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PROFESSIONAL DEVELOPMENT
AND
TRAINING PLAN GUIDELINES
FOR
U.S. EPA ON-SCENE COORDINATORS

September 2001

Foreword

The EPA Removal Program has operations which must be performed, or rapidly and efficiently resumed, in an emergency. While the impact of the emergency cannot be predicted in advance–planning, training and exercising for operations under emergency conditions can mitigate the impact of the emergency on our people, our facilities, and our mission. Each OSC should have an individual training development plan based on their specific needs and priorities, developed in conjunction with his or her supervisor. This document should be used as a basis for identifying needed training for OSCs.

Contents

PROFESSIONAL DEVELOPMENT AND TRAINING PLAN GUIDELINES FOR U.S. EPA ON-SCENE COORDINATORS

1. National Standard

On-Scene Coordinators (OSCs) must participate in exercises and be trained as required by federal statutes, regulations, Agency directives, and regional policies to carry out their official duties. OSCs also participate in advanced exercises and training which enhance their knowledge, skills, and abilities and those of the response community.

2. Overview of Training Guidelines

OSC supervisors are responsible for equipping their employees with the skills and competencies they need to get work done effectively and efficiently. OSC development can take various forms, such as formal training courses, educational conferences, on-the-job training, simulations and exercises, rotational assignments, mentoring, and coaching. The success of any of these approaches to training depends on how fully management supports the program, and how employees use the information they learn in the training.

EPA efforts to address future workforce needs, such as *EPA's Strategy for Human Capital* and *Workforce Assessment Project*, suggest that EPA's work is becoming more complex and that the workforce is aging (24% eligible to retire by 2005). This means that training to improve skills for existing employees and to prepare new employees for their responsibilities will be a continuing challenge.

This document describes the training required by government and Agency standards that apply to EPA OSCs, as well as training that is recommended by Senior OSCs, industry best practices, and workforce development efforts. Training appropriate for EPA OSCs is categorized in 5 areas: Required, Essential, Advanced, Mentoring, & Exercises/Drills.

3. Required Training

The following training is required to be taken by all OSCs as defined by statute, regulation, order, directive, or policy. Most of the training discussed in this section is mandated by the U.S. Occupational Safety and Health Administration (OSHA) and the EPA. While many of these standards are performance-oriented, allowing regions the flexibility to tailor the particular program to specific work site conditions, many of the training provisions require that particular categories of information be addressed.

The Removal Program has established a goal for OSCs to have completed these courses within one year of becoming an OSC. Although many of the refresher courses will not be required the first year,

some of the training is required prior to working onsite, e.g., 40-Hour OSHA training. Other training requirements apply only to OSCs working under specific conditions. For example, not having taken the asbestos awareness course would hinder an OSC from working on an asbestos site.

3.1 Safety and Health Training Requirements

All EPA OSCs must meet the safety, health, and environmental training requirements specified in EPA Order 1440 and in regional-specific programs. In addition, Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120 (e) (3)-(9)) require training for employees working at clean-up operations conducted under the Superfund or RCRA corrective action programs, voluntary cleanup operations, operations involving hazardous waste at RCRA Treatment Storage and Disposal Facilities, and emergency response operations for releases of hazardous substances (see table below). Training must be provided at the time of the employee's initial assignment and prior to assignments involving potential exposure to hazardous substances. OSHA and EPA requirements are similar and some training will meet both sets of requirements, but they are separate.

Basically, OSHA requires a 40-hour health and safety course that includes respirator instruction and fit testing for employees who may be expected to need it, and a minimum of three days actual field experience under the direct supervision of trained, experienced personnel. The 40-hour course must be taken prior to beginning work on a site. A medical evaluation in accordance with the Respiratory Protection Standard 29 CFR 1910.134 is necessary in order to participate in this training. Each student must provide a letter from their supervisor or a copy of a medical certificate that clearly states a medical evaluation has been completed and that the student is medically able to wear respiratory protection equipment. For OSCs, this requirement is generally covered under a more comprehensive medical monitoring program.

A 24-hour course and one day of supervised experience is required for workers who are only occasionally on site, or who work in areas where site characterization indicates little or no potential for exposure (e.g. command post support personnel). Supervisors are required to complete the 40-hour course and at least eight additional hours of specialized training at the time of job assignment. An 8-hour refresher training is required to be repeated annually by both OSCs and their supervisors.

EPA Order 1440.1, Safety, Health and Environmental Management Program, establishes policies, delegates authorities, defines management functions and responsibilities, and creates Agency-wide organizational structure for the administration of a safety, health, and environmental management program. EPA Order 1440.2, Health and Safety Requirements for Employees Engaged in Field Activities, establishes EPA's internal mandatory requirements for occupational health and safety training and certification, and occupational medical monitoring of Agency employees.

EPA Order 1440.2 establishes three levels of initial health and safety training: basic (24 hours), intermediate (basic plus 8 hours), and advanced (intermediate plus 8 hours). For OSCs all three levels can be met while fulfilling the OSHA 40 hour requirement. EPA requires more in the way of annual refresher training. Those employees completing basic level training need 8 hours of annual refresher training, intermediate level employees need 16 hours, and 24 hours of annual refresher instruction is required to maintain certification at each of the three levels (advanced). Due to the nature of the EPA

OSCs job duties, most OSCs should be trained to the advanced level. Most health and safety courses, provided by EPA or others, issue certificates at the completion of training. Both OSHA and EPA require certain objectives be met by the training and that instructors be qualified; however, neither certifies that specific courses meet these requirements. Rather, EPA health and safety officers in the regions and other organizations must determine that the training meets requirements.

Training Requirement	
40-hour OSHA training (165.5 or equivalent)* *Provided by EPA's Environmental Response Training Program (165 series).	29 CFR 1910.120 (e) (3)
24-hour field requirement	29 CFR 1910.120 (e)(3)(i)
8-hour hazardous waste supervisor training	29 CFR 1910.120 (e)(4)
Emergency Response to Hazardous Materials Incidents* *Provided by EPA's ERTP (165.15).	29 CFR 1910.120 (q)
Radiation safety training* *ERTP (165 series) or DOE	EPA Order 1440.1 (Training Guideline 38) 29 CFR 1910.1096 &10 CFR 19
Asbestos awareness training	29 CFR 1910.1001 (j)
Bloodborne pathogens	29 CFR 1910.120 (b)-(o)
First Aid/CPR	29 CFR 1910.120 (e)
Refresher Training Requirement	
Annual 8-hour health and safety refresher	29 CFR 1910.120 (e)(8)
Annual 16-hour health and safety refresher (intermediate-level employees)	EPA Order 1440.2
Annual 24-hour health and safety refresher (advanced-level employees)	EPA Order 1440.2
Biennial Radiation safety refresher	EPA Order 1440.1 (Training Guideline 38) 29 CFR 1910.1096 &10 CFR 19
Annual CPR Course	29 CFR 1910.120 (e)
First Aid Course (every three years)	29 CFR 1910.120 (e)

Other health and safety training required by OSHA for hazardous waste regulations apply to specific hazards or potential exposures expected to be encountered by OSCs. These include training in

radiation, asbestos awareness, and bloodborne pathogens. There may be instances where employee exposures to chemicals regulated by an OSHA substance-specific standard (i.e. lead, asbestos) exceed the permissible exposure limit. In this case, additional specific training may be required.

Radiation safety training is required by EPA Order 1440.1 for EPA personnel who face potential radiation exposure, which includes emergency response personnel. This course may be waived by the EPA radiation safety officer based on a verifiable record of the employee's past training and experience. Refresher training in basic radiation safety is also required every two years. Instructional materials and other information are available from the Office of Radiation and Indoor Air (ORIA) or your local radiation safety officer. OSHA and EPA also both require training in asbestos awareness for hazardous materials workers. OSHA standards require that all employees who are occupationally exposed to bloodborne pathogens and other potentially infectious materials be trained on the hazards associated with these agents. This training also is recommended for supervisors and others.

First aid and CPR training requirements are also contained in OSHA and EPA guidelines. These two courses can be combined in a one-day event or taken separately. First aid courses offered by the Red Cross only need to be taken every 3 years. CPR courses are required every year.

Neither OSHA nor EPA's Office of Administration and Resources Management (OARM) certifies specific courses as meeting specific requirements. Rather, it is the responsibility of the supervisor (or a designated Agency official, such as the regional safety and health officer or radiation safety officer) to certify that a specific employee has met the requirements based on time spent in training, topics covered, and instructor qualifications. OARM is piloting a new approach for meeting internal EPA training requirements that incorporates a risk-based formula. Under this approach, safety and health training should be what the employee needs for the specific job risks and exposures they might encounter, rather than a standard listing of content as currently exists in EPA Order 1440.2. OARM has not determined if there will be a specific hourly training requirement. Whatever changes are made to EPA's internal requirements for field employees (anticipated this year) will not impact OSHA requirements.

3.2 Inspector Training Requirements

EPA Order 3500.1 (May 1988) established training requirements for EPA compliance inspectors and field investigators. However, since CERCLA staff do not perform classic compliance inspections, the "Inspector Training" requirements allowed for EPA's Office of Solid Waste and Emergency Response (OSWER) and Office of Enforcement and Compliance Assurance (OECA) to determine which staff would be subject to the order's requirements and to develop a CERCLA-specific curriculum. This order incorporates EPA requirements under Order 1440.1, and it also is currently being revised. Only unique inspector training requirements applicable to OSCs and their first-line supervisors are addressed in this section.

EPA Order 3500.1 established a basic curriculum and requirements for the development of program-specific minimum curricula for Inspectors before they lead or conduct inspections independently. For CERCLA, this has been interpreted (OSWER Directives 9842.0-9842.2, 9295.9-05) to apply to all personnel (including CERCLA program and EPA contractor/grant inspectors) actually performing

inspections and leading or overseeing Agency inspectors and state, local, or contractor inspectors, regardless of actual job title. This definition includes OSCs involved in field activities and their first-line supervisors. OECA is responsible for tracking inspector training requirements and preparing periodic reports to congress.

Inspector Training Requirements	
Training Requirement	Required by:
CEC: Fundamentals of Superfund	EPA Order 3500.1/OSWER Directive 9295.9-05
CEC: Removal Process	EPA Order 3500.1/OSWER Directive 9295.9-05
CEC: Enforcement Process	EPA Order 3500.1/OSWER Directive 9295.9-05
Negotiations training	EPA Order 3500.1/OSWER Directive 9295.9-05

The CERCLA Education Center (CEC) was established and is administered by OSWER to meet these requirements and other training needs of CERCLA staff. The *Fundamentals of Superfund* course fulfills basic inspector training requirements and is a prerequisite for program-specific training provided through the *Removal Process* and *Enforcement Process* courses. Each course lasts 3 to 5 days, and is provided at various locations in regional cities three or four times each year. A two-day negotiations training course was previously incorporated in the *Enforcement Process* course, but is now expected to be fulfilled through completing a separate negotiations course provided in the region or commercially.

3.3 Other Training Requirements

In addition to health and safety and inspector training requirements, OSCs must complete training in contracts management, transportation, RCRA (as generators of hazardous waste), and quality assurance/quality control. The following table lists these requirements and references the source of the requirement.

Training Requirement	
Warrant training	EPA Acquisition Regulations 1120
Contracting Officer Representative (COR) Mentor on-line training course * * Available through the Federal Acquisition Institute	Clinger-Cohen Act (Maloney Bill) and EPA Acquisition Regulations 1120
Purchase Card Holder training (8-hour)	EPA Acquisition Regulations 1120

Other Training Requirements	
Transportation for hazmat (DOT HM 181)	49 CFR 172 &173
RCRA Generator required training	40 CFR 265.16
QA/QC training * * Regional requirements as directed in Regional Quality Assurance Management Plans	EPA Order 5360.A2
40-hour biennial contracts training/ One-day contracting re-certification course	Clinger-Cohen Act (Maloney Bill) and EPA Acquisition Regulations 1120
Transportation for hazmat (DOT HM 181) (every 3 years)	49 CFR 172 &173

As of fiscal year 2001, all EPA OSCs have completed a four-day Warrant Authority training course that is required by OARM in order to receive a limited contract officer warrant to operate independently for emergency response actions during non-business hours. Completion of the COR Mentor course is a prerequisite for this course. The Warrant course was developed and delivered by the OSC Readiness Task Force, EPA's Office of Acquisition Management (OAM) and Office of Emergency and Remedial Response (OERR). Additionally, a mandatory one-day purchase card holder training is required for authorizing EPA employees to become government purchase card holders for the acquisition of limited goods and services (under $2,500 per order). Warrants for OSCs are issued by the Director of the Superfund, RCRA, and Regional Procurement Operations Division. Warrants for purchase card holders are issued by the Manager of the Internal Oversight Service Center.

The Clinger-Cohen Act, sometimes referred to as the "Maloney Bill," requires federal policies for education and training of the federal acquisition workforce. This includes contracting officers (CO) and contracting officer representatives (COR)—i.e., those who manage contracts, such as project officers, work assignment managers, delivery or task order project officers. As a result, the Federal Acquisition Institute develop the Internet-based "COR Mentor" training course. It replaces EPA's former Contract Administration and Acquisition Training for Project Officers courses and is a requirement for OSCs. In August 1998, the Director of OAM required all Agency CORs to complete the COR Mentor Course by October 1, 2001. Once the course is completed, a one-day Re-certification Course will be required every three years to review new policies and regulations in acquisition and to reinforce proper contract management practices. Contract management training includes requirements for training that addresses ethics for government employees and conflicts of interest (48 CFR 2803.104-70), among other topics. EPA contract training requirements are detailed in EPA Acquisition Regulations section 1120, and in the Contracts Management Manual, available from OAM.

4. Essential and Advanced Training

Basic or essential training is defined as training that has been identified as critical to an OSC's effective job performance, and is based on the knowledge and experience of senior OSCs, consideration of previous needs assessment research; and earlier attempts at developing OSC specific curricula within the Agency.

This training category includes additional site-specific specialized training that may be required by statute, regulation, order, directive, or policy within the federal government, EPA, or the regional office, but is not covered in the Required Training section above. This specialized training may be required only if the OSC expects to work on specialized sites, or with special substances or methods.

Advanced training is that which will develop experience and maximize the OSC's performance within current grade level (consistent with workforce development strategies). Once an OSC has completed required training, essential and advanced courses should be taken in order to provide site-specific knowledge and skills, improve performance, or provide for professional development. OSWER Directive 9295.9-05 established a requirement for 80 hours of professional development training each year for EPA OSCs. It is envisioned that each OSC will work with his or her supervisor to develop a training plan that would meet training requirements and enhance the OSC's particular knowledge, skills and abilities based upon their individual work experience thus far. To assist in developing the individual training plan, the essential and advanced training has been organized by the following four categories of knowledge, skills, and ability.

4.1 Laws, Regulations, and Policies

OSCs are required to have an understanding of the regulatory framework governing their emergency response to incidents involving hazardous substances, oil, pollutants, or contaminants. Most of the laws, regulations and policies that OSCs operate under regularly (CERCLA, OPA, NCP) are covered in the required training section.

Laws, Regulations, and Policies

Essential Training Topics	PDD 39, 62, 63
Waste Treatment, Transportation, and Disposal (RCRA, TSCA, FIFRA)	
Underground Storage Tank Regulations	
Asbestos Abatement Identification and Removal for Supervisors (AHERA)	
Stafford Act/Federal Response Plan	
Federal Radiological Emergency Response Plan (FRERP)	
Knowing and Using the NCP	

Advanced Training Topics

Facility Response Plan (FRP); Response Management Plan (RMP)
Spill Prevention Control and Countermeasures (SPCC)
Integrated Contingency Plans (ICP)
Federal Acquisition Regulations, EPA Acquisition Requirements
CIH, CHMM

4.2 Technology, Equipment, and Risk Management

OSCs are required to have an understanding of the technology and equipment (including personal protective equipment) required to respond to an emergency incident involving hazardous substances, oil, and pollutants or contaminants. OSCs are also required to be able to evaluate the risks associated with releases or potential releases of hazardous substances and pollutants or contaminants and discharges, or potential discharges, of oil. Additionally, OSCs must be able to select appropriate and cost effective response tactics to minimize the impact of a release or discharge to public health and the environment.

Technology, Equipment, and Risk Management

Essential Training Topics

Innovative Treatment Technologies
Personnel Protective Equipment: Level A
Confined Space Entry
Environmental Chemistry
Chemistry of Hazardous Materials
Sampling for Hazardous Materials
Inland Oil Spills
Hazard Categorization
Air Monitoring
Risk Evaluation
Underground Storage Tank Response Action
Natural Resource Damage Assessment
Computer Applications
Analytical Methods

Advanced Training Topics

Electroplating Processes and Cleanup
Field-based Site Characterization
Response Technologies
Bioremediation
Railroad Response
Pipeline Incident Response
Fire Fighting
Fixed Facility Accident Response
Explosives
Compressed Gas Cylinders
Counter terrorism response

4.3 Managing People

OSCs are required to maintain and demonstrate competence in managing people (including contractors), programs, and resources.

Managing People

Essential Training Topics	Advanced Training Topics
Integrated Command Structure/Unified Command (ICS/UC)	Crisis Management (EPA version of Yorktown)
Emergency Management Structures	Public Administration
Project Management	Personnel, Finance, Audit, Organizations
Leadership Training	Advanced Leadership Training

4.4 Communication

OSCs must be able to effectively communicate with members of the public, the media, and other stakeholders about the Removal program and associated efforts (e.g., statutory basis for actions, risks associated with sites).

Essential	Advanced
Risk Communication	Crisis Communication
Media Relations	Camera Skills (Advanced Media Skills)
Community Involvement	
Emergency Community Outreach Team	
Public Speaking/Briefing Skills	

5. Exercises

Although many OSCs already participate in exercises to develop skills in emergency response, a more formal requirement and process would be helpful in ensuring that all OSCs meet the requirements of Sections 300.212 and 300.215 of the NCP, which require that OSCs be prepared to exercise federal response capabilities. OSCs should seek out opportunities to participate in (i.e., observe, play, control, or evaluate) at least one exercise/drill each year. Advanced deployment for FEMA exercises and responses may be used to fulfill a portion of this requirement. Exercises may be coordinated and conducted with Superfund contractors (e.g., ERRS, START, or REAC), the EPA Environmental Response Team, Departments of Energy and Defense, Federal Emergency Management Agency, U.S. Coast Guard, Area Committees, Local Environmental Planning Committees and other response organizations. The removal branch will track OSC participation in these drills; each OSC will be responsible for identifying and taking advantage of drill and exercise opportunities. One branch

employee will assist OSCs in identifying drills and exercises outside of those generated through the sub-Area and Area planning process.

In addition to exercises and drills listed above which provide response management training, OSCs should participate in regional training that would be specific to field readiness. All OSCs that are Level A, B and C ready, should regularly don and doff personal protective equipment and work with field monitoring instruments. Familiarity with response equipment is the goal. This familiarity can be achieved in the field or practiced during training exercises and drills.

6. Mentoring

The OSC mentoring program is a key aspect of EPA's training program. Currently, the mentoring program places the burden on a single mentor in each region to provide new OSCs with the full range of competencies expected from an OSC; however, it is unrealistic to think that one OSC can "mentor" all required skills. Each OSC has individual strengths and weaknesses, and much can be learned by experiencing the various approaches of different OSCs. As a result, the mentoring program should be revised to ensure that new OSCs are exposed to the broadest range possible of sites and OSCs. Consistent with Agency-wide policy on mentoring, each new OSC should be assigned a lead mentor by his or her supervisor soon after appointment. The lead mentor for each incoming OSC will be selected on the basis of the mentor's and protégée's experience, background, and preferences. The supervisor, lead mentor, and the new OSC will assess weaknesses in the OSC's technical experience and background. Each new OSC's mentoring program will be targeted to address weaknesses identified in this initial discussion. Mentors will be provided with this document for use in selecting training and other development tools. New OSCs will remain in the mentoring program until the lead mentor, the protégée, and the supervisor agree that the OSC is ready for a response action assignment. So that all new OSCs are exposed to the broadest range of experiences possible, the lead mentor and the protégée will work together to identify a series of site activities and other job-related experiences (e.g., site start-up, public meetings, site shut-down) that the protégée should seek out during the mentoring period. New OSCs will be expected to spend as much time as possible with as many OSCs as possible, so that they are exposed to a variety of OSC approaches and site phases. The lead mentor and protégée will revisit their progress on a monthly basis to identify areas that need to be focused upon during the upcoming month.

7. Individual Development Plans

All OSCs and their supervisors are expected to work together to develop annual Individual Development Plans that will serve to enhance both the individual OSC's career and his or her contribution to fulfilling the mission and objectives of the removal program. An Individual Development Plan will help to develop the OSC's strengths, make the job more engaging and rewarding, and help emphasize matters that are both interesting and relevant to the Agency's work. The process should

begin with the OSC's consideration of his or her strengths and values, and the supervisor's organizational plans and goals. Developmental activities—such as special assignments or projects that take advantage of strengths, and training or coaching to enhance functions that don't match well with strengths—are then selected jointly. OSCs have work that they are expected to carry out, each should be helped to learn how to do it, encouraged to get it done, and required to get it done on time. Once the OSC and supervisor have agreed on the primary areas of focus, the supervisor will likely need to speak with other OSCs and locate funding for training before making commitments. OSC supervisors are responsible for making sure each OSC develops an IDP, balancing work needs with training requirements and developmental needs, and for approving training and development plans in the IDP. OSCs must take responsibility for successfully completing assigned training, development, education, and qualification activities; providing objective feedback to supervisors and training personnel on the effectiveness and relevance of training; and provide training documentation to relevant individuals or offices to maintain current training records. EPA's Institute for Individual and Organizational Excellence can provide guidance and assistance in completing the IDP process.

8. Training Opportunities

This section of the guidelines provides a brief description of some of the many training and development opportunities that are available to OSCs to meet the required, essential, and advanced training listed in previous sections. Much of this training is provided to OSCs free of charge or with costs supplemented by other EPA organizations.

8.1 OSC Readiness Training

The OSC Readiness Task Force identified the need for a training forum directed specifically at the OSCs job functions. The OSC Readiness Task Force developed the OSC Readiness Training Board made up of OSCs and representatives of OERR and TIO. The members of the OSC Readiness Training Board are responsible for the development, planning and implementation of the annual OSC Readiness Training that occurs each November. Learning activities offered at each OSC Readiness Training are selected by the OSC Readiness Training Board based on current needs, feedback from previous offerings and training requests from OSCs and their supervisors. Approximately half of the Agency's OSCs attend each year's training. More information is available from the EPA OSC web page (http://www.epaosc.org).

8.2 TIO and OERR Sponsored Training

EPA headquarters staff in the Office of Emergency and Remedial Response (OERR) and Technology Innovation Office (TIO) assist in the planning and implementation of the OSC Readiness training, but they also offer other training opportunities. Information and schedules for most of these training courses can be found on the Training Exchange web page (http://trainex.org).

8.3 Environmental Response Team Training

OERR's Environmental Response Team Center manages the Environmental Response Training Program (ERTP) that offers dozens of health and safety and technical training courses in EPA regions each year. This support includes the 165 series of training courses, technical assistance from ERT experts, the OSC web page (http://www.ert.org), as well as software and video tapes that address technical topics.

8.4 CERCLA Education Center

TIO offers required and advanced training for OSCs through the CERCLA Education Center (e.g., Fundamentals of Superfund, Removal Process, Innovative Treatment Technologies) and through other programs to support the implementation of innovative remedial technologies (e.g., Cleanup Information web site, Technical Support Project, Internet Seminars, Superfund Online Institute, partnerships with other federal agencies and private sector organizations). Regional OSWER Training Forum members can assist in scheduling and coordinating these and other courses.

8.5 Community Involvement and Outreach Center

The Community Involvement and Outreach Center in OERR offers a number of training courses through the Community Involvement University (e.g., Stress Management, Leadership, Media Relations, Cross Cultural Effectiveness), sponsors an annual EPA-wide Community Involvement Conference, and offers assistance through the Emergency Community Outreach Team, alternative dispute resolution services, other assistance.

8.6 Mid-Level Development Initiative

National attention to EPA's Human Capital Strategy and workforce development needs has lead to the development of the EPA Mid-level Development Initiative by the Office of Human Resources and Organizational Support (OHROS). This program is part of a broader workforce development strategy that is focused on incorporating training, career development and other human resource issues into EPA's strategic planning and budgeting process. The Mid-level Development effort aims to identify, develop, and deliver competency training and development activities to EPA staff in mid-level grades. These competencies are those identified in a national workforce assessment as addressing critical cross-cutting skills needed now and in the future. Courses to be offered in the regions include:

- Getting the Work Done with Others
- Getting the Work Done through Program Management
- Getting the Work Done through Process Improvement
- Getting the Work Done through Change
- Getting the Work Done and Achieving Professional Results.

14. Training Program Administration

To effectively manage OSC training, responsibilities should be assigned for conducting regular training needs assessments to determine the requirements for training content and frequency, coordinating training delivery by identifying training resources and arranging training delivery, maintaining training records as specified by various responsible entities, and conducting training course and program evaluations to ensure the quality of training provided for OSCs.

14.1 Training Needs Assessment

The first step in organizing and offering training expected to be valuable to OSCs and the removal program is to determine whether problems exist that can be addressed by training. With regard to required training for new hires or recertification, this involves determining the number of individuals who require the training and their locations, and then establishing a method for ensuring that the training is available. In situations where OSCs need new information or skills to better conduct their responsibilities, an analysis of the specific training needs and audience characteristics is required to design and develop effective training. Sometimes this training is initiated by headquarters to introduce new policies or guidance, and it is important that this type of training be integrated into existing training programs.

Training needs assessments for OSCs are currently conducted informally by removal program managers and the OSC Readiness Task Force by discussing important activities and identifying skill gaps. In addition, the Technology Innovation Office conducts a comprehensive training needs assessment every five years. These methods should be sufficient to direct training plans and new course development, along with feedback and evaluation results from existing courses and programs.

14.2 Coordinating Training

To become motivated to pay attention and learn the material that the trainer is presenting, employees must be convinced of the importance and relevance of the material. This is frequently addressed in EPA by ensuring that more experienced OSCs participate in the training process, by helping to establish goals, develop training materials, and provide instruction. Training participants can also contribute by taking seriously the commitment to attend training, participating in discussions, asking questions, contributing their knowledge and expertise, and learning through hands-on experience and exercises.

Getting the word out about training, managing logistics, ensuring the qualifications of trainers, managing training budgets, and evaluating various potential sources of training are all important responsibilities. Much of this work is accomplished by managers or those involved in training development and delivery, but it is always important that local training coordinators do their part to ensure the success of training. The Technology Innovation Office, Environmental Response Training Program, OSWER Training Forum, and Training Exchange web page are all important resources for training within OSWER. Additional training and support also is available from OHROS, regional training offices, health and safety officers, and others.

14.3 Maintaining Training Records

The need to document and maintain training records has been identified and agreed upon by the OSC Task Force, Removal Managers and OERR and incorporated into the core Emergency Response evaluation criteria. Because of the amount and variety of required training for OSCs, and the diverse organizations responsible for maintaining training records, tracking training and ensuring successful completion of course requirements is a challenge. For this reason, the OSC Readiness Task Force and TIO have committed to developing a system (tentatively known as "Train Track") for maintaining verifiable training records by program and by individual, for tracking accomplishment of requirements, and for preparing reports on training.

14.4 Training Course and Program Evaluation

Training and development programs that support career growth and promote competency of OSCs should be subject to formal and informal assessments to determine how well they meet short and long range needs. These assessments should be conducted annually in accordance with regional policy and procedures. They should address the extent to which training programs are achieving the objectives stated in training plans and other organizational plans and strategies; the effectiveness of training OSCs with skills and knowledge that can be used on the job; and the effective and economic use of resources.

ANNEX A

AUTHORITIES AND REFERENCES

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EPA Directives and Guidance:

Policy and Procedures Manual (Office of Administration and Resources Management, Facilities and Support Services Division):

Volume 4820, Communications
Volume 4830, Property Management

2160, *Records Management Manual*

2100, *Information Resources Management (IRM) Policy Manual*

Statutes and Executive Orders:

Executive Order (EO) 12148, Federal Emergency Management, July 20, 1979, as amended.

EO 12472, Assignment of National Security and Emergency Preparedness Telecommunications Functions, April 3, 1984, as amended.

Occupational Safety and Health Administration (OSHA) regulations: 29 CFR 1910.120

Other Documents:

National Industrial Security Program Operating Manual for Safeguarding Classified Information, DOD 5220.22 M, January 1995.

Principal Threats Facing Community and Local Emergency Management Coordinators, FEMA, March 1991.

ANNEX B

EPA ORDER 3500.1

ANNEX C

EPA ORDER 1440

ANNEX D

Example Forms for Training Documentation

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Site Remediation and Restoration
Emergency Planning and Response Branch
One Congress Street, Boston, MA 02114-2023

CERTIFICATION OF 24 HOURS OF ON-SITE TRAINING

NAME:_____

DATE OF HIRE:_____

SECTION:_____

I certify that the requirements of 24 hours of on-site training under the direction of a senior staff member, as required by 29 CFR 1910.120(e)(3)(i), has been met for the above named person. The details of this training are listed on the attached pages.

Dennisses Valdes
Chief, Emergency Response Section

Date:_____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England Region
Environmental Services Division
60 Westview Street, Lexington, MA 02173-3185

Certification of 24-hours of on-site training
OSHA 29 CFR 1910.120 (e)(3)(i)

The purpose of this certificate is to record the 24 hours of on-site training each OSC is to receive under the supervision of a senior staff person.

Name of Person Receiving Training:_____

*Note: Hours **NOT** to be included are: travel time, trailer time and in-office time.

As a minimum employees must complete at least 2 hours in each level of protection and conduct each type of work task the employee may reasonably be expected to conduct.

SITE NAME/ID:_____

TYPE OF SITE: (ex. site investigation, emergency response, etc.)

_____

_____

DATE(S):_____
HOURS OF ON-SITE TRAINING:_____
LEVEL OF PROTECTION/HOURS:_____

TASKS PERFORMED/HOURS: _____

_____

_____

_____

_____ DATE: _____

Trainee's Signature/Printed Name

_____ DATE: _____

Trainer's Signature/Printed Name