Xanterra
PARKS & RESORTS

BEAUTIFUL PLACES ON EARTH.

December 17, 2007

Renette Anderson
Clean Utah!
c/o DEQ OPPA
168 North 1900 West
Salt Lake City, UT 84116

RE: Application to Clean Utah! Program

Dear Ms. Anderson:

Attached are the applications and supporting materials for membership in the Clean Utah! Program for Xanterra Parks & Resorts at Bryce Canyon Lodge.

The Clean Utah! Program is a fine example of a partnership opportunity for businesses and the State of Utah. We are pleased to apply to the program and we look forward to a long association with the State of Utah. Please feel free to contact us should you have any questions or should you require additional information.

Sincerely,

David C. Perkins
Regional Environment, Health, & Safety Director
Xanterra Parks & Resorts, Inc.
Bryce Canyon and Zion National Park Lodges
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Partner Level Application
(Tier Two)

This is a / X / single facility /___/ multiple facility application*

Applications are accepted at any time and will be reviewed on a semi-annual basis.
Type or print the following information:

Xanterra Parks & Resorts at Bryce Canyon Lodge — 100-499
* Site Specific Facility Name — *Number of Employees

National Park Service Concessionaire at Bryce Canyon Lodge – provide lodging, food services, and retail.
* Product or Service (What do you do?)

* Previous Facility Name(s)

Xanterra Parks & Resorts, Inc. — 721110
Parent Company, if applicable — *Industry SIC Code (4 digits)

Bryce Canyon Lodge, Bryce Canyon National Park — Bryce — 84764
*Facility Street Address — City — Zip

Mailing Address — City — State — Zip

David C. Perkins — Regional Environment, Health, & Safety Director
Contact Name — Title

435 - 772 - 7776 — 435 - 772 - 7792 — dperkins@xanterra.com
Telephone — FAX — E-mail address

* If you are applying for multiple facilities designation, include an additional sheet providing the * information for each facility.

Environmental Permits

You are eligible to participate in Clean Utah if you are governed by federal, state, or local environmental regulations.

For a Permitted Business:

List the environmental permits you hold. Attach additional sheets if more space is needed. If you are applying as a multiple facility, make sure the information is complete for *all* facilities to be covered by the Clean Utah designation.

Type of Permit:	Permit Number:	Issued by:
Propane-fired Steam Generating Boiler Permits	U-40045 U-0046	State of Utah Labor Commission, Division of Boiler and Elevator Safety
Concessionaires' Contract		USDOI - NPS

For a Small Business:

In some cases, small businesses are exempted from permit requirements because of the size of the operation. They may still be required to meet certain federal or state environmental regulations, such as record keeping and pollution prevention steps.

Let us know, in the space below, which environment regulations apply to you and what steps you take to assure your operation meets applicable requirements.

Compliance Eligibility Requirement

Clean Utah seeks to reward those who are willing to go beyond what is required by rule or statute to prevent or reduce pollution. You are eligible to participate provided you:

- have not been in Significant Noncompliance of Drinking Water, Water Quality, or Hazardous Waste regulations, had a High Priority Violation of Air Quality regulations, had a Severity Level I, II, or III Violation of Radiation Control regulations, or any equivalent violation of any state, federal, or local environmental regulation in the past year and you have not had a total of three such violations in the past three years;

- have not had any criminal violation of environmental regulations for the past five years and are not currently the focus of an environmental criminal investigation.

- have no other open or unresolved violation(s).

Have you continued to meet the compliance eligibility requirement? /_X_/ Yes /__/ No

Note:

Compliance history and status will be determined by the appropriate DEQ program(s), in consultation with EPA and the Local Health Department.

Environmental Management System (EMS)

To be considered for this Tier, you need to have had an Environmental Management System or EMS for one full or continual cycle. Several EMS models currently exist and you can select a model that best meets your circumstances, provided it meets all the components outlined in the Clean Utah policy. DEQ or its designee reserves the right to request documentation of the EMS and/or to make site visits for verification. Complete the EMS worksheet. Then, answer the following questions:

- Does your company have, in place, an EMS for the facility or facilities requesting the Clean Utah Partner Level designation?

/_X_/ Yes /___/ No

- If you are using a particular EMS model, please name: ISO 14001

- Do you meet all the criteria outlined in the EMS worksheet? /_X_/ Yes /___/ No

- Has your EMS been in place for one full cycle? /_X_/ Yes /___/ No

- Describe third party or self-assessment protocol used to evaluate your EMS: An internal audit is conducted once per year to determine whether the facility is adhering to its written EMS. An external audit is also conducted once per year by an ISO 14001-certified third party auditor. In 2007, the audit was conducted by ABS Quality Evaluations. A Preventative and Corrective Actions Database is maintained to track corrections to procedures to better adhere to established EMS policies. Both audits also suggest corrections and additions to the EMS to

address new challenges. Ongoing inspections, instruction, and training are also conducted by the facility environmental director.

Incentives

All participants:	DEQ-initiated publicity Annual meeting with DEQ policy leaders.
Partner Level:	Use of the Clean Utah Partner logo Negotiated incentives
Possibilities:	Selected permit enhancements (indicate specifically what you are seeking)
	Facility specific incentives (indicate specifically what you are seeking)
	(Water Quality/Drinking Water Projects Only) - Recommendation for a reduced percentage or higher priority on loan funds. (This incentive is conditional, based on the approval of the appropriate Board)
	Low Priority for Routine Inspections
	Self audit
	Other incentives offered by EPA to its Performance Track participants. (See website)

In the space below, indicate the incentives you are interested in receiving in return for your participation. If facility-specific incentives are selected, indicate what it is you are seeking. Please rank in order your preferences, with one being the most preferred.

1. Xanterra would seek an extension to the permitting interval for the *two propane-fired* boilers at Bryce Canyon Lodge. Currently these are permitted every two years. Xanterra would request that the permitting interval be extended.

2. Xanterra collects generally small quantities of regulated medical waste on a periodic basis from the lodging and food service operations at Zion Lodge. A licensed hazardous waste contractor hauls this medical waste about once per quarter. However, medical waste from the time it is gathered cannot be stored for more than seven days if it is not refrigerated, generating significant expense. Xanterra would request that an exemption be granted to allow us to have our medical waste picked up within 90 days rather than seven days, given that we can demonstrate proper handling, training, and storage out of the public area.

Note

The granting of incentives is at the discretion of DEQ, based on site-specific conditions, the strength of the proposed environmental projects, and the ability of the applicable DEQ program to provide the requested incentive.

Environmental Improvement Projects

Partner Level participants are required to work on two projects designed to significantly reduce or prevent pollution. "Significant" will be determined by considering your size, your industry sector, and your previous environmental improvement efforts.

Proposed projects cannot be work that is already required - by statute, rule, or as part of a settlement agreement. Wherever possible, your projects should be based on environmental aspects identified in your EMS. At least one of the two projects should benefit a Core area listed in the Clean Utah policy.

Include with this application, an outline of your proposed projects. Submit a separate write up for each project. Make the proposal brief and succinct while clearly addressing the areas below. As you prepare your proposal, keep in mind that it will be considered by the Public Interest Review Panel as part of the approval process and that it will be part of the Clean Utah public record. Therefore, it is recommended that you provide enough information to justify your proposal but *do NOT submit proprietary or confidential information.*

1. Begin with an introductory statement outlining your project. Tell us:
   - what you plan to accomplish;
   - how you plan to do it; and
   - why you consider your project "significant" and beyond what is required in statute.

2. Identify whether this is a Core or a Suggested project and which area it falls within. (See Clean Utah policy pages 6 and 7).

3. From your EMS, identify the environmental aspect or aspect(s) you are seeking to improve and why. Tell us how Utah's environment will benefit from your actions.

4. Tell us how you plan to monitor and/or measure your progress.

5. Complete the following for **each** indicator. Be specific:

   Targeted Indicator:
   Baseline year:
   Baseline total (indicate amount):
   Targeted reduction (indicate amount):
   Annual reduction: (indicate amount):
   Target year to reach this goal:

6. Identify any permits or special considerations you may need to do this project.

7. Tell us how you plan to meet the public participation requirement. (See Clean Utah policy page 9)

8. Any other information clarifications you want us to consider.

Terms and Conditions

Acceptance as a Partner Level participant entitles my facility to:

- display the Clean Utah logo at our place of business and in facility-related publicity. I understand that if my company has multiple facilities in Utah, only those locations covered by the approved application are eligible to use this logo.

- participate in DEQ-initiated publicity and in an annual meeting with DEQ policy leaders. Other incentives will be negotiated, based on the requests outlined in this application. I understand that final approval will be outlined in a signed Incentive Agreement and is subject to site-specific conditions and the ability of the applicable DEQ program to provide the incentive.

As a Partner Level participant, I agree to:

- remain in compliance with applicable environmental regulations. I understand that failure to do so may be grounds for removal.

- continue our EMS process and actively work on approved Clean Utah projects.

- submit an Annual Report, certifying ongoing compliance and including a summary of project commitments, accomplishments to date, major indicators of environmental improvements, and a plan for the upcoming year

- conduct appropriate public outreach activities, as outlined in the Clean Utah policy.

All ***Clean Utah*** participants agree to remain in compliance with applicable environmental regulations. Failure to do so may be grounds for removal.

Certification Statement

(to be signed by a senior facility manager)

I have read and agree to the terms and conditions for participation in the Clean Utah Program as described in the Clean Utah policy and application. I have personally examined and am familiar with the information contained in this application and it is, to the best of my knowledge and based on reasonable inquiry true, accurate and complete and I have no reason to believe the facility would not meet all program requirements. I agree that Utah DEQ's decision whether to accept participants into or remove them from Clean Utah is wholly discretionary.

I am a senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signed	12-17-07 *Date*
Jeff D'Arpa *Print Name*	GM *Title*
772-7771 *Telephone*	jdarpa@xanterra.com *E-mail address*

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December 13, 2007

RE: Environmental Improvement Project 1

Project 1

Initiate the Composting of Food Waste

Introductory Statement

Xanterra Parks & Resorts at Bryce Canyon Lodge has accomplished a 25% reduction in solid waste to the landfill since 2000. Total recycling at the lodge has also increased more than 230% since 2000. Although we have shown improvement in regard to management of solid waste, Xanterra desires to continue to improve our diversion of solid waste from the landfill. Xanterra anticipates that by composting our food waste we may be able to divert an additional 20,000 pounds per year of waste from the landfill.

Goal & Purpose (What we plan to accomplish)

Xanterra's goal is to reduce our solid waste diversion from the landfill. In the next three years our goal is to reduce solid waste to the landfill by 29,000 pounds. The 20,000 pounds of food waste will accomplish the bulk of this goal, but in addition further diversion efforts including improving recycling efforts will help to accomplish this goal.

Action Plan (How we plan to accomplish our goal)

Xanterra will purchase EarthTub composters to compost food waste. The EarthTubs have been in use with great success at other Xanterra properties composting as much as 26,000 pounds of food waste in a year. An employee training program to initiate the program will be added to Xanterra's new employee orientation and manager training programs. Recycling staff will also be trained on operation and maintenance of EarthTubs, handling of food waste, and ensuring the proper mix of compost. This process will be ongoing as we work to increase our food waste diversion. Xanterra will also seek a partner to who the compost can be donated.

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ADMINISTRATION OFFICE PHONE 435/772-0863 • FAX 435/772-0701

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Significance Beyond Statute

Xanterra is subject to no regulatory statute or requirement that mandates the composting of food waste. Xanterra has exceeded National Park Service requirements regarding solid waste diversion; however, Xanterra continues to work to increase recycling of solid waste and reduction of non-recyclable materials coming into the park.

Core or Suggested Project

The project falls within the Core project area of Waste Reduction.

EMS Aspect

Xanterra's Significant Aspect Ranking for the Utah Region including Bryce Canyon Lodge lists "Generation of Solid Wastes" as a significant aspect under our Environmental Management System. The cost of disposal of solid waste is rising in Utah. As well, slowing the filling of existing landfills will benefit tax payers as the life expectancy of those landfills increases. Food waste that can be composted can be kept from the landfill. Xanterra has concluded that it not only benefits the corporation to reduce solid waste, especially solid waste to the landfill, we also believe that in the long run it is the right thing to do for Utah.

Monitoring and Measurement of Progress

Progress will be measured through Xanterra's Baseline Resource Tracking. Solid waste to the landfill and recycling are tracked monthly by recording landfill data and data from Municipal Recycling Facilities and transfer stations. These numbers are verified in an annual audit.

Baseline Tracking

Targeted Indicator: Solid Waste to the Landfill
Baseline year: 2006
Baseline total: 179,400 pounds
Targeted reduction: 29,000 pounds
Annual reduction: 9,667 pounds
Target year to reach this goal: 2009

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Target Indicator: Total Recycling
Baseline year: 2006
Baseline total: 47,016
Targeted increase: 29,000 pounds
Annual increase: 9,667 pounds
Target year to reach this goal: 2009

Permits or Considerations Needed

None

Meeting Public Participation Requirement

Xanterra will solicit guest input via guest comment cards and front desk agents. In addition, Xanterra at Bryce Canyon Lodge is accountable to the NPS and will respond to concerns and challenges arising from our actions. Comment from the community and NPS will also be solicited through bi-monthly NPS Green Team meetings.

Additional Information

Should you have any questions or concerns, please contact:

David C. Perkins
Regional Environment, Health, & Safety Director
Xanterra Parks & Resorts, Inc.
Bryce Canyon and Zion National Park Lodges

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December 13, 2007

Re: Environmental Improvement Project 2

Project 2

Complete Large-Scale Lighting Retrofit to LED and Fluorescent Lighting

Introductory Statement

Xanterra Parks & Resorts at Bryce Canyon Lodge has been working on a retrofit of all lodge incandescent lighting to fluorescent and LED lighting. There remains much to accomplish in this effort.

Goal & Purpose (What we plan to accomplish)

Xanterra's goal is to reduce our electricity use by 300,000 kwh by 2009. The lighting retrofit along with other measures is expected to allow Xanterra to achieve the goal.

Action Plan (How we plan to accomplish our goal)

Xanterra will set aside funds to continue the lighting retrofit focusing on retail and guest room areas first and then expanding to food and beverage areas. Additional energy conservation measures will also be necessary to achieve the goal including an increased commitment to renewable energy and continuing conservation education.

Significance Beyond Statute

Xanterra is subject to no regulatory statute or requirement that requires the ambitious reductions in energy use that Xanterra has accomplished and proposes to accomplish. The proposed reductions go well beyond the Department of the Interior and NPS mandates.

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Core or Suggested Project

The project falls within the Suggested project area of Electricity Use Reduction.

EMS Aspect

Xanterra's Significant Aspect Ranking for the Utah Region including Bryce Canyon Lodge lists "Consumption of Electricity" as a significant aspect under our Environmental Management System. The generation of electricity has long been one of the most significant contributors to the emission of air pollutants and greenhouse gases. In addition, electricity use consumes fossil fuels. Xanterra has concluded that it not only benefits the corporation to reduce electricity use, we also believe that in the long run it is the right thing to do for Utah.

Monitoring and Measurement of Progress

Progress will be measured through Xanterra's Baseline Resource Tracking. Electricity use numbers are provided through the local utilities and are recorded monthly. The tracking of this data is subject to an annual audit.

Baseline Tracking

Targeted Indicator: Electricity Use
Baseline year: 2006
Baseline total: 1,505,271 kwh
Targeted reduction: 300,000 kwh
Annual reduction: 100,000 kwh
Target year to reach this goal: 2009

Permits or Considerations Needed

None

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Meeting Public Participation Requirement

Xanterra will solicit guest input via guest comment cards and front desk agents. In addition, Xanterra at Zion Lodge is accountable to the NPS and will respond to concerns and challenges arising from our actions. Comment from the community and NPS will also be solicited through bi-monthly NPS Green Team meetings.

Additional Information

Should you have any questions or concerns, please contact:

David C. Perkins
Regional Environment, Health, & Safety Director
Xanterra Parks & Resorts, Inc.
Bryce Canyon and Zion National Park Lodges

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EMS Worksheet

1. Environmental Policy

/_X/ Yes /__/ No	Does your EMS include a written environmental policy that has been defined by top management?
/__/ Yes /__/ No /_X/ Yes /__/ No	Does your policy commit your facility to compliance with both your legal requirements and your voluntary commitments? OR Do you have programs and procedures in place that achieve compliance with both your legal requirements and your voluntary commitments?
/_X/ Yes /__/ No	Does your policy commit your facility to preventing pollution at its source wherever possible?
/_X/ Yes /__/ No	Does your policy commit your facility to continuously improve your environmental performance, even in areas where you do not have regulatory requirements?
/_X/ Yes /__/ No	Does your policy commit your facility to sharing information with your community about your environmental performance and about how your EMS operates? OR Do you have programs and procedures in place that implement your commitment to share information with your community about your environmental performance?

2. Planning

/_X/ Yes /__/ No	Have you conducted an analysis of all your facility's aspects, both regulated and unregulated?
/_X/ Yes /__/ No	Have you determined which aspects are significant?
/_X/ Yes /__/ No	Does your EMS include an inventory of all your legal requirements at the Federal, State, tribal or local level?
/_X/ Yes /__/ No	Does your EMS include procedures for integrating changes to your legal requirements or voluntary commitments into the EMS?
/_X/ Yes /__/ No	Does your EMS include measurable objectives and targets and active, documented programs to meet your policy commitments?

3. Implementation and Operation

/_X/ Yes /__/ No	Is there top management commitment to your EMS (e.g,, a top manager with responsibility and authority for implementing your EMS)?
/_X/ Yes /__/ No	Does your EMS establish roles and responsibilities for meeting the objectives and targets of the EMS, including compliance with legal requirements?
/_X/ Yes /__/ No	Does your EMS establish procedures for achieving and maintaining compliance with legal requirements and meeting performance objectives?
/_X/ Yes /__/ No	Does your EMS establish procedures for communicating EMS information throughout your organization, including information about your facility's environmental performance?
/_X/ Yes /__/ No	Does your EMS hold managers and employees accountable for meeting EMS requirements?
/_X/ Yes /__/ No	Does your EMS establish procedures for controlling EMS documents that include who will maintain the documents and where they will be stored?
/_X/ Yes /__/ No	Does your EMS include specific training for those who have direct responsibility for achieving legal compliance or the objectives and targets in the EMS?
	Does your EMS document all of the following:
/_X/ Yes /__/ No	- your environmental policy?
/_X/ Yes /__/ No	- your significant environmental impacts?
/_X/ Yes /__/ No	- your objectives and targets
/_X/ Yes /__/ No	- the manager in charge of the EMS?
/_X/ Yes /__/ No	- your compliance audit program?
/_X/ Yes /__/ No	- your EMS audit program?
/_X/ Yes /__/ No	- overall authority in the EMS?
/_X/ Yes /__/ No	Does your EMS include operation and maintenance programs for equipment and other activities that are related to legal compliance and achieving the objectives and targets in the EMS?
/_X/ Yes /__/ No	Does your EMS include an emergency preparedness program?

4. Checking and Corrective Action

/_X/ Yes /__/ No	Does your EMS include an ongoing program for assessing facility performance and for preventing and detecting nonconformance with your EMS?

/_X/ Yes /__/ No	Do you have an EMS audit program?
/_X/ Yes /__/ No	Does your EMS include an ongoing program for preventing and detecting noncompliance with legal requirements?
/_X/ Yes /__/ No	Does your EMS include a compliance audit program?
/_X/ Yes /__/ No	Does your EMS include an active program for prompt corrective action of noncompliance with legal requirements and of nonconformance with EMS requirements?

5. Management Review

/_X/ Yes /__/ No	Do you have a documented management review of the performance and effectiveness of your EMS in meeting the EMS policy commitments?

6. Aspect Analysis

/_X/ Yes /__/ No	Have you done a comprehensive review of all activities conducted at your facility that could impact the environment? Note: An aspect is any part of a facility's activities, products or services that could have an impact on the environment. An aspect analysis includes both regulated and unregulated activities and products and their associated impacts.

7. Significant Aspects

/_X/ Yes /__/ No	Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors? Note: Some of your aspects should be classified as "significant" because they have the greatest potential to cause a significant environmental impact. Your EMS should include a consistent method for determining which of the aspects are significant. In addition to environmental risk, this method may consider other factors such as regulatory requirements, community concerns, or opportunities for pollution prevention.

8. Aspect Analysis Update

Month: Year:	When did you last update your aspect analysis? As part of your EMS implementation cycle, your aspect analysis should be reviewed and updated to insure that it continues to accurately reflect your facility's activities.

9. EMS Cycle

/_X/ Yes /__/ No	Have you completed at least one EMS cycle (plan-do-check-act)? A complete cycle includes: - Defining and documenting your EMS; - Identifying significant aspects and legal requirements; - Setting measurable objectives and targets; - Establishing roles and responsibilities for meeting EMS and legal requirements; - Conducting training for personnel on EMS and legal requirements; - Taking steps to meet the established objectives and targets; - Evaluating your progress in meeting established objectives and targets; - Conducting an EMS audit; - Completing a compliance audit; - Correcting any areas of EMS non-compliance or legal non-compliance; and - Completing a management review of the EMS and its results

10. EMS and Compliance Audit

/_X/ Yes /__/ No	Have you completed an audit of the EMS and an audit of compliance with applicable Federal, State, tribal and local environmental requirements? These audits may have been performed by someone in your facility or parent company or by an independent auditor. This question does not refer to inspections by government agencies.

11. EMS Assessment

/_X/ Yes /__/ No	Have you completed an objective self-assessment or third-party assessment of your EMS? If yes, indicate the protocol used in the appropriate space on the application.