

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



August 2011

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# 1 Introduction

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This document is a work product of the On-Scene Coordinators (OSC) Readiness Task Force (RTF), and has been thoroughly reviewed by the Removal Managers, and may be used to identify required training for the OSC Position Description in Appendix A. OSCs are expected to exercise their professional judgment and consult with others in determining their training needs.

## 2 Overview of Training Guidelines

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This document describes the training required by regulation and Agency policies that apply to EPA OSCs, as well as training that is recommended by more experienced OSCs, industry best practices, and workforce development efforts. The required and recommended training lists for OSCs do not include the additional required Agency training in topics such as computer security, ethics, security clearance, confidential business information, and many others.

## 3 Definitions\*

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**Required training** is defined by statute, regulation, order, directive, or policy. There is some flexibility permitted in the delivery of these required courses. Training that is required may be task dependent and very specialized but may not always be applicable or relevant to all individuals with an OSC position description.

**Recommended training** is not mandated by regulation, but is intended to enhance the knowledge, skills, and abilities of OSCs' effective job performance. Examples include innovative treatment technologies, crisis communications, and refreshers of National Contingency Plan (NCP) training.

\*Recommended training is budget dependent while required training is not discretionary.

## 4 Required Training

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The RTF recommends that OSCs complete required courses as soon as possible after becoming an OSC. Examples include health and safety training which is required prior to conducting site work (e.g., 40-Hour OSHA training) and contracts training (e.g. warrant and COR/COTR). Other training requirements apply only to OSCs working under specific conditions. For example, Spill Prevention, Control, and Countermeasures (SPCC)/Facility Response Plan (FRP) Inspector Training would only be required for OSCs who conduct SPCC/FRP inspections.

## 4.1 Health and Safety Training

All EPA OSCs must meet the health, safety, and environmental training requirements specified in EPA Order 1440.2 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 and supervisors 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. 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.

OSHA requires a 40-hour health and safety course that includes respirator instruction and fit testing for employees who may be expected to use respirators, and a minimum of three days actual field experience under the direct supervision of trained, experienced personnel. A baseline medical evaluation in accordance with the Respiratory Protection Standard 29 CFR 1910.134 is necessary in order to participate in this training. Prior to attending the course each student must have 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 met under a more comprehensive ongoing medical monitoring program.

EPA preceded the OSHA requirements with EPA Order 1440.2, *Health and Safety Requirements for Employees Engaged in Field Activities*, issued in 1981. This Order is broader than the OSHA requirements in that it addresses health and safety training for EPA "field activities" which includes "hazardous material spills." The Advanced Level of training specified in the Order can be met with the 40-hour OSHA training if all the subject areas are covered. Typically not covered in the 40-hour training are requirements in the EPA Order for employee rights and responsibilities, emergency help and self-rescue, and vehicle rules and regulations.

EPA Order 1440.2 requires training in emergency help and self-rescue for employees engaged in field activities. Training in cardio-pulmonary resuscitation (CPR) and first aid will fulfill this requirement. First aid and CPR training are now most often combined with a short session on Automatic Electronic Defibrillator (AED) training. These two courses can be combined in a one-day event or taken separately. The training provider, e.g., the Red Cross, National Safety Council, etc., determines the frequency of refresher training according to their internal standards, typically every two years for CPR and every three years for first aid. Addition of AED training is desirable, given the large number of AED devices now available in public settings.

Pursuant to OSWER Directive 9285.3-12, EPA is developing an Emergency Responder Health and Safety Manual to provide for consistent health and safety standards among EPA emergency response personnel. Several chapters have been completed and can be viewed on epaosc.net. The Respiratory Protection Chapter includes requirements for training. The Health & Safety Manual is a living document and chapters are revised as necessary. The Respiratory Protection Chapter states:

*At least once a year, each emergency responder must participate in an exercise on the use of a negative-pressure APR and a PAPR by conducting an inspection, tear-down, cleaning, reassembly, and donning/doffing the respirator. In addition, on at least an annual basis, each emergency responder who uses a SCBA must practice using the equipment by conducting an inspection, donning/doffing, breathing down a tank of air (20 minutes minimum), cleaning, and reassembling the SCBA. To maintain Level A readiness, responders must also exercise two or more times per year wearing full Level A equipment. These exercises may be held in conjunction with SCBA practice sessions.*

EPA's policy is that On-Scene Coordinators (OSCs) should be capable to perform and manage response actions requiring the use of Levels A/B/C personal protective equipment (PPE). A capability to perform a Level A/B/C PPE response also applies to designated members of EPA's Special Teams.

Basic and advanced radiation safety training is required by EPA's Safety and Health Environmental Management Division (SHEMD) Guideline 38, the *Radiation Safety and Health Protection Program*, for those engaged in emergency response activities where a potential for exposure to ionizing radiation exists. Requirements include training on the use of thermoluminescent dosimeters (TLD) badges. Initially, basic radiation safety training is provided by the Safety, Health and Environmental Management Program (SHEMP) Manager or the local Radiation Safety Officer (RSO). Advanced training is required for those who engage in emergency response or removal activities where the potential for exposure to ionizing radiation exists. Advanced training is met by participating in a course provided by or which meets the approval of the RSO. Basic and advanced radiation courses refresher training is required every two years. Instructional materials and other information are available from the Office of Radiation and Indoor Air (ORIA), SHEMD, or Regional RSO or SHEMP Manager.

Bloodborne pathogen training is an annual requirement in the EPA Emergency Responder Health and Safety Manual. The Manual also requires confined space training, with a refresher every 2 years, and training on Physical Stress Management. Each of these subjects can be presented by the SHEMD.

EPA Directive 9200.51 calls for two hours of training on the use of nerve agent antidotes with an annual one-hour refresher. This is only applicable to regions that have nerve agent antidote kits. Note that Meridian Technology, Inc., the manufacturer of the Mark 1 kits, has replaced the Mark 1 with a new nerve agent antidote kit called the Duo Dote.

OSCs' annual training covers the competency areas of an "On Scene Incident Commander" as required in paragraph (q) of 29 CFR 1910.120. Therefore, no requirements are listed in this document specifically with reference to 29 CFR 1910.120(q). A "Hazardous Materials Technician" course is available through Environmental Response Training Program (ERTP) and is very valuable. It is recommended training for OSCs, but is not required.

Asbestos awareness training is required for OSCs working on sites where asbestos is involved, pursuant to OSHA regulation 29 CFR 1910.1001(j). However, the OSHA and EPA regulations have not been updated for over 30 years and do not reflect current science and toxicology. The permissible exposure limit (PEL) of 0.1 fibers per cubic centimeter is not sufficiently protective for EPA emergency responders. The regulated limit of one percent asbestos in "asbestos-containing materials" was not based on a health or environmental standard but instead was based on the laboratory analytical limitation at the time. The asbestos regulations only cover six mineral fibers that were identified for commercial purposes; they do not cover similar mineral fibers which may also cause harm such as winchite, richterite, or erionite. OSCs are encouraged to seek expert advice from scientists and toxicologists familiar with the current research when conducting a response at a release of mineral fibers. An updated course on asbestos fibers and current science is offered at OSC Readiness periodically to fulfill this requirement.

### Required Health and Safety Training

Training Requirement	Required By	Current Delivery Option	Hours	Refresher Requirements
Medical Surveillance Awareness Training	EPA Emergency Responder H&S Manual	SHEMP	1	None
40-hour OSHA training Must include a 6-hour component on respirators and SCBAs)	29 CFR 1910.120 (e) (3) EPA Order 1440.2  EPA Emergency Responder H&S Manual: Respiratory Protection  29 CFR 1910.120 (e) (8)	EPA ERTTP	40	8 hour annual refresher  (must include a 2-hour component on respirators and SCBAs). An annual exercise is required to practice using an APR, PAPR, and SCBA. Delivery method is Region-specific.

<b>Training Requirement</b>	<b>Required By</b>	<b>Current Delivery Option</b>	<b>Hours</b>	<b>Refresher Requirements</b>
24-hour field requirement	29 CFR 1910.120 (e)(3)(i) EPA Order 1440.2	On the Job Training (OJT) in field	24	None
First Aid/CPR	EPA Order 1440.2 requires training on "Emergency help and self-rescue"	Local provider such as Red Cross or National Safety Council	Approximately 8 hours	Frequency of refresher is specified by training provider, e.g., every 1, 2, or 3 years
8-hour hazardous waste supervisor training	29 CFR 1910.120 (e)(4)  29 CFR 1910.120 (e) (8)	ERTP	8	Relevant supervisor topics should be covered in the 8 hour annual refresher
Radiation safety training	EPA Order 1440.1 (Training Guideline 38) 29 CFR 1910.1096 EPA Emergency Responder H&S Manual: Radiation Safety	EPA ERTTP, EPA Radiation Safety Officer, or CD-ROM SHEMD Disk #3 Radiation Protection Training	Not specified	Every two years
TLD Badge	EPA Emergency Responder H&S Manual: Radiation Safety	SHEMP		None
Radiation Detection Instrumentation	EPA Emergency Responder H&S Manual: Radiation Safety	SHEMP		Every two years
Bloodborne pathogens	EPA Emergency Responder H&S Manual: Bloodborne Pathogens	SHEMP	Not specified	Annually
Confined Space	EPA Emergency Responder H&S Manual: Confined Space Safety Program	SHEMP or other designated provider	Not specified	Refresher required every two years – can be covered during 8 hour refresher

<b>Training Requirement</b>	<b>Required By</b>	<b>Current Delivery Option</b>	<b>Hours</b>	<b>Refresher Requirements</b>
Physical Stress Management: fatigue, heat, cold, noise, vibration, overexertion, altitude	EPA Emergency Responder H&S Manual: Physical Stress	SHEMP	Not specified	Noise and hearing conservation refresher is required annually - can be covered during 8 hour refresher. Other topics require refreshers as needed.
Nerve Agent Antidote(This is only applicable to regions that have nerve agent antidote kits)	EPA Directive 9200-51		2 hours	Annual 1 hour - can be covered during 8 hour refresher

## 4.2 Contracts Training

### Warrant Training

Warrant authority provides limited contracting authority to OSCs financially obligating the Government for the procurement of essential goods and services, in support of a Federal response. OSCs usually exercise this authority with the Emergency Response and Removal Services (ERRS) contractor, although it may also be used with other procurement tools such as a Notice to Proceed. An OSC must have a one-time warrant training class to receive a warrant. The actual warrant will not be issued until the Regional Removal Manager submits the OSC warrant request package to the Director of Superfund/RCRA Regional Procurement Operations Division (SRRPOD) and the SRRPOD provides the Certificate of Appointment to the OSC. The SRRPOD will issue the Certificate when the OSC has taken the appropriate contracts administration training courses, demonstrated proficiency in administering contracts and has sufficient on-site experience to determine appropriate implementation of the warrant.

The Warrant Officer Training Class is 3 ½ days long and is provided by EPA's Office of Superfund Remediation and Technology Innovation (OSRTI) approximately two times per year. Each OSC planning to attend the class shall have previously completed the Contracting Officer Representative (COR) training course, described below.

The OSC Task Force recommends that new OSCs complete the warrant training within one year of their hire to avoid any delays in receiving their warrant authority.

## **Contracting Officer Representatives (CORs), New Certification Requirements and Refresher Training**

### Previous EPA Program

OSCs that have warrant authority are considered CORs and are required to take an initial COR course and a recertification course every three years. OSCs are required to complete 40 hours of continuing acquisition training every two years.

### New Federal Requirements

The federal government established a new program on November 26, 2007, requiring a Federal Acquisition Certification (FAC) for Contracting Officer Technical Representatives (COTRs). Existing CORs generally already meet the initial Office of Federal Procurement Policy (OFPP) training requirement and will be certified as COTRs based on their earlier training record. (At EPA, COTRs are also known as CORs, and these acronyms are used interchangeably in this document). OSCs who are COTRs will continue to be required to take 40 hours of continuous learning training every two years. The options for obtaining the continuous learning training have expanded, as described below.

All new CORs appointed to a contract after November 25, 2008, must possess the FAC-COTR certification and must maintain their skills through continuous learning. The requirements are summarized below and can be read in their entirety in EPA's Office of Acquisition Management "Interim Policy Notice" 09-01 which became effective October 1, 2008, and can be viewed at: <http://oamintra.epa.gov/files/OAM/09-01.pdf>

The FAC program requires competency-based core training. OFPP identified the following professional business and technical competencies for certification:

### **Core Competencies for Contracting Officer Representatives**

<ul style="list-style-type: none"> <li>• Oral Communication</li> <li>• Decision-Making</li> <li>• Teamwork</li> <li>• Problem solving</li> <li>• Attention to Detail</li> <li>• Reasoning</li> <li>• Flexibility</li> </ul>	<ul style="list-style-type: none"> <li>• Interpersonal skills</li> <li>• Self Management/Initiative</li> <li>• Integrity/Honesty</li> <li>• Planning and Evaluating</li> <li>• Influencing and negotiating</li> <li>• Writing</li> <li>• Project Management</li> </ul>
<ul style="list-style-type: none"> <li>• Understanding COTR duties, responsibilities and obligations</li> <li>• Effective Communication of Contract Requirements</li> <li>• Effective Performance management</li> <li>• Strategic Planning</li> <li>• Detailed Evaluation Skills</li> </ul>	<ul style="list-style-type: none"> <li>• Defining Business Relationships</li> <li>• Understanding the Marketplace</li> <li>• Effective Communication</li> <li>• Defining Government Requirements in Commercial/Non-Commercial Terms</li> <li>• Effective negotiation and analytical Skills</li> </ul>

New COTRs will have to meet the initial training requirement by taking 40 hours of training. Of these 40 hours, a minimum of 22 hours of training must be in the above core competencies. The Federal Acquisition Institute offers five free online courses which are listed in Appendix A of the OAM “Interim Policy Notice” cited above. The OSC who is a new COTR (without previous COR training) must take all five courses to fulfill the 22 hours of core competency training or find similar courses by commercial providers. The remaining 18 hours of initial training must include a new 8-hour EPA specific course taught by OAM entitled “EPA Basic Contracting Officer Technical Representative Training,” and other competency based or Agency specific training, technical courses, or activities that develop the contracting skill sets.

**Requirements to Maintain Certification**

To maintain certification, COTRs must earn a minimum of 40 Continuous Learning Points (CLPs) every two years after receiving initial FAC-COTR certification. All existing CORs who have kept their OAM COR training current, have a registered ACMIS account, and have a total of 40 CLPs (previous COTR training included) were granted FAC-COTR certification on September 30, 2008.

As OAM works towards implementing the subject OFPP guidance, it has created a three year transition cycle from October 1, 2007, to September 30, 2010. Any FAC-COTR obtained as a result of the Interim Policy Notice was valid until September 30, 2010. The current and all subsequent cycles will be two years (e.g., October 1, 2010 – September 30, 2012).

Any training required to obtain needed competencies can count towards the continuous learning requirements for current COTRs. The refresher training may include on-line training, classroom training, in-house training (e.g., staff meetings and conferences), and on-the-job experiential assignments at the discretion of the supervisor. Other relevant training may also be counted towards the 40 hour requirement including ethics training, purchase card refresher training, CBI training, etc. COTRs may also take a new optional one-day EPA COTR Refresher course equal to 8 CLPs. Additional options for CLPs are listed in Appendix B of the OAM Interim Policy Notice cited above.

The ACMIS database should continue to be used to document the CLPs ([www.acmis.gov](http://www.acmis.gov)).

The table below summarizes the differences in training and maintenance requirements between the COR and COTR certification.

<b>Previous EPA Program</b>	<b>New EPA Program</b>
<p><b>To Become a COR:</b>            Employees must take either an OAM 3 day course or specific OFPP free online courses.</p>	<p><b>To Become a COTR:</b>            Existing CORs generally already meet the OFPP requirement and will be certified based on their earlier training record. New COTRs must meet the</p>

	<p>40 hours of training by completing 22 hours through:</p> <ol style="list-style-type: none"> <li>1. Specific OFPP core competency based, free online courses <u>OR</u> a course offered by an OAM identified commercial provider; <u>AND</u></li> <li>2. An 8-hour EPA specific course taught by OAM. The remaining hours will be met by taking other competency based or Agency specific training, technical courses, or activities (identified by the supervisor in conjunction with the Contracting Officer) that develop the COR skill sets.</li> </ol>
<p><b>To Maintain COR Status:</b> COR must take a 1 day OAM Recertification course every three years AND COR must earn 40 hours of training every two years. The 40 hours of training can be Agency specific, electives, or technical courses and activities that develop COR skill sets.</p>	<p><b>To Maintain COTR:</b> COTR must earn 40 hours of training every two years after the initial certification. The 40 hours of training can be competency based or Agency specific training, electives, technical courses, and/or activities (identified by the supervisor in conjunction with the Contracting Officer) that develop COTR skill sets.</p>

## Purchase Cards

If an OSC is issued a government purchase card, i.e., a credit card separate from their travel credit card, then the OSC must complete a one-day Purchase Card training course. Refresher training is required every three years.

A summary of required contract training is provided in the table below:

### Required Contract Training

Training Requirement	Required By	Delivery Options	Hours	Refresher Requirements
Warrant training	EPA Acquisition Regulations 1120	EPA OSRTI course, see Trainex.org	3 ½ days	Initial course – one time only

<b>Training Requirement</b>	<b>Required By</b>	<b>Delivery Options</b>	<b>Hours</b>	<b>Refresher Requirements</b>
Contracting Officer Representative (COR) training – now changing to COTR	Clinger-Cohen Act (Maloney Bill) and EPA Acquisition Regulations 1120	Five courses in FAI Online, <u>AND</u> EPA OAM class, <u>AND</u> 10 hours of electives	40 hours	40 hours of continuous learning points (CLPs) every two years
Purchase Card Holder training	EPA Acquisition Regulations 1120	EPA OAM	8 hours	Refresher training every 3 years.

### 4.3 Credentials Training

EPA Order 3500.1 (May 1988 – last revision: March 28, 2003) established training requirements for all EPA personnel authorized to conduct compliance inspections/field investigations under any of EPA’s statutes and their supervisors. For CERCLA, this has been interpreted (OSWER Directives 9842.0-9842.2, 9295.9-05) to apply to all “staff who collect samples, conduct field audits or oversee Potentially Responsible Party (PRP) projects for the purpose of ensuring PRP compliance or for obtaining evidence to use in potential enforcement actions.” This definition includes OSCs.

The CERCLA Education Center (CEC) was established to meet these training requirements and other training needs of CERCLA staff. The basic and program-specific training requirements of Order 3500.1 are summarized in the table below.

#### Required Credential Training

<b>Training Requirement</b>	<b>Required By</b>	<b>Delivery Option</b>	<b>Hours</b>	<b>Refresher Requirements</b>
Basic Inspector Training Course	EPA Order 3500.1	Classroom or online at <a href="http://netionline.com">netionline.com</a>	3.5 days	None
CEC: Superfund 101 (Fundamentals of Superfund & Enforcement Process Overview)	EPA Order 3500.1/OSWER Directive 9295.9-05	CEC – see <a href="http://Trainex.org">Trainex.org</a>	40	As identified by supervisor.
CEC: Removal Process	EPA Order 3500.1/OSWER Directive 9295.9-05	CEC – see <a href="http://Trainex.org">Trainex.org</a>	35	As identified by supervisor.

<b>Training Requirement</b>	<b>Required By</b>	<b>Delivery Option</b>	<b>Hours</b>	<b>Refresher Requirements</b>
Negotiations training	EPA Order 3500.1/OSWER Directive 9295.9-05	Courses may be offered by EPA Regions or commercially	Not Defined	As identified by supervisor.
Self-study/Review of CERCLA, NCP and a minimum of two completed inspection reports	EPA Order 3500.1 Compendium of Program Specific Training Requirements	Self-Study/ Review	Not Defined	As identified by supervisor.
Conduct a minimum of two SPCC and two FRP inspections with a senior inspector before conducting an inspection.	EPA Order 3500.1 Compendium of Program Specific Training Requirements	On the Job Training	Not Defined	As identified by supervisor.

Where documentation is needed, but cannot be found, the employee signs a statement that he/she has completed the training, and the Division Director must certify that the employee has demonstrated competency.

SHEMD mandates that EPA compliance officers and field investigators complete a one time 24-hour course for field activities and an annual 8-hour refresher course. SHEMD has stated that a select group of employees, which includes On-Scene Coordinators and emergency responders on EPA's Special Teams, can fulfill the safety training required by EPA Orders 3500.1 and 1440.2 by completing the following minimum requirements:

- a. Completion of the 40-hour HAZWOPER training course (one time requirement), and
- b. Completion of annual safety training, including an 8-hour refresher course, or suitable equivalent approved and certified by the local SHEMP manager.

SHEMP managers must be actively involved in a review of the content and delivery of the annual 8-hour Refresher course (or equivalent), thereby ensuring that appropriate and relevant safety training, based on a job hazard analysis, is provided to the employees for whom they are responsible. If SHEMP managers determine that additional training is required, they must work with employees and managers to have the training completed within nine months. (Refer to the December 4, 2009, memorandum from Wesley J. Carpenter, Acting Director of SHEMD to Phyllis Flaherty, Chief, National Compliance Monitoring Policy Branch, Compliance Assessment and Media Programs Division.)

## SPCC and FRP Inspections – Required Training

OSCs conducting inspections for Spill Prevention, Control, and Countermeasures (SPCC) and Facility Response Plan (FRP) compliance pursuant to the Federal Water Pollution Control Act (FWPCA) as amended by the Clean Water Act (CWA) and the Oil Pollution Act (OPA) must complete the training listed above for inspectors, as well as specific training for SPCC/FRP inspections.

Detailed information for these requirements may be found at the OECA inspector training site on EPA's Intranet at:

<http://intranet.epa.gov/oeca/oc/campd/inspector/index.html>.

### SPCC/FRP Inspector Training

Training Requirement	Required By	Delivery Option	Hours	Refresher Requirements
Basic Inspector Training (BIT)	EPA Order 3500.1	Classroom or online at <a href="http://netonline.com">netonline.com</a>	EPA course is 3.5 days in length	EPA Order 3500.1, March 28, 2003: OECA, program offices, or first-line supervisors are responsible for identifying any necessary refresher Basic Inspector and/or refresher program-specific curriculum on new or revised policies, regulations or legislation.
Spill Prevention Control and Countermeasures (SPCC) / Facility Response Plans (FRP)	EPA Order 3500.1	Classroom training provided by Oil Program Center (OPC) staff	40 hours classroom plus self-study and OJT (refer to table below for self study and OJT requirements)	Annual 4-hour OPC refresher training course or its equivalent. This course is available upon request to OPC. If an equivalent course is utilized, the first-line supervisor will determine the scope of the refresher training.

Additionally, EPA Order 3500.1 has training requirements for the supervisors of OSCs conducting inspections. These requirements are detailed in the "Supervisor's Guide to Executive Order 3500.1:"

<http://intranet.epa.gov/oeca/oc/campd/inspector/training/3500supervisorguide.pdf>

## Self Study and OJT Training Requirements for SPCC/FRP Inspectors

**Mandatory Self-Study/ Review** – see requirements at  
<http://intranet.epa.gov/oeca/oc/campd/inspector/training/3500/media.html>

**Recommended Training** – see  
<http://intranet.epa.gov/oeca/oc/campd/inspector/training/3500/media.html>

### **On-the-Job Training (OJT) and mentoring with senior lead inspector**

- New inspectors must complete a minimum of four days of OJT, or 4 compliance inspection/field investigations with senior lead inspector(s).
- If no senior lead inspectors are available within the region to provide mentoring then arrangements may be made with personnel from another region to complete OJT.
- Depending on the experience level of the inspector and the need in the region, conduct OJT at facilities such as petroleum exploration and production facilities, electric utilities, petroleum refineries, petroleum marketing/bulk storage facilities, construction sites, airports, marinas, fish canneries, farms, and other regulated industry sectors.
- The first-line supervisor should determine the type of facility to be inspected to meet the OJT requirements and may require additional OJT inspections as he/she deems appropriate. The OJT should be constructed so that over time there is a progression of increasing responsibility for the new inspector.
- The first-line supervisor must maintain documentation of compliance with OJT requirements and should include a description of the types of facilities inspected as well as the name of the senior inspector(s) leading the inspection activity.

#### Notes:

- It is **not recommended** that new inspectors lead inspections at FRP regulated facilities within the first 6 months.
- It is **not recommended** that new inspectors lead inspections at large, more complex facilities such as electric utilities or petroleum refineries within the first 6 months.
- First-line supervisors are encouraged to achieve efficient use of new inspectors by encouraging OJT for specific types of inspections (e.g., petroleum marketing/bulk storage facility) that would expedite the approval to lead inspections.
- First-line supervisors may want to assign new inspectors to the most common type(s) of regulated facilities found in that region.

## 4.4 Incident Command System Training

Homeland Security Presidential Directive-5 (HSPD-5) requires all response organizations to adopt the National Incident Management System (NIMS) and the Incident Command System (ICS). The EPA National Approach to Response (NAR) states that EPA will adopt the NIMS and utilize the ICS as a response management tool. The EPA ICS Training, Qualification, and Certification Order establishes the training requirements in support of the NAR.

## Incident Command System Training

Training Requirement	Required By	Delivery Method	Hours	Refresher Requirements
ICS 100	HSPD-5	On-line	3	none
ICS 200	HSPD-5	On-line	3	none
IS 700 NIMS	HSPD-5	On-line	3	none
IS 800 National Response Framework	HSPD-5	On-line	3	none
ICS 300/400	FEMA (for response personnel serving in Command and General Staff positions within an Incident Management Team)	Class room	30-36	none
Command and General Staff (EPA Key Leadership Positions) – only required for OSCs if they are serving in these positions within an Incident Management Team	This is based on the 2008 Incident Management Team Order requirement for regions to staff 11 member Incident Management Teams with ICS trained personnel.	Class room	Hours vary depending on the KLP	There is a maintenance requirement for continued qualification in these positions. To maintain qualification status OSCs must show experience in the position, during an actual incident or exercise, within a 5 year period. The course does not have to be repeated.

### 4.5 Regional Required Training

Regions may require training related to their specific work. As an example, Region 6 performs a significant amount of oil field work during the normal course of business. Region 6 requires EPA workers who perform oil-field activities to complete a hydrogen sulfide safety (sour gas) course and appropriate refreshers. Certain states have this requirement as well.

Regions may add a variety of additional technical training requirements, including but not limited to:

- Railroad tank car safety
- Commercial Driver's License (CDL) training
- Defensive Driving (recommended by the May 14, 2001, "Revised Fact Sheet: Safety and Health Requirements for EPA Compliance Inspectors")
- Boater Operation
- Leadership Training

#### 4.6 Other Required Training

The Department of Transportation (DOT) regulations on hazardous materials transportation require training for hazmat employees (49 CFR 172.704). The regulations specify that certain topics and functions be included in the training, but do not specify the duration of the initial training. This is sometimes referred to as a "DOT HM-181" course, although the "HM-xx" nomenclature refers to DOT rulemaking dockets, not specific regulations. The regulations also require refresher training every three years, but the duration of the refresher is not specified.

The EPA RCRA hazardous waste regulations for generators of hazardous waste (40 CFR 262.34) require generators to comply with the training requirements in 40 CFR 265.16. This would be an Applicable or Relevant and Appropriate Requirement (ARAR), subject to the conditions specified in the NCP, 40 CFR 300.415(j). The NCP definition of "Applicable Requirements" in 40 CFR 300.5 means, in part, "substantive" requirements of a federal or state environmental law. Therefore, the administrative portions of the training requirements in 265.16 do not need to be included as part of the OSC's training program.

OSWER Directive 9295.9-05, issued on September 29, 1989, also established a requirement for 80 hours of professional development training each year for EPA OSCs to ensure effective job performance. This can be satisfied by refresher courses taken annually, or through other training such as the annual OSC Readiness Training Program.

### Other Required Training List

Training Requirement	Required By	Delivery Method	Hours	Refresher Requirements
Transportation for Hazmat	49 CFR 172 & 173	Not offered by EPA – available commercially	Duration not specified	Every 3 years – duration of refresher not specified
RCRA Generator required training	40 CFR 262.34 (a)(4), 265.16	OSC Readiness (or region-specific)	Duration not specified	Annually – duration of refresher not specified
QA/QC training - Regional requirements as directed in Regional QA Management Plans	EPA Order 5360.1 A2	Region-specific	Region-specific	Region-specific
80 hours annual professional development training	OSWER Directive 9295.9-05	Not specified		80 hours annually- can overlap with other training

## 5 Recommended Training

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EPA's [www.trainex.org](http://www.trainex.org) lists more than 400 courses, some of which are required and others that are recommended for OSCs. Recommended courses are listed in the table below.

### Recommended Training List

Recommended Training	Delivery Method	Hours	Refresher Requirements
USCG Crisis Management	Face to Face Yorktown, VA	80	None
<b>Laws &amp; Authorities</b>			
National Contingency Plan (part of content is in the Removal Process course)	OSC Readiness or online	3.5	None
Waste Treatment, Transportation, and Disposal (RCRA, TSCA, FIFRA)	Face to Face CEC	16	None
Hazardous Materials Technician	ERTP	24	None

<b>Recommended Training</b>	<b>Delivery Method</b>	<b>Hours</b>	<b>Refresher Requirements</b>
Asbestos Abatement Identification and Removal for Supervisors (AHERA)	Commercial classes may be available	24	
Presidential Decision Directives 39, 62, 63, and Homeland Security Presidential Directives	Independent Study	Varies	As Needed
Risk Management Plans (RMP)	Trainex.org	24	None
Federal Acquisition Regulations, EPA Acquisition Requirements	Independent Study	Varies	As Needed
Industrial Hygiene, Health Physics	Independent Study	Varies	As Needed
Clean Water Act/NPDES Inspector Training	NETI on demand webinar	8	None
<b>Oil Spill Response*</b>			
Accessing and Using the Oil Spill Liability Trust Fund	OSC Readiness	8	None
Fast Water Booming	ERTP	3 days	None
Slow Water Booming	ERTP	5 days	None
Basic Oil Spills	OSC Readiness	8	None
Emerging Issues about Biofuels	OSC Readiness	8	None
Introduction to Alternative Countermeasures (ACM) for Oil Spills	OSC Readiness	8	None
Oil Response Training - Combined Backwater and Fast Water	Erlanger, KY	2-5 days	None
Oil Spill Response Drills and Exercises under the Facility Response Plan (FRP) Regulation	OSC Readiness	4	None
Oilfield Removal Actions	OSC Readiness	4	None
Oil Field Production Facility	Private vendor	Varies	None
Tailored and Streamlined ... the 2009 SPCC Rule Amendments	OSC Readiness	4	None
<b>Technology, Equipment, and Risk Management</b>			
Innovative Treatment Technologies	<a href="http://www.clu-in.org">www.clu-in.org</a> & IRTC have monthly internet seminars	varies	As needed
Personnel Protective Equipment: Level A	Exercise	varies	Health & Safety Manual for Respiratory Protection recommends two Level A exercises per year
Environmental Chemistry	EPA ERTP	4-24	None

<b>Recommended Training</b>	<b>Delivery Method</b>	<b>Hours</b>	<b>Refresher Requirements</b>
Chemistry of Hazardous Materials	Commercial classes may be available, e.g., Hazmat IQ	4-24	None
Sampling for Hazardous Materials	ERTP	24	None
Inland Oil Spills and Fast Water/Slow Water Oil	ERTP	24	None
Hazard Categorization	ERTP and commercial classes	8-24	None
Air Monitoring	ERTP		None
Risk Evaluation	trainex.org	varies	None
Post-Incident Critique/Lessons Learned	On the Job Training	varies	None
Underground Storage Tank Response Action	trainex.org	varies	None
Natural Resource Damage Assessment	USDA, DOI	varies	None
Computer Applications	Regional Training Coordinator	varies	None
Analytical Methods	trainex.org	varies	None
Electroplating Processes and Cleanup	ertpvu.org (Trainex.org)	4	None
Field-based Site Characterization (TRAID)	ertpvu.org	varies	None
Response Technologies	OSC Readiness	varies	None
Bioremediation	Clu-in.org	varies	None
Railroad Response	Pueblo, CO Tank Car	40	None
Pipeline Incident Response	varies	varies	None
Fire Fighting	FEMA –Emmitsburg, MD	varies	None
Fixed Facility Accident Response	varies	varies	None
Explosives	ATF	varies	None
Compressed Gas Cylinders	Chlorine Institute	varies	None
Counter terrorism response	varies	varies	None
Anthrax response	varies	varies	None
Chemical agent response	varies	varies	None
Radiological response	varies	varies	None
<b>Managing People</b>			
Project Management	OPM	varies	None

<b>Recommended Training</b>	<b>Delivery Method</b>	<b>Hours</b>	<b>Refresher Requirements</b>
Leadership Training	OPM	varies	None
Public Administration	OPM	varies	None
Personnel, Finance, Audit, Organizations	OPM	varies	None
Advanced Leadership Training	OPM	varies	None
Working Effectively with Tribal Governments	Online at golearn.gov	1	None
<b>Communication</b>			
Risk Communication	Trainex.org (Community Involvement University)	varies	None
Media Relations	Trainex.org (Community Involvement University)	varies	None
Community Involvement	Trainex.org (Community Involvement University)	varies	None
Emergency Community Outreach Team	Trainex.org (Community Involvement University)	varies	None
Public Speaking/Briefing Skills	Trainex.org (Community Involvement University)	varies	None
Crisis Communication	Trainex.org (Community Involvement University)	varies	None
Camera Skills (Advanced Media Skills)	Trainex.org (Community Involvement University)	varies	None

\* Additional, oil-specific training for OSCs will be included in the Oil Training Plan currently under development.

## 6 Training Opportunities

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This section of the guidelines provides a brief description of some of the training and development opportunities that are available to OSCs to meet the required and recommended training.

## 6.1 OSC Readiness Training

The OSC Readiness Task Force identified the need for a training forum directed specifically at the OSC's job functions. The OSC Readiness Task Force developed the OSC Readiness Training Board made up of OSCs and representatives of OSRTI and OEM. The members of the OSC Readiness Training Board are responsible for the development, planning and implementation of the annual OSC Readiness Training, which encompasses 35 to 49 separate 4 or 8-hour training sessions as well as management briefings, case study presentations, and other events. 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. To continue the ongoing dialogue of the OSC Readiness program and to reach OSCs and other response staff, OSRTI supports sessions from the event through Clu-In Internet seminars ("Response Contracts Basics" and "ESF-10: From No Mission to Mission"). More information is available at <http://www.epaosc.org> and [www.clu-in.org](http://www.clu-in.org).

## 6.2 OSRTI Sponsored Training

The Office of Superfund Remediation and Technology Innovation (OSRTI) assists in the planning and implementation of the OSC Readiness training, and they also offer other training opportunities. OSRTI supports the OSWER Training Coordination Team, who's regional Training Coordinators support both headquarters and regional specific training. Specialized training in site characterization, field sampling and analytics, and other technical topics is available in both classroom and internet based seminars. The Clu-In website now offers podcasts and archived versions of live internet seminars. Information and schedules for most of these training courses can be found on the Training Exchange web page (<http://trainex.org>). Trainex also advertises courses and conferences offered by its training partners (e.g., National Education and Training Institute, Agency for Toxic Substance and Disease Registry, Interstate Technology and Regulatory Council, Northwest Environmental Training Center), as well as many regional courses and online training opportunities.

## 6.3 Environmental Response Team (ERT) and Environmental Response Training Program (ERTP)

OSRTI's Environmental Response Team (<http://www.ert.org>) provides assistance from ERT experts and supports the OSC web page, as well as software and DVDs that address technical topics. ERT also manages the Environmental Response Training Program (ERTP) that offers dozens of health and safety, technical, incident command system, and specialized courses in EPA regions each year. In addition to training

courses, ERTTP provides field, level A, and incident management team exercises. ERTTP can also develop and present specialized courses and exercises upon request. ERTTP also supports the ERTTP virtual university (erttpvu.org)

## 6.4 CERCLA Education Center

OSRTI offers required and advanced training for OSCs through the CERCLA Education Center (e.g., Superfund 101, Removal Process, OSC 201) and through other programs to support the implementation of the latest environmental technologies (e.g., Cleanup Information web site, Internet Seminars, Advanced Triad Training, Field XRF). The courses provide not only basic definitions and procedures, but detailed presentations on EPA's role with other federal agencies as well. Participants also receive reference materials that they can use later on the job. Regional OSWER Training Coordination Team members can assist in scheduling and coordinating these and other courses.

## 6.5 Community Involvement University

The Superfund Community Involvement program offers a number of training courses through the Community Involvement University (e.g., Media Relations, Risk Communication, Building Trust and Resolving Differences, Cross Cultural Effectiveness), sponsors an annual EPA-wide Community Involvement Conference, and offers assistance through the Emergency Community Outreach Team, alternative dispute resolution services, and other assistance.

# 7 Exercises

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It is recommended that OSCs seek opportunities to participate in (i.e., observe, play, control, or evaluate) at least two NCP exercises/drills each year. This has been a consensus standard included in the Core ER/Core NAR criteria in recent years. Participation in actual emergency responses or removal actions may be considered to satisfy this criterion, at the discretion of the Removal Managers and OEM. Advanced deployment for FEMA exercises, responses and National Special Security Events may be used to fulfill this requirement. Additionally, OSCs should participate in emergency operations during regional COOP drills/exercises. Participation in exercises may count towards the 80 hour professional development requirement outlined in OSWER Directive 9295.9-05.

OSCs should become familiar with the EPA National 3-year Training and Exercise Plan (NTEP) to locate upcoming exercise participation opportunities. The NTEP is located on epaos.net on the Training and Exercise Planning Workgroup website under the HQ logo.

## 8 OSC Training and Exercise Responsibilities

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The following summarizes expectations with respect to training and OSCs.

OSCs should:

- Expect to be surveyed periodically and to provide professional, constructive feedback about training and exercises. There are general needs surveys and course-specific surveys. Information provided in surveys continues to be an excellent source for improving course content and relevancy.
- Fill out sign-in sheets and participant evaluation forms.
- Be aware of upcoming training opportunities.
- Report course completions to your training coordinator to ensure it is electronically recorded in the Emergency Management Portal (EMP)- Field Readiness module..
- Expect to help develop and/or deliver training at some point.
- Volunteer for the national OSC Readiness Task Force or OSC Readiness Training Board in order to share your skills and experience.
- Take advantage of on-the-job training opportunities.

### 8.1 Documentation of Training

The EMP- Field Readiness module is an electronic tracking system maintained by OEM to track courses taken and certifications obtained by all EPA employees potentially involved in emergency response. The system allows for regional training customizations while maintaining a uniform national list of courses as dictated by existing EPA guidance. The EMP- Field Readiness module is currently available to all EPA regions and Headquarters to use in tracking required and recommended training. OSCs should inform their regional EMP coordinators of courses completed to ensure they are entered in the tracking system.

The RTF recommends that individual OSCs also maintain a record of their training, including certificates or other documentation provided by the course instructors.

## 9 Mentoring

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The OSC mentoring program is a key aspect of EPA's training program. Consistent with Agency-wide policy on mentoring (OSWER Directive 9285.9 – 02), each new OSC should be assigned a mentor by his or her supervisor soon after appointment. New OSCs will remain in the mentoring program until the mentor, the protégé, and the supervisor agree that the OSC is ready for a response action assignment in accordance with OSHA 1910.120 (e) and EPA Order 1440.2, which both require 24 hours of on the job training.

## 10 Professional Development \*

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OSCs and their supervisors may work together to develop annual Individual Development Plans (IDPs) 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. OSC supervisors are responsible for 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 providing training documentation to relevant individuals or offices to maintain current training records. OSCs should take advantage of the Office of Human Resources for guidance and assistance in completing the IDP process. A sample IDP is provided in Appendix B.

\*EPA staff are encouraged to develop IDPs to assist them in managing their individual careers as well as assuring that they schedule and receive the required job related training. This document provides guidance for the job related training component of an IDP. Employees are encouraged to discuss other career related IDP issues with their supervisor.

## 11 APPENDIX A: Sample OSC Position Description

### **Biologist/Environmental Engineer/Environmental Scientist (On-Scene- Coordinator) GS-401/819/1301-13**

#### **INTRODUCTION**

This position is located in [*to be filled in with Region-specific information*]. The incumbent serves as an On-Scene Coordinator responsible for responding to threats to public health and/or the environment pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) 40 Code of Federal Regulations (CFR) Part 300 with responsibility for emergency and removal response activities under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the Oil Pollution Act (OPA) and the Clean Water Act (CWA), Presidential Decisions Directives (PDD) and in accordance with appropriate laws, regulations, Executive Orders, as required. The incumbent has unique authorities/responsibilities within the federal government to both approve an action and procure necessary resources to implement a response to these actions.

The work of this position is multi-media in nature and the incumbent has responsibility for preventing, and/or mitigating the health and environmental hazards resulting from; 1) sudden and unexpected or intentional releases or discharges of oil and hazardous substances, pollutants or contaminants, including releases of biological, chemical and radiological agents; and, 2) uncontrolled hazardous waste sites, either individually or as a team member. These pollutants can spread from a variety of sources such as industrial, manufacturing or storage facilities through the physical environment (i.e. land or water) into plant life, the food chain and people, if left unmitigated. Consequently, this is an interdisciplinary position which can be filled by an individual with a professional background in the life or physical sciences or in environmental engineering. In this capacity, the incumbent performs the following:

#### **MAJOR DUTIES AND RESPONSIBILITIES**

1. Responds on an emergency basis, applying expert knowledge of life science/ environmental engineering/environmental science in order to mitigate accidental or deliberate releases of hazardous materials. Provides direction on innovative or alternative treatment technologies and techniques to be used in the cleanup of hazardous materials. Many of these releases present an immediate, critical threat to public health through extreme exposure rates; on, and off-site migration; imminent fire/explosion threat; extreme threat or damage to environmentally sensitive areas and/or endangered species on sites which may be large or complicated by multi-media problems (e.g., air, groundwater, and surface water). These multi-media problems may transcend State or Regional boundaries, and potentially international boundaries, as well. Actions are carried out consistent with the NCP, CERCLA/SARA, Stafford Act, other standards and EPA guidelines.
2. Maintains 24-hour readiness for mobilization to an emergency, during specific time periods, as required. When dispatched, incumbent will mobilize to the scene of release and determine EPA's role in responding to the incident. The incumbent independently determines whether the action needed is emergency, time-critical, or non-time critical, by considering the

probable direction, migration rate, nature, amount and location of the contamination, as well as the potential impact on human health and the environment.

**3.** Serves as the predesignated federal official for directing all response efforts at a spill of oil, hazardous substances, pollutants or contaminants, including intentional releases of biological, chemical and radiological agents. Independently determines whether the incident requires immediate action and if so, will exercise appropriate delegated authorities (including contracting/procurement authorities) which may include but are not limited to approving emergency Fund-lead actions; issuing verbal task orders and delivery orders; directing all federal, state, or private actions at oil discharges that pose or may pose a substantial threat to public health or welfare of the United States.

**4.** Under the Clean Water Act, independently makes determinations as to whether a response is necessary to mitigate impacts of an oil discharge. If response is warranted, the OSC directs the responsible party (RP) to begin remediation under applicable laws and regulations. If the RP efforts are inadequate the OSC initiates appropriate response actions and notifies the RP of potential liability for federal response costs. Provides assistance for enforcement actions, provides technical review and oversight of PRP activities, provides technical support for enforcement actions, and supports the USEPA Criminal Investigation Division (CID) and law enforcement officials with criminal investigation efforts, which may include counter-terrorism-related environmental incidents (performs a similar role with respect to CERCLA in duty #5.)

**5.** Under CERCLA, performs enforcement or enforcement-related duties, at both fund-lead and enforcement lead removal responses, which support other enforcement actions or future cost recovery. Assists in the preparation and negotiation of enforcement orders.

**6.** Serves as the duty officer, providing coverage for the 24-hour emergency response telephone, with responsibility for assessing the nature of the reported incident and deploying an OSC, as appropriate, for oil or hazardous substance spill reports received through the National Response Center (NRC); federal, state, or local response agencies; and independent sources within the region, as required. This includes providing preliminary advice to the reporting party, independently determining the appropriate level of response, and notifying and coordinating with federal and state Natural Resource Trustees regarding spill occurrences and site activities impacting natural resources.

**7.** Serves as a warranted Contracting Officer with contracting authority. Exercises procurement authority in accordance with the specific terms of the Delegation of Procurement Authority (DPA) from the EPA Office of Acquisition Management. Maintain certification through continuing education, as required by law. Incumbent may devote approximately 20% of time to contract management duties. Maintains certification of and uses warrant authorization to enter into delivery orders and contracts for the procurement of services necessary to implement removal responses including: verbal and written delivery orders; orders for services contracts; letter contracts with state and local governments; and notice to proceed procurements.

**8.** Develops a strategy, plan, and schedule for implementing a removal response and determines appropriate authorities. Identifies and characterizes the nature and extent of the release and selects the alternatives for treatment and/or disposal to mitigate the release. Manages and directs all on-site resources and activities involved with the removal process to ensure safe and expeditious completion of the work. Evaluates changing conditions and develops and implements approaches to effectively continue removal actions.

- 9.** Secures site access and coordinates site activities with all involved parties, including site owners, potentially responsible parties (PRPs), other EPA programs, and federal, state, tribal and local agencies. Prepares and maintains the necessary documentation for the initiation, continuation, and completion of a removal response.
- 10.** The incumbent is authorized to conduct official investigations and inspections pursuant to all federal laws administered by the US EPA. These may include compliance inspections as well as release investigations.
- 11.** Reviews and analyzes scientific literature and confers with other government and industry experts, and other experts in the life sciences, engineering sciences or physical sciences in order to ascertain the technical implications of EPA decisions on hazardous waste, soil, sediment, and ground water issues. Integrates technical information from these sources into the analytical and decision-making process as part of determining innovative approaches to difficult site technical problems.
- 12.** May serve as a primary Agency spokesperson for public meetings, press conferences. This involves contact with the public, news media, regulated community, and other government agencies concerning the nature and status of removal responses. Responds to public, other agency and EPA Regional inquiries concerning assessment and cleanups at hazardous waste sites. Prepares and delivers presentations and briefings for conferences, public interest groups, industry and government. Acts as official EPA representative, addressing community concerns, facilitating public understanding and soliciting citizens comment regarding removal response-related issues which may be complicated by fear, mistrust or lack of cooperation on the part of the citizenry and which may result in high profile or hostile conditions, requiring tact and diplomacy on the part of the incumbent in representing the Regional viewpoint. Provides technical support and expert testimony in courts or other judicial bodies, such as administrative hearings, and gives depositions.
- 13.** May participate in national and regional workgroups or task forces involved in examining ways of enhancing or improving the OSC functions, including readiness issues. Analyzes the issues involved or changes under consideration, and works with other group members to build consensus on recommendations and options for management consideration.
- 14.** May be required to perform planning, prevention, and preparedness activities in accordance with appropriate Presidential Decision Directives (PDDs), laws, regulations, Executive Orders. This may include preparing for the health and environmental hazards resulting from intentional releases of biological, chemical and radiological agents or declarations made under the Stafford Act. These duties may also include providing or selecting response training for local, state, or federal response. Facilitates and leads the development of Regional, Area, and Sub-Area Contingency Plans (as required under the NCP 300.210) with representatives of state, local and tribal governments, as well as Canadian and Mexican representatives where necessary in Border areas. The OSC is delegated signature authority for approval of Area Contingency and Facility Response Plans. The incumbent plans and leads drills and exercises to test and improve the plan's effectiveness.
- 15.** May be required to perform duties in response to man-made and natural disasters under the Federal Response Plan, including the preparation and planning of the response activities of Emergency Support Function (ESF) 10 activations, representation of EPA at the

Regional Response Center (RRC), Disaster Field Office (DFO), and Regional Operations Center (ROC) during ESF-10 activations, and coordination with state responders. The incumbent may also take actions under the Federal Radiological Emergency Response Plan (FRERP) and other “non-traditional” emergency plans.

16. Performs other related duties as assigned.

### **CONDITIONS OF EMPLOYMENT**

This position:

- is subject to random drug testing
- may require a high level security clearance
- is subject to medical monitoring
- requires the incumbent to be able to properly wear and use a respirator
- requires the employee to travel more than 10 days a month
- requires the annual filing of a financial disclosure form

### **Factor 1 Knowledge Required by the Position Level I-8 1550 Points**

The position requires mastery of the principles, theories, concepts and methodologies found in the life science, environmental engineering or physical science fields sufficient to apply new developments and experienced judgment, as a technical authority, to solve novel or obscure problems in the areas of environmental emergency response, uncontrolled hazardous waste site response and/or releases of chemicals or other hazardous substances. This position requires a thorough knowledge of the various types of chemical contaminations and possible threats and effects on humans and the environment.

It requires the skill and ability to extend or modify existing techniques and develop new approaches for use by others in solving a variety of problems related in the area of emergency response. These knowledge, skills and abilities are employed in the design of field surveys and studies at uncontrolled hazardous waste sites and environmental emergencies in order to develop information necessary to determine the degree of risk or extent of contamination involved. The position requires the ability to perform environmental assessments at hazardous materials spills or incidents and to develop and conduct removal/remedial activities. This position also requires knowledge, abilities and skills to evaluate techniques and technologies for use at hazardous waste sites to assess the impacts of the hazardous releases and their impact on human health and the environment. The incumbent in this position requires a familiarity with the principles and theories found in related fields such as geology, hydrology, chemistry, and statistics.

The position requires knowledge of safety issues and problems and the ability to recognize and take steps to protect investigators from contamination of potentially hazardous materials.

The position requires training in the proper use of a variety of protective equipment, including self-contained breathing apparatus.

Incumbents of this position are also required to possess knowledge of contract negotiation and contract administration as required under the OSC Warrant Authority for scientific and labor services while conducting response actions.

## **Factor 2. Supervisory Controls Level 2-4 450 points**

Incumbent receives general guidance as to timing, objectives and resources for the program from the supervisor. Assignments are usually broad in nature, and the incumbent has wide latitude in terms of responsibility for planning, designing and implementing solutions for site clean up and the alleviation of damage caused by hazardous substances. This includes the responsibility for planning the goals and objectives for a particular response site and for carrying them out, including the development of technical approaches and independently coordinating with other scientists, engineers, representatives of State, local or Tribal entities, and potentially responsible parties. The incumbent keeps supervisor informed of any major problems or controversial issues on site. Completed work is subject normally accepted as technically proficient, but is reviewed for conformance to EPA policy, regulations, site compliance standards, and efficiency and effectiveness of actions in the mitigation of threat to humans and the environment.

## **Factor 3 Guidelines Level 3-4 450 Points**

Guidelines are in the form of Federal statutes and regulation (e.g., CWA, OPA, CERCLA, RCRA, and the Stafford Act) the National Priorities List, the National Oil and Hazardous Substances Pollution Contingency Plan; various Federal, State and local regulations; and EPA policies and standards, in addition to broad agency policy, and professional scientific and/or engineering training and experience. The employee also has access to EPA historical information on proven remedies for site clean up and reduction of environmental damage which may be of some use as precedents. However, these guidelines are often inadequate to meet the challenges involved at sites where standard methods cannot be used to correct the situation without precedent. In such instances, the incumbent must rely on personal experience, and judgment to adapt current practices or extend traditional methods to solve problems encountered.

## **Factor 4 Complexity Level 4-5 325 Points**

Work assignments involve varied and complex technical duties, including problem analysis, often with limited data available as to the type and extent of human threat and environmental contamination. Performance of this work requires application of the theories, principles and practices of related fields of science such as chemistry, hydrology, biology and geology, which may be adapted to the development of solutions suitable to the variables associated with each unique response site and the coordination of removal and disposal of hazardous substances; and budgetary limitations regarding costly, necessary clean up activities. The clean up process is also complicated by interaction with State and local political officials and agencies, negotiations with potentially responsible parties and contractors, the presence of television and print media, and various community and special interest groups.

## **Factor 5 Scope and Effect Level 5-4 225 Points**

The purpose of the position is to develop and implement practical and effective solutions for the protection of human health and the environment, the clean up of contaminated sites, the removal of hazardous materials, and mitigation or damage to the environment within the Region. The employee provides advice on physical, environmental or engineering aspects of studies and investigations on human health risk by identifying, quantifying the nature of the incident, along with guidance and coordination for contractors and potentially responsible parties.

The work of the position affects and facilitates the work of entities contracted to test and clean up a site, potentially responsible parties, and the Region in which this position is located. The work helps to ensure that Federal, State and local laws are upheld; that the work is in compliance with Federal regulations; that the site sustains no further damage; and, that the damage does not spread to other environments.

**Factor 6 Personal Contacts Level 6-3 60 Points**

Personal contacts are with scientific, technical and engineering personnel, officials of Agency Headquarters and Regional offices, officials and professionals of other Federal, State and local agencies, industry representatives, members of congressional committees, and fellow members of national societies and special interest groups.

**Factor 7 Purpose Contacts Level 7-3 120 Points**

In addition to exchanging factual information, the purposes of these contacts are to discuss methodological problems and potential solutions, explain the data obtained; persuade, influence or motivate individuals who generally have conflicting opinions; and to ensure that contractor work is following the agreed upon work plan. The incumbent's approach must be tactful, skillful, and directed toward establishing a cooperative atmosphere conducive to open communication and to the expression and acceptance of plans and decisions, in order to ensure compliance with Federal, State, and local laws and with negotiated agreements.

**Factor 8 Physical Demands Level 8-2 20 Points**

The work requires overnight travel, extended work shifts (e.g. 12 to 18 hours, or more) during major emergency response or removal operations. The work requires a large amount of walking, climbing, running, bending, stooping, and the employee may be required to perform such physical activities while wearing a variety of protective clothing which can include respiratory protection or self-contained breathing apparatus

**Factor 9 Work Environment Level 9-2 20 Points**

Work is both in an office and in remote field settings. While on site in the field, the employee may be exposed to unfavorable weather conditions and rough terrain. The work may involve regular and recurring exposure to moderate risks or discomforts that require special safety precautions particularly where there is risk of exposure to hazardous and toxic substances, radioactive materials or other pollutants. The employee is required to use protective clothing and equipment (i.e., gloves and face masks) and may occasionally be required to use fully encapsulating suits and supplied air (Level A & B.)

Total Points = 3,220 = GS-13

12 APPENDIX B: Sample IDP

**ENVIRONMENTAL PROTECTION AGENCY  
INDIVIDUAL DEVELOPMENT PLAN**

NAME: Smith

Effective Dates: FY 11

*Developmental Goal(s): Set 2-3 specific goals in consultation with your supervisor. Those goals should support your organization's goals.*

DEVELOPMENT PLANS/ACTIVITIES	Description/Support required, Success Measures	Time Frame
<b>Work Assignments:</b>		
<p><b>1. Upcoming Removals</b></p> <ul style="list-style-type: none"> <li>• Don's Auto Time-Critical Removal</li> <li>• Aluminum Finishing Completion of Removal under Emergency Action Memo</li> <li>• Southeastern Wood Time-Critical Removal</li> </ul> <p><b>2. SPCC and FRP Inspections</b></p> <p><b>3. Newly assigned Removal Site Evaluations</b></p>	<p><b>1. Description:</b></p> <ul style="list-style-type: none"> <li>• Short term removal dealing with treatment and disposal options</li> <li>• Removal dealing with disposal of various hazardous substances. Clean close-out of facility warehouse. Chemist support and various disposal options. Possible recycling of materials to off-set costs.</li> <li>• Creosote site with 24 year history of EPA involvement. Must coordinate efforts with experts throughout the field of subsurface migration of contaminants.</li> </ul> <p><b>2. Work with mentor on FRP inspections and drills. Conduct a minimum of 5 SPCC inspections on my own.</b></p> <p><b>3. Complete 3 RSEs throughout the year.</b></p>	<p><b>1.</b></p> <ul style="list-style-type: none"> <li>• 1 month</li> <li>• 2 months</li> <li>• 4-6 months</li> </ul> <p><b>2. This FY</b></p> <p><b>3. This FY</b></p>
<b>Self Development Activities:</b>		
<b>Emergency Response:</b>		<b>This FY</b>

<b>DEVELOPMENT PLANS/ACTIVITIES</b>	<b>Description/Support required, Success Measures</b>	<b>Time Frame</b>
<b>Participate in 3 Emergency Response Actions</b>		
<b>Formal programs:</b>		
<ul style="list-style-type: none"> <li>a) Risk Assessment Guidance</li> <li>b) Waste Treatment, Transportation and Disposal Course</li> <li>c) OSC Readiness</li> <li>d) COR Recertification</li> </ul>		<b>This FY</b>
<b>Preparedness:</b>		
<b>Participate in National Level Exercise</b> <b>Participate in regional IMT exercise as Planning Section Chief</b>		

EPA Form 3140-31 (1/99)

Employee Signature

Date

Manager Signature

Date