



City of Dallas
Environmental Management System



TRAINING, AWARENESS AND COMPETENCY PROCEDURE

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1.0 Policy Reference

Educate City employees on Dallas' environmental policies to motivate and encourage employees to practice environmental stewardship by raising awareness and sensitivity to environmental issues through City policies, regulations, training, and interactive dialogue.

2.0 Purpose

The procedure establishes a process for identifying and implementing environmental training requirements for City employees.

3.0 Scope

This procedure addresses operations and activities that can have a significant impact on the environment, and applies to City employees engaged in City-related work activities within the Environmental Management System (EMS) fenceline.

4.0 Responsibility & Authority

4.1 Facility Managers/Supervisors are responsible for the following:

- 4.1.1 Identify required training courses by job title/description and assure that scheduled training is completed by affected staff.
- 4.1.2 Notify and require employees to attend environmental training classes. Refer to OEQ and/or Departmental List of Training Courses.
- 4.1.3 Ensure that the required course training record/sign in sheet is traceable and retained.
- 4.1.4 Ensure that appropriate employees are trained regarding significant aspects that relate to their jobs.
- 4.1.5 Ensure that employees are informed of the legal requirements affecting their jobs.
- 4.1.6 Ensure that employees are informed regarding the consequences of deviating from procedures (e.g., Spill Procedure, AD 3-74, etc.)

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- 4.2 The Office of Environmental Quality (OEQ) is responsible for the following:
- 4.2.1 Assisting in determining training needs and competency requirements by job titles in conjunction with Human Resources (HR) and affected City Departments.
 - 4.2.2 Developing and conducting training courses in conjunction with City Departments.
 - 4.2.3 Ensure that the required OEQ course training record/sign in sheet is traceable and retained.
 - 4.2.4 Conducting EMS Awareness Training at new employee orientation.
 - 4.2.5 Notifying employees of OEQ environmental training opportunities.
 - 4.2.6 Making training materials (e.g., videos, PowerPoints) in OEQ's library available to departments.
- 4.3 Environmental Management Representatives (EMRs) are responsible for the following:
- 4.3.1 Assisting Facility Managers in determining training requirements by job titles in conjunction with OEQ and HR.
 - 4.3.2 Notifying employees of departmental environmental training opportunities.
 - 4.3.3 Offering environmental training classes.
- 4.4 HR is responsible for the following:
- 4.4.1 Maintain a current list of job titles and make the updated list available to departments in the Lawson/HRIS or other format.
 - 4.4.2 Ensuring that OEQ has a place on the New Employee Orientation agenda. HR will document attendance at the training session.
 - 4.4.3 Determine training by job titles in conjunction with OEQ and affected Departments.
 - 4.4.4 Assisting affected Departments in tracking the completion of environmental courses by job title upon request by updating Lawson/HRIS.

5.0 Procedures

The environmental training program is further described below:

- 5.1 Training Needs Assessment
- OEQ and the EMRs will meet annually (generally in August) to review the previous year's training program, competency grid, and the OEQ environmental training course list.
- 5.2 Training Schedule and Notification

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OEQ will announce a schedule monthly for OEQ taught training courses and other required courses.

5.3 Training Records

- 5.3.1 Attendance at all training sessions shall be documented through the use of a sign-in sheet.

The integrated sign-in sheet (COD-FRM-012) shall be used at all OEQ conducted training sessions to document attendance.

Departments may use the integrated sign-in sheet or a department-specific sign-in sheet to document class attendance for departmental training. All sign-in sheets must include the following information at a minimum:

- Course Title
- Training Date
- Training Duration (hours/minutes)
- Trainer's Name
- Employee Name
- Employee's Department
- Employee's Signature

- 5.3.2 Sign in sheets will be kept in accordance with OEQ-EMS-008, Document and Record Management Procedure.

OEQ shall maintain sign in sheets for all OEQ instructed courses. Copies can be sent to facility EMRs/training coordinators and/or HR for tracking upon request. These training records shall be readily available.

Departments shall have a retention and tracking method for environmental training delivered by the department. Departments shall also maintain records of who has been trained and who needs training.

- 5.3.3 It is acceptable for trainers to sign the sign-in sheet and receive credit for the class provided there is at least one other attendee signed-in for the class.

6.0 Tiered Training Program

This procedure outlines the training classification of the City's EMS tiered training program to ensure the appropriate level of training is provided to City employees. These tiers include the following: Regulatory, Environmental Stewardship and EMS training, which are further described below:

6.1 Regulatory Training

This training is specifically required by federal, state, and local regulations or is needed to assist in meeting these regulatory requirements. The intent of the training is to ensure those employees who are involved in job

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activities with regulatory requirements have the appropriate tools to perform their job. Examples include: Right-To-Know and waste management.

OEQ will develop a “train the trainer” course for certain identified regulatory topics. OEQ will teach the course at least annually to ensure regulatory updates are communicated to trainers. OEQ may also assist in individual Department’s compliance training. However, it is the responsibility of the affected Department to ensure that these courses are offered and attended by required employees. Department taught regulatory training records are maintained by the department.

There may be regulatory training requirements which are not covered by the OEQ taught classes. These classes may be taught by the appropriate outside regulatory agency or another qualified entity. An example is water pretreatment operator’s license training. These training requirements shall be included on the training matrix.

6.2 Environmental Stewardship

These courses are designed to promote environmental awareness and/or assist employees in developing and implementing pollution prevention practices throughout City Departments. These are opportunities for employees to learn new environmental information which may or may not be directly related to their job. Examples are green procurement, energy conservation, recycling and composting.

6.3 Environmental Management System (EMS) Training

6.3.1 EMS Awareness

This training is provided for those employees working within the EMS fenceline. EMS awareness training is provided by OEQ annually. The scope of the training includes:

- Review of the City’s environmental policy and commitments
- Environmental aspects
- Significant environmental aspects
- EMS objectives and targets
- Roles and Responsibilities
- Proven pollution prevention concepts discussion
- Potential environmental consequences due to deviations from EMS procedures and/or work instructions

EMS Awareness (EMS 101) training may be conducted by OEQ or the affected Department.

6.3.2 Objective and Target Training

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This training is for Objective and Target leaders to help them understand their role.

6.3.3 Root Cause Analysis and Nonconformance Handling

This training is for those employees working within the EMS fenceline who are involved with the handling of nonconformances.

6.4 Competency

Environmental Competency is based on a person's knowledge and experience of an operational task and its associated environmental impact. Competency is determined by facility managers/supervisors with assistance from their EMR and/or OEQ. The following has been implemented by the City to address competency:

- Hiring and interview process
- Job descriptions
- Performance Plans
- Identification and tracking of required licenses or registrations for work activities (e.g., pesticide application license)
- Formal training programs
- On the job training

For additional EMS competency requirements, see OEQ-EMS-006.03, EMS Competency Grid, for job positions, competency training requirements and training frequency. Also, additional competency requirements for auditors are located in OEQ EMS Auditing Procedure OEQ-EMS-013.

Departments may substitute outside training classes to meet the training requirements of their departmental training matrix. Examples of outside classes are online courses or training classes offered by organizations external to the City of Dallas. The burden will be on the departments to assure that the substitute training is comparable to the OEQ-offered class it replaces and to retain documentation of course content and attendance.

7.0 Related Documentation

AD 3-73 Environmental Management Program

OEQ-EMS-002 Legal and Other Requirements Procedure

COD-FRM-012 Integrated Training/Meeting Sign In Sheet (formerly OEQ-EMS-006.01 EMS Training/Meeting Sign in Sheet)

OEQ-EMS-006.02 List of Training Courses

OEQ-EMS-006.03 EMS Competency Grid

OEQ-EMS-008, Document and Record Management Procedure

OEQ-EMS-013 EMS Audits Procedure

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8.0 Definitions

Competency - Properly or sufficiently qualified; capable; legally qualified or fit to perform an act.

9.0 Change History – Rev. 1

- 9.1 Allowed the use of a department specific sign in sheet as long as it meets certain specifications.
- 9.2 Added definition of competency and requirement for documentation of training needs assessment.
- 9.3 Deleted reference to HRIS system.
- 9.4 Revised associated documents: Sign In Sheet, List of Training Classes and Competency Grid.
- 9.5 Added Change History.

Rev. 2

- 9.6 Addressed that specific individuals need to be trained about significant aspects that relate to their jobs.
- 9.7 Addressed that employees must be informed of the legal requirements affecting their jobs.
- 9.8 Addressed that employees must be informed of the consequences of deviating from procedures.
- 9.9 Added root cause analysis and nonconformance handling class to the list of classes.
- 9.10 Added additional competency requirements for auditors to the EMS Competency Grid.
- 9.11 Revised the description of the EMS Awareness class.

Rev. 3

- 9.12 Added in Section 4.1.1 that Managers/Supervisors are to assure that scheduled training for their employees is completed.
- 9.13 Added in Section 4.1.2 reference to OEQ and/or Department list of courses.
- 9.14 Revised OEQ responsibilities in Section 4.2, including retaining sign-in sheets for OEQ-taught classes, conducting EMS Awareness Training at New employee Orientation, and notifying employees of OEQ environmental training opportunities.
- 9.15 Revised EMR responsibilities in Section 4.3, including notifying employees of departmental environmental training opportunities.
- 9.16 Revised HR responsibilities in Section 4.4, including use of Lawson/HRIS for tracking training.
- 9.17 Added in Section 5.1.1 the requirement to conduct the annual review of the training program in August and deleted HR as a participant.
- 9.18 Revised Section 5.2.1 to incorporate the use of the Integrated Sign In Sheet.

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- 9.19 Revised Section 6.0 to reflect the deletion of the BMP classes from the list of training courses.
- 9.20 Revised the description of Environmental Stewardship training (Section 6.2) to reflect the addition of courses formerly classified as BMPs.
- 9.21 Revised Section 6.3.1 to indicate EMS Awareness 101 rather than EMS Refresher.
- 9.22 Added paragraph to Section 6.4 allowing substitute training classes through online courses and training classes offered by organizations external to the City of Dallas.
- 9.23 Revised Section 6.5 to indicate the Integrated Sign In Sheet will be used at all training/meetings conducted by OEQ.
- 9.24 Revised Section 7.0 to indicate COD-FRM-012 replacing OEQ-EMS-006.01.
- 9.25 Made several spelling/grammatical revisions throughout the procedure.

Rev. 4

- 9.26 Added "generally" to Section 5.1.1
- 9.27 Revised Section 6.3.2 to indicate the initial training and the EMS Refresher course is required for EMRs
- 9.28 Revised Section 6.3.2 to remove the contents of the course requirements.
- 9.29 Administrative edits.

REV. 5

- 9.30 Added OEQ responsibility (4.2.6) to make training material in OEQ library available to departments.
- 9.31 Reorganized section 5.0 *Procedures* by adding a subsection 5.3 *Training Records*.
- 9.32 Added subsection 5.3.3 which states it is acceptable for trainers to sign the sign-in sheet and receive credit for classes taught.
- 9.33 Deleted 6.3.2 *EMR Training* and renumbered subsequent subsections.
- 9.34 Administrative edits.