prophylaxis need can be done. To reach Public Health for a risk assessment, the concessioner can contact their local or State health department directly or the NPS Office of Public Health (OPH) (Dr. Maria Said at 202-513-7151 or Dr. Danielle Buttke at 970-267-2118). They should also notify the park concession program and their NPS OPH public health consultant. The local/State health department and/or the NPS OPH can provide the concessioner guidance on how to arrange to test the animal for rabies. (Rabies testing fees are covered by the NPS or State). The park concession program should notify the park IPM coordinator.
3. A representative from Public Health (either from the local/State health department or the NPS OPH) will contact the person directly to obtain details on the animal interaction, inform the person of the potential bat rabies risk, and make recommendations about the potential need to see a health care provider based on rabies test results for the bat, if available, and the type of exposure that occurred.
4. The concessioner, in consultation with the public health consultant and the park concession program, IPM coordinator, and other applicable park personnel, must investigate the source(s) of the intrusion, clean up, and abate the animal intrusion risk using appropriate equipment and techniques. This may be limited to a single room or structure or they may have to address a larger infestation. The involved facilities should not be reopened until this can be accomplished.
5. The concessioner should intensify monitoring to ensure the resultant bat exclusion actions were effective, and the park concessions specialist should check to ensure this monitoring by the concessioner is occurring.

## **Rodents**

Rodents can carry many diseases, including hantavirus, tick-borne relapsing fever, salmonella, leptospirosis, and rat bite fever, and should be excluded from buildings. The most serious rodent-borne disease is hantavirus, which has a high case fatality rate. Although hantavirus is a very rare disease, and only a very small percentage of rodents, mainly deer mice (western US) and white-footed mice (eastern US), are infected with hantavirus and an even smaller percentage are shedding the virus at any point in time, we cannot tell if a rodent is infected just by looking at it. Any deer mouse or white-footed mouse in a facility should be considered a hantavirus risk. The vast

majority of human cases are associated with high-risk activities that stir up dust, such as sweeping, cleaning out old buildings, or living in heavily infested buildings.

Resources on rodent management are available to NPS personnel on the InsideNPS rodent management web page. Information on hantavirus in particular can be found on InsideNPS hantavirus web page. Park staff are encouraged to download and share resources from these sites with their concessioners.

If there is evidence of a rodent in a building, it should be considered a potential health risk and responded to immediately through the following actions:

1. Upon notification by a person (e.g., visitor or NPS employee) of an intrusion (e.g., rodent sighting or noted evidence of rodent intrusion such as droppings), trained concession personnel should immediately investigate the incident location to identify the nature of the intrusion.
2. If the rodent is still present, it should be properly trapped and disposed of by a trained concession person wearing proper personal protective equipment. The NPS does not test individual rodents for hantavirus because the proportion of infected and/or virus-shedding rodents changes rapidly and does not tell us if other infected rodents have previously been in the room or if the tested rodents was previously shedding the virus. If one rodent can get in, other rodents could have entered as well, and a rodent that tests negative may give a false sense of security.
3. The concessioner should keep a log of all rodent and trap activity, including the location, date, nature of activity (i.e., droppings or reports of rodent sightings), and actions taken to address the issue. The park concession program should review this log with the park IPM coordinator and public health consultant on a regular basis.
4. If a visitor reports a rodent in their lodging, they should be informed by the concessioner that rodents are associated with health risks. In areas with higher hantavirus prevalence (mainly the western United States), the visitor should be specifically informed of the potential hantavirus risk and the symptoms of hantavirus. They should also be instructed to seek medical attention if they develop two or more symptoms of hantavirus within 8 weeks of their exposure and inform their medical provider that they may have been exposed to hantavirus. Information on hantavirus is available on the NPS.gov hantavirus page. Additional information on rodent-borne diseases, in general, is available through the Centers for Disease Control and Prevention (CDC) rodent page. If further concern exists, the NPS Office of Public Health can be consulted (Dr. Maria Said, 202-513-7151, maria\_said@nps.gov or Dr. Danielle Buttke, 970-267-2118, danielle\_buttke@nps.gov).
5. When evidence of elevated rodent activity or inadequate rodent exclusion is detected based on review of the rodent activity log, the concessioner, in consultation with the public health consultant and the park concession program and other applicable park personnel, must investigate the source(s) of the intrusion, clean up, and abate the animal intrusion risk using appropriate equipment and techniques. This may be limited to a single room or structure or may need to address a larger infestation. The involved facilities should not be occupied until this can be accomplished. Information on rodent exclusion is available in the
6. The concessioner should intensify rodent monitoring and snap trapping in the facility which experienced the elevated rodent activity until reasonably certain that the rodent exclusion is

effective. The park concessions specialist should check to ensure monitoring and trapping by the concessioner is occurring.

### **Responsibilities and Limitations**

Public health recommendations are based on current CDC guidance. Visitors are under no obligation to follow the advice that is offered regarding medical treatment. Those communicating with visitors as outlined above will inform the person that the information provided is advice, not a requirement. NPS is not responsible for payment of visitor or employee medical expense that may result from taking the advice offered.

Concessioners are not contractually obligated to pay for medical expenses incurred by visitors who take the advice offered by the regarding medical treatment. However, they may wish to do so as a business decision.

### **NPS Oversight of Concessions Program and Practices**

Concessioners are responsible for implementing their own internal animal exclusion program including facility inspections and animal intrusion prevention practices. The NPS provides oversight of concession programs and practices through the Concessioner Review Program. Lodging, employee housing, and food and beverage service periodic evaluations include review criteria specifically related to animal exclusion program implementation. Finally, the NPS may conduct more focused animal exclusion program inspections using technical experts such as NPS public health consultants, IPM coordinators, or facility managers.

### **Other Wildlife Interactions Health or Safety**

There are a variety of other potential wildlife interactions that may occur with concessioners, employees, and visitors in concession facilities or during concession-provided activities. Concessioners should follow contract requirements, NPS policy and guidance, and park-level procedures associated with these events.

### **Distribution**

Please distribute this memorandum to park concessions managers in your region.

### **Feedback and Questions**

For further information, contact Kurt Rausch, Contract Management Branch Chief, Commercial Services Program, at 202-513-7202; Danielle Buttke, One Health Coordinator and veterinary epidemiologist, at 970-267-2118; or Maria Said, Epidemiology Branch Chief, at 202-513-7151.

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## SPILL RESPONSE AND CHEMICAL MANAGEMENT

The Pisgah Inn is responsible for any hazardous chemical spill that occurs on lands assigned by the contract to the concessionaire, when such hazardous chemical spill is a result of an action by a concessionaire employee and/or when it involves equipment and operations maintained by the concessionaire.

Proper response by a concessionaire to a spill of **less than** 25 gallons of gasoline or fuel is to contact the Communications Center at 828-298-2491 (Dispatch) and begin cleanup of the spill following proper cleanup and disposal procedures per the MSDS for that chemical. The Communications Center will contact the appropriate district ranger who will follow-up the concessionaire and ensure proper cleanup occurs.

Proper response by a concessionaire to a spill of **25 gallons or more** of gasoline or fuel oil or to any amount of any other hazardous chemicals per the MSDS description is to immediately contact the park Dispatch who will immediately contact the local emergency response department and the ranger on duty. After contacting Dispatch, the concessionaire and/or designated and qualified employee will secure the area without endangering oneself and wait for the local responders. Once initial response is made, the concessionaire will contract with an appropriate spill response and cleanup contractor for full and complete cleanup and disposal. Dispatch will contact the appropriate state spill enforcement agency. All spills shall be reported to the Park Hazardous Materials Coordinator and Park Concessions Specialist as soon as possible.

It shall be the responsibility of the District Facility Manager to advise the concessionaire of any hazardous chemicals used by the park and to which concession-employees may be exposed and of the appropriate protective measures to be taken.

**EQUIPMENT USING REFRIGERANT**

<b>type</b>	<b>Brand</b>	<b>Lbs.</b>	<b>Location</b>
Wine cooler	True	<5	Kitchen
Cooler	Hussman	<5	Kitchen pantry
Cooler	Master bilt	<5	Kitchen pantry
Cooler	traulsen	<5	Kitchen pantry
Cooler	Hobart	<5	Kitchen pantry
Ice Maker	Manitowac	<10	Kitchen
Freezer	McCall	<5	Kitchen Line
Cooler	Delfield	<5	Kitchen Server pick up line
Ice Maker	Manitowac	<5	Kitchen
Cooler, Walk-in	Kolpak	<12	Kitchen
Cooler, Walk-in	Kolpak	<12	Kitchen
Freezer, Walk-in	Kolpak	<12	Kitchen
Soda Cooler #1	Bev-Air	<5	Country Store
Soda Cooler #2	Bev-Air	<5	Country Store
Soda Cooler #3	Bev-Air	<5	Country Store
Freezer (ice)	Caravell	<5	Country Store
Freezer (ice cream)	Leer	<5	Country Store
Ice Maker	Manitowac	<5	Country Store
Ice Maker	Hoshizaki	<5	Country Store
Ice Maker	Hoshizaki	<5	Building C
Ice Maker	Whirlpool	<5	Building B
Salad Cooler	Hussman	<5	Kitchen pantry
Reach-in Cooler	McCall	<5	Kitchen Line
Reach-in Cooler	ColdTec	<5	Kitchen Line
Reach-in Cooler (2)	Lowtemp	<5	Kitchen Server pick up line
Reach-in Cooler (1)	Lowtemp	<5	Kitchen Line
Dressing Cooler	True	<5	Kitchen pantry

## 5: DOCUMENT CONTROL AND INFORMATION MANAGEMENT SYSTEM

The Environmental Director is responsible for identifying all environmental documentation that will be maintained, listing it below, and assigning individuals to update the environmental documentation. He/She will review this list on an annual basis to determine whether any documents need to be updated, amended, or added. Individuals responsible for updates will inform all relevant staff of any changes made to the documents by telling them about changes in person, circulating updated versions of the documents, or by instructing department heads to inform their staff.

Most environmental documents will be kept in the Environmental Director's filing cabinet, including copies of key records. Certain documents are maintained at the point of use (e.g., inspection logs).

### LIST OF DOCUMENTS

1. Written EMP
2. Recycling Log
3. Solid Waste Disposal Log
4. Recycling and Disposal Procedures
5. Current Conservation Efforts
6. Environmental Emergency Procedures
7. Pest Control Procedures
8. Equipment using Refrigerant
9. EMP goals monitoring
10. Hazard Communication program
11. Inventory of Hazardous substances
12. Material Safety Data Sheets for all Hazardous chemicals
13. Inventory of hazardous Wastes
14. Environmental & Safety Audits

## PHONE NUMBERS AND ENVIRONMENTAL ORGANIZATIONS

### **RECYCLING, DISPOSAL, AND HAZMAT**

- Mountain Environmental 456-5189 (Mike Kimel)
- 3RC 336-784-4300
- Hepco 828-250-0426
- Stat 800-627-1451
- Park Service Dispatch 828-298-2491
- Asheville Waste Paper
  - 828-252-6963
  - 304 Lyman Street Asheville, NC 28801
- Global Environmental Assurance, Inc
  - 320 Winningham Road St.George, SC 29477
  - 843-563-8916



## 6: COMMUNICATION

### GUEST EDUCATION

- We Welcome Your Ideas
- What we separate for recycling
- Other steps we are taking to protect the planet
- In room towel and sheet changing cards
- In room recycling waste cans
- Updates on Social Media
- "On-hold" phone message
- "Pisgah Inn is committed to the environment. We have instituted many systems that help preserve and protect the environment. These include water saver devices on all plumbing fixtures, compact and standard fluorescent lighting throughout the property, innovative cardboard back hauling, glass, plastic, and aluminum recycling, a container deposit program, a sheet and towel laundering option for our guests, an electric vehicle for use around the Inn, and a heat exchanger coil for cooling and hot water preheating. We will continue to pursue innovative concepts in an effort to maintain the delicate balance between preservation and use in our National Parks."
- "Don't throw it away" Signs

## EMPLOYEE COMMUNICATION POLICY

The Safety and Environmental Committee meets quarterly during our regular operating season. The Safety Officer and the Environmental Director will coordinate each meeting. Notice of the meeting will be posted by the time clocks at least 1 week prior to the event. Every employee is encouraged to attend. It is our intent to have at least one employee from every department on the committee.

Minutes for the meeting are taken by the committee secretary, and are submitted to the General Manager, the Safety Officer, and the Environmental Director. These are kept on file in the offices of these people. The minutes are reviewed at the beginning of the subsequent meeting. Any unresolved issues are then addressed.

Any issues that need to be communicated will be communicated through the department heads, who will, in turn, inform their employees.

## 7: TRAINING

### PLAN

The Environmental Director and the Managing Director will train Department Heads at the beginning of each business season. The Department Heads will be responsible for training their respective employees in their departments within two weeks of hire date. They will be required to follow existing procedures, and encouraged to suggest innovations in the following areas:

1. Education
  1. Ability to educate guests
  2. Ability to educate employees
2. Resource Consumption
  1. Ability to reduce energy consumption
  2. Ability to reduce water consumption
  3. Ability to reduce non-renewable fuel consumption
3. Pollution
  1. Ability to reduce toxic chemical use
  2. Ability to reduce light and/or noise pollution
4. Disposal and Recycling
  1. Ability to properly dispose of wastes
  2. Ability to reduce solid waste
  3. Ability to increase recycling
5. Other
  1. Overall Environmental and Safety Initiative

## 8: MONITORING, MEASUREMENT, AND CORRECTIVE ACTION

At the end of each calendar year, the Environmental Director will determine whether The Pisgah Inn has achieved environmental goals and targets (as listed under Chapter 2 of this written EMP). If no progress has been made, the Environmental Director will coordinate with staff to determine why goals and targets were not achieved, and will implement new operating policies or procedures that will assist The Pisgah Inn in achieving our stated environmental goals and targets. We will prepare an annual EMP Performance Summary to document our progress and maintain the summary on file in the Environmental Director's office.

The Environmental Director will also routinely monitor progress in addressing audit findings identified during environmental audits, including audits we conduct internally as well as environmental audits conducted by the NPS and environmental agencies. The Environmental Director will ensure that The Pisgah Inn adequately addresses identified audit findings in a timely manner (i.e., before the Deadline to Close Audit Finding date agreed upon by the audit team and The Pisgah Inn for CEAS audits). The Pisgah Inn's plans for implementing corrective action will be filed, along with the environmental audit report, in the Environmental Director's office.

At least annually, the Environmental Director and appropriate staff will review this written EMP and identify opportunities for improvement. As appropriate, we will discuss all updates with our employees and provide additional training if appropriate. We will continuously solicit input and feedback from our employees on the EMP.