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ATTACHMENTS: None

A. PURPOSE AND APPLICABILITY

The purpose of this Operating Procedure (OP) is to establish a uniform method for minimizing the potential negative impacts of Region 7's significant environmental aspects by ensuring all individuals whose activities, products, and services (referred to generically as processes) have the potential to contribute to one of those aspects are:

- Properly trained with respect to the Region's environmental management system (EMS); and
- Deemed competent in the performance of their duties on the basis of appropriate education, training, or experience.

This OP applies to all permanent EPA personnel working in Region 7 and Region 7-hired on-site grantees and contractors. To the greatest extent practical, this OP will also apply to all other individuals who work in the Region 7 RO, Science & Technology Center (STC) or Training & Logistics Center (TLC) facilities including other federal employees, temporary employees, and contractors not hired by the Region.

B. DEFINITIONS

All definitions may be found in the document titled *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions* (SHEMS 007.9000.02) contained in the EMS Manual. For the purposes of this OP, the following terms apply:

- Activity, Product, or Service
- Awareness
- Competence
- Environmental Aspect
- Environmental Impact
- Management Program (MP)
- Regional Training Officer
- REGISTRAR
- Senior Management
- Significant Environmental Aspect
- Training

C. PROCEDURAL STEPS

1. EMS Training

- a. All Region 7 EMS training is designed to ensure all personnel are aware of:

- (1) The importance of conforming with the Region's environmental policy, procedures, and the requirements of the EMS;
 - (2) The significant environmental aspects and related actual or potential impacts associated with their work and the environmental benefits of improved personal performance;
 - (3) Their roles and responsibilities in achieving conformity with the requirements of the EMS; and
 - (4) The potential consequences of departing from specified procedures.
- b. Two levels of EMS training will be provided by the EMS Coordinator:
- (1) **Awareness Training:** Awareness-level training is provided to all new personnel and Region 7-hired on-site grantees and contractors. To the greatest extent possible, the training will be provided to all other new individuals who work in the Region 7 RO, STC or TLC facilities including other federal employees, and contractors not hired by the Region. In addition to the items specified in Paragraph 1.a. above, the purpose of this training is to provide an overview of the elements of ISO 14001 and a general discussion of the Region's EMS including its policy, significant aspects, objectives and targets, and management programs (MPs). The EMS Coordinator will identify new employees, on-site contractors, and on-site grantees that have started since the previous training date in accordance with Paragraph C.c.(2) below. The training will be developed and maintained by the EMS Coordinator and will be provided by the EMS Coordinator or their designee.
 - (2) **Refresher Training:** Refresher-level training is provided during each EMS cycle to Region 7 personnel and EPA Region 7-hired on-site grantees and contractors except for those who have received Awareness Training within the previous six months. While it is the Region's preference to provide Refresher training to all of these people and other individuals who work in the Region 7 RO, STC or TLC facilities, the goal is to ensure at least 90% of the people within the scope of the EMS are trained each cycle. In addition to the items specified in Paragraph 1.a. above, the purpose of this training is to remind personnel of the basic structure of the Region's EMS; provide updates on ongoing objectives and targets; identify any changes to the EMS scope or environmental policy; and introduce any new significant aspects, objectives and targets, and MPs. The training will be developed, maintained, and provided by the EMS Coordinator, or their designee, using a variety of media (*i.e.*, classroom, video-based, handouts).

The unique roles and responsibilities for members of the Region's Senior

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Management under the EMS are reviewed at least once each cycle during the Management Review and are often revisited during the meeting where they are asked to review and approve of the changes to the system held toward the beginning of the cycle. Otherwise, they receive general awareness and refresher-level training as described above and in Paragraph C.1.c below.

c. EMS training will be scheduled as follows:

(1) **Awareness Training:** EMS Awareness Training will normally be scheduled in REGISTRAR and provided during the 2nd, 3rd, and 4th quarters of each fiscal year at the discretion of the EMS Coordinator. The Coordinator will contact the Human Resources and Organizational Development Branch (PLMG/HROD) prior to the next course to obtain a list of new employees who have been (or will be) hired since the previous training session and will invite them to sign up for the course via REGISTRAR. The trainer (EMS Coordinator or designee) will take attendance during the training session and will update the appropriate personnel training records in REGISTRAR.

Additionally, once Awareness Training Classes have been scheduled, the EMS Coordinator will email the Grantee Coordinator and Region 7 managers to identify new on-site grantees and contractors that have been hired since the previous session. Those individuals will then be notified of when the classes are scheduled and how to sign up.

(2) **Refresher Training:** The EMS Coordinator will work with Division Directors and/or Branch Managers to schedule EMS Refresher Training classes during their branch/staff meetings. On-site grantees and contractors are expected to attend the training class with the branch / office staff where they work. If necessary, additional training sessions will be scheduled for individuals that were not able to attend the original branch/staff meetings. All individuals who attend a session will be required to sign a class roster documenting their attendance. All training dates/times will then be entered in to the REGISTRAR database as well as the roster of who has completed the training. Trainings will typically occur in the 2nd quarter of each EMS cycle; if needed, additional trainings may be scheduled in the 3rd quarter or at other times as deemed necessary by the EMS Coordinator. The trainer (EMS Coordinator or designee) will take attendance during the training session and ensure the appropriate personnel training records in REGISTRAR are updated.

d. The EMS Coordinator will work with Contracting Officer's Representatives (CORs) and Contracting Officers (COs) to ensure contracts contain provisions requiring participation in appropriate Region 7 EMS training courses.

- e. The EMS Coordinator will provide the Region's Senior Management with periodic updates on completion rates of required training as part of the overall EMS Status Report if requested.

2. Competency

- a. It is Region 7's position that all personnel, in order to be assigned to specific duties within the organization, are technically competent to perform those duties in accordance with established policies, guidelines, and procedures.
- b. Technical competency will be assessed by an individual's supervisor through the Performance Appraisal and Recognition System (PARS) and through internal and external audits (*i.e.*, compliance audits and laboratory certification audits). It is expected that supervisors will move quickly to address and rectify any noted competency deficiencies.
- c. The EMS Coordinator shall determine the competency level needed and ability, based on training and/or experience, of individuals assigned to specific duties pertaining to the operation of the EMS. These duties include, but are not limited to, membership on the EMS Sustainment Team, MP Leads, and members of internal EMS Audit Teams. Only competent individuals will be assigned EMS-related duties.
- d. EMS-specific competency training will be provided on an as needed basis and will be developed, maintained, and provided by the EMS Coordinator or their designee. Tracking of this training will depend upon the type and purpose of the training and may include, but is not limited to, training records, training attendance records, memorandums, and meeting minutes. Competency training is not tracked in REGISTRAR.

D. RECORDS MANAGEMENT

This OP requires the generation of the following records:

<u>Record</u>	<u>Responsible Person</u>	<u>Record Location</u>
Training Attendance Lists	EMS Coordinator	EMS Working Files
Training Records	EMS Coordinator	REGISTRAR Database

This OP may also result in the creation of additional EMS records. Any records created will be managed in accordance with the most current versions of SHEMS 006.7210.02, *Document Control* and SHEMS 006.7210.17, *Records Management*.

E. QUALITY ASSURANCE AND QUALITY CONTROL

The consistent application of the procedural steps in this OP should achieve suitable results related to the EMS training and awareness, as well as the technical competency, of all personnel assigned to EPA Region 7. Ultimately, the quality assurance and quality control (QA/QC) success of the training, awareness, and competency process and this OP will be determined through the internal and external EMS conformance and environmental compliance audit processes. Deficiencies noted during these audits will be managed through the Region's Corrective/Preventive Action Process as defined in the current version of SHEMS 006.7210.12.

F. REFERENCES

Current versions of the following references are assumed if no date is provided.

1. ISO 14004:2004(E); *Environmental Management Systems – General Guidelines on Principles, Systems, and Support Techniques*; November 15, 2004
2. USEPA R7, *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions*, SHEMS 007.9000.02
3. US EPA R7, *Document Control*, SHEMS 006.7210.02
4. US EPA R7, *Corrective/Preventive Action Process*, SHEMS 006.7210.12
5. US EPA R7, *Environmental Management System Audit*, EMS 006.7210.13
6. US EPA R7, *Records Management*, SHEMS 006.7210.17