



EPA Region 1 McCormack Federal Building

EMS Procedure

4.4.2 Training

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Document location: The official controlled version of this document is the electronic version maintained on-line in the Lotus Notes Database.

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1.0 Purpose

- 1.1 The purpose of this procedure is to establish guidelines for periodic environmental management system (EMS) awareness and competency training. This procedure covers the provision of general awareness training for all EPA-NE Boston Office employees and competency training of employees whose duties are associated with one or more significant environmental aspects or with meeting the requirements of environmental regulations.

2.0 Scope

- 2.1 This procedure for training covers all relevant functions and levels of the EPA-NE Boston Office and addresses the requirement to provide appropriate environmental training for all employees. It covers both EMS competency and EMS awareness training.

3.0 Definitions

- 3.1 For definitions of common terms for EPA-NE Boston Office EMS procedures, refer to EMS document EMS Definitions.

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4.0 Approach

4.1 General EMS Awareness Training:

- 4.1.1 General EMS Awareness training will be conducted for all EPA employees as part of the implementation of the EMS.
- 4.1.2 New employees will receive EMS General Awareness Training as part of new employee orientation (within six months of an employee's hire date).
- 4.1.3 Training requirements for contractors will be established as appropriate on a case-by-case basis.
- 4.1.4 Periodic refresher updates on the EMS will cover the EPA-NE Boston Office Environmental Policy, changes to the EMS significant aspects and objectives and targets, and any other significant changes to the EMS, as needed. Refreshers may be accomplished by various means, including emails, poster displays, staff meeting presentations or by online or classroom training.
- 4.1.5 The objective of EMS General Awareness Training is to make all EPA-NE staff aware of the basic elements of an EMS including:
 - 4.1.5.1 the employees' role in the EMS;
 - 4.1.5.2 the commitments of the EPA-NE Boston Office Environmental Policy;
 - 4.1.5.3 identification of significant environmental aspects; and
 - 4.1.5.4 the objectives and targets that have been established.

4.2 Competency Training

- 4.2.1 Personnel that perform tasks that can cause significant environmental or compliance impacts need to be competent on the basis of appropriate education, training and/or experience. Such personnel receive specialized training when it is determined that they need such training to be more proficient in addressing significant environmental aspects that they are involved with in their work.
- 4.2.2 Competency training may include on-the-job training, formal training course(s), or informal training by the employee's supervisor or a member(s) of the EMS Core Team. Competency training may include:
 - 4.2.2.1 an explanation of the significant environmental impacts, actual or potential, of an employee's work activities and the benefits of improved performance;
 - 4.2.2.2 employee roles and responsibilities in achieving conformance with the environmental policy, EMS Procedures, and with the requirements of the EMS, including emergency preparedness;

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4.2.2.3 employee roles and responsibilities with regard to significant environmental aspects, or compliance requirements that they are personally involved with as an ongoing element of their work; and/or

4.2.2.4 the relevant procedures identified under employee training elements, the benefits of adhering to the procedures and potential environmental consequences of departure from them.

4.2.3 Internal EMS auditors training.

4.2.3.1 All internal EMS auditors must have either received training from a formal EMS audit training program or have observed at least one internal audit and audited under the guidance of a previously qualified auditor. Prior to auditing without guidance, new auditors must have been deemed sufficiently trained and able to perform audits by the EMS coordinator.

4.3 Training Elements include:

4.3.1 Identification of employee training needs to accomplish EMS-related job responsibilities;

4.3.2 Development of a training plan to address defined needs;

4.3.3 Training of target employee groups;

4.3.4 Documentation of training for each EPA-NE Boston Office employee; and

4.3.5 Evaluation of training received.

4.4 Adequate Resources: Adequate resources are to be made available to provide the identified training. In certain cases, training may require certified trainers in such topics as safety, chemical handling or auditing.

4.5 Retraining will be done as required due to changes in the EMS, and on a periodic basis in order to assure continued employee awareness of EMS requirements, and/or as a result of an incident where a procedure was not properly followed.

4.6 Tracking the Training: The Office of Administration and Resources Management (OARM) maintains training records for each Boston Office employee. Training records include information on the following: Employee's name; Job title; Job description, Title of training course, and Date employee completed the training.

5.0 Responsibilities

5.1 The Regional EMS Executive and EMS Board of Directors are responsible for:

5.1.1 ensuring office-wide awareness of EMS training requirements, and

5.1.2 providing adequate resources for training.

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5.2 Each Office Director is responsible for:

- 5.2.1 ensuring that employees within their offices complete the required training, including EMS General Awareness and refresher training,
- 5.2.2 identifying (with the EMS core team) staff with specific, competency training needs, and subsequently assuring that those staff identified complete required training,
- 5.2.3 determining which employees need training on specific EMS Procedures or Operational Controls and subsequently assuring that those staff identified complete required training;
- 5.2.4 ensuring that supervisors within their Offices assess the adequacy of employees' skills for complying with the EMS and determining what additional EMS training, if any, is needed.
- 5.2.5 identifying areas of operation or specific staff where additional training or retraining is needed, and assuring that staff complete identified training, and
- 5.2.6 providing staff and assistance as needed to meet training needs and requirements.

5.3 The Director of OARM is responsible for operation and maintenance of the Boston Office EMS in accordance with EMS procedures including:

- 5.3.1 reviewing proposed EMS training with the EMS coordinator as required;
- 5.3.2 assuring adequate financial and technical resources are available for EMS training;
- 5.3.3 promoting the EMS training programs and encouraging all employees, managers and supervisors to participate in EMS training and awareness programs.

5.4 The Information Services Offices within OARM have the following EMS training responsibilities:

- 5.4.1 providing technical support to EMS training development and record keeping.

5.5 The Human Resources Office within OARM has the following EMS responsibilities:

- 5.5.1 developing and implementing a training plan and budget to address EMS training needs and requirements,
- 5.5.2 with the EMS Core Team, developing EMS General Awareness Training for all employees and competency training of target employees or employee groups;
- 5.5.3 tracking of EMS training, including documentation and maintenance of records of EMS-related training for each EPA-NE Boston Office employee;

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- 5.5.4 with the EMS Coordinator, ensuring that qualifications have been adequately identified in employee position descriptions as needed for EMS conformance and for identifying training needs. Qualifications should specify level and type of education, amount and type of experience, previous training, and special skills;
- 5.5.5 periodically reviewing records of competency training to ensure that all employees who need specialized training have received the required training;
- 5.5.6 If an employee has not received or completed the required training, communicating the nonconformance to the direct supervisor; and
- 5.5.7 with the EMS Core Team, evaluating training provided and using those evaluations for continual improvement of EMS training programs.

5.6 The EMS Coordinator and Core Team are responsible for:

- 5.6.1 assuring that the training programs are consistent with the EPA-NE Boston Office Environmental Management System and updating it to reflect changes in the EPA-NE Boston Office Environmental Policy, significant aspects, or current objectives and targets,
- 5.6.2 with the Human Resources Office, identifying and documenting the EMS General Awareness and Competency training needs for the EPA-NE Boston Office and how and when that training will be delivered,
- 5.6.3 communicating to Office Directors the necessary EMS training so that it can be incorporated into employee training plans;
- 5.6.4 providing, as needed, informal EMS training sessions; and
- 5.6.5 with the Human Resources Office, evaluating training provided and using those evaluations for continual improvement of EMS training programs.

5.7 All EPA-NE Boston Office employees have the responsibility to participate in EMS awareness training, and understand the potential environmental impacts associated with their job responsibilities.

6.0 Records and Related Documents

- 6.1 EPA-NE Boston Office EMS General Awareness Training Module
- 6.2 EPA-NE Boston Office EMS Internal Auditor Training Module
- 6.3 General Employee Training Records
- 6.4 Legal and Other requirements

7.0 Distribution

7.1 The EMS Core Team's documentation lead has placed the most current version this procedure

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in an electronic repository. It is available electronically to users of the EPA Regional 1 intranet. Procedures are subject to revision. The EPA Intranet EMS Page (<http://r1-gis-web.r1.epa.gov:9876/oarm/ems/index.html>) has a link to the latest version.

8.0 Example Training Needs Matrix

This form is not required, it has been provided as an aid in documenting training needs and delivery mechanisms.

Example Training Needs Matrix. This is an example only. Actual training requirements will be documented in consultation with HR and the relevant management staff.				
Training Element	Types of employees who will require the training element	How the Training will be delivered	Frequency at which the Training should be updated	When the training will be offered
Basic Knowledge of the EMS	All employees	Web-based	Periodically to assure EMS awareness and revisions. New employees will receive training as part of new employee orientation.	within 6 mo of new hire
Employee Responsibilities within the EMS	Employees whose job can have significant Environmental Impact or who are responsible for environmental compliance	On-the-job Informal by supervisor assisted if necessary by EMS team or Green team	Same as above	Within __ Days of assignment
Manager Responsibilities within the EMS	Office Directors and those they designate	Group Sessions	Same as above	Within __ Days of assignment
Operational Controls	Employees who have responsibility for operational controls	Informal by supervisor assisted if necessary by EMS team or Green team	As above and whenever operational controls are revised	Q2-3 2004
EMS Refresher Training	All employees	Various (email, Green Notes, web,	Periodically to assure EMS	First quarter of Calendar Year

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		staff meeting, posters/displays, etc.	awareness and revisions.	beginning CY 05