



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D C 20460

JUL 15 1988

THE ADMINISTRATOR

MEMORANDUM

SUBJECT: Agency-Wide Program to Train, Develop and Recognize
Compliance Inspectors/Field Investigators

TO: Assistant Administrators
Inspector General
General Counsel
Associate Administrators
Regional Administrators
Compliance Program Directors
Environmental Services Division Directors

Achieving and maintaining a high level of compliance with environmental laws and regulations is one of our most important goals. Personnel conducting compliance inspections and field investigations play a key role in the success of the national enforcement programs. EPA Order 3500.1, signed by Jim Barnes on June 29, 1988, and the accompanying program description will now establish a comprehensive program to train, develop and recognize the contribution of EPA's compliance inspectors and field investigators, and others who perform this function under EPA's statutes.

State and local personnel conduct the majority of environmental compliance inspections and investigations under delegated or approved programs. EPA will work with the State and local agencies to encourage State and local training programs and to identify and meet training needs for their compliance inspectors/field investigators. These agencies are welcome to use all relevant training materials and participate wherever possible in the training opportunities EPA offers.

Although no training program or periodic recognition for achievement can guarantee performance or substitute for effective day-to-day work, I believe that these actions will help to foster professionalism and quality in inspections and investigations, commensurate with the importance of this function to our mission.



Lee M. Thomas

Attachments

**AGENCY-WIDE PROGRAM TO
TRAIN, DEVELOP AND RECOGNIZE
COMPLIANCE INSPECTORS/FIELD INVESTIGATORS:
A PROGRAM DESCRIPTION**

June 1988

**U.S. Environmental Protection Agency
Washington, D.C. 20460**

ACKNOWLEDGEMENTS

This Program Description was prepared for the Agency-wide Work Group on Inspector Training and Development by the Compliance Policy and Planning Branch, Office of Compliance Analysis and Program Operations, Office of Enforcement and Compliance Monitoring (OECM). The overall project manager and principal author was Rebecca A. Barclay. Appendices D-1 to D-9, Summaries of Program-Specific Curricula, were prepared by the Program Offices.

DISCLAIMER STATEMENT

No language in EPA Order 3500.1 and/or this policy shall create any right in any person to use this Order as a basis for suit, or as a basis for defense, against EPA; it is intended as notice solely for internal personnel administration and its terms shall not inure to the benefit of any person who is not employed by EPA. Nothing in EPA Order 3500.1 nor this policy shall affect adversely admissibility of evidence offered by the United States in any proceeding, or the competency of witnesses called by the United States.

EXECUTIVE SUMMARY

EPA's program to train, develop and recognize compliance inspectors and field investigators does the following:

- o Focuses on Quality Inspections, not just "training for training's sake," by continuing to rely on the Performance Management System and the first-line supervisor's judgment in evaluating the field performance and the readiness of an inspector to lead an inspection. Development of criteria for quality inspection reports and Supervisors' Guides for assessing training needs and requesting exceptions are new tools provided for this purpose.
- o Establishes Minimum Training Requirements Before Leading Inspections, in the form of a Basic Inspector Curriculum developed by OECM, and Program-Specific Minimum Curricula developed by the Program Offices, with Regions' and States' participation.
- o Addresses a Broad Audience including EPA's new and experienced inspectors and first-line supervisors, along with EPA's contractors leading compliance inspections and field investigations for compliance and enforcement-related purposes.
- o Maintains Flexibility in Implementation by phasing in requirements for new inspectors and all first-line supervisors on October 1, 1989, and for experienced inspectors on October 1, 1991. The Program also allows exceptions to requirements based on previous training and experience in most instances; however, new inspectors cannot be excepted from the Basic Curriculum.
- o Assists State/Local Personnel, by encouraging States to adopt structured training programs for inspectors, sharing EPA developed training materials, assessing training needs during the State/EPA Enforcement Agreements Process, and offering to train State instructors.
- o Ensures Ongoing, Consistent Delivery of Training, by using the EPA Institute model for the Basic Curriculum, continuing contractor or grant support in program-specific situations, and relying on a combination of these approaches to deliver health and safety training required by existing EPA Orders.
- o Maintains Program Accountability, by assigning responsibilities for development, delivery, tracking and evaluation of training in Headquarters and the Regions, establishing standing work groups and incorporating evaluation throughout the program design.
- o Builds Recognition into the Work by encouraging more feedback and acknowledgment of the inspector's contribution to enforcement actions and by encouraging AAs and RAs to reward excellence in compliance monitoring inspections/field investigations.

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**AGENCY-WIDE PROGRAM TO TRAIN, DEVELOP, AND RECOGNIZE
COMPLIANCE INSPECTORS/FIELD INVESTIGATORS**

I. INTRODUCTION

In June, 1988, the Administrator issued a policy, entitled, "Agency-wide Program to Train, Develop and Recognize Compliance Inspectors and Field Investigators." The primary goal of this program is to foster quality compliance inspections and field investigations as critical components of the Environmental Protection Agency's (EPA's) compliance monitoring and enforcement functions.* It is the continuing responsibility of the compliance inspector, or field investigator, and his/her first-line supervisor to focus on quality, not just quantity and timeliness in meeting the commitments for inspections and investigations. Managers and staff at all levels should support this emphasis throughout the Regions and Headquarters.

There are existing systems and responsibilities which EPA will continue to rely upon to ensure quality. Among these are development and provision of inspection guidance manuals, policies, and procedures; management systems including performance standards and performance appraisals; and decisions by the first-line supervisor on assignments and the readiness of personnel to represent the Agency in the field with the regulated community. This document explains several new actions designed to reinforce the goal of quality in EPA's compliance monitoring programs and details the responsibilities of Agency managers and staff in carrying out these actions.

Highlights of these actions include:

- o Using New Tools to Assess Inspectors/Investigators' Training needs;
- o Reinforcing Quality in Inspection Reports;
- o Establishing Formal Training Curricula and Requirements;

* Activities encompassed in the term compliance inspections/field investigations are shown in "Definitions," Appendix A.

- o Creating Standing Work Groups to Improve EPA's Compliance Inspection Programs; and
- o Building Recognition into the Day-to-Day Work.

Taken together these key actions should help create the necessary conditions for high quality inspections, thereby strengthening the Agency's compliance and enforcement programs. The remainder of this document describes these and related actions in more detail.

II. DEVELOPING AND EVALUATING QUALITY IN INSPECTIONS AND INVESTIGATIONS

A first-line supervisor has very important responsibilities regarding employee development. The supervisor makes decisions on the individual's training needs, the best ways to meet those needs, if and when an individual is ready to lead an inspection, the annual performance rating, and when promotions are warranted. These activities are done cyclically and are very closely interrelated. To assist supervisors with these responsibilities, the following will occur.

A. Performance Evaluation

Training prerequisites alone do not ensure high quality performance in the field. Nor is completion of these the sole basis for a first-line supervisor to decide that an employee is ready to lead inspections. Personal qualities such as individual motivation and judgment are among the factors a supervisor considers. EPA's Performance Management Systems provides the framework for assessing the individuals readiness for leading inspections/investigations and the quality of performance.

When evaluating the quality of performance of compliance inspectors/field investigators, first-line supervisors are strongly encouraged to use three primary methods with related performance standards:

- o Review of inspection plans, files and reports against established criteria for quality: Criteria for evaluating the quality of inspection reports should be developed in conjunction with case development personnel and a system of periodic reviews should be established that offers clear and prompt feedback. Some programs and Regions already use this approach.
- o Direct observation of the inspector's performance in the field: Because inspectors operate independently in the field, it is crucial for the supervisor to have direct knowledge of how the

individual is performing in the field as EPA's representative. Periodically observing and evaluating the inspector in the field can be a useful way of developing such knowledge.

o Self-evaluation: Self-evaluation is always an important component, so that the supervisor knows whether the inspector understands what is important about quality in performance and how the individual perceives his/her own accomplishments.

B. Assessing Training Needs

As part of this program, Program Offices and OECM are developing Supervisors' Guides to help supervisors assess previous training and experience against the established curricula. These guides will link the training curricula to the knowledge, skills and abilities (KSAs) that are related to the job. They offer a common framework for applying training requirements, annually reviewing training needs, preparing Individual Development Plans, and requesting exceptions from training requirements. These guides will be available during FY 1989.

Also Program Offices and OECM are encouraged to develop and test objective measures to assess what individuals have learned through the training program and to use this information in deciding future training needs. Such measures of progress could be self assessments built into training materials, mock inspections or other means of evaluating learning.

C. Standing Work Groups

Standing work groups are important to support and promote quality in all aspects of EPA's compliance inspection/monitoring programs. These groups provide opportunities for discussion among peers and can enhance the sense of professionalism among the Agency's very diverse group of compliance inspectors and investigators.

Program Offices will establish standing work groups composed of Headquarters, Regional and State compliance inspectors/investigators and other compliance program staff to exchange ideas about work methods and strategies; to assist in design, development and review of training materials; and to develop better mechanisms for timely dissemination of information on policy and regulatory changes related to inspections/investigations. Program Offices have already used such groups effectively in the development of the program-specific curricula that form a central component of the training program described below.

Related to this, the Program Offices should also establish mechanisms to keep inspectors/investigators abreast of

policy, regulatory, and procedural changes between training cycles (i.e. newsletter, procedures memoranda, inspection manual inserts).

Also, OECM will establish a board of Senior Agency Managers, inspectors and investigators from Headquarters and Regions to advise OECM in updating EPA Order 3500.1, overseeing and implementing this program, updating the Basic Curriculum, and developing other projects to improve the Agency's compliance monitoring programs.

III. TRAINING AND DEVELOPMENT

The primary goal of the EPA's national training program is to develop and maintain among EPA employees, the knowledge, skills and abilities needed for high quality compliance inspections on a consistent and continuing basis. EPA Order 3500.1 establishes formal curricula and minimum requirements for all EPA inspectors, first-line supervisors of inspectors, EPA contractors and others conducting inspections under EPA's statutes. The Order also establishes procedures for exceptions to the training requirements.

This is the first time the Agency has articulated a national, comprehensive approach to professional development of compliance inspectors. Program Offices and the Office of Enforcement and Compliance Monitoring (OECM) are responsible for developing and maintaining these training programs on a continuing basis. Both the Regional Offices and Headquarters Program Offices have important roles in delivering the training.

A. Training Curricula

The curricula consist of three required elements: Occupational Health and Safety, Basic, and Program-Specific Minimum Curricula. Appendices B, C, and D respectively describe each curriculum. Recommendations on multi-media (multi-program) training appear in Appendix E. Supplemental training to strengthen skills such as negotiations and appearing as an expert witness are also available, as described in Appendix F. For more information about each curriculum, contact the representative listed in each summary. Briefly these curricula are:

1. Occupational Health and Safety: EPA Orders 1440.2 and 1440.3 establish requirements for knowledge of hazard recognition, personal protective equipment, and general health and safety practices. The Occupational Health and Safety Staff (Office of Administration and Resources Management) is responsible for updating these Orders and the associated curricula. (See Appendix B.) Training required by these Orders is an essential component of the Basic Curriculum for inspectors.

2. Basic Inspector Curriculum: This Curriculum establishes required training to provide a comprehensive overview of knowledge and skills needed for compliance inspections/field investigations under any EPA statute. It consists of a course, that integrates legal, technical and administrative subjects, with communication skills. The goal of this training is to foster a common understanding of the role of the compliance inspector and EPA's general enforcement philosophy; the enforcement authorities and enforcement process under all the major environmental statutes; and to develop skills needed to gather information, collect evidence, and write objective reports of findings. OECM is responsible for developing and updating this course and overseeing implementation of the curriculum. Appendix C describes the curriculum in more detail. The curriculum also encompasses the training required by the Health and Safety Orders cited above.

3. Program-Specific Curricula: Each Program Office has defined a minimum curriculum of legal, programmatic, and technical subjects to prepare an inspector to lead specific types of inspections, recognize violations, and to properly obtain information/evidence. The curriculum must be completed prior to leading a inspection. Appendix D contains a brief summary of each Program Office's minimum curriculum. If an individual is leading inspections in more than one program area, s/he must complete the minimum curriculum for each program area before leading an inspection in that program.

Each Program Office has or will develop advanced or specialized curricula for particularly complex or difficult types of inspections, and will incorporate these into their training plans as they are developed and approved by training work groups. The proper mix of inspectors with specialized training is the decision of Regional management, depending on needs for specialized types of inspections and knowledge of control technologies or industries.¹ Any inspector seeking such specialized training should have previously completed the Basic and Program-Specific Minimum Curricula.

4. Multi-Media (Multi-Program) Training

The goal of multi-media (multi-program) training is to develop a flexible work force capable of responding to changing program priorities and to enable more efficient use of travel time and money. Regions are encouraged to support

¹Throughout this document, wherever Regional Administrator or Regional Management appears, the same authorities or responsibilities apply to any Assistant Administrator with Headquarters-based compliance inspectors/field investigators, for example, in the Air Mobile Sources Program.

multi-media (multi-program) training where the relationship between the requirements of two or more programs or the location of the facilities makes it cost-effective to do so. Appendix E recommends areas for future development of multi-media (multi-program) inspections and associated training.

5. Supplemental Training

To supplement the required Basic Curriculum, EPA inspection personnel are encouraged to take other training courses designed to strengthen specific skills associated with the compliance and enforcement process, such as administrative hearings/trials, negotiations skills, appearing as an expert witness, and criminal enforcement techniques. See Appendix F for additional information and whom to contact.

6. Refresher-Training

The purpose of refresher training for inspectors and their first-line supervisors is to reinforce basic knowledge and skills and to keep current the specific technical, legal and programmatic knowledge and skill needed for high quality inspections/investigations. Refresher training in occupational health and safety is required annually under EPA Orders 1440.2 and 1440.3.

Refresher training in both the Basic and Program-Specific Minimum Curricula is strongly recommended every three years at a minimum. The first-line supervisor will determine the frequency of such training based on the needs of the individual, and changing emphases or needs in the Compliance Program. This means that training is ongoing, rather than a one-time occurrence. Program Offices may specify refresher training more frequently for some or all parts of their curricula.

B. Applicability

This section elaborates on EPA-Order 3500.1, Section 2 so that staff and managers implementing this training program for compliance inspectors/field investigators have a broader understanding of its applicability to EPA personnel, contractors and others performing inspections under EPA's statutes, and to State and local personnel.

1. EPA Compliance Inspector/Field Investigators, and First-Line Supervisors.

The requirements of this program apply to all EPA compliance inspectors/field investigators and the first-line supervisors of individuals who lead or oversee compliance inspections/field investigations. While program requirements apply to both "new"

and "experienced" personnel as defined in the Order, there are some distinctions in training requirements and exceptions to them. Regional Administrators and those Assistant Administrators with inspectors based in Headquarters and are responsible for determining which personnel fall in the categories of "new" and "experienced," and which requirements and/or exceptions apply. Although not required, anyone participating or assisting in compliance inspections/field investigations is strongly encouraged to complete the Basic and Program-Specific Curricula.

Not all individuals performing work as On Scene Coordinators (OSCS) and Remedial Project Managers (RPMS) under the CERCLA program are covered by the definition of the compliance inspection/field investigation function. OSWER will develop additional program guidance to assist Regions in distinguishing these functions from other programmatic responsibilities.

2. EPA Contract Personnel and Others

In order to be effective representatives of EPA and carry out Agency policies and procedures, EPA contract personnel, consultants, and other personnel performing compliance inspections/field investigations under EPA's statutes must fulfill the requirements of the Basic and Program-Specific Minimum Curricula prior to leading any inspections. Program Offices and Regions are responsible for assuring that under future contracts and assistance agreements awarded under the Senior Environmental Employment Program involving compliance inspections, training is required by means of statements of work and/or other appropriate vehicles.

3. State/Local Personnel

Because State and local personnel perform more than 80% of all environmental compliance inspections nationally under delegated or approved programs, it is essential for EPA to work with the State and local agencies to help assure that their personnel too receive ample training and development. Although this program does not require State/local agencies to train compliance inspectors/field investigators, it does encourage these agencies to adopt structured approaches to train their personnel, recognizing State-specific concerns and the value of alternate instructional methods, and to use EPA-developed training materials where appropriate.

EPA recognizes that States' training needs differ from EPA's needs in areas such as program requirements and regulations, but there are common areas of need, for example in technical field methods and investigative techniques. In many instances, States are the repository of expertise that EPA needs

to tap as well. EPA's training program recognizes the importance of this mutual relationship in design and implementation of inspector training (See discussion in Section III. F).

C. Requirements and Exceptions

The Basic and Program-Specific Minimum Curricula establish a core set of subjects and field experience that must be completed by each inspector. Regions are encouraged to tailor training materials to suit local needs, while still being consistent with the national program. This means that Regions may add to the course content but coverage of the essential content is required. Completion of any of the training required under this program means completing self-study, OJT and/or participation in classes covering the content of the curriculum.

Training requirements are oriented around key stages in the process of employee development as follows:

1. Prerequisites to Field Activities

EPA Order 1440.2 established basic health and safety training requirements that apply to all of EPA's compliance inspectors/field investigators and their first line supervisors, and that are prerequisites to any activities in the field. The training requirements of EPA Order 1440.3 may also apply.

2. Prerequisites to Leading Inspections

EPA Order 3500.1 establishes minimum training requirements under the Basic and Program-Specific Minimum Curricula for all of EPA's compliance inspectors/field investigators that constitute prerequisites to leading or overseeing inspections/investigations performed by States/local personnel, EPA contractors or others conducting inspections under EPA's statutes.

3. Within One Year When Supervising

EPA Order 3500.1 establishes minimum training requirements under the Basic and Program-Specific Minimum Curricula for all first-line supervisors of personnel who lead or oversee compliance inspections that should be completed within one year of appointment to the supervisory position. If the first-line supervisor directs inspectors/investigators in two or more programs, the supervisor may need additional time to complete all of the applicable Program-Specific Minimum Curricula, and should do so as soon as practicable.

4. Procedure for Exceptions

Paragraph 9 (d), EPA Order 1440.2 and EPA Order 1440.3 provide procedures that should be followed to seek exceptions to health and safety training requirements. Paragraph 8 (c), EPA Order 3500.1 establishes the procedure for obtaining exceptions to requirements to complete the Basic and Program-Specific Minimum Curricula. In the Regions, the responsibility for approving exceptions rests with the Regional Administrator. Delegation below this level may be made to the Deputy Regional Administrator or a panel of managers, excluding the immediate first or second-line supervisors of the individual for whom an exception is being requested.

For those Program Offices with inspectors based in Headquarters, the authority to approve requests for exceptions for these individuals rests with the Assistant Administrator. Delegation below this level may be made to the Deputy Assistant Administrator, the Office Director, or in the case of OECM, to the Director of NEIC. In no case does the AA approve requests for exceptions made for personnel based in the Regions.

5. Exceptions to Requirements for Completing Basic and Program-Specific Minimum Curricula

Regional Administrators or Assistant Administrators, or their delegates, are responsible for determining whether each inspector or first-line supervisor is "new" or "experienced" as defined in EPA Order 3500.1.

The following chart (FIGURE 1) shows what options exist for new and experienced inspectors/investigators and first-line supervisors of inspectors to receive exceptions to these requirements. These exceptions must be based on an evaluation of each inspector's or supervisor's previous training and experience as compared to the required curricula. The Supervisors' Guides discussed in Section II. B are the primary tool for performing this assessment.

For the Basic Curriculum, the policy of no exceptions for new personnel is important because this training is the common foundation on which the Program-Specific Minimum Curricula builds. Exceptions for some experienced employees may be appropriate. Nonetheless, experienced inspectors are strongly encouraged to take the Basic Curriculum even if excepted from it because it is useful as refresher training and allows them to share experiences with new inspectors.

For Program-Specific Curricula, a limited number of exceptions are possible for both new and experienced employees, based on previous training and experience. Supervisor's Guides will provide criteria for such exceptions.

FIGURE 1. SUMMARY OF POLICY ON EXCEPTIONS
TO TRAINING REQUIREMENTS

	BASIC CURRICULUM	PROGRAM-SPECIFIC MINIMUM CURRICULUM
NEW INSPECTORS/ INVESTIGATORS AND 1ST-LINE SUPERVISORS	No Exceptions Possible	Limited Number of Exceptions Possible
EXPERIENCED INSPECTORS/ INVESTIGATORS AND 1ST-LINE SUPERVISORS	Limited Number of Exceptions Possible	Limited Number of Exceptions Possible

D. Implementation of the Training Program

In implementing the training program, the primary goal is to develop and deliver, on a consistent and timely basis, the necessary instructional materials and course offerings required under the Basic and Program-Specific Minimum Curricula. This section discusses key principles, responsibilities and the timetable for developing and delivering this training program to EPA personnel and assisting State/local personnel. Appendix G contains a detailed list of functions and responsibilities needed to make this program a success.

1. Design and Development of Training

Development of training involves the key functions of defining the content, selecting the instruction method(s) and developing the associated training materials. Design and development of the Basic and Program-Specific Curricula and the associated training materials are primarily functions of Headquarters. The AA, Office of Administration and Resources Management (OARM) is responsible for the Health and Safety Curriculum, the AA, Office of Enforcement and Compliance

Monitoring, for the Basic Curriculum, and the AA's, Program Offices, for the Program-Specific Curricula. Key principles for design and development are shown in Table 1. following.

Table 1.

KEY PRINCIPLES FOR DESIGN AND DEVELOPMENT OF TRAINING	
1.	Active participation by the Regions/States in annual assessment of training needs, and in development and evaluation of training materials and methods.
2.	Instructional value of training materials and methods is apparent; inspection manuals are not sufficient.
3.	Evaluation of training (including objective measures or tools for self-evaluation, pre-and post-training) is built into the materials and methods, and results are used by Program Offices and OECM to develop or revise training.
4.	Training methods and materials are selected and designed to maximize their replicability and to minimize delivery costs to a wide audience including State and local personnel, EP/ contractors and others.

2. Delivery of Training

This section describes the general approach to delivery of the Basic Curriculum and the Program-Specific Curricula to EPA personnel. Delivery means who receives what training, where and how. Key principles appear in Table 2 following.

a. Balancing Flexibility with Effectiveness

Effective training depends on the instruction methods used to convey the knowledge or techniques to be learned. OECM and the Program Offices have identified the preferred method(s) of instruction for their curricula, and have or will develop materials accordingly. When classroom instruction is the preferred approach, a continuing concern has been the availability of classes. To accommodate this concern, EPA Order 3500.1 and the Program Description do the following:

(1) Broadly define classroom instruction to include seminars, workshops, lecture-type or video-assisted classes, or question-and-answer sessions following prior independent self-study, i.e. any approach that fosters group interaction with an instructor or an experienced inspector.

(2) For the Basic Curriculum, the preferred approach is classroom instruction broadly defined as noted above, because of the benefits to be derived such as team-building within the Region and interaction between more experienced and less experienced inspectors. Reliance on in-house instructors to implement this approach, under the EPA Institute, is the preferred approach; however, contractor support may be considered.

(3) Program-Specific Curricula, in deference to different State approaches which rely more heavily on OJT, sometimes leave the instructional method optional while expressing a preference for classroom experience. Program Offices will work to provide training materials in flexible formats to accommodate these differences.

b. Regional responsibilities include:

(1) The Regional Administrator is responsible for planning and organizing delivery of the Basic Curriculum in the Region, relying on in-house instructors for any classroom training. The Region should submit a written plan for this to OECM by October 30, 1988. (See Appendix G for a more detailed list of responsibilities.)

(2) For supervised self-study, the first-line supervisor is responsible for ensuring that each inspector has the necessary materials, and for on-the-job training, that necessary field assignments under the supervision of an experienced inspector are given.

(3) Regions must absorb the costs of course materials, course attendance, travel for training of instructors or attendance at courses in another Region, and in rare instances, at Headquarters.

c. Headquarters responsibilities include:

(1) For the Basic Curriculum, OECM is responsible for working with Regions, the EPA Institute (OARM) and Program Offices with inspectors based in Headquarters, to assure consistent and continuing delivery. OECM will maintain a list of trained instructors from both Headquarters and other Regions who will be available to supplement Regional instructors. Each AA with inspectors based in Headquarters is responsible for planning delivery of the Basic Curriculum and submit a written

plan for this to OECM by October 30, 1988 (may coordinate among Program Offices or the Region.)

(2) For Program-Specific Curricula, the Program Offices are responsible for assuring delivery occurs on a continuing basis by a) assigning responsibilities for training delivery to specific managers and staff, b) providing training contracts for delivery and support, and/or c) providing grants to university training centers or other nonprofit organizations to deliver training, as appropriate.

Table 2.

KEY PRINCIPLES FOR DELIVERY OF TRAINING

1. To the greatest extent possible when using classroom training, rely on in-house instructors for delivery of the Basic Curriculum in the Regions and Headquarters. When using on-the-job training, rely on in-house experienced inspectors as trainers.
2. For Program-Specific Curricula, continue to rely on contractors or grants to non-profit organizations to deliver training on an ongoing basis.
3. Coordinate and communicate training schedules early between Program Offices and the Regions, and between the Regions by using up to date electronic systems.

E. Implementation Timetable

1. Phasing of Training Requirements

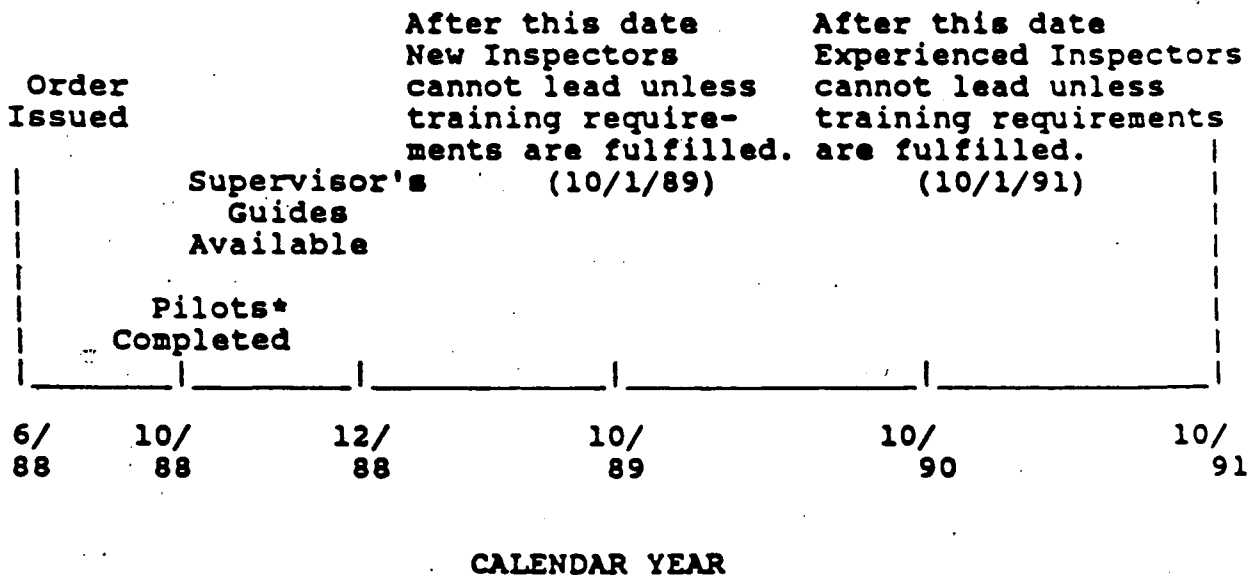
Although EPA Order 3500.1 is effective on the date of issuance, the Program Offices and Regions need time to complete materials, organize delivery of training, set up any administrative systems, identify who needs to be trained, and evaluate qualifications for exceptions. Recognizing these steps will take time, the Order should be fully implemented for new inspectors by October 1, 1989, and for experienced inspectors by October 1, 1991, as shown in

Figure 2. After these dates, neither new nor experienced inspectors may lead inspections unless they have completed required training or have been excepted from the requirements.

Beginning October 1, 1989, first-line supervisors, must complete training requirements within one year of appointment to the supervisory position. Those supervisors who direct inspectors/investigators in two or more programs may need additional time to complete all of the applicable program-specific minimum curricula and should do so as soon as practicable.

EPA Order 3500.1 states that a "new" inspector is any inspector hired or transferred subsequent to the issuance date of the Order. In the interim between the issuance date (June 1988) and full implementation (October 1, 1989), these employees are still subject to the requirements and exceptions applicable to "new" inspectors. Even though they are gaining experience, they do not convert to the "experienced" inspector category; and they may not be excepted from the Basic Curriculum.

FIGURE 2. PHASING IMPLEMENTATION OF TRAINING REQUIRED BEFORE LEADING AN INSPECTION



*Pilots of the Basic Inspector Curriculum and Inspector Health & Safety Module.

2. Availability of Training Materials

Not all the training materials for Program-Specific Minimum Curricula will be available with sufficient time before requirements must be met. This should not delay the implementation of the training requirements. Each Program Office will identify what materials are available in the interim. Program and Regional managers should use these existing materials to cover the subject matter of the Program-Specific Minimum Curricula.

When the preferred, new training materials or guides for OJT become available under the Program-Specific Minimum Curricula, compliance inspectors/field investigators shall have one year thereafter to complete the training associated with the material or be excepted, if eligible.

F. Delivery to State and Local Agency Personnel

State and local personnel are a substantial part of the audience for inspector training, because they conduct the vast majority of compliance inspections in support of Federal environmental statutes through delegation or authorization. Although EPA Order 3500.1 does not establish requirements for any of these personnel, EPA will share training materials (and training of State instructors where appropriate) and encourages State and local agencies to adopt structured approaches to train compliance inspectors/field investigators. EPA encourages participation by State and local personnel in available EPA course offerings, development and use of better structured on-the-job training, and the use of self-study materials with apparent instructional value.

To promote training of State and local agency personnel, Regions, Program Offices will:

- o Encourage adoption of structured State/local inspector training programs through information sharing and participation in EPA's own curriculum design, and promote cooperative State ventures in cost-efficient training, such as that offered under the Northeast Hazardous Waste Project.
- o Assess States' training needs annually through the State/EPA Enforcement Agreements process, and during mid-year reviews identify priorities for training.

- o Establish the means to routinely communicate about course offerings by Program Offices and their training contractors to State and local personnel.
- o Offer to train State instructors in how to use training materials developed by EPA, who can then train other State/local employees on site.
- o Identify individuals with expertise within EPA and within State and local agencies to tap as trainers.

This approach allows State and local agencies wide latitude to devise training programs appropriate to their own circumstances while drawing on relevant training materials available from Regions, Program Offices and OECM.

III. RECOGNITION FOR EXCELLENCE

Achieving better recognition of the crucial role that EPA's compliance inspectors/field investigators play as the front line of the enforcement programs is another important aspect of the inspector training and development program. Further steps to enhance recognition include building recognition into the work, supporting professional development and enhancing public recognition.

A. Building Recognition into the Work

Striving to increase recognition in the day-to-day interactions between inspectors/investigators and enforcement personnel and to better use EPA's existing awards system are important as outlined below:

1. Routinely following through to recognize the inspector's work in support of the enforcement response using letters of commendation and appreciation where appropriate, at all levels of Regional and Headquarters management.
2. Working with the EPA Institute to organize an annual meeting or other forum to recognize the in-house instructors for the Basic or Program-Specific Curricula.
3. Strongly encouraging AA or RA recognition of the compliance monitoring function, using the existing merit and honor awards system. OECM will work with the AAs or RAs to issue joint awards for excellence in the compliance monitoring function.
4. OECM, with its Advisory Committee, will identify opportunities for using existing awards to recognize compliance inspectors/field investigators for such activities as:

- (a) Outstanding contribution to a major case by means of high quality inspection/investigation, report and overall technical support given to a case;
- (b) Introducing new field techniques or methods; and
- (c) Improved means of reporting compliance status.

B. Supporting Professional Development and Recognition

EPA endorses membership by inspectors/investigators in societies and associations which have objectives appropriate to the inspector acquiring and maintaining knowledge, skills or professional standing of importance to the mission of the Agency. Inspectors are encouraged to 1) assume leadership roles in job-related professional societies and associations, 2) support publications which deal with fields of knowledge important to the Agency's mission, and 3) participate in professional society meetings.² Program Offices and Regions are encouraged to support these activities with travel funds as appropriate.

C. Enhancing Public Recognition

Program Offices, Regional Administrators and OECM are encouraged to publicize compliance monitoring and inspection functions and excellent performance of those functions through existing and new publications such as the EPA Management News and the EPA Journal.

²Thomas, Lee M. Memorandum entitled, "Policy on Participation in Professional Societies and Associations." USEPA. November 26, 1986.

APPENDICES A - G

June 1988

U.S. Environmental Protection Agency

Washington, D.C. 20460

SUMMARY OF APPENDICES

- A. DEFINITION**
- B. SUMMARY OF HEALTH AND SAFETY TRAINING ORDERS**
- C. SUMMARY OF BASIC INSPECTOR CURRICULUM**
- D. SUMMARIES OF PROGRAM-SPECIFIC CURRICULA**
- E. SUMMARY OF RECOMMENDED MULTI-MEDIA
(MULTI-PROGRAM) TRAINING**
- F. SUPPLEMENTAL TRAINING**
- G. ACCOUNTABILITY**

APPENDIX A

DEFINITIONS

The definitions in this appendix are quoted from EPA Order 3500.1, "Training and Development for Compliance Inspectors/Field Investigators," issued June 1988. The numbering and lettering is identical to the Order.

5. DEFINITIONS.

a. Compliance Inspection/Field Investigation Function

The function includes leading, or overseeing State/local, contractor or other personnel conducting, any of the following activities for the purpose of establishing the compliance status of facilities or sites with applicable laws, standards, regulations and permits and/or of supporting appropriate enforcement action (administrative, civil judicial or criminal), including:

(1) planning and carrying out inspections of pollution abatement equipment, relevant facility operations and maintenance practices, self-monitoring practices and records, and laboratory equipment;

(2) gathering and developing evidence, including but not limited to emission monitoring measurements, other analytical field procedures such as sampling and the associated quality assurance procedures, and in depth engineering evaluations; and

(3) maintaining field logs, recording field observations photographically, analyzing sampling and emissions data, and preparing reports of observations along with any supporting documentation.

Any EPA employee performing these activities regardless of job title shall be considered a compliance inspector/field investigator for the purposes of this Order. The terms compliance inspector/field investigator will be used throughout this Order. This function does not include field activities or investigations for purposes such as research and development which are unrelated to compliance monitoring or enforcement.

Not all individuals performing work as On-Scene Coordinators (OSCs) and Remedial Project Managers (RPMs) under the CERCLA program are covered by the definition of the compliance inspection/field investigation function. Additional program guidance will be developed to assist Regions in distinguishing these functions from other programmatic responsibilities.

b. New Compliance Inspector/Field Investigators. Including:

(1) Individuals newly employed by EPA subsequent to the issuance date of this Order regardless of previous training in and experience leading environmental compliance inspections/field investigations, or

(2) Individuals rehired by EPA or transferred within EPA, subsequent to the issuance date of this Order, with no previous training in and experience leading environmental compliance inspections/field investigations.

c. Experienced Compliance Inspectors/Field Investigators. Including: Individuals who were employed by EPA on the issuance date of this policy, and/or who have previous training in and experience leading environmental compliance inspections/field investigations in any one of EPA's compliance and enforcement programs.

d. First-line Supervisors of Inspectors. A first-line supervisor is the immediate supervisor of the day to day work of the inspector/investigator who leads or oversees compliance inspections/ field investigations. The first line supervisor, who is responsible for the official performance appraisal, may be "new" or "experienced" as defined above in items 5(b) or 5(c).

e. Contract Inspectors and Others. This category includes contract personnel and employees of a grantee organization under the Senior Environmental Employment Program performing compliance inspections/field investigations under EPA's statutes.

f. Leading an Inspection. Leading an inspection means independently conducting a compliance inspection/field investigation or directing an inspection/investigation with others as support staff.

g. Curriculum. Curriculum refers to defined content presented in a sequence of supervised self study, formal on the job and/or classroom training:

(1) Supervised Self-Study. Self study means any knowledge gained through independent, personal study, and overseen by a first line supervisor or an experienced inspector/investigator.

(2) On-the-Job Training. On the job training (OJT) means structured training that relates principles or theories to work related skills which are demonstrated and applied in the field environment during an actual compliance inspection/field investigation.

(3) Classroom/classes. This refers broadly to any form of instruction, flexible in format and size, to include seminars, workshops, lecture-type or video-assisted classes, or question and answer sessions following prior independent self study, i.e., any approach that fosters group interaction with an instructor or an experienced inspector.

h. Completing Required Training. Completion of required training means completing self-study, OJT and participation in classes covering the content described in applicable training curricula.

APPENDIX B

SUMMARY OF EPA ORDERS ON HEALTH AND SAFETY TRAINING OF FIELD EMPLOYEES

A. SUMMARY OF EPA ORDERS 1440.2 AND 1440.3

EPA compliance inspectors and field investigators continue to be subject to the training and other requirements of EPA Order 1440.2 - Health and Safety for Employees Engaged in Field Activities, and EPA Order 1440.3 - Respiratory Protection.

Pertinent portions of these Orders are summarized below. For more complete information, refer to the Orders themselves and/or contact the Occupational Health and Safety Designees in the Reporting Unit (Headquarters or Regional Office) or the Director, Occupational Health and Safety, Office of Administration, U.S. Environmental Protection Agency, PM-273, Washington, D.C. 20460 (FTS 8-382-3640).

1. EPA Order 1440.2 - Health and Safety for Employees in Field Activities (July 12, 1981)

a. Policy: Employees may not engage in routine field activities until they have been trained and certified to a level commensurate with the degree of anticipated hazards.

b. Training Requirements for Certification:

Basic level: 24 hours classroom training followed by three days of supervised field experience. Classroom subjects include employees rights and responsibilities; nature of anticipated hazards; emergency help and self-rescue; vehicles - mandatory rules and regulations; safe use of field equipment; use, handling, storage, transportation of hazardous materials; personal protective equipment/clothing, use and care; safe sampling techniques.

Inter-mediate level: 8 hours additional classroom training followed by three days of supervised field experience. Classroom subjects include site surveillance and safety plan development; use and decontamination of totally enclosed personal protective clothing and equipment; use of field test equipment for radioactivity, explosivity.

Advanced level: 8 hours additional classroom training followed by three days of supervised experience. Required for employees who manage field activities at sites involving hazardous materials. Classroom subjects include management of restricted and safe zones; rules for handling the press and VIPs; and safe use of specialized sampling equipment.

Refresher At all levels, a minimum of 8 hours refresher classroom instruction is required annually.

c. Exceptions to Training Requirements: The Director of Occupational Health and Safety can certify an employee based on an evaluation of previous training, education, and experience. Recommendations for this type of certification are made by the Occupational Health and Safety Designee at the employee's Reporting Unit.

2. EPA Order 1440.3 - Respiratory Protection (July 24, 1981)

a. Policy: EPA shall provide certified respiratory protective devices, and employees shall use these devices whenever necessary to protect their health due to the nature of the working environment.

b. Training Requirements: A minimum of six hours of initial training and two to four hours refresher training annually is to be provided to employees using respiratory equipment. The training can be part of occupational safety and health training for other reasons, and can count as credit for both programs. Training topics include instruction in the nature of hazards; explanation of the need for respirators; selecting the proper respirator for the particular purpose; capabilities and limitations of the device; instruction and training in actual use, including fit and seal testing.

B. TRAINING MATERIALS AND SOURCES

1. Non-EPA Training

There are many health and safety courses available from public and private sources. The Occupational Health and Safety Staff (OHSS) in Headquarters will review and approve the content of such courses to meet the requirements of 1440.2 and 1440.3.

2. EPA-Developed Training

EPA has also developed health and safety training courses for all employees who engage in field activities. For more information, contact the person or organization listed below each course, or consult the Regional Health and Safety Manager to determine which course is suitable and satisfies applicable training requirements under 1440.2 or 1440.3

a. OHSS-Developed Courses

- (1) Basic Field Activities Safety Training (HazTrain)
- (2) Safety and Health in EPA Field Activities (Steere & Associates, Inc.)

APPENDIX C

SUMMARY OF BASIC INSPECTOR CURRICULUM

Basic Inspector Curriculum

The Basic Inspector Curriculum encompasses five subject areas needed for safe and effective conduct of compliance monitoring inspections in all EPA program areas. Health and safety, one of these key subjects, is covered separately in Appendix B preceding.

A. Basic Training Course

The basic training course, covering the fundamentals of environmental compliance monitoring inspections, integrates key concepts and procedures from four subject areas and presents these through a combination of classroom and self-study methods. In addition, the curriculum explains EPA's enforcement philosophy, the role of inspectors and compliance monitoring in the administration and enforcement of environmental laws, and the partnership between EPA and the States in assuring compliance, particularly what is involved in oversight inspections with States.

**Legal
Authorities
Requirements**

Includes overview of EPA's major environmental statutes and enforcement authorities, the administrative and judicial enforcement processes, collecting and documenting evidence for enforcement proceedings, authority and requirements for lawful entry.

**Technical
Skills and
Procedures**

Includes types of inspections, inspection site selection, and pre-inspection planning and preparation, recognizing and documenting violations, sample collection and handling, and overview of protocol and procedures for oversight inspections.

**Communi-
cations**

Includes gaining entry, inspector as educator, interviewing techniques, negotiations, and preparation of inspection reports.

**Administra-
tive
Procedures**

Includes pay administration, timekeeping, leave, travel, and procurement.

B. Health and Safety Training

The Basic Inspector Curriculum encompasses training required in health and safety procedures and respiratory protection under EPA Orders 1440.2 and 1440.3, respectively. They describe levels of required training depending on the type of field work to be performed.

C. TRAINING MATERIALS AND SOURCES

1. Basic Training Course (OECM)

The course is designed in modular units that can be presented either over a several-day sequence of time or in individual units by in-house, experienced compliance and enforcement staff.

Contact: Donna Fletcher
Compliance Policy and Planning Branch
Office of Enforcement and
Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street, S.W. (LE-133)
Washington, D.C. 20460.
FTS 8-382-7550; E-mail code EPA 2281.

2. CERCLA Basic Training (OSWER)

The Office of Solid Waste and Emergency Response is developing a tailored basic course for On Scene Coordinators and Remedial Project Managers which will be available in FY 1989.

Contact: Division Director
CERCLA Enforcement Division
Office of Waste Programs Enforcement
401 M Street, S.W. (WH-527)
Washington, D.C. 20460
FTS 8-382-4810; E-mail code EPA 5240

3. Health and Safety Training

Appendix B describes EPA-developed courses and materials that are available to satisfy the health and safety training requirements.

Contact: Regional Occupational Health and Safety Manager

(3) Health and Safety Training for Compliance Inspectors
(Developed by OECM. Available FY 89)

Contact:

Regional Health and Safety Manager

or

Cherie demello-Zieschang
Occupational Health and Safety Staff
Office of Administration
U.S. Environmental Protection Agency
401 M Street, S.W. (PM-273)
Washington, D.C. 20460
FTS: 8/382-3650
Commercial: 202/382-3650

b. Office of Emergency and Remedial Response (OERR)
Developed Courses

- (1) Hazardous Materials Incident Response Operations
(Course #165.5)
- (2) Personnel Protection Safety Training
(Course #165.2)

Contact:

Superfund Training Regional Contact

or

Registrar, OERR Training Program or
Thomas C. Sell, Training Coordinate or
Jerome Joyce, Training Officer

U.S. Environmental Protection Agency
26 West St. Clair Street
Cincinnati, OH 45268
FTS: 8/684-7537
Commercial: 513/569-7537

APPENDIX D

SUMMARIES OF PROGRAM-SPECIFIC TRAINING CURRICULA

Program-Specific Minimum Curricula

The Program-Specific Curriculum for each major environmental program prepares inspectors/investigators to lead specific types of inspections/investigations and to obtain information and evidence in a technically and legally sound manner. The minimum curricula can be implemented quickly and will undergo periodic changes based on course evaluations and needs assessments.

Although some specialized curricula are available, Program Offices will be developing materials over the next few years. The need for specialized training will be determined by the first-line supervisor in consultation with the employee. In general, any inspector seeking such training should have completed the Basic and Program-Specific Minimum Curricula or their equivalent before taking specialized training.

Summaries of the curricula for the following programs are found in Appendix D:

- D-1. Air-Stationary Sources (RICH B, MARIO, CARY)
- D-2. Air-Mobile Sources (RICH A, ROSS RUSKE)
- D-3. Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (SALLY MARTINI)
- D-4. National Pollutant Discharge Elimination System (NPDES) (DAVE, DON, BRAD)
- D-5. Pesticides/Toxic Substances (PHYLLIS/KATHY/LAKE)
- D-6. Public Water Supply Supervision (DON OLSON)
- D-7. Resource Conservation and Recovery Act (RCRA) (KEW BETSY, WALT)
- D-8. Underground Injection Control (UIC) (DON O.)
- D-9. Wetlands Protection (LAURA JOHNSON)

Update Needed

1/13/00

Notes

LIST, ~~point~~, ~~point~~, C.F.R., OPA, Asbestos, EPCRA, MM (Dave) Jones, FQPA

New Requirements
Per Revised Order

APPENDIX D-1

AIR STATIONARY SOURCE INSPECTOR TRAINING PLAN

EXECUTIVE SUMMARY

Objectives and Scope of Inspector Training Program

The Air Stationary Source Inspector Training Program establishes a multi-level training curriculum for Agency personnel engaged in stationary source compliance inspections. A description of the training curriculum is presented in the Inspector Training Plan (ITP). The two major objectives of the program are: 1) to ensure that every inspector gains the ability to conduct a Level II inspection within six-to-eighteen months of the initiation of training and 2) that experienced personnel have the opportunity to take advanced courses in their area of specialization to upgrade their skills and continue their professional development.

The ITP focuses mainly on entry level training for new or inexperienced inspectors to ensure a minimum level of expertise. The training curriculum graphically depicted in Figure 1 shows a progressive sequence of core courses, self-study and on-the-job field training (OJFT) designed to provide the essential technical skills and procedural knowledge needed to conduct routine inspections of all but the most complex source categories.

The training program is structured around three levels of training. The first training level, referred to as generic-basic, provides basic inspection knowledge and skills common to any Agency inspection function. The second training level, termed program-minimum, provides those program-specific knowledge and skills needed to conduct meaningful inspections of a wide range of regulated air pollution source categories. The third level of training consists of advanced specialized technical training for more experienced inspectors to enable them to perform highly complex inspections and compliance evaluations in certain source-specific inspections areas. Although the current training plan emphasizes entry level training (basic and program-minimum), the plan will be expanded in the next phase to include more program-specialized training and various training paths for attaining more advanced inspection skills needed to perform Level III and IV inspections and special engineering knowledge needed to work more proficiently in certain types of sources.

Training Sequence and Completion Time

The training sequence for the generic-basic and program-minimum level courses is designed to be completed in six to eighteen months. The exact completion time depends on the amount of the time that the new inspector spends on training activities

and the educational background and prior relevant experience of the inspector. The chart shown in Figure 2 illustrates the approximate training time required for new employees without prior field experience. The chart assumes completion of the prescribed basic courses within nine months and the program-minimum courses within eighteen months. Many elements of the generic-basic training and the program-minimum training occur simultaneously as was shown on the time-line in Figure 1. However, EPA Health and Safety rules require that certain safety courses must be completed before the inspector can perform any field work other than supervised participation in field training demonstrations.

The training curriculum described in the ITP and outlined in Figure 1 consists of at least 11 major training modules and is estimated to require a total of 325 to 350 hours of course work to complete. This is approximately 15 percent of the inspector's available work time over an 18 month period. Compressing the training schedule into a six month period, an option shown in the training plan, will increase the percent time in-training to more than 50 percent when averaged over the shorter time period. EPA field supervisors, as a whole, strongly favor the accelerated training option and are inclined to have new inspectors spend the maximum time possible in training during their first few months to prepare them to perform independent inspections and begin contributing to the inspection workload at the earliest date.

Evaluating Training Needs and Developing Individual Training Plans

The training program includes provisions for waiver of certain program-minimum courses if the supervisor determines the inspector already has the specific technical knowledge or skills based on the employee's formal education and/or prior field experience. A Supervisor's Training Evaluation Guide is being prepared to assist supervisors in assessing the individual inspector's training needs. After completing the generic-basic portion of the curriculum which must be taken by all inspectors without exception, each trainee would be evaluated to determine any strengths, weaknesses or other critical gaps in the inspector's education or experience background in order to prepare an individual employee training plan. A supervisor's decision to waive any of the prescribed program-minimum training courses must be reviewed at a higher management level.

Training Delivery Methods

The training approach presented in the ITP advocates three basic methods of training: 1) classroom courses, 2) formal on-the-job field training, and 3) monitored self-study. A mix of each type of training should be used depending on the most cost-

effective training delivery method for a specific subject area. Some factors possibly affecting selection of the training delivery method and source of training can be readily anticipated. First, other than during the initial start-up of the training program, only small groups of inspectors will need to take a given course at a time. Second, classroom courses must be given frequently in order to move new inspectors rapidly through the program. Also, Agency travel budgets will likely not allow for extensive travel to training courses held outside the program operation area.

These factors strongly suggest that each Region should develop good in-house training capability if the long-term inspector training program is to operate efficiently and cost-effectively. Therefore, instructor training will be included in the training program and development of in-house training capability will be encouraged.

Implementation of the Training Program

Many of the core training courses described in the ITP are not available at this time. Existing air training courses and specialty compliance training workshops cover many of the topics included in the proposed program-minimum curriculum and can be used on an interim basis to implement the training program. However, the training materials were generally developed for other purposes and are not necessarily geared towards entry level inspectors. In addition, the materials are not sufficiently integrated with the other proposed training courses to offer a thorough, well structured training experience or streamlined enough to allow for completion of the training sequence in an optimum timeframe.

Therefore, included as an integral part of the ITP is a multi-year training development effort that will provide the training curriculum envisioned in the plan. The 3 to 4 year phased development schedule described in the ITP will permit work to begin immediately on the training areas of highest need and gradually fill-in and upgrade course modules as resources become available. A summary of the training development projects appears in Table 1.

Extending Training to State/Local Agencies

The Agency inspector training and development program initiative is basically intended to apply to EPA compliance inspectors. However, it is recognized that State and local personnel conduct the vast majority of compliance inspections nationally under delegated or approved State programs and that they require comparable training to perform their inspection duties.

The State and local control program officials consulted during development of the Air Stationary Source Inspector Training Plan expressed interest in adapting EPA's inspector training courses for their own training purposes. Therefore, in the design and development of the Air Stationary source Inspector Training Program every effort will be made to develop training materials that will have the widest possible application to all agency inspection programs. States will be welcome to use all relevant training materials and to participate whenever possible in training opportunities arranged by the Regional Offices.

To assure that the training program is fully responsible to the training needs at both the Federal and State/local program level and to have the widest outreach and benefit to all control agency inspection personnel, a Training Advisory Group has been established to provide input throughout the planning and implementation of the program. Experienced compliance program staff from EPA Regional Offices and State/local agencies have been asked to serve as representatives. Their input is reflected in the present plan.

Responsibility for Inspector Training

The Air Stationary Source Inspector Training Program cannot be successful unless it has the assistance and support of all the various air program offices involved in the planning, direction and the daily operation of the Agency's air compliance inspection activities. Responsibility for several of the more important elements of the training program is discussed in the ITP.

The Regional Program Supervisors have ultimate responsibility for assuring that inspector staff are properly trained and equipped to perform their inspection duties. The first-line supervisors, in particular, will play a critical role in actively working with each inspector to identify training needs, prepare individual training plans and monitor the training.

The ITP emphasizes the field training portion of the curriculum as much as the classwork. The Regional Offices will have the responsibility for developing a structured on-the-job field training (OJFT) program and selecting and training OJFT instructors. Although various training delivery options are available it appears the most practical approach for the Regions is to develop a cadre of qualified in-house instructors for presenting all of the basic generic and many of the program-minimum courses. The Regional Offices will also need to designate persons to serve as focal points and coordinators for implementing the program.

The Stationary Source Compliance Division (SSCD) will serve as the lead office for planning and coordinating the national air inspector training effort. The Manpower and Technical Information Branch of the Air Quality Management Division (Air Pollution Training Institute) will provide logistic support and assist SSCD in the program planning and development. These functions will include developing and updating the program specific training curriculum, providing sufficient training materials to do the training, conducting surveys of training needs, coordinating the Air Training Advisory Group,, and developing longrange training plans and supporting budget requests.

Most of the generic-basic training courses will be developed by the Office of Enforcement and Compliance Monitoring (OECM). OECM will provide instructor guides and up-to-date training manuals and other instructional materials needed to carry out the basic training. OECM also has agreed to coordinate and oversee a 3-year Agency-wide evaluation of inspector training with the help of the media programs.

Annual Assessment of Training Needs

The Stationary Source Compliance Program curriculum may undergo changes fairly rapidly since it is a dynamic, technically complex program that deals with a wide variety of emission control regulations and regulated sources categories. To be responsible to new and emerging compliance inspection demands, provisions are included in the ITP for developing new courses and for periodic revision and updating of existing courses. This will be accomplished through annual training needs surveys and assessments, review of the training modules each year to correct and replace out-of-date material, coordination with the program offices on new control programs and regulations, and contact with other EPA training groups and outside organizations.

Additional Information

For additional information contact: Division Director. Stationary Source Compliance Division, Office of Air Quality Planning and Standards. 401 M Street, S.W., (EN-341) Washington, D.C. 20460. FTS 8-382-2807.

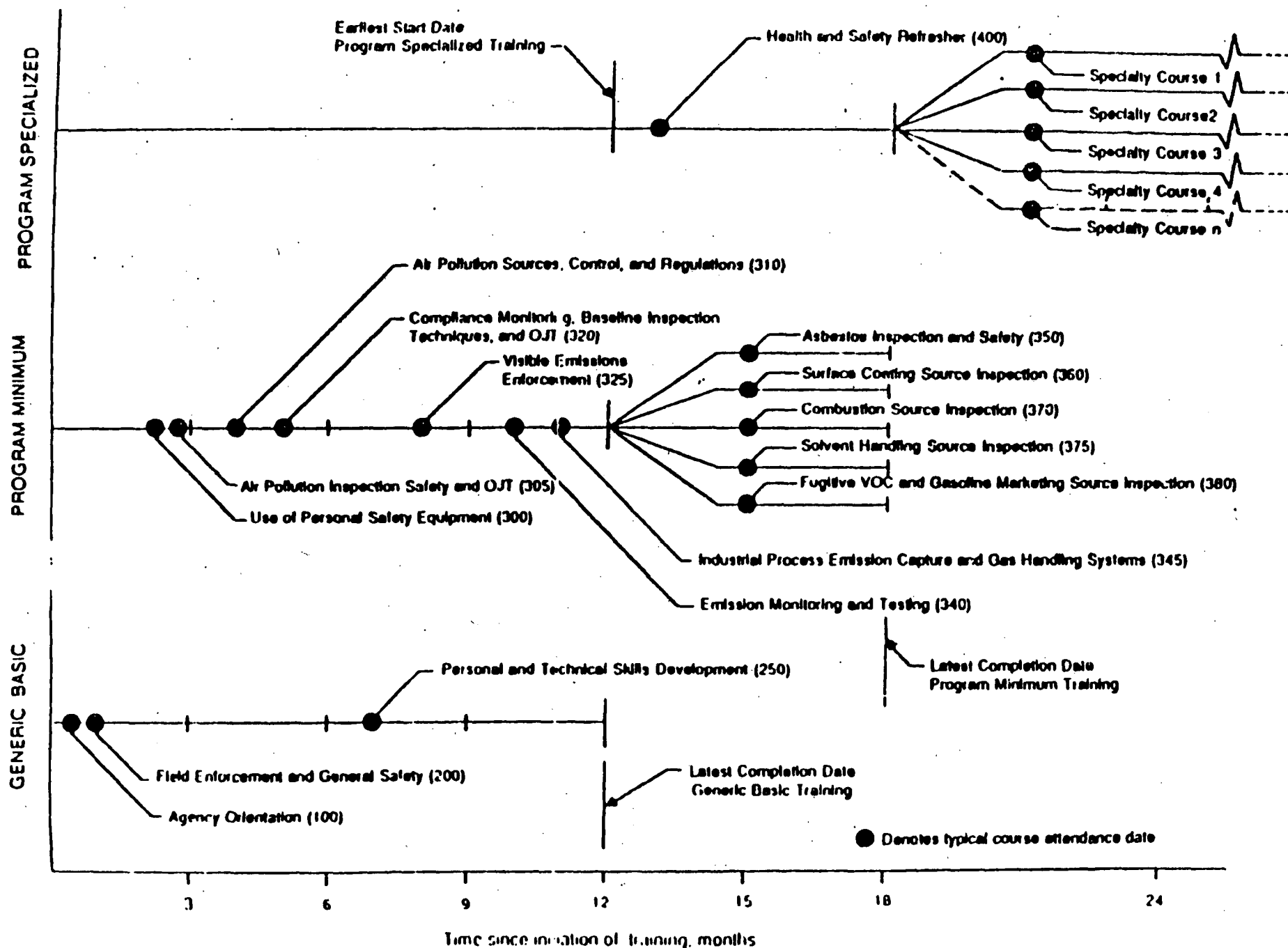


Figure 1 Recommended Training Schedule for New Employees

Table 1.

Training Development Projects

First Phase (Current fiscal year through 1989):

Agency/Air Programs Orientation Course

Basic/Program-minimum Safety Course Series

Asbestos Inspection Safety Procedures

VOC Surface Coating Industry Training Package

VOC Fugitive Source Inspection

VE/Opacity Enforcement Instructors Training Package

Combustion Source Compliance Evaluation

Environmental Statistics Review Course

Second Phase (FY 1989-1990):

Solvent Cleaning and Solvent Storage/Handling Facilities Insp.

Air Pollution Sources, Control and Regulations

Process Emission Capture and Gas Handling Systems

Emission Monitoring and Testing

VOC Inspection Safety Procedures

Third Phase (FY 1991-92):

Modifications to Program-minimum Courses

NESHAPS Organic Emission Standards and Air Toxics Source
Inspection/Evaluation Procedures

Class B VOC Source Compliance Monitoring and Evaluation Tech.

Solid and Liquid Waste Incinerators Inspection and Performance
Evaluation

Source Permit Drafting Techniques to Support Inspection
Program Activities

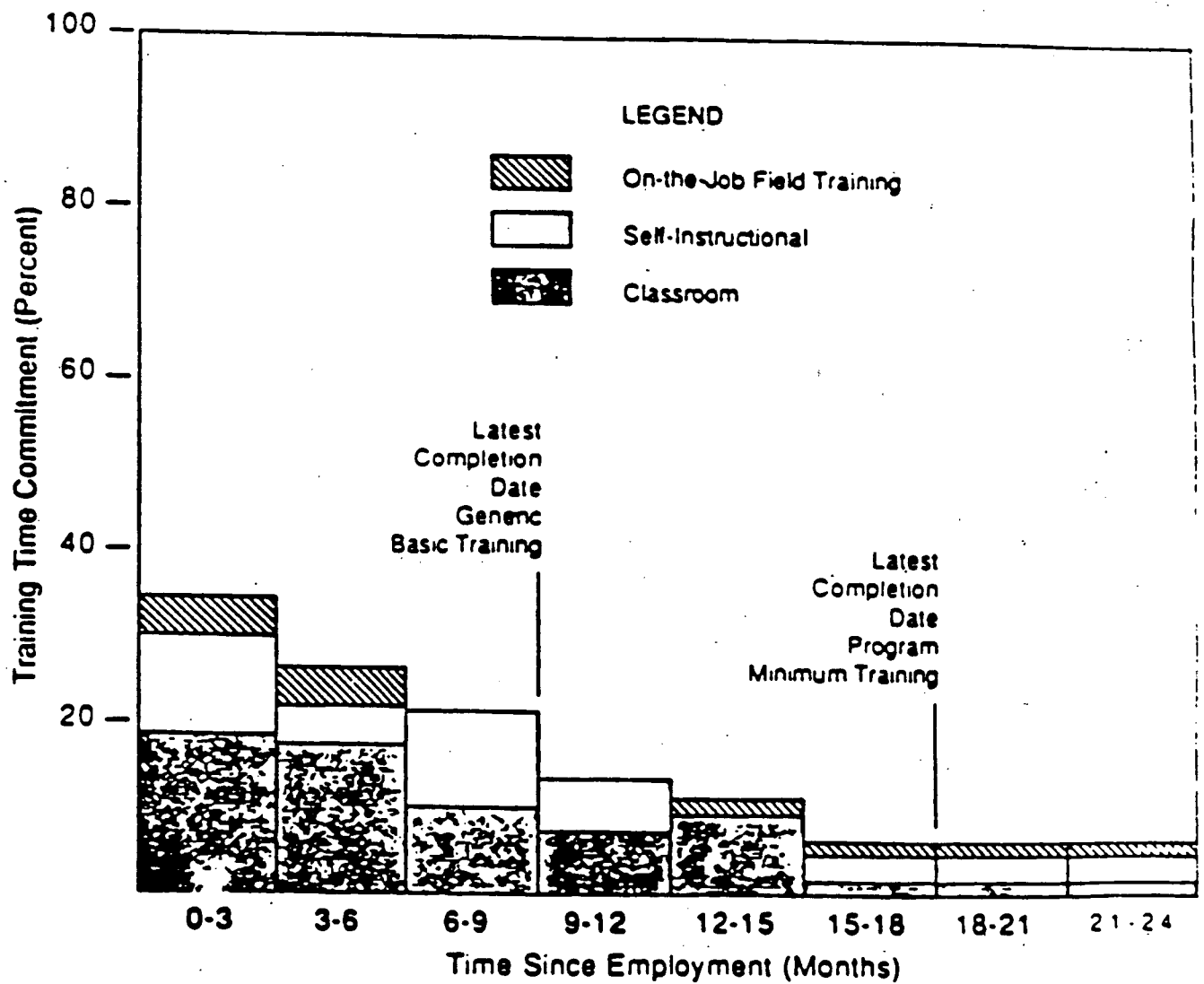


Figure 2 Training Time Requirements for New Employees without Prior Field Experience

APPENDIX D-2

SUMMARY OF AIR - MOBILE SOURCE INSPECTOR TRAINING PROGRAM DESCRIPTION

A. SUMMARY

The Air-Mobile Source Inspector Training Program establishes a core program of self-study, coursework, and on-the-job training (OJT). The Program training is intended for agency and non-agency inspectors, the latter consisting of contractor, state and local personnel who perform inspections as official representatives of the Agency. The purpose of the training is to develop a knowledgeable and effective field investigative staff who understand the goals of the mobile source enforcement program, the investigative techniques and data necessary to develop solid enforcement cases, and the program's underlying policies.

This summary describes a series of basic skills that should be acquired and relevant training/methodology oriented to the type of inspections, i.e., Level I, II, or III conducted by the Program. The training that is basic to all levels of inspections is shown first, followed by skills and training that are unique to the different levels of inspection. There is no established time frame for delivery; training is done on an as needed basis.

Figure 1 below shows the plan in summary fashion. To obtain a copy of the complete "Office of Mobile Sources Program Specific Inspection Training" contact: Richard Ackerman, Field Operations and Support Division, Office of Mobile Sources (EN-397F), USEPA, 401 M Street, S.W. Washington, D.C. 20460. FTS 8-382-2643.

FIGURE 1

General Training for All Levels

<u>Basic Skills</u>	<u>Training/Methodology</u>
Knowledge of EPA mission and general Clean Air issues	Self-study
Knowledge of applicable regulatory requirements and statutory provisions	Self-study, classroom (Colorado State Univ. and/or Univ of MI course)
Ability to recognize violations of applicable provisions	Classroom (EPA lecture), OJT-24 hours

Ability to collect, organize and present investigative materials appropriately to support enforcement action

Classroom (EPA lecture)

Knowledge of criminal investigative skills and techniques (limited to most senior EPA field personnel)

Classroom (Glynco, GA)

Training for Levels I and II

Basic Skills

Training/Methodology

Knowledge of sampling techniques and field testing and chain of custody procedures

Classroom (EPA lecture), OJT-40 hours

Understanding of investigative techniques, inspection protocols, and interaction with regulated parties and the public

OJT-40 hours, Classroom EPA lecture)

Training for Level II

Knowledge of Mobile Source technology and emissions effects

Self-study, classroom (Colorado State Univ. and/or Univ. of MI course)

Training for Level III

Knowledge of refinery and importer records and audit techniques for lead phase-down investigation and case development.

OJT-120 hours, self-study (contractor prepared manual)

B. TRAINING MATERIALS AND THEIR SOURCES

The following materials are part of the Air-Mobile Source Inspector Training Program.

1. Self-Study Materials

- o Documents and publications on EPA mission, major clean air issues, the federal motor vehicle emission control program, and motor vehicle emission control technology and emissions effects.

- o Applicable regulatory and statutory provisions.
- o Textbook from University of Michigan's course "Combustion Engine Emissions."
- o Emission Controls Handbook from Colorado State University training.
- o General outline and flow chart for Level III audits.

2. Classroom Training

- o University of Michigan 40 hour course entitled "Combustion Engine Emissions." Deals with the theory of motor vehicle emissions and the related control technology. Presented once a year in Ann Arbor, Michigan and on occasion presented to EPA employees in Washington, D.C.
- o Criminal investigators training offered at the Federal Law Enforcement Training Center in Glynnco, Georgia.
- o Colorado State University course entitled "Tampering Detection Course." This is a 24 hour training session presented by CSU staff and covering basic emissic control technology, identification of vehicle tampering, and associated inspection techniques.
- o EPA lectures on inspection protocols, public interaction, evidence gathering, and presentation of investigation results; and on basic orientation for non-EPA inspectors.
- o Training sessions offered when available by auto manufacturers regarding new technology.

APPENDIX D-3

SUMMARY OF CERCLA INSPECTOR TRAINING

[TO BE DEVELOPED]

The Program-Specific Minimum Curriculum for On-Scene Coordinators (OSCs) and Remedial Project Managers (RPMs) who lead compliance inspections/field investigations under CERCLA is currently under development. When completed the program-specific materials will cover the subject matter in the Basic Inspector Curriculum as well as CERCLA-specific requirements.

As noted under Section 5.a. of EPA Order 3500.1, OSWER will provide additional program guidance to identify those OSCs and RPMs within the CERCLA program who are performing work covered by this Order. For additional information contact: Division Director, CERCLA Enforcement Division, Office of Waste Programs Enforcement, Office of Solid Waste and Emergency Response, 401 M Street, S.W., (WH-527), Washington, DC 20460, FTS 8-382-4810; E-Mail EPA 5240.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MCV 28 1988

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Guidance on Applicability of EPA Order 3500.1 to CERCLA Staff

FROM: Bruce M. Diamond, Director ~~of~~
Office of Waste Programs Enforcement

Henry L. Longest II, Director *HL*
Office of Emergency and Remedial Response

TO: Waste Management Division Directors
Regions I - X
Environmental Services Division Directors
Regions I - X

On June 29, 1988, EPA Order 3500.1 established training requirements for Compliance Inspectors/Field Investigators. This Order applies to all EPA personnel who lead or oversee the conduct of compliance inspection/field investigations on a full or part-time basis under any of EPA's statutes, including CERCLA.

However, since CERCLA staff do not perform classic compliance inspections, the Order allows the CERCLA program offices to define, through guidance to the Regional Administrators, which CERCLA staff shall be subject to the Order's requirements. It also indicates that a CERCLA-specific curriculum is being developed to address the required training.

Applicability

The following definition shall be used to determine the CERCLA staff subject to the Order's training requirements:

"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 should include, at a minimum, On-Scene Coordinators (OSCs) and Remedial Project Managers (RPMs) involved in field activities. However, it is understood, per Section 9d(2) of the Order, that the Regional Administrator makes the final determination of who in the Region is subject to the Order and is responsible for reviewing and approving any exceptions to the training requirements.

Curriculum

In addition to the health and safety training currently required, the Order mandates a minimum of forty hours that cover:

- o Legal fundamentals - introduction to enforcement of EPA statutes, overview of enforcement and compliance goals and strategies, administrative and judicial litigation processes, legal authority and EPA policies regarding gaining entry, use of information-gathering tools, and defining and documenting evidence
- o Technical issues - roles and responsibilities of an inspector/investigator, violation detection and investigative techniques, records inspection, statistical sampling strategies, obtaining physical samples, QA/QC, and lab analysis
- o Communication skills - notification, negotiation techniques, elements of an inspection plan, written documentation & reporting requirements
- o Administrative - planning considerations, travel, records management, organizational structure, contract mechanisms

To meet these requirements, our offices will slightly modify the "OSC/RPM Basic Course". Additionally, the OSC/RPM Support Program developed by OERR calls for an OSC/RPM Academy to be piloted in April 1989 which will provide 41 days of required training for new OSCs and RPMs that will also meet, as part of its curriculum, the training requirements in EPA Order 3500.1.

At this time, it is not anticipated that any additional training courses or materials will need to be developed to meet the Order's requirements.

If you have any questions about or problems with the proposed definition of affected CERCLA staff or the curriculum, please feel free to contact either of us.

CERCLA IMPLEMENTATION
PLAN FOR INSPECTOR TRAINING ORDER

<u>Product/Activity</u>	<u>Who</u>	<u>Target Completion Date</u>
Develop Guidance on Applicability of Order to CERCLA Staff	Bruce Diamond, Director OWPE Henry Longest, Director OERR	(Completed) 11/28/88
Modify OSC/RPM Basic Course to Meet Order Requirements	Debby Thomas CERCLA Enforcement Division Meg Kelly OPMT	(Completed) 12/15/88
Develop draft curriculum for Superfund Training Academy which also addresses the training requirements in Order	OSC/RPM Support Program Advisor's Group	(Completed) 10/21/88
Finalize curriculum for pilot Academy Program	Meg Kelly OPMT	(Completed) 1/18/89
Schedule CERCLA-Specific required training annually and disseminate this schedule to all Regions	Meg Kelly OPMT	On-going
Conduct annual training needs surveys	Debby Thomas, OWPE Jim Cruickshank Training Coordinator, OSWER	On-going On-going
Evaluate Academy's effectiveness	Henry Longest, Director OERR Meg Kelly OPMT Bruce Diamond, Director OWPE	After 1st pilot in May 89 will be ongoing
Address Order Requirements in future contracts	Henry Longest, Director OERR Bruce Diamond, Director OWPE	9/89

Deliver required
training

Meg Kelly
OPMT

1st pilot
begins
5/89



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 16 1989

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Final Implementation Plan for EPA Order 3500.1 -
Inspector Training

FROM: Lloyd Guerci, Director
CERCLA Enforcement Division *Lloyd Guerci*

TO: Gerald A. Bryan, Director
Office of Compliance Analysis and Program Operations

The attached table summarizes the major planned or completed activities of the CERCLA program offices for implementing the requirements of EPA Order 3500.1.

Guidance on applicability of the Inspector Training Order to CERCLA was provided to the Regions in November 1988. Additionally, an initial draft of the CERCLA-specific curriculum allowed for in the Order was developed in October 1988. This curriculum is scheduled to be piloted in May, 1989. In the interim, the OSC/RPM Basic Course has been modified to meet the training requirements of the Order. Attached also are a copy of the applicability guidance memorandum and the proposed schedule for sessions A, B, and C of the Superfund Training Academy.

If you have any questions about the Superfund program's implementation of EPA Order 3500.1, please contact Debby Thomas, of my staff, at 475-7028.

Attachment

cc: Bruce Diamond, OWPE
Henry Longest, OERR
James Vickery, HSCD
Meg Kelly, OPMT
Timothy Fields, ERD

**Superfund Training Academy
Session A
Proposed Schedule
Two Weeks**

**W
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1**

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V**

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Travel	Introduction (P)(E)	Project Management (P)(E) (Project Planning and Scheduling, Cost Estimation, Communication Skills)	Project Management (P)(E)	Project Management (P)(E)(AV) ↓	Project Management (P)	Videotape Viewing/Feedback
	Overview of Superfund (P) (CERCLA, EPCRA, Removal/Remedial Processes)					
	Registration					
Registration	OSC/RPM Roles & Responsibilities (P)(E) (Authorities and Liabilities Policy and Outcomes)	↓	Meeting Management (P)(E) (Leadership Skills)	Getting to Yes (P)(E) (Negotiation Skills, Conflict Resolution)	Case Study Presentations/ Videotaping	Sports/ Shopping
	Presentation Skills (P)(E)					
	Dinner					
Dinner	Homework: Case Study	Superfund Film Fest	Dinner Case Study Group Work	Case Study Group Work	Social Event	Social Activity Options
Cincinnati Tour	Health and Safety (P)(E)(AV)(D) (Personnel Protection Hazard Recognition, Safety Procedures)				→ →	Travel
					Wrap Up/ Homework for Next Session	

**W
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(P) = Presentation (E) = Exercise (AV) = Audio (D) = Demonstration

DRAFT

1/10/85

**Superfund Training Academy
Session B
Proposed Schedule
Two Weeks**

WEEK 1

		Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
DAY	Travel		Introduction(P)(E) Superfund Site/ Incident Management (P)(E)(AV)	Superfund Site/ Incident Management (P)(E) ↓	Site Visit	Superfund Site/ Incident Management (P)	Legal Fundamentals (P)(E) (Enforcement Mechanisms, PRP Liability, Administrative Record)	Sports/ Shopping
	Registration		(Notification, Evaluation and Planning, Initiating Activities, Managing Removals, Site Plan Development, RIFS, ROD, Remedial Design/ Action, Site/Project Closeout)			Community Relations/Mock Public Meeting (P)(E) (Background, Strategies, Requirements, and Goals of Community Relations Program, Press Relations)	Case Study Presentations	Homework
	Dinner		Social Options	Case Study Group Work	Case Study Group Work	Case Study Group Work	Social Options	
DAY			Legal Fundamentals (P)(E) ↓	Legal Fundamentals (P)(E)	Contract Administration/ Project Officer Training (P)(E) ↓	Contract Administration/ Project Officer Training (P)(E) ↓	Contract Administration/ Project Officer Training (P)(E)	Travel
	Site-seeing			Contract Administration/ Project Officer Training (P)(E) (Superfund Contracts, Work Assignment Management, Roles of Contracting Personnel)			Overview of Cooperative Agreements and Superfund State Contracts (P)(E) (Notes of EPA/State, Statutes and Regulations)	
	Homework			Homework	Homework	Homework	Wrap Up/ Homework for Next Session	

WEEK 2

(P) = Presentation (E) = Exercise (AV) = Audiovisual (D) = Demonstration

Superfund Training Academy
Session C
Proposed Schedule
Three Weeks

	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
WEEK 1	Travel	Introduction (E)	Technical Fundamentals (P)(E)(AV)	Treatment Technologies (P)(E)(D)	Treatment Technologies (P)(E)(D)	Treatment Technologies (P)(E)(D)	Homework
	Registration	Technical Fundamentals (P)(E)(AV) (Standard Operating Procedures, Sampling Methods, QA/QC, Detection Limit Objectives)	↓	(Past, Current and Future Treatment Technologies Used on Superfund Sites and their Advantages and Disadvantages, Land Disposal Restrictions)	↓	↓	Sports/Shopping
	Dinner	Homework	Homework	Homework	Homework	Social Options	
WEEK 2	Tours/Homework	Groundwater Fundamentals (P)(E)(AV)(D) (GW Fundamentals, Contamination, Clean Up Goals and Technologies)	Groundwater Fundamentals (P)(E)(AV)(D) ↓	Risk Assessment (E) (Basic Concepts and Principles, Qualitative and Quantitative Techniques, Health Assessment, ATSDR, Environmental Audits)	Risk Assessment (E)	Field Trip to Headquarters ↓	Homework
				Risk Communication/ Crisis Management (P) (Community Relations)	Debrief		Sports/Social Options
		Homework	Homework	Homework	Homework	Social Options	
WEEK 3		ARARS/State Speakers (P)(E) (Identification and Communication Procedures, Federal/State Requirements) ↓	ARARS/State Speakers (P)(E) ↓	Negotiations/ Depositions (P)(E)(AV) (Principles/Roles, Litigation Process, Discovery) ↓	Negotiations/ Depositions (P)(E)(AV) ↓	Mock Deposition Video Taping/ Feedback (P)(E) (AV) Lunch/Speaker Wrap Up/ Certificates	Travel
	Sports/Social Options						
		Homework	Homework	Homework	Homework		

(P) = Presentation (E) = Exercise (AV) = Audiovisual (D) = Demonstration

1/18/8

APPENDIX D-4

SUMMARY OF NPDES INSPECTOR TRAINING PROGRAM DESCRIPTION

A. SUMMARY

The NPDES Training Program establishes a core program, of coursework, self instruction and on-the-job training (OJT) for those individuals who carry out NPDES compliance/enforcement activities for EPA. This summary describes a sequence for new inspectors, and for expansion of skills later on. After completion of Basic Training and Introductory NPDES training, self-instruction and OJT, the inspector should be able to conduct the compliance evaluation inspection and the sampling inspection. The goal is for each new inspector to complete this sequence within six to nine months on the job. Job skills can then be expanded through more study and instruction into areas such as performance audit, pretreatment, and diagnostic inspections.

The figure below shows the plan in summary fashion. In order to get a copy of the complete NPDES Training Program Description, contact: Director, Enforcement Division, Office of Water Enforcement and Permits, HQ (EN-338), USEPA, 401 M Street, SW, Washington, D.C. 20460. FTS 8-475-8488.

NPDES Training Plan

General Orientation	
<u>Courses/Workshops</u>	<u>Self Instruction /OJT</u>
----- -----	
<u>Program-Minimum</u>	
Basic Inspector Curriculum	CWA and Regulations
NPDES Introductory Coursework	Violation Recognition
(Manuals available by 4/88)	Sampling Techniques
	Manuals for Introduction
	to Compliance Inspections
	Flow Measurement Manual
	OJT- 2 inspections each
	for compliance evaluation
	and compliance sampling
	inspections

Skills Expansion

Pretreatment Inspection Workshop	Pretreatment Guidance
	Pretreatment Compliance
	Inspection and Audit Manual
Diagnostic Inspection Workshop	Inspector's Guide for Evalu-
	ating Municipal Wastewater
	Treatment Plants

Toxics Sampling

OJT-Biomonitoring, toxics
sampling and pretreatment
inspections (to be developed)

(To be developed)

Specialized Skills

Offshore Drilling Rig Inspections
(to be developed)

Criminal Investigations (FLETC, Glynco, GA)

B. TRAINING MATERIALS AND THEIR SOURCES

The following materials for the new inspector should be available from the inspector's first-line supervisor or the addresses footnoted below.

o General Orientation Package

- Organization chart
- Clean Water Act and regulations
- NPDES Inspection Strategies and Guidance such as the Clean Water Act Compliance/Enforcement Compendium
- Sample NPDES inspection reports
- Description of HQ/Regional/State relationships
- NPDES Compliance Inspection Manual

o Introduction to NPDES Inspections (Available 4/88)

- NPDES Compliance Monitoring Inspector Training Modules ¹
 - Overview (draft)
 - Legal Issues (draft)
 - Sampling (draft)
 - Laboratory Analysis (under development)
 - Biomonitoring (under development)

- | | | |
|--|-----------------|-----------------------|
| - Field Manuals for Self Instruction and OJT | <u>Order #</u> | |
| -- NPDES Compliance Inspection Manual | NTIS PB85115897 | IRC ² 068U |
| -- NPDES Flow Measurement Manual | PB82131178/AS | 050U |

o Skills Expansion Coursework

Pretreatment Inspections¹

Pretreatment Compliance Monitoring and Enforcement
(July 1986)

Compliance Inspection and Audit
1 Authorities (July 1986)

- Inspection for Evaluation of Municipal
Wastewater Treatment Plants, EPA/430/9-79-010
(April 1979)

IRC²
021U

- 1 Office of Water Enforcement and Permits, Enforcement Division
(EN-338) USEPA, 401 M Street, SW., Washington, D.C. 20460
- 2 U.S. Department of Commerce Instructional Resources
National Technical Information Center (IRC)
Service (NTIS) Ohio State University
5285 Port Royal Road 1200 Chambers Road, Room 310
Springfield, VA 22161 Columbus, OH 43212
(703) 487-4650 (614) 292-6717

APR 21 1989

OFFICE OF WATER ENFORCEMENT AND PERMITS
ENFORCEMENT DIVISION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
INSPECTOR TRAINING PROGRAM DESCRIPTION

March 10, 1989

DEVELOPED IN CONJUNCTION WITH THE INSPECTOR
TRAINING AND DEVELOPMENT WORK GROUP

Table of Contents

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II. Description of training components	1
III. Suggested sequencing of training	3
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B. Detailed Description of Training for Experienced Inspectors.....	A-5

NPDES INSPECTOR TRAINING PROGRAM DESCRIPTION

I. INTRODUCTION AND PURPOSE

This Program Description sets out a primary goal of a formal, structured approach to training of individuals who carry out NPDES compliance/enforcement field activities for EPA (hereafter termed inspectors), with a defined process for seeking Regional ideas and feedback on national NPDES inspector training activities, workshops and materials for national and regional training efforts. The program described may also be of interest to states, and other federal agencies, involved in NPDES inspection activities. As a national program it establishes a core program of course work and self instruction materials, which regions may wish to supplement as the need arises.

This description is arranged to help answer the questions, what training is available, how is it delivered, and when is it appropriate? The detailed analyses of the training programs for new and experienced inspectors are included as an Appendix for those who want greater detail. This training description should be read in conjunction with the NPDES Inspector Training Implementation Plan which contains detailed information such as lists of OWEK speakers, training materials available, and ordering information. The main sections of this Training Description provide detail on training components, a brief skills analysis, suggested sequencing of the training, a statement on the responsibilities for inspector training and a description of the system for obtaining feedback on this system.

II. DESCRIPTION OF RECOMMENDED TRAINING COMPONENTS

Basic to the development of any training plan is a listing of the skills needed to conduct inspections. That listing is shown in Table I with a brief description of the type of training that could be used to meet the job skill needs of the inspector.

As can be seen in Table I there are three basic methods to deliver training: course work, on-the-job training (OJT) and self instruction. All three together play an important role in the training of the inspector. Table I presents the information on the target audience level, the type of training and general time frame for the training. The detailed analysis of the training for new and experienced inspectors is described in greater detail in the Appendix, pages A-1 to A-8.

After completion of Fundamentals of Inspections Training and NPDES Introductory training, self instruction and OJT for new inspectors, the inspector should be able to conduct the compliance evaluation inspection, the sampling inspection and then progress to other inspections as for pretreatment. Thereafter he/she will expand job skills into specialized areas such as performance and diagnostic inspections.

**APPENDIX D-8
SUMMARY**

**UNDERGROUND INJECTION CONTROL
PROGRAM SPECIFIC INSPECTOR TRAINING**

I. INTRODUCTION AND PURPOSE

The purpose of this UIC training program is to take a structured approach to the training of UIC inspectors (those who conduct or oversee compliance and enforcement activities in the field) to strengthen the effectiveness of their activities. While the program is specifically applicable to EPA inspectors, it may be of interest to States who conduct inspection in primacy programs. As a national program it establishes a core of essential training which may be supplemented as needed.

II. DESCRIPTION OF RECOMMENDED TRAINING COMPONENTS

The purpose of a training plan is to ensure opportunity for every inspector to acquire and refine the skills and knowledge needed to perform effectively. To that end, a set of experiences should be made available over time including formal course work, self instruction and on the job training.

Inspectors for the UIC program should be able to conduct required field and monitoring activities and enforcement related activities. EPA personnel, in addition, should be able to provide oversight and assistance to State and contractor inspectors.

Basic Inspector Training and UIC technical training, self-instruction and on-the-job training are currently planned or available for EPA inspectors. In addition, supplemental training will also be needed to be developed to address new program areas and enforcement needs.

III. SUGGESTED SEQUENCING

The sequence of training should be decided by the supervisor in conjunction with the inspector, and after considering the inspector's level of experience and the unique needs of the Region. The sequencing should take advantage of the availability of courses and the scheduling of inspections. In general, the suggested sequence for all inspectors is as follows: Orientation, Basic Inspector Curriculum, self study, technical courses and on-the-job experience and training. For experienced inspectors, training needs should be decided in consultation with the first-line supervisor using the Supervisor's Guide to determine if exceptions for training are appropriate. However, it may be desirable to attend the Basic Inspector Training Curriculum and/or structured field training so that EPA inspectors have a common understanding with States and remain

current with technical advances. Basic skills and knowledge which all inspectors will be expected to acquire, and the associated training experiences, are detailed as Attachment A.

IV. TRAINING MATERIALS AND THEIR SOURCES

The following kinds of materials for new inspectors should be available from the inspector's first-line supervisor.

- o General Orientation

- Organization chart
- SDWA and regulations
 - UIC Compliance Strategy
 - Description of HQ/Regional/State relationships
 - Applicable guidance and policy documents
 - Inspection Manual (available FY 88)

- o Technical Courses

- MIT Seminars (as available)
- Training Seminars

- o Program Management Training

- (to be developed)

- o Field Training

- (to be developed)

ATTACHMENT A

UIC Program-Specific Minimum and Specialized Training

SKILLS AND ASSOCIATED TRAINING

Basic Skill/Knowledge Needed	Associated Training Experience
o Knowledge of EPA enforcement philosophy and strategies	o Basic Inspector Training
o Ability to complete enforcement fact gathering, with understanding of ethics, right of entry and inspector conduct	o Basic Inspector Training
o Understanding of health and safety requirements	o Health and Safety Training
o Understanding of the mission authority of the UIC program, and enforcement strategies	o Orientation (self study)
o Knowledge of basic UIC technical processes, causes of noncompliance, ways to improve operations in large and small systems	o Inspection Manual (self-study) Inspection Manual Training (TBD) Seminars ¹
o A working knowledge of violation recognition, sampling procedures and laboratory analysis	o OJT Special courses ¹
o A working knowledge off applicable State programs and procedures and ability to provide constructive oversight	o Program Management Training (OJT/self study) ¹
o Knowledge of field conditions and procedures	o Formal Field Training(TBD) ¹

¹specialized training as needed

APPENDIX D-9

SUMMARY OF WETLANDS PROTECTION INSPECTOR TRAINING

[TO BE DEVELOPED]

The Office of Wetlands Protection is developing a Program-Specific Minimum Curriculum for inspections/investigations under the wetlands protection program of the Clean Water Act, Section 404. OWP anticipates that the training materials and course will be available during FY 1989.

For additional information, contact: Hazel Groman,
Enforcement Coordinator, Office of Wetlands Protection,
Regulatory Activities Division, 401 M Street, S.W., (A-104F),
Washington, D.C. 20460, FTS 8-475-8798.

OFFICE OF WETLANDS PROTECTION
PROGRAM-SPECIFIC INSPECTOR TRAINING CURRICULUM

JUNE, 1989

INTRODUCTION

Program Description

Section 404 of the Clean Water Act establishes a program to regulate the discharge of dredged or fill material into "waters of the United States," which includes most wetlands. EPA and the Army Corps of Engineers jointly implement Section 404, with the Corps responsible for deciding whether to issue or deny permits. EPA, in conjunction with the Corps, develops Guidelines under Section 404(b)(1) which contain the environmental standards that the Corps must apply when evaluating permit applications. Under Section 404(c), EPA has authority to prohibit or restrict discharges if it determines that the discharge would have unacceptable adverse effects on the resource. EPA's other primary Section 404 responsibilities include defining the geographic scope of Section 404 jurisdiction, applicability of exemptions under Section 404(f), assumption of the program by qualified States, and enforcement.

Section 404 enforcement differs from other Clean Water Act enforcement programs in several ways. For one, EPA and the Corps share Section 404 enforcement authority. Sections 301 and 309 of the Clean Water Act give EPA the authority to act against persons who discharge without a permit and also to enforce against violations of Section 404 permit conditions. Section 309 provides EPA with a variety of enforcement mechanisms. Our first line of defense is the administrative compliance order issued pursuant to Section 309(a), which generally requires a violator to stop all illegal discharges and, where appropriate, to remove the fill and/or restore the site. Section 309(g) authorizes EPA to assess administrative civil penalties for, among other things, violations of Section 404. A third enforcement mechanism allows EPA to seek monetary penalties, injunctive relief, and even prison sentences through judicial action pursuant to Sections 309(b) and (c). Under these Sections, EPA may refer cases to the Department of Justice for criminal and/or civil litigation.

Training Required by EPA Order 3500.1

EPA Order 3500.1, "Training and Development for Compliance Inspectors and Field Investigators," establishes a consistent Agency-wide training and development program for employees leading environmental compliance inspections/field investigations. The Order mandates both Basic and Program-Specific training for compliance inspectors and their first-line supervisors. The Office of Wetlands Protection has responsibility for development of the Section 404 Program-Specific training and curriculum. However, the Regional Administrators and first-line supervisors of inspectors are ultimately responsible for confirming that the training requirements have been fulfilled. Responsibilities are discussed

further in a later section. EPA Occupational Health and Safety Training requirements are still in effect and will remain in effect.

TRAINING CURRICULUM

Objective of Program-Specific Minimum Curriculum

This curriculum presents formal structure for training of individuals who carry out Section 404 dredge and fill compliance inspection/field investigations for the Environmental Protection Agency's (EPA's) Section 404 Program. There are three basic components to the Section 404 Curriculum: (1) Self Study; (2) Classroom; and, (3) On the Job Training (OJT). These components together play an important role in training of the inspector and are described in detail at Attachment 1. A generic description of the Basic Inspector Training Curriculum and Health and Safety Training Order are also included in this attachment. The curriculum described herein is considered the minimum training for new and experienced inspectors and first-line supervisors. OWP will conduct an annual review of the Section 404 Program curriculum (in consultation with the Regions) to identify successes and shortcomings and how they can best be addressed.

Applicability

This curriculum is applicable to all Section 404 Program staff and first-line supervisors who conduct compliance inspection/field investigations as defined by EPA Training Order 3500.1. Specifically, this function applies to activities related to compliance monitoring and enforcement; it does not include, for example, field activities or investigations for purposes such as research and development, which are unrelated to compliance monitoring or enforcement efforts. New and experienced inspectors and their first-line supervisors¹ must meet all requirements unless it can be demonstrated to their supervisor that they have previous comparable training and/or experience that meets the requirements of this curriculum. Separate guidance entitled "Guidelines on Requirements for Exceptions to OWP Program-Specific Minimum Curriculum for Inspector Training Under EPA Order 3500.1" dated July 1989, explains how to assess previous training and request exceptions. The general skills that the compliance inspector should gain from the training, and the methodologies used to attain these skills, are outlined in Attachment 2.

¹ EPA Order 3500.1 defines new and experienced inspectors and first-line supervisors at Section 5.(b), (c), and (d).

Scheduling

New inspectors should complete the program-specific training as soon as practicable once they are appointed to a Section 404 position with compliance inspection responsibilities. This applies regardless of the percentage of time spent on these activities. Experienced inspectors can also greatly benefit from the training and should complete it as soon as scheduling allows. Beginning October 1, 1989, new inspectors shall not lead inspections unless they have completed the Basic Curriculum, and have completed, or have been formally excepted, from the Program-Specific Curriculum. Beginning October 1, 1991, experienced inspectors shall not lead inspections unless they have completed or have been formally excepted from the Basic and Program-Specific Minimum Curricula.

RESPONSIBILITY FOR DEVELOPMENT OF TRAINING AND CURRICULUM

Headquarters

The Office of Wetlands Protection (OWP) has responsibility for development of the Section 404 Inspector Training Curriculum. OWP has already offered with their contractor, the Environmental Law Institute, a comprehensive two and one-half day Section 404 Enforcement Training Course in May 1989. Since OWP cannot now commit to offer the training course on a regular basis, OWP will use an enforcement handbook as an alternative training tool. OWP's contractor is developing a comprehensive Section 404 case development/enforcement strategy handbook, which is designed to provide EPA Section 404 Program and legal enforcement personnel with practical, step-by-step guidance and information on all aspects of Section 404 enforcement. This handbook will be available by September, 1989, for distribution to Section 404 Program personnel, ORC contacts, and representatives from other Federal and State agencies. In addition, the May, 1989, National Wetlands Enforcement Workshop Text used in conjunction with the program-specific classroom training, is available and will serve as a complementary training tool to the handbook. The points of contact for the Section 404 inspector training curriculum, and scheduling of national enforcement training course offerings are Joseph DaVia and Hazel Groman (FTS 475-7799).

Regional Offices

The Regional Administrators and first-line supervisors of inspectors have ultimate responsibility for assuring that appropriate training is completed. As directed by EPA Order 3500.1, first-line supervisors are responsible for setting up the Individual Development Plan for each individual inspector. First-line supervisors are also responsible for overseeing certain aspects of the self study component in the Section 404 curriculum.

GENERALTraining Materials

The specific materials listed in each section of the Curriculum should be made available to the inspector. The list of materials may be substituted with comparable training material, or augmented at the discretion of the first-line supervisor.

Continuing Education

The first-line supervisor may recommend additional training of the inspector as deemed necessary. Additional training may take the form of courses, self-instruction, or OJT with the first-line supervisor or a more senior inspector. This training will be developed concurrently with new regulations, guidance, or inspection procedures. Training needs will be monitored through Regional reviews, and State input. OWP also welcomes suggestions from inspectors, supervisors, and other enforcement personnel.

ATTACHMENT 1

SECTION 404 INSPECTOR TRAINING CURRICULUM

BASIC INSPECTOR TRAINING COURSE

- Objectives:**
- To provide knowledge of the Agency's compliance and enforcement process, and the roles inspectors play in compliance monitoring and case development;
 - To provide knowledge of the extent and limitations of EPA's legal authorities to enter and inspect facilities;
 - To provide knowledge of evidentiary requirements and the procedures designed to assure that data collected on an inspection will be admissible in court;
 - To provide knowledge of good work practices related to planning and conducting field inspections, including technical and administrative subjects and communications skills;
 - To provide knowledge of the requirements of a good quality inspection report; and,
 - To provide knowledge of how to prepare for and participate in enforcement proceedings such as settlement negotiations, hearings, and trials.

Materials: Basic Inspector Training Course -- Fundamentals of Environmental Compliance Inspections Text

Methods: Classroom

Level of Effort: 32 hours

SECTION 404 INSPECTOR ORIENTATION -- SELF STUDY

Objective: To provide a basic overview of EPA enforcement in the context of the Section 404 Program and the relationship to the U.S. Army Corps of Engineers approach to permitting and enforcement.

Scope:

- Program Organization
- Agency Philosophy and Policy on Enforcement
- Role of Enforcement
- Overview of Section 404 of the Clean Water Act
- Overview of Enforcement Mechanisms
- Overview of the U.S. Army Corps of Engineer Regulations

Materials:

- Headquarters and Regional Section 404 Organization Chart
- Sections 301, 308, 309, and 404 of the Clean Water Act
- Section 404(b)(1) Guidelines [40 CFR Part 230]
- Section 404(c) Regulations
- 1-19-89 EPA/Department of Army Enforcement MOA
- 1-19-89 EPA/Department of Army Jurisdiction MOA
- U.S. Army Corps of Engineer Regulations
[33 CFR Parts 320-330]
- Section 404 Administrative Penalty Guidance

Methods: Supervised Self Study (SSS)

Level of Effort: Minimum of 16 hours

SECTION 404 PROGRAM-SPECIFIC CLASSROOM TRAINING

Objective: To provide inspectors with the knowledge, skills and ability to complete an effective Section 404 inspection.

Scope:

- Case Development
 - o Elements of a 404 case
 - o Site access, entry
 - o Sources and types of evidence
 - o Waters of the U.S. delineation (including wetlands)
 - o Aerial photography/Remote sensing
 - o Evidentiary considerations
 - o Expert witness
- Enforcement Authorities
 - o Options, Pros and Cons
- Enforcement Options
 - o Administrative -- 309(a) and 309(g)
 - o Information Request -- 308 Letter
 - o Civil Judicial
 - o Criminal 404 Case -- Practice and Procedure
 - o After the Fact (ATF) Permit
- Referrals and Settlements
 - o EPA and DOJ
- Negotiation Skills
- Use of Media in the Enforcement Effort

Materials:

- National Wetlands Enforcement Workshop Text - May 1989
 - + Model 309(a) Administrative Order
 - + Model 309(g) Administrative Penalty Complaint
 - + Model 309(g) Consent Agreement
- Section 404 Enforcement Handbook - September 1989
- Model 308 Information Request Letter
- Sample Litigation Report
- Model Press Release
- Federal Wetland Delineation Manual

Methods: Classroom using Workshop Text (May 1989), and/or
SSS using Enforcement Handbook (September 1989) and
Workshop Text

Level of Effort: Classroom Training - 20 hours
and/or
SSS using Handbook and Text - 24 hours

SECTION 404 ON-THE-JOB TRAINING (OJT)

Objective: To prepare for, and assist in, an actual Section
404 compliance inspection/field investigation with
an experienced inspector.

Scope:

- Develop inspection plan (or equivalent) by review of
appropriate file(s)
- Prepare supplies, equipment, and travel schedule
- Coordinate with other Federal, State, and local offices
- In the field with the experienced inspector, further
develop knowledge of dredge or fill violations;
inspection techniques; recordkeeping and reporting;
evidence collection; conducting opening and closing
meetings
- Prepare an inspection report (or equivalent)

Materials:

- Sample inspection plan or equivalent
- Sample inspection report or equivalent

Method: Accompany experienced inspector on site visits

Level of Effort: A minimum of two compliance inspections/field
investigations at two different sites for
separate violations.

HEALTH AND SAFETY TRAINING

- o Follow the applicable requirements of EPA Order 1400.2

This order establishes basic, intermediate, advanced and refresher requirements for occupational health and safety training for all EPA employees before engaging in any field activities.

ATTACHMENT 2

SKILLS AND RELEVANT TRAINING/METHODOLOGY

Basic Skills Needed

Training Methodology

Knowledge of EPA enforcement policies and strategies

Basic Fundamentals Course, Classroom

Basic understanding of general Section 404 dredge and fill issues, applicable statutory/regulatory requirements, legal authority, and Corps permit program

Supervised Self-Study (SSS), Classroom

Knowledge of enforcement mechanisms

Classroom, SSS

Working knowledge of wetland delineation

Classroom, SSS, OJT

Ability to recognize dredge or fill violations

Classroom, OJT

Knowledge of investigative techniques, fact gathering, inspection protocols, and interaction with the regulated community

Basic Fundamentals Course, Classroom, OJT

Ability to collect, organize and present investigative materials appropriately to support enforcement action

Basic Fundamentals Course, Classroom, SSS

Knowledge of criminal investigative skills and techniques

Classroom

Knowledge/skills on health and safety appropriate for site investigations

Health and Safety Training

Basic knowledge of wetland characteristics: vegetation soils, hydrology. [Necessary background desirable but not required]

APPENDIX E

SUMMARY OF RECOMMENDED MULTI-MEDIA (MULTI-PROGRAM) TRAINING

Multi-Media (Multi-Program) Training is designed to foster knowledge and skill in two or more compliance programs. This training may occur for different compliance programs under one environmental statute or under different statutes. Preparation of this kind may be desirable, depending on the resources and needs of each Regional Office. Having inspectors with cross program training and experience would enable more efficient use of travel time and money by allowing coordination of inspections in a given geographical area. Also cross training builds a flexible work force which can respond to changing needs and changing resource levels. Decisions on the appropriate mix and level of cross program training are at the discretion of Regional Management.

A. Multi-Media (Multi-Program Inspection Screening Course (Level 1)

This one-day course is designed to prepare compliance inspectors/field investigators to recognize and report on obvious, key indicators of possible non-compliance in all environmental program areas relevant to a particular facility or site. The objective is to broaden the awareness of cross-program and cross-media concerns, thus enabling the inspector/field investigator to be a more effective representative of EPA as a whole. (This training would go beyond the overview of all enforcement programs in the Basic Curriculum.) Identification of non-compliance problems could result subsequently in a full inspection(s) for one or more environmental programs at the facility. The course would be most useful to employees who already have experience with compliance inspections/field investigations, and/or who spend a substantial portion of their time e.g., 20% or more performing compliance inspections/field investigations. OECM will work with the Programs and Regions to develop this training course in FY 1989.

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B. Multi-Media (Multi-Program) Inspection Training (Level 2)

This level of training means completing the required Program-Specific Minimum Curricula (and specialized training, if appropriate) in two or more Compliance Programs so that the individual compliance inspector/field investigator is fully prepared to lead inspections in two or more programs at a facility(ies). Regions are encouraged to support this level of training where the relationship between the requirements of two or more programs or the location of facilities makes it cost-effective to do so.

C. Multi-Media (Multi-Program) Team Inspection Training (Level 3

Depending on Regional Office needs and resources, a multi-media (program) inspection which addresses all relevant program requirements operative for a single facility may be desirable. To support the development of compliance inspectors/field investigators to lead such multi-media inspections carried out by a team, the following training is recommended. In addition to completion of the 1) Basic Curriculum, 2) Program Specific Curricula in two or more Compliance Programs and 3) significant experience in leading inspections in more than one program, specialized training in directing the activities of a team inspecting a facility is appropriate. Such training would develop organizational and supervisory skills and an ability to grasp and convey cross-program issues and interrelationships. The National Enforcement Investigations Center (NEIC) has provided multi-media training. Any request for such training should be sent to Robert Harp, NEIC, Building 53, Box 25227, Denver Federal Center, Denver, CO, 80225; [FTS 8-776-5100; Commercial 303-236-5100.]

Each Region is encouraged to develop and train at least one team leader for multi-media, team inspections/investigations, and to decide where such inspections would have significant benefits for deterring non-compliance.

APPENDIX F

SUPPLEMENTAL TRAINING

1. Administrative Hearings/Trials: EPA Institute*

One-day course designed for technical and legal personnel involved in administrative case preparation and presentation. Covers types of administrative hearings, steps in the hearing process, prehearing conferences, preparation of evidence and witnesses, appeals.

2. Expert Witness: EPA Institute*

One-day course designed for EPA personnel who need an understanding of the legal process and/or who may serve as an expert witness. Covers the legal system, anatomy of a lawsuit, what to expect of depositions and of direct and cross examinations at a trial.

3. Negotiation Skills: EPA Institute*

Two-day course designed for enforcement personnel. Covers basic negotiation concepts, planning for negotiations, tactics for expediting negotiations, EPA position on issues commonly found in settlement negotiations.

4. Criminal Investigations: Federal Law Enforcement Training Center (FLETC)

The Federal Law Enforcement Training Center (FLETC) in Brunswick, Georgia, offers criminal investigation training to EPA technical personnel on an infrequent basis. In late FY '88 or early FY '89, FLETC will present eight days of classroom instruction on recognizing and responding to criminal violations of environmental laws. The course will cover subjects such as developing sources of information, interviewing techniques, search and seizure issues, and collection and protection of evidence. Also to be covered are functions and services of the Office of Criminal Investigations and laboratory and other services of EPA's National Enforcement Investigation Center (NEIC) and the Environmental Photographic Interpretation Center. Classroom instruction will be augmented by crime scene and courtroom practical exercises. Class size is limited to 24. For additional information, contact Phillip Andrew in Brunswick, Georgia, at FTS 8-230-2726.

* EPA Institute

For more information about individual courses (faculty, dates, locations) or about the Institute, contact: Director, EPA Institute, Office of Administration, 401 M Street, S.W., (PM-224), Washington, D.C. 20460, FTS 8-382-2594, E-mail EPA3880).

5. Automated Information Systems for Compliance Inspectors/
Field Investigators: National Enforcement Investigations
Center (NEIC)

NEIC will develop a one-day course for inspectors and investigators to provide familiarity with the full range of ADP support available to EPA and State personnel. The course will cover EPA's Major National Program Compliance and Enforcement systems as well as supplemental sources from both the private and public sector. For more information contact Robert Harp, NEIC, Box 25227, Denver Federal Center, Denver CO. [FTS 8-776-5100; Commercial 303-236-5100]

APPENDIX G

ACCOUNTABILITY FOR INSPECTOR TRAINING

Ensuring that training occurs requires an effective system of accountability within Headquarters and the Regions. Without this, training for compliance inspectors/field investigators may continue in a haphazard rather than a consistent, continuing way. This appendix contains a more detailed list of the functions that need to be performed by different organizations to effectively implement this program.

A. Headquarters' Responsibilities

1. AA for OECM. The AA for Enforcement and Compliance Monitoring (OECM) or his/her designee is responsible for the following:

- a. Updating EPA Order 3500.1, overseeing and evaluating implementation of the overall program requirements and reporting to the Administrator and Assistant Administrators;
- b. Coordinating a major evaluation of program implementation in three years with the assistance of the Office of Policy, Planning and Evaluation (OPPE);
- c. Developing, updating and disseminating student manuals and instructors' guides for the Basic Curriculum to Regions and Headquarters;
- d. Coordinating selection of instructors for the Basic Curriculum, and maintaining a national list of instructors from Regions and Headquarters;
- e. Developing guides for first-line supervisors to use in evaluating individual training needs and requesting exceptions when applying the requirements of EPA Order 3500.1 with respect to the Basic Curriculum;
- f. Organizing a board of Senior Agency Managers and inspectors/investigators from Headquarters and Regions, to advise him/her in carrying out these responsibilities;
- g. Working with RAs and AAs to jointly recognize excellence in compliance monitoring inspections/investigations; and
- h. Assigning functions needed within OECM for implementation of these responsibilities and incorporating them into the performance standards of responsible individuals.

2. AA for OARM. The AA for Administration and Resources Management or his/her designee is responsible for the following:

- a. Updating and providing sufficient materials for occupational health and safety training, or approving non-EPA courses to meet the requirements of EPA Orders

1440.2 and 1440.3, and reviewing program-specific health and safety training;

- b. Working with OECM and the EPA Institute to coordinate selection of instructors for Inspector Health and Safety Curriculum and maintaining a national list; (OHSS)
- c. Training EPA instructors in effective teaching methods for the Basic Curriculum; (EPA Institute)
- d. Working with Regions and Programs to evaluate instructors' performance and provide useful feedback; (EPA Institute)
- e. Coordinating and disseminating a timely schedule of classes for the Health and Safety, Basic and Program-Specific Curricula, in consultation with OECM, Program offices and the Regions using the E-Train Information System; (PMD) and
- f. Assigning functions needed within OARM for implementation and incorporating them into the performance standards of responsible individuals.

3. AAs for Media Programs: Each Assistant Administrator or his/her designee is responsible for the following:

- a. Developing, updating and disseminating materials and schedules for classes under the Program-Specific Curriculum(a), including advanced or specialized training, in consultation with Regions and States;
- b. Conducting surveys of Regions' and States' needs, and periodic reviews of the entire Program-Specific Minimum and Specialized Curricula;
- c. Ensuring in future contracts and assistance agreements awarded under the Senior Environmental Employment Program, involving compliance inspections that training is required by means of statements of work or other appropriate vehicles;
- d. Developing guides for first-line supervisors to use in evaluating individual training needs and in requesting exceptions when applying the requirements of this Order with respect to the Program-Specific Minimum Curricula;
- e. Assisting Regions by providing training delivery contracts, or grants to university training centers or other non-profit organizations for training delivery where useful and effective;
- f. For those programs with Headquarters-based inspectors, or for OECM and NEIC, identifying who is subject to EPA Order 3500.1 approving requests for exceptions for these personnel, planning for delivery of the Basic Curriculum and submitting a plan for this to OECM by October 30, 1988, and incorporating training requirements into position descriptions and performance standards;

- g. Establishing standing work groups including Regions, and States where appropriate, to help carry out these responsibilities and to improve the quality of the compliance monitoring function; and
- h. Assigning functions needed within the Media Program Offices to implement this Order and incorporating them into appropriate performance standards, such as the general management standard.

B. Regions' Responsibilities*

1. RA. Each Regional Administrator is responsible for the following:

- a. Establishing an internal system, assigning functions for implementation of the Basic Curriculum, and submitting a plan that explains this operation to OECM by October 30, 1988;
- b. Determining who is subject to this Order and maintaining records of those individuals and their training accomplishments and/or exceptions;
- c. Designating the DRA or a cross-Regional panel to review and approve any exceptions to the requirements of this policy;
- d. Supporting in-house instruction for the Basic Curriculum by working with OECM to identify Regional personnel to serve as classroom instructors and keeping a current roster of trained instructors;
- e. Scheduling the Basic Curriculum annually and communicating it to OECM, OARM and other Regions;
- f. Incorporating training requirements into position descriptions and performance standards;
- g. Ensuring in future contracts involving compliance inspections that training is required by means of statements of work or other appropriate vehicles;
- h. Maintaining a sufficient supply of training materials for Basic and Program-Specific Minimum Curricula in the Region;
- i. Ensuring each Regional program identifies States' inspector training needs annually through the State/EPA Enforcement Agreements process;
- j. Assisting States in identifying ways to meet their training needs and coordinating training opportunities; and
- k. Assigning functions needed within the Region to implement EPA Order 3500.1 and incorporating them into appropriate performance standards.

*These responsibilities apply to any AA having compliance inspectors/investigators based in Headquarters such as the AA for Air and Radiation for Mobile Sources Enforcement.

2. Line Supervisors. Line supervisors, in Program or Environmental Services Divisions, are responsible for the following:

- a. Ensuring quality compliance inspections/field investigations using performance standards, periodic appraisal, appropriate assignments to ensure development, and recognition of personnel engaged in the compliance monitoring function;
- b. Working with each assigned compliance inspector to identify training needs and to incorporate these into an Individual Development Plan (IDP);
- c. Preparing written requests for exceptions to EPA Order 3500.1 and securing these in accordance with procedures established in the Region or in Headquarters;
- d. Providing self-instruction materials and structured on-the-job training experiences, and assuring that assignments meet the requirements of this training program;
- e. Designating OJT instructors and preparing them for this assignment;
- f. Reviewing progress and maintaining records of individuals subject to EPA Order 3500.1 including their accomplishments and/or exceptions;
- g. Incorporating training requirements into position descriptions and performance standards of responsible individuals;
- h. Completing required training; and
- i. Evaluating the effectiveness of training materials and methods.

3. Compliance Inspectors/Field Investigators. Compliance Inspectors/Field Investigators are responsible for the following:

- a. Advising their supervisor about the history, and extent of relevant training and experience, and assisting in the preparation of an Individual Development Plan (IDP) to meet the requirements of EPA Order 3500.1;
- b. Assisting in locating training courses to meet the objectives of EPA Order 3500.1;
- c. Evaluating the effectiveness of training materials and methods;
- d. If selected as an OJT instructor, planning and preparing for this assignment; and
- e. Applying and maintaining the knowledge, skills and techniques acquired through training to ensure that inspections/investigations are accomplished in a technically and legally sound manner.

APPENDIX G

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- f. Organizing a board of Senior Agency Managers and inspectors/investigators from Headquarters and Regions, to advise him/her in carrying out these responsibilities;
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1440.2 and 1440.3, and reviewing program-specific health and safety training;

- b. Working with OEMC and the EPA Institute to coordinate selection of instructors for Inspector Health and Safety Curriculum and maintaining a national list; (OHSS)
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- b. Conducting surveys of Regions' and States' needs, and periodic reviews of the entire Program-Specific Minimum and Specialized Curricula;
- c. Ensuring in future contracts and assistance agreements awarded under the Senior Environmental Employment Program, involving compliance inspections that training is required by means of statements of work or other appropriate vehicles;
- d. Developing guides for first-line supervisors to use in evaluating individual training needs and in requesting exceptions when applying the requirements of this Order with respect to the Program-Specific Minimum Curricula;
- e. Assisting Regions by providing training delivery contracts, or grants to university training centers or other non-profit organizations for training delivery where useful and effective;
- f. For those programs with Headquarters-based inspectors, or for OEMC and NEIC, identifying who is subject to EPA Order 3500.1 approving requests for exceptions for these personnel, planning for delivery of the Basic Curriculum and submitting a plan for this to OEMC by October 30, 1982, and incorporating training requirements into position descriptions and performance standards;

- g. Establishing standing work groups including Regions, and States where appropriate, to help carry out these responsibilities and to improve the quality of the compliance monitoring function; and
- h. Assigning functions needed within the Media Program Offices to implement this Order and incorporating them into appropriate performance standards, such as the general management standard.

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- b. Determining who is subject to this Order and maintaining records of those individuals and their training accomplishments and/or exceptions;
- c. Designating the DRA or a cross-Regional panel to review and approve any exceptions to the requirements of this policy;
- d. Supporting in-house instruction for the Basic Curriculum by working with OECM to identify Regional personnel to serve as classroom instructors and keeping a current roster of trained instructors;
- e. Scheduling the Basic Curriculum annually and communicating it to OECM, OARM and other Regions;
- f. Incorporating training requirements into position descriptions and performance standards;
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- j. Assisting States in identifying ways to meet their training needs and coordinating training opportunities; and
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- c. Preparing written requests for exceptions to EPA Order 3500.1 and securing these in accordance with procedures established in the Region or in Headquarters;
- d. Providing self-instruction materials and structured on-the-job training experiences, and assuring that assignments meet the requirements of this training program;
- e. Designating OJT instructors and preparing them for this assignment;
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- b. Assisting in locating training courses to meet the objectives of EPA Order 3500.1;
- c. Evaluating the effectiveness of training materials and methods;
- d. If selected as an OJT instructor, planning and preparing for this assignment; and
- e. Applying and maintaining the knowledge, skills and techniques acquired through training to ensure that inspections/investigations are accomplished in a technically and legally sound manner.

TABLE I

SKILLS AND ASSOCIATED TRAINING

Basic skill/Knowledge Needed	Associated Training Experience*
<p>Entry Level- usually course work (classes) and self instruction within first 3 to 6 months; OJT first 6 to 9 months. *(Individuals as hired generally have basic knowledge of engineering, chemistry or biology. Remedial training for other individuals can be arranged through local colleges and universities.)</p>	
o knowledge of EPA enforcement philosophies and strategies	Fundamentals of Inspections Training (FIT)
o ability to complete enforcement fact gathering, with understanding of ethics, right of entry, and inspector conduct	FIT
o knowledge/skills on health and safety appropriate to the encountered and facilities entered	Health and Safety training
o basic understanding of the mission and components of NPDES program	NPDES Introductory - 30 hr. class
o understanding of the duties and responsibilities of the NPDES inspector	NPDES Introductory Training
o understanding of the legal authority for NPDES program, in relationship to water quality standards, effluent guidelines, and NPDES permits	NPDES Introductory Training
o minimum knowledge including basic wastewater treatment, sampling procedures, flow measurement, and laboratory procedures	NPDES Introductory Training
o working knowledge of essential violation recognition, evaluation and documentation fundamental to all inspections	OJT
o reasonable knowledge of basic wastewater treatment process control and quantitative observation/measurement	OJT
o reasonable grounding in the basic concepts (so the inspector can assist) in the areas of: pretreatment, biomonitoring and performance audit	NPDES Introductory Training

Basic Skill/Knowledge Needed	Associated Training Experience
o knowledge of sampling techniques, field calibration and use of measuring devices	OJT
Skills Expansion *(for experienced inspectors, who know the basics but need skills expansion or update)	
o knowledge of pretreatment compliance inspection duties and responsibilities	Workshop (8 hr) and OJT
o knowledge of diagnostic inspection duties, & treatment techniques	Workshop (16 hr) and OJT
o reinforcement of basic skills specific where the supervisor determines there is a need	Self instruction or refresher course where appropriate
o Knowledge to perform biomonitoring and performance audit inspections	OJT, self instruction, Regional workshops
o knowledge of procedures	OJT and self study
o toxics sampling inspections	OJT and self study
Specialized skills (optional for experienced inspectors needing specialized skills)	
o knowledge of procedures and requirements for criminal investigations	Classroom training (Glynco, GA)
o knowledge of how to plan and conduct offshore drilling rig inspections	OJT & possible Course material being developed
o skill in conducting oversight inspections (meaning evaluating inspections conducted jointly with another agency)	OJT
o skills in teaching and preparing classroom presentations	Course - EPA Institute

(To maintain skills, an inspector may need refresher training in certain areas above as determined by the supervisor.)

The latter skills in Table I would be developed primarily in classes, workshops and OJT. As the inspector becomes more proficient, he/she can take the lead on specific types of inspections. As skills become rusty, as observed in the performance evaluation process, or as technology advances and statutory and regulatory requirements change, refresher training may be needed.

III. SUGGESTED SEQUENCING OF THE INSPECTOR TRAINING

The supervisor should prepare Individual Development Plans (IDP) for new NPDES inspectors, considering the unique needs of the Region and the experience of the individual inspector in position. Several Regions have pointed out that employees, especially new ones, should have IDP's which utilize self instruction, only in conjunction with interactive instruction as in courses (classroom training) and controlled or supervised OJT. Self instruction alone is not sufficient. The sequencing of the NPDES inspector training must take into consideration the availability of courses and workshops and the scheduling of inspections (for OJT). The suggested sequencing is included in Table I. The training sequence is arranged by category with introductory items coming first (generally taking place during the first few months unless excepted because of the experience of the inspector). Then for inspectors who have attained the ability to complete compliance evaluation inspections and compliance sampling inspections, there should be skills expansion training for other types of inspections as the need of the Region dictates. In addition, optional training may be useful but not every inspector or every Region may need this. The following paragraphs describe the sequencing of specific phases of inspector training.

Introductory Training

The FIT training should be taken by all new inspectors, as soon as possible after being hired. Supervisors provide NPDES Introductory materials to new inspectors for their self instruction and OJT training. Regions often provide workshops on Introduction to NPDES inspections for new inspectors. (It is recommended that all introductory course work and workshops be provided within the first six months.) Self instruction and OJT on the basics can be excepted if the new inspector has had experience with NPDES inspections and meets the NPDES basic skills evaluation in the supervisor's guide (to be developed).

Skills Expansion Training

After the inspector has had the FIT and NPDES Introductory training and mastered the basic skills, the inspector may seek more specialized training in Diagnostic Inspection and Pretreatment Compliance Inspections. The NPDES inspectors are

have the course work or self instruction and OJT in specialized inspections before they take the lead in conducting them. In addition, self instruction and OJT can be used by the supervisor to update or improve the expertise available in the region.

Specialization Training (to be developed)

The degree of skills accumulation in specialized activities is often dependent on the inspector's experience, academic background, aptitude, personal motivation, and the needs of the program. The supervisor or inspector may wish to identify training in specialized areas depending on the needs of the region program. The inspector may need to develop skills in criminal investigations, and oversight inspections. More experienced inspectors may consider training in communication skills as they begin to pass on their expertise to new inspectors. Topics may eventually include offshore platform inspections.

IV. RESPONSIBILITIES FOR INSPECTOR TRAINING

Office of Water Enforcement and Permits

The Director of the Office Of Water Enforcement and Permits (OWEP) will take responsibility for developing program-specific training materials, modules and manuals to back up the training efforts of the regions. The materials which are available will be listed in the NPDES Inspector Training Implementation Plan which is updated every year and is available from Enforcement Division, OWEP, EN-338. In addition, OWEP will coordinate the NPDES Inspection Materials Work Group effort to review and assist in development of training materials, both newly developed material and revised materials. In addition where there is sufficient need, OWEP will offer annual contract support for delivery of skills-expansion workshops such as for Compliance Diagnostic Inspections and Pretreatment Compliance Inspections. As the need arises, OWEP can provide speakers on specific topics such as biomonitoring inspections, pretreatment inspections and enforcement and discharge monitoring report quality assurance.

Regional Offices

Regional Administrators and supervisors have ultimate responsibility for assuring time is set aside for training of inspectors and for carrying out Individual Development Plans (IDPs). Responsibility for setting up the IDP for individual inspectors/positions rests with the first line supervisor. In addition the supervisor provides basic manuals, modules and copies of the Act and regulations to new employees. Information on courses will be available in ECATS and other schedules for classes/workshops. Information on how to locate and obtain copies of manuals and modules related to NPDES inspector training will be

found in the NPDES Inspector Training Implementation Plan available from Enforcement Division, OWE (EN-338). Self instruction and OJT may be overseen by more experienced inspectors. Experienced inspectors also can provide excellent instructors for regional workshops such as for the Introduction to NPDES Inspections as well as other regional workshops. The regional training officer may be used as a resource to locate courses and training materials.

In addition individual experienced inspectors will be selected by OWE to serve on the NPDES Inspection Materials Work Group which will periodically review and comment on training materials.

NPDES Inspectors

Once an IDP is in place it is the responsibility of the inspector to help in locating courses to satisfy or fulfill the IDP, and to attend classes, workshops and satisfactorily complete the required reading, self instruction and OJT assignments.

V. FEEDBACK FOR UPDATING THE NPDES INSPECTOR TRAINING

Once a year in preparation for the coming fiscal year, the Director of the Office of Water Enforcement and Permits will seek information from the regional offices on their training needs for the coming year, including training materials, delivery of workshops by contract and need for specific speakers. OWE will also at least every two years seek ideas from the Regions and the NPDES Inspection Materials Work Group on future instructional material and modules, and needs for specific course work. These comments will be used to determine priorities for development of new training materials and courses or revision of existing training materials and courses.

APPENDIX

DETAILED DESCRIPTION OF TRAINING FOR NEW INSPECTORS

1) Objectives: Fundamentals of Inspections Training (FIT) - classes

To understand the standard basic skills
for field investigations

NPDES Introductory Training (Classes/Self Instruction)

To obtain a basic overview of the mission
and components of the NPDES program

To provide a more comprehensive
understanding of Clean Water Act and NPDES
legal authorities

To provide the new inspector with basic
technical and sampling knowledge to allow
OJT in the field with more senior inspectors

NPDES OJT for new inspectors:

To develop working knowledge of fundamentals
of violation recognition, evaluation and
documentation fundamental to all types of
NPDES inspections

To develop a reasonable comprehension of
basic wastewater treatment processes and the
ability to make observations and
measurements

To become knowledgeable in proper analytical
procedures and record keeping requirements

To gain field experience with the proper
calibration and use of measuring instruments
and sampling techniques

2) Assump- tions:

The newly hired employee will have any required
health and safety training required by EPA order.

This and FIT training occurs before performing
field work. The self instruction in NPDES basics
may be concurrent with or before the field work.

3) Audience:

New inspectors doing NPDES inspections

4) Content: FIT training:

This will include all information that an inspector will need regardless of the program he/she works in. Some topics include: basics of safety, communications, administrative procedures, litigation process, witness guidelines, and ethics.

Self instruction study material for the new inspector should include in an orientation package:

- o Organization chart
- o NPDES Inspection Strategies and guidance such as the Clean Water Act Compliance/Enforcement Compendium.
- o Sample NPDES inspection reports
- o Descriptions of HQ/Regional/State relationships
- o Introductory NPDES Inspection Training Modules
- o NPDES Compliance Inspection Manual
- o The Statute and regulations
- o NPDES Flow Measurement Manual

The content for OJT includes but is not limited to the following:

In the office, the new inspector should go through the preparation for an inspection by developing the inspection plan: by reviewing the compliance/permit files, including self monitoring reports, correspondence, administrative orders and permit applications. In addition, the inspector learns to prepare supplies, equipment and travel schedule and arranges coordination with the laboratory, state and other programs.

In the field, the inspector learns while accompanying an experienced inspector on at least 2 inspections- 1 municipal and 1 industrial, for each type of inspection (for at least the compliance evaluation and compliance sampling inspection and other inspection types as determined by the supervisor) to develop knowledge in processes, pollution control equipment operation, inspection techniques, interpretation of data, record keeping and reporting, evidence collection, analytical procedures and basic measurements and abatement strategies. The inspector also gains knowledge in conducting opening and closing conferences.

The new inspector learns in the field by observing, asking questions, and documenting events of each inspection. He/she may:

- o record a summary of items learned from the site/ field visit.
- o prepare an inspection report based on his or the lead inspector's field notes.
- o Gain hands-on field experience in proper calibration and use of necessary instruments and sampling techniques

Suggested progressive sequence of field training:

- o Make observations and write them up
- o Focus on individual components of inspection as file and records review, sampling procedures, use of measurement devices, and writing inspection reports
- o Work on particular types of inspections and areas of weak experience
- o Finally take the lead with an experienced inspector and then go unaccompanied on inspections

5) Materials available:

Basic Inspector Training: Manuals and Regional materials as follows:

NPDES Introductory training:

- o Organization chart
- o NPDES Strategies and guidance such as that in the Clean Water Act Compliance/Enforcement Compendium
- o Sample NPDES inspection reports
- o Descriptions of HQ/Regional/State relationships
- o NPDES Introductory Inspection Modules
- o NPDES Compliance Inspection Manual
- o Statutes and regulations
- o NPDES Flow Measurement Manual

NPDES OJT: NPDES Compliance Inspection Manual

6) Training Method:

FIT: courses or self instruction

NPDES Introduction - Class/Self Instruction:

Reading material on one's own, with one on one discussion or class with more experienced inspectors. (Regions may use a class/workshop format if there are a sufficient number of new hires.)

NPDES OJT: OJT is used in combination with self instruction to develop more complex skills.

7) Hours/Level of Effort: FIT: about 40 to 80 hours

NPDES Introductory Course work: An average of 30 hours for class and on average of 80 hours for self instruction.

NPDES OJT: An average of 100 hours. Must have minimum number of OJT inspections before taking lead on inspections (see Item 4 above).

8) Timetable/sequence: FIT: within first 3 to 6 months of being assigned inspection duties.

NPDES Introductory training: Materials for self instruction should be given to the new inspector within the first month of employment and usually before or in conjunction with FIT or program specific training. (HQ recommends having all introductory courses or workshops during the first six months of employment.) The self instruction generally occurs before OJT in the field.

NPDES OJT: OJT should occur during the first year and often along with self instruction and courses.

9) Required/Recommended: FIT: For new employees, no exception

NPDES Introductory Course work: Required
NPDES OJT: Required especially the field OJT before performing inspections alone or as the lead inspector.

Exception conditions: No exceptions for those newly hired into EPA. The NPDES Introductory class/self instruction, and OJT may be excepted if performance/experience can satisfy the requirements, by meeting the evaluation the reviewing official or regional peer review board.

10) Testing/
Certif-
ication:

FIT: Testing in some form.

NPDES Introductory Course: It is OWEP's preference that there be a testing program after course to provide feedback to the inspector, trainer, and supervisor on knowledge gained from the training.

DETAILED DESCRIPTION OF TRAINING FOR EXPERIENCED INSPECTORS

- 1) Objectives: Course work (generally workshops): To provide increased understanding of components of the NPDES inspection program for more specialized types of NPDES inspections.
- Self instruction: To provide refresher training for brushing up on skills where the inspector fails to demonstrate adequate maintenance of skills, with concentration on subjects which are weak areas. This demonstration could be by poor on-the-job performance for instance (See Item 10 on page A-8 and the Supervisor's Guide).
- Self instruction is also used to prepare the employee for OJT for more complicated types of inspections using modules and manuals available from OWEF (See Section 5).
- OJT: To develop more specialized knowledge of various types of inspections such as biomonitoring, toxic sampling and performance audit.
- To develop an increased comprehension of various types of wastewater treatment processes and ability to make detailed evaluations of laboratory analytical procedures and quality control activities.
- To gain field experience in the proper use of complex sampling and equipment techniques.
- 2) Assumptions: Completion of the introductory level study, and some field experience on basic inspections (compliance evaluation and sampling inspection).
- Course work: Training site will be the regional office with trainers provided by the region or through national contract.
- Self instruction: Materials are provided by the region to the inspector.
- OJT: Any needed self instruction or course activity is completed prior to OJT.
- 3) Audience: Experienced inspectors who have completed the basic courses and study and have had some field experience.

- 4) Content: Course work: Specialized courses and skills expansion workshops such as; Pretreatment Compliance Inspections, and Diagnostic Inspections. Selection of courses depends on regional need. A course on techniques and skills for instructors is available through the EPA Institute.
- Self instruction: Materials currently available include the Pretreatment Manual. Material for refresher self instruction include the NPDES Inspection Training Modules, and current inspection manuals, Statute and regulations as well as policy and guidance binders.
- OJT: Learning in the field occurs by accompanying experienced inspectors on biomonitoring, performance audit, pretreatment or diagnostic inspections.
- 5) Materials Course work: A manual/ workbook is available which may vary from year to year.
- Self instruction: See above in Item 4.
- OJT: Manuals such as the NPDES Compliance Inspection Manual and the Pretreatment Inspection Manual.
- 6) Training Course work: The instructor is an experienced inspector or contractor in a workshop or seminar setting, generally in the regional office.
- Method:
- Self instruction: Introductory NPDES Inspector Training Modules (to be available March, 1988), and current manuals such as the NPDES Compliance Inspection Manual, the Act and regulations. (It is assumed that an experienced inspector is available to answer questions.)
- OJT: OJT generally follows self instruction or courses with OJT primarily in the field with an inspector experienced in the type of inspection being studied.
- 7) Level of Effort: Workshops require 8 to 24 hours.
- Self instruction: No set limit or minimum required hours. Refresher training in particular will vary with the subject and with the individual.

OJT: The number of hours needed will vary with the type of inspection. For each type of inspection studied, at least two OJT inspections (with the inspector assisting) are recommended before he/she performs an inspection alone or in the lead.

8) Timetable/
Sequence

In general, this training may occur at any time, after the inspector has completed the basic instruction, and has had some field experience with basic inspections.

Course work: The inspector preferably will have courses before OJT in the field.

Self instruction: Self instruction generally takes place before OJT in the field.

OJT: The OJT in field generally will occur after course work or self instruction.

9) Required/
Compliance
Recommended:

Course work: Workshops in Pretreatment

Inspections and in Diagnostic Inspections are recommended before inspectors conduct these inspections.

Self instruction: Self instruction and refresher training is required for all inspectors.

OJT: Inspectors are required to have OJT before taking the lead on inspections.

Exceptions: Employees with experience in NPDES inspections of a particular type may be excepted from that particular courses and self instruction. No exceptions are allowed from refresher training where there is a determination that this is necessary.

10) Testing

Testing as part of a workshop or other training can provide feedback to the inspector, trainer, and supervisor on knowledge gained.

APPENDIX D-5

SUMMARY OF TOXIC SUBSTANCES/PESTICIDES PROGRAM TRAINING

A. SUMMARY

This training plan describes the required core and specialized training for TSCA/FIFRA inspectors. It describes both the basic requirements for new (i.e., either new to the inspection function or new to OPTS) inspectors and specialized courses which are required only for personnel who will be conducting inspections in particular program areas (e.g., GLP inspections, asbestos inspections, etc.). Both designated new and experienced inspectors will take the specialized training.

After completing the TSCA/FIFRA overview and basic TSCA inspection procedures (both within the first two months on the job) and the OECM Basic Curriculum (within the first six months), OPTS inspectors will be ready for a series of OJT and program sub-speciality training and activities.

In order to get a copy of the complete description of the TSCA/FIFRA training program, please contact Mike Wood, Chief, Compliance Branch, Office of Compliance Monitoring, USEPA, 401 M Street, SW, (EN-342), Washington, D.C. 20460, Rm E-715, FTS 8-382-7835.

The schematic below shows the plan in summary fashion.

TSCA/FIFRA INSPECTOR TRAINING

I. Program-Minimum

<u>Training</u>	<u>Method of Instruction</u>	<u>Timing</u>
1. TSCA/FIFRA intro/ orientation (required unless has equivalent training)	mostly self-study	80 hrs. within first two months on job
2. Basic TSCA/FIFRA Inspection Procedures (required)	mostly self-study (some lecture)	10 hrs. within first two months on job
3. OECM Basic Curriculum (required or equivalent)	coursework or equivalent	up to 80 hrs. (depending on individual) within first six months on job

<u>Training</u>	<u>Method of Instruction</u>	<u>Timing</u>
4. OJT Office Preparation to prepare inspector for field work (required)	supervised OJT	20-60 hrs. (depending on individual) prior to first field inspection
5. OJT Field Experience (recommended)	3-6 supervised OJT inspections as a junior inspector	8-32 hrs. per inspection within first six months on job

<u>Training</u>	<u>Method of Instruction</u>	<u>Timing</u>
6. OJT Inspections (recommended)	solo inspection at 5-10 facilities (Supervisor evaluates inspection report)	8-45 hrs. per inspection after completion of 1,2,3
7. TSCA/FIFRA Case Preparation Procedures (recommended)	classroom (lecture), case studies	estimated 24 hrs. (taken as offered)

II. Specialized Training

Section-specific detailed training (required for designated inspectors)	Seminars, Workshops, and individually-designed training sessions	2-32 hrs. depending on the section-specific training (after completion of 1 and 2)
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TSCA

Testing (s4); PMN (s5); PCB's (s6); Reporting (s8); Imports/Exports (s12/13); Asbestos; SARA Title III (s313)

FIFRA

GLP; Cancellation/Suspension; Recalls/SSURO; Establishment Inspections; Use Investigations; Exp. Use Permit; Imports; Reporting [including s6(a)(2)]

B. TRAINING MATERIALS AND THEIR SOURCES

The following materials should be available from the inspector's first line supervisor:

I. Program-Minimum

1. FSCS/FIFRA statutes and 40 CFR regulations; TSCA Manual; FIFRA Inspection Manual; TSCA and FIFRA Policy Compendiums
2. FIFRA and TSCA Inspections Manuals
3. Five OECM Basic Curriculum Modules
4. Computerized Data Bases; Regional Inspection Report; Company Files
5. TSCA and FIFRA Inspection Manuals; Inspection Forms; Site Safety and Sampling Plans (as necessary)

APPENDIX D-6

PUBLIC WATER SYSTEM SUPERVISION PROGRAM SPECIFIC INSPECTOR TRAINING

I. INTRODUCTION AND PURPOSE

The purpose of the PWSS training program is to take a structured approach to the training of PWSS inspectors (those who conduct or oversee compliance and enforcement activities in the field) in order to strengthen the effectiveness of their activities. While the program is specifically applicable to EPA inspectors, it may be of interest to States who conduct the vast majority of PWSS inspections. As a national program it establishes a core of essential training which may be supplemented as needed.

II. DESCRIPTION OF TRAINING COMPONENTS

The purpose of a training plan is to ensure opportunity of every inspector to acquire and refine the skills and knowledge needed to perform effectively. To that end, a set of experiences should be made available, over time, including; formal course work, self instruction and on the job training.

All inspectors for the PWSS program should be able to conduct PWSS inspections including sanitary surveys and enforcement case development inspections. In addition, EPA personnel should be able to provide assistance to State inspectors.

Basic Inspector Training and Sanitary Survey training, self-instruction and on-the-job training are currently planned or available for EPA inspectors. In addition, supplemental training will also need to be developed as new requirements under the SDWA come into effect.

III. SUGGESTED SEQUENCING

The sequence of training should be decided by the supervisor in conjunction with the inspector after considering the inspector's level of experience and the unique needs of the Region. The sequencing will also be determined by the availability of courses and the scheduling of inspections. In general, the suggested sequence for all inspectors is as follows: Orientation, Basic Inspector Curriculum, Sanitary Survey Course, self study, computer based training and on-the-job experience. For experienced inspector, training needs should be decided in consultation with the first-line supervisor using Supervisor's Guide to determine if exceptions for training are appropriate. However, it may be desirable to attend the Basic Inspector Training Curriculum and/or Sanitary Survey Course so that EPA inspectors have a common understanding with States. Basic skills

and knowledge which all inspectors will be expected to acquire, and the associated training experiences, are detailed as Attachment A.

IV. TRAINING MATERIALS AND THEIR SOURCES

The following kinds of materials for new inspectors should be available from the inspector's first-line supervisor.

- o General Orientation
 - Organization chart
 - SDWA and regulations
 - FWSS Compliance Strategy
 - Description of HQ/Regional/State relationships
 - Applicable guidance and policy documents
- o Sanitary Survey Course
 - Sanitary Survey Manual (small systems)
 - Training modules (large systems - to be developed)
- o Program Management Training
 - (to be developed)
- o Skills Expansion
 - (to be developed)

PWSS Program-Specific Minimum and Specialized Training

SKILLS AND ASSOCIATED TRAINING

Basic Skill/Knowledge Needed	Associated Training Experience
o Knowledge of EPA enforcement philosophy and strategies	o Basic Inspector Training
o Ability to complete enforcement fact gathering, with understanding of ethics, right of entry and inspector conduct	o Basic Inspector Training
o Understanding of health and safety requirements	o Health and Safety Training
Understanding of the mission of the PWSS Program	o Orientation (self-study)
o Understanding of the legal authority of the PWSS program, and enforcement strategies	o Orientation (self-study)
o Understanding of basic public water supply processes, causes of non-compliance, ways to improve operations in large and small systems	o Sanitary Survey Course (small systems) Computer based training modules (large systems) ¹
o A working knowledge of violation recognition, sampling procedures and laboratory analysis	o OJT o Special Courses ¹
o A working knowledge of applicable State programs and procedures and ability to provide constructive oversight	o Program Management Training (OJT/self study) ¹
o Knowledge of field conditions and procedures	o Sanitary Survey Course (OJT/Self Study)

¹specialized training as needed

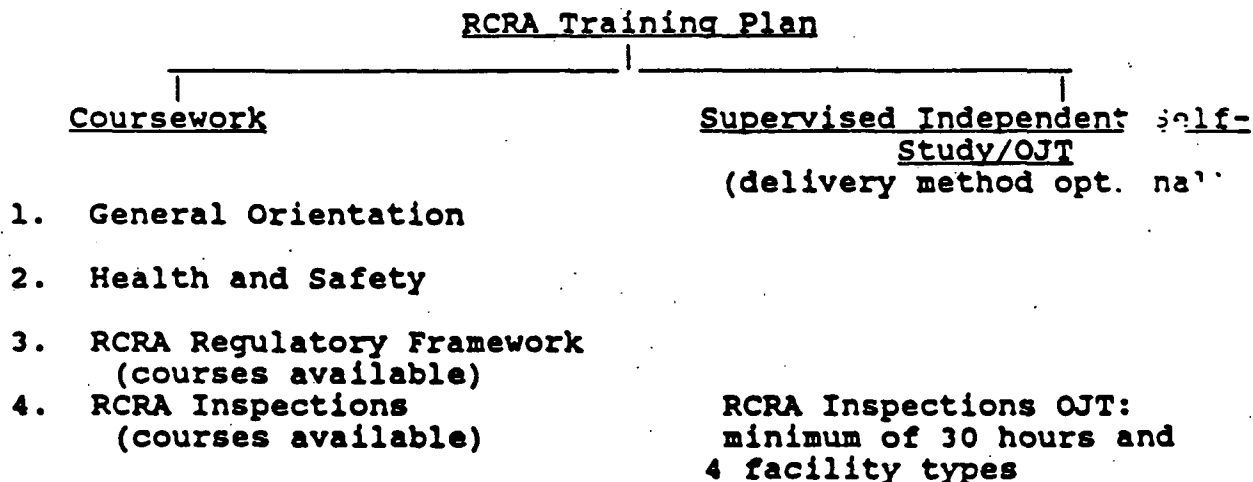
SUMMARY OF RCRA INSPECTOR TRAINING

A. SUMMARY

The RCRA Training Program establishes the minimum knowledge, skills and abilities necessary for those individuals who carry out lead RCRA inspections, while providing flexibility in training delivery methods. The program states that courses, supervised independent study and on-the-job training should all be used depending on availability, resources and the needs of the inspector. This summary describes the program for inspectors.

The training curriculum outlined below must be completed before the inspector conducts lead inspections (some exceptions may be allowed based on the supervisor's judgment and only if the actions do not jeopardize possible enforcement actions or human safety.) After the training, the supervisor will make a determination as to whether the inspector is sufficiently prepared to perform as a lead inspector. Contact: RCRA Enforcement Division Director, Office of Waste Programs Enforcement, Headquarters (WH-527), USEPA, 401 M Street, SW, Washington D.C. 20460; FTS 382-4808.

The figure below shows the plan in summary.

B. TRAINING MATERIALS

The following materials for the inspector are suggested:

1. General Orientation
 - RCRA Orientation Manual
 - Understanding the Small Quantity Generators (SQG) Hazardous Waste Rules

- The Resource Conservation and Recovery Act
- Videos (e.g., CERCLA's RCRA Overview)
- State developed materials covering related topics

Health and Safety

- materials to be developed

RCRA Regulatory Framework

- 40 CFR hazardous waste regulations
- RCRA statute
- HSWA statute

RCRA Inspections

- Inspection Manuals:

RCRA
State Oversight
Compliance Monitoring Evaluation
Land Disposal Restrictions
Technical Case Development
Hazardous Waste Tanks
Operations and Maintenance
Lab Audit

- Effluent Guidelines
- Equipment Manufacturer Operating Manuals
- 40 CFR Hazardous Waste Regulations
- SW-846
- Groundwater Monitoring Technical Enforcement Guidance Document
- Groundwater Monitoring Compliance Order Guide



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 12, 1988

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: RCRA Inspector Enhancement Strategy

FROM: J. Winston Porter
(Assistant Administrator)

TO: Regional Administrators

ATTN: Regional Waste Management Division Directors

In the past year, much attention has been given to the importance of a quality enforcement/inspection program for RCRA. The RCRA Enforcement Division (RED) within the Office of Solid Waste and Emergency Response has directed their efforts to the enhancement of the RCRA inspection program nationwide. To accomplish this goal, RED has been undertaking several major projects. In an effort to coordinate these projects into a manageable, collective effort we have developed the attached RCRA Inspector Enhancement Strategy.

With this strategy we intend to increase the quality of inspector training, improve the mechanisms for updating experienced inspectors on new techniques and regulations, and establish a system that encourages RCRA inspectors to remain in the enforcement area. The strategy includes the following components:

- * Training initiatives
- * Inspector qualifications
- * Description of inspection guidance documents
- * Oversight activities
- * Headquarters initiatives
- * State Applicability
- * Inspector Training Curriculum

A draft of this strategy was reviewed by the Regional RCRA program offices and the Environmental Services Divisions. The comments received were constructive and incorporated into the strategy. The RCRA Inspector Training Curriculum (Appendix A) was developed in coordination with the Office of Enforcement and Compliance Monitoring and the Agency-wide Inspector Training Policy presently in green border review.

We appreciate the time that your offices have put into the review of this strategy and look forward to its implementation and the enhancement of the RCRA inspection program nationwide. If you have any questions please call Elaine Stanley at FTS 382-4808.

Attachment

RCRA Inspector Enhancement Strategy

June 1988

Office Of Waste Programs Enforcement

RCRA Enforcement Division

I. INTRODUCTION

The objectives of the strategy outlined below are to enhance the RCRA inspection program by improving training, promoting better recognition and opportunities for inspection personnel, and increasing oversight of RCRA inspections. The following areas are covered in the plan to assist in this effort:

- * a description of training initiatives being undertaken by OWPE
- * a discussion of inspector qualifications
- * a description of inspection guidance documents
- * approaches to improving oversight of Regional and State RCRA inspections
- * additional Headquarters initiatives in the area of RCRA inspections
- * applicability to the States

Implementation of this plan will require a concerted effort from management to emphasize the role of the inspector in the RCRA program. The RCRA inspector has responsibilities which cover the overall RCRA program and an appreciation of that fact is needed in order to accomplish the goals set out in this plan.

The Agency has devoted extensive resources identifying and developing solutions to problems relating to the inspection program and investigating unique and innovative ways to improve the program with existing State and Regional resources. These efforts have been greatly assisted by Regional and State participation through workgroup representation and through office review of materials. It is essential that we maintain our momentum by devoting adequate resources to fully meet the objectives in this plan.

II. TRAINING

The Office of Waste Programs Enforcement (OWPE) is currently updating guidance documents, developing inspector training programs, and initiating new ways to transmit information directly to the RCRA field inspector. All of these activities should greatly enhance the transfer of information to the inspector.

In this strategy we are establishing a minimum requirement for inspector training. In adopting a policy of mandatory training the concern is about the problems of getting the training to the inspectors (or the inspectors to the training) and using inspectors in the field who have not completed the required training. To address these concerns we have developed a training requirement for RCRA inspectors which provides flexibility to prevent resource management problems. The training requirements are described further in Appendix A.

We are requiring a minimum number of hours of structured training as follows:

- General orientation ----- 10 hours
- RCRA regulations ----- 40 hours
- RCRA Inspection Procedures -----100 hours (30 hours
must be on-the-job
training with an
experienced inspector)

It is important that the required training be structured as detailed in Appendix A so as to provide the full benefit to the inspector receiving the training. Meeting the training requirement can be done in several ways including (but not limited to) supervised independent study, classroom, and on-the-job training. It is the responsibility of the first-line supervisor to document how each inspector meets the required training or, in the case of senior inspectors, how his/her demonstrated performance justifies a waiver of the requirements.

The RCRA Enforcement Division (RED), with input from the Regions and States, has developed a RCRA inspector training course. This course is designed to be given to State and Regional RCRA inspectors and will be initially offered in the Spring of 1988 and will be presented in all ten Regions. The curriculum presents current information on EPA's regulations and policies. Training materials developed for the course (e.g., slides, overheads, and manuals) will be made available to the Regions or States for in-house training. It should also provide a stage for an exchange of information between inspectors that has not existed on a national basis.

The Regions are strongly urged to make every attempt to make this course available to Regional inspection personnel at all levels. The Regions should also work with the States to encourage State inspector attendance at this or other courses.

III. INSPECTOR QUALIFICATIONS

One of the findings of the recent GAO Inspector survey (December, 1986-May, 1987) was that the inspection staffs at the State and Regional level included a variety of academic backgrounds. Some of the academic backgrounds included biological sciences, chemistry, environmental science, engineering, hydrogeology, ecology, and resource management.

Given that the RCRA program is one of the most complex programs that the Agency administers and that it requires a

multi-disciplinary approach, the GAO survey findings reinforces our confidence in the overall recruiting efforts of the States and Regions. Therefore, it is strongly recommended that State and Regional management continue to recruit the best qualified personnel from a broad range of academic fields.

During the Regional review process, the Regions should be prepared to demonstrate to Headquarters their recruitment and hiring practices to ensure that qualified personnel are being hired to fill inspector vacancies. The Regions should also review the States' staffing procedures to affirm that qualified personnel are selected to perform RCRA inspections.

IV. INSPECTION GUIDANCE DOCUMENTS

Prior to 1987, inspection guidance documents under the RCRA program have not been updated on a routine basis and have not been adequate to meet the demands of the increasing regulatory program. Beginning in the first quarter of FY'87, OWPE has been developing a revised set of inspection guidance documents to fulfill these needs. In late 1986 and early 1987, OWPE completed work on and published the following guidance documents:

- RCRA Ground Water Monitoring Technical Enforcement Guidance Document
- Waste Oil Interim Enforcement Guidance
- Land Disposal Restrictions Guidance (solvents/dioxins)
- Compliance Monitoring Evaluation (CME) Guidance

By the fourth quarter of FY'88, OWPE will have published an entire set of new RCRA inspection guidance documents including:

- RCRA Inspection Manual (replaces the 1981 version)
- State Oversight Inspection Guidance
- Operation and Maintenance Manual
- Lab Audit Manual
- Technical Case Development Manual
- Hazardous Waste Tanks Inspection Manual

These guidance documents should replace the existing inspection guidance documents used by the Regions and States. It is envisioned that these guidance documents can form the basis for an effective Regional or State training program.

The guidance documents have been designed to be updated in the future based on statutory, regulatory, or policy actions. Headquarters personnel will continually review the guidance to verify that it meets the needs of the program. In addition,

Headquarters, Regional, and State personnel will determine the need and scope for additional inspection guidance on a routine basis.

Headquarters has developed a complete mailing list of State and Regional RCRA inspection personnel and will mail guidance documents directly to them. However, each Region is responsible for informing the RCRA Enforcement Division of any changes to the mailing list. This mailing list will allow for the efficient transfer of the inspection guidance documents and RCRA Inspector Newsletter to appropriate personnel. It is also the responsibility of the Regional office to review the State inspection program to confirm that it is being implemented in accordance with EPA procedures as presented in EPA guidance.

V. OVERSIGHT ACTIVITIES

One of the major findings of the GAO Survey was that there was inadequate oversight. Oversight of inspections involves two phases: Headquarters oversight of Regional performance and Regional oversight of the States.

1. Regional Oversight of States

The Regions are responsible to perform routine State oversight inspections. The 1988 RIP did not state explicitly that the Regions should perform 10% oversight. However, the Regions should nonetheless strive to attain the 10% oversight. The Regions should make a concerted effort to coordinate the oversight inspection program with the States at the beginning future fiscal years and to meet more frequently during the year to meet the minimum target of 10% oversight.

Oversight inspections are one of the most important tools to determine the effectiveness of the RCRA program. This is because the inspector is, in many cases, the only direct link between the owner/operator of a facility and the EPA or State environmental agency. In order for the RCRA program to move forward, quality inspections must be performed at RCRA sites. It is therefore imperative that EPA verify, through the oversight inspection program, that the inspections are thorough and complete. For these reasons, EPA oversight inspectors should be experienced field personnel.

The first-line supervisor should routinely evaluate the inspector in the field to determine overall performance and whether the inspector requires additional training. These field evaluations will place demands upon the supervisor, but are needed to verify that inspectors are performing quality RCRA inspections.

Appendix A

RCRA Inspector Training Curriculum

Applicability

This curriculum is applicable to all RCRA staff conducting field activities. New and experienced inspectors must meet all requirements unless the inspector can demonstrate to his/her supervisor that he/she has had previous equivalent training or experience that meet the requirements of this curriculum.

Delivery Methods

Delivery methods are recommended in each section, however the ultimate decision will be determined by the supervisor and inspector depending on availability of courses, on-the-job training (OJT) instructors, and independent study materials. It is recommended that two different methods of training be used under each different section of training. This is to avoid, for example, any inspector being required to read for 40 hours on any particular subject without having the opportunity to have an alternate training experience. When possible it is recommended that the inspectors meet the training requirements by attending relevant courses.

Visual Aids and Training Materials

The specific materials listed in each section should be made available to the inspector. The supervisor may choose to add to the specific materials listed or to use other equivalent materials (ie. State or Regional program manuals) to meet the objectives of each section.

Implementation and Tracking

It is suggested that the inspector complete the curriculum in the order in which it is described. If however, when availability of courses, materials, travel money, etc., do not allow for this, at a minimum health and safety training must be completed before any field work under EPA Order 1440.2. All training is required before the inspector performs in the field as a lead inspector.* The inspector may go into the field as a member of an inspection team led by an experienced inspector prior to the completion of

* The lead inspector is the field person responsible for designing, conducting, and being the ultimate technical focal point for a field evaluation of a RCRA facility.

technical training. In certain cases where immediate inspection capability is required it may be necessary to send an inspector who has not completed the technical training. The supervisor should carefully exercise discretion in these cases so as not to jeopardize any possible enforcement actions or the safety of the inspector or others. An inspector must however have some field OJT with an experienced inspector before a solo inspection.

Level of effort (LOE) hours are assigned to each section of training. First-line supervisors are required to ensure that the training requirements are followed and documented. It is recommended that the training be documented in both the training and inspector personnel files. A training requirement checklist (attached) including number of hours, dates and methods of training was developed by the Office of Waste Programs Enforcement (OWPE) to document completed training and to identify additional training needs.

Evaluation

Upon completion of the training requirements the supervisor will make a determination as to whether the inspector is sufficiently prepared to perform as a lead inspector. It is recommended that the supervisor (or other experienced inspector) accompany the new inspector on his first lead inspection to evaluate performance. If the supervisor concludes that the inspector is not prepared to carry out the duties of a lead inspector he may require additional training of the inspector.

Continuing Education

At any time during the tenure of an inspector, the supervisor may require additional training for the inspector. Additional training may take the form of an abbreviated course, self-instruction, or OJT with the supervisor or a more senior inspector. (This would be in addition to the Health and Safety refresher training required under EPA Order 1440.2.)

Training for continuing education of inspectors will be developed concurrently with new regulations and/or new and innovative inspection procedures. Currently there are two courses for continuing education: RCRA Ground Water Monitoring and Land Disposal Restrictions.

Training needs will be monitored through State oversight, Regional reviews, and review of inspection reports. EPA Headquarters also welcomes suggestions from inspectors, supervisors and other enforcement personnel.

Basic Inspector Training

RCRA Inspector Training is to be preceded by "Basic Inspector Training." The Basic Inspector Training Curriculum is currently under development by the Office of Enforcement and Compliance Monitoring (OECM).

RCRA Inspector Orientation

Objectives: To obtain a basic knowledge of the following:

- o program organization
- o philosophies of the Agency/State program
- o role of enforcement (what is your job?)
- o overview of RCRA and other related environmental statutes
- o policies
- o information sources

Materials:

- o RCRA Orientation Manual
- o "Understanding the SQG Hazardous Waste Rules"
EPA Publication
- o The Resource Conservation and Recovery Act
(as amended by HSWA)
- o available videos
- o state developed materials covering related topics

Methods: Supervised independent study

LOE: Minimum of 10 hours. Additional training may be required at the discretion of the supervisor depending on the complexity of the particular office or division.

Health and Safety

- o Follow requirements of EPA Order 1440.2 and OSHA requirements (most stringent apply).

RCRA Regulatory Framework

Objective: To obtain knowledge of the RCRA regulations.

Scope:

- o recent regulations
- o generator requirements
- o interim status requirements
- o permit requirements

Materials: 40 CFR, Resource Conservation and Recovery Act, HSWA

Methods: Supervised independent study. Some courses are available through private firms.

LOE: 40 hours

RCRA Inspections

Objective: Provide inspectors with the knowledge and skills to complete an effective RCRA inspection.

Scope:

- o industrial processes and associated wastes
- o emergency and RCRA site-specific safety issues
- o types of RCRA inspections including elements and goals
- o operation and maintenance of equipment
- o cross-media concerns
- o case development
- o RCRA resources
- o inspection preparation
 - file review
 - permit review
 - EPA/State program coordination
 - preparation of equipment
- o sampling methods
 - split samples
 - packaging and shipping
- o inspection procedures
 - facility entry
 - interaction with owner/operator
 - file review
 - observations
 - documentation
 - exit interview
- o inspection follow-up (reporting procedures)
 - timeliness
 - format
 - content

Materials:

- o Inspection manuals:
 - RCRA
 - State Oversight
 - Compliance Monitoring Evaluation
 - Land Disposal Restrictions
 - Technical Case Development
 - Hazardous Waste Tank Systems
 - Operations and Maintenance
 - Lab Audit
- o Effluent guidelines
- o equipment manufacturer operating manuals
- o 40 CFR *Parts 260-280*

RCRA Inspections

Materials (continued):

- o SW-846
- o Groundwater Monitoring Technical Enforcement Guidance Document
- o Groundwater Monitoring Compliance Order Guide

Methods: OWPE has developed a RCRA inspector training course to be available in FY 1988-89. This course will account for 32 hours of the required 100 LOE. Other courses are also available through the Association of State and Territorial Solid Waste Management Officials (ASTSWMO), Northeast Hazardous Waste Project, Western Hazardous Waste Project, and various private firms.

LOE: 100 hours. At a minimum 30 of the total 100 hours must be OJT inspections with experienced inspectors at four different facilities.

Note: OJT inspection hours include all time devoted to the inspection of the facility (eg. file reviews, on-site, report writing, etc.).

Training for Continuing Education

Current OWPE courses:

- o RCRA Ground Water Monitoring Enforcement, 24 LOE hours
- o Land Disposal Restrictions, 8 LOE hours

2. Headquarters Oversight of Regions

In future Regional reviews, Headquarters will perform a closer check of the oversight activities conducted by the Regions of State inspections. This may include some Headquarters conduct of oversight inspections in advance of the Regional review.

In addition, the Regional review team will be verifying that there are procedures in place to provide feedback to the inspectors. One of the reasons for inspector turnover and frustration is that violations detected by the inspectors are not always addressed by enforcement. The inspector needs to receive input from enforcement personnel on whether the information collected and compiled in the report did not warrant any further action or whether there were other reasons for not initiating an enforcement action. Regions and States should have procedures in place to provide feedback to the inspectors. The Regional review team will ascertain whether these procedures are adequate to meet the needs of the program.

The RCRA Enforcement Division, with the help of State and Regional personnel, has developed a RCRA State Oversight Inspection Guidance. The guidance stresses the fact that oversight inspections must be well planned and coordinated between the States and Regions. The guidance should be reviewed by EPA oversight inspectors prior to conducting the inspection. The guidance includes a discussion of planning activities, preparation for the inspection, conducting the inspection, and post-inspection procedures. Findings from the oversight inspection must be forwarded to appropriate EPA and State personnel.

Finally, the Regions should be performing an in-depth review of EPA oversight inspection reports and State inspection reports. This information should be used in the mid-year and end-of-year review process with the States in order to make improvements to the States' hazardous waste management program.

VI. HEADQUARTERS INITIATIVES

In addition to the items discussed above, Headquarters is developing initiatives that are designed to enhance the inspection program on a continuing basis. Some of these initiatives are discussed below:

A. RCRA Inspector Newsletter

To expedite the transfer of technical and regulatory information to the field, the RCRA Enforcement Division has established the RCRA Inspector Newsletter. The newsletter will

provide inspectors with a forum for information exchange on various field techniques and practical application of the hazardous waste regulations. The newsletter will be mailed directly to State and Federal RCRA inspectors. The newsletter should prove invaluable to field inspectors. The anticipated benefits of the newsletter include a system that:

- Develops a national network of State and Regional inspectors
- Establishes a mechanism to keep inspectors abreast of new EPA regulations
- Designates the RCRA Enforcement Division as an office that can act as a conduit for inspector requests for information

RCRA inspectors should be encouraged to review the newsletters and provide input on field techniques and ideas that may improve the procedures used by personnel in the field.

B. RCRA Training Institute

One of the proposed means of implementing the strategy is the establishment of a RCRA Training Institute. It is envisioned that the Institute would perform three essential functions:

1. Conduct training courses for both entry level and experienced personnel on a recurring basis.
2. Revise and develop the curriculum for the courses with input from Headquarters and the Regions.
3. Participate in actual field inspections for the purpose of relating that experience to students.

OWPE would be responsible for revising the curriculum to include new regulations and policies and for providing instructors to teach the course. Training institute personnel would be responsible for the actual course presentations and for participating in field investigations to stay abreast of field techniques and practices.

C. Classification Guidance

The RCRA Enforcement Division is investigating the promotion of non-supervisory RCRA enforcement staff, including inspectors and compliance officers, to the GS-13 level. Guidance on this subject was transmitted to the Regions in the form of a memorandum (dated 12/15/86) from Jack McGraw to the Regional

Waste Management Division Directors. The guidance also presents procedures for the promotion of non-supervisory personnel to the GS-14 and GS-15 levels. The Regions should pursue this initiative to support qualified personnel for higher grade levels in the RCRA enforcement program.

Another approach involves establishing a classification system which enables inspectors with exceptional abilities and performance to receive greater recognition. The system would recognize different levels of experience and expertise and could include the following job titles:

- Inspector
- Senior Inspector
- Civil Investigator

This approach may enable the Agency to retain senior personnel by providing a goal for inspectors that involves increased responsibility and recognition.

D. Agency-Wide Inspector Training

The Office of Enforcement and Compliance Monitoring (OECM) has the lead in developing an Agency-Wide Inspector Training Strategy. The strategy is investigating various options for inspectors under all programs within EPA and includes a requirement for mandatory and systematic basic training. This basic training requirement would apply to all programs. The Regions would adopt the basic training requirement into the inspection program after the policy was finalized by Headquarters.

E. State Applicability

It is the Agency's intent that we encourage the States to adopt this strategy and comply with the requirements specified within. In some cases, the States may have similar programs in place which address the requirements for training and recruitment. The Regions should discuss training programs with State management during the review process to determine comparability with the items mentioned in this strategy.

As mentioned previously, the Regions should encourage the States to attend the training course being developed by the RED and the States should adopt and revise the training for their in-house training programs.

Inspector Name: _____
 Regional/State Office: _____
 Date of Hire: _____

Training Method

Area of Training
 (required hours)

Supervised
 Independent Study

On-the-job

Course
 (include name)

Other

Total

Health and Safety (40 hrs)	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	
Basic (40 hrs)	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	
RCRA Orientation (10 hrs)	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	
RCRA Regs. (40 hrs)	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	
RCRA Inspections (100 hrs)	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	
Continuing Ed. _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	
Continuing Ed. _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	#hrs: _____ Date: _____ Place: _____	

Signature/Inspector: _____

Signature/Supervisor: _____