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Division of Operations Environmental Implementation Procedure  
Bureau: Highway Maintenance

Date: 5/04/17

**Procedure EIP-7**

Revision: 3.4

**Competence, Training, and Awareness**

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**PURPOSE:**

The purpose of this Environmental Implementation Procedure (EIP) is to establish, maintain, and document a method of providing environmental education and training, and a plan for verifying employee competence on the basis of their training.

**RESPONSIBILITY:**

Office of Stewardship and Compliance (OSC):

- Design, develop, and implement environmental training, education, awareness programs, and competence evaluations appropriate for Division level staff.
- Monitor EMS Training Matrix to ensure specific content and training frequency for all Bureau-level employees is appropriate.
- Coordinate with Bureau management to schedule and implement training programs.
- Assist Bureaus in defining the scope and content of environmental training and competence evaluation for Bureau employees.

Director/Bureau Administrator:

- Ensure adequate resources are available to provide environmental training to Bureau staff.
- Through coordination with the District Safety and Environmental Coordinator, EMS Coordinator, Maintenance Supervisors and OSC, ensure that personnel under their supervision receive environmental training and demonstrate competence to meet and maintain requirements under the EMS applicable to their position and environmental roles and responsibilities.

District Engineer/Designee:

- Coordinate with the District Safety and Environmental Coordinator, EMS Coordinator and OSC to provide adequate resources to make environmental training available to District staff.
- Ensure through District Safety and Environmental Coordinator, and Maintenance Supervisors those under their supervision receive environmental training and demonstrate competence to meet and maintain requirements under the EMS applicable to their position and environmental roles and responsibilities.
- Ensure through the District Safety and Environmental Coordinator that all training is documented appropriately for each district level employee.

Safety and Environmental Coordinators & EMS Coordinator:

- Develop and maintain the Bureau's EMS Training Matrix that identifies specific content and training frequency for all Bureau employees.



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- Coordinate with OSC to identify and create Bureau-level environmental training, education, and awareness programs
- Provide information to supervisors to be used during competence evaluations appropriate to each employee's environmental roles and responsibilities, as requested.
- Ensure that all training is documented for each individual and maintain training records for district level employees.

**Bureau Employees:**

- Attend and understand the content of environmental training and awareness programs. The level of understanding is commensurate with staff position in the Bureau. Refer to EIP-Form 6a for a summary of Roles, Responsibilities, and Accountabilities.

**Contractors and Suppliers:**

- Ensure that personnel under their supervision have the basic knowledge, understanding, and capacity to perform their assigned work tasks in accordance with all applicable state, local, and federal regulations, NHDOT Policies and the Bureau's EMS program. EIP-6-Form-6b Contractor and Supplier Safety and Environmental Checklist will be used to document this understanding. The level of Contractor and supplier EMS knowledge is commensurate with type of service and function while at Bureau facilities.

**DOCUMENTS AND RECORDS:**

- EIP-7-Form 7a Required Training Summary and Matrix.
- EIP-7-Form 7b Summary of Competence Evaluation.
- EIP-6-Form-6b Contractor and Supplier Safety and Environmental Checklist.
- Training topic syllabus or summary of training content.
- Training records.

**PROCEDURE:**

The Bureau Administrator, the District Safety and Environmental Coordinators, and the Bureau EMS Coordinator collaborate to identify environmental training needs for all employees within the bureau and applicable districts. This can be accomplished in a number of ways, including but not limited to: 1) reviewing position descriptions, 2) conducting interviews with staff and management personnel, 3) and reviewing environmental organizational charts (see EIP-6: Organization, Personnel, Accountability, and Responsibility).

At a minimum, all employees and third parties (e.g. contractors) must be provided with the required knowledge to safely, competently, and legally fulfill their EMS and environmental compliance responsibilities. The level of knowledge and understanding is commensurate with staff position and role in the Bureau. Refer to EIP-Form 6a for a summary of Roles, Responsibilities, and Accountabilities.



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The general awareness level training shall include:

- The importance of conformity with policy and procedures and with the requirements of EMS.
- Explanation of each Bureau's significant aspects and impacts, and the environmental benefits of improved personal performance.
- Current objectives and targets.
- A description of individual roles and responsibilities for implementing the EMS.
- Potential consequences for not adhering to the EMS framework specified operating procedures, and legal and regulatory requirements.

Bureau level staff and third parties may require additional training in order to minimize the impacts of their activities or to meet specific objectives and targets. The EMS Team should periodically assess all positions under their control to determine training requirements for those positions and provide relevant training to appropriate employees.

Training methods can consist of a variety of methods, including but not limited to: 1) traditional classroom, 2) field practicum, 3) distance learning, and 4) on-the-job mentoring. Training can be offered internally and externally through regional programs, in-house training, or third-party trainers.

1. Bureau EMS Coordinator and Bureau EMS Team should list all required regulatory training topics and training frequencies in the Required Training Summary and Matrix (EIP 7 – Form 7a.) Each training topic, training type, and frequency for each individual or for each group of employees who require that training should be specified.
2. OSC, District Safety and Environmental Coordinators, and the Bureau EMS Coordinator coordinate and collaborate to develop or obtain appropriate training materials for each identified topic. Maintain written summaries of training content with EMS documentation.
3. District Safety and Environmental Coordinators will either conduct the training, or identify internal or external qualified trainer(s) for each training topic.
4. The Bureau EMS Team coordinates, conducts, or contracts for training sessions in accordance with the frequency required for each topic.
5. OSC and District Safety and Environmental Coordinators will document completed training. Records of training shall be maintained as appropriate by means of hardcopy sign-in sheets, electronic training records, or equivalent. Include the name of each employee trained, date and topic(s) of training, and the name and affiliation of the qualified trainer. Employees should maintain their own training certificates, if provided. Environmental training records can be maintained with other employee training records



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and must be provided upon request, within a timely manner, for EMS and Compliance evaluations.

- 6. OSC, Bureau Management, and the Bureau EMS Team shall develop and implement a plan, summary, or a set of criteria to periodically assess the competence of employees having environmental roles and responsibilities. The plan should describe the metrics by which employee competence will be measured, the frequency of evaluation, and the consequences (i.e., re-training, disciplinary action) of apparent incompetency. Methods to evaluate competence can include audits, inspections, additional training, or employee certifications. A summary of the Bureau's current competence evaluation criteria is presented in the Summary of Competence Evaluation (EIP 7 – Form 7b).
- 7. Contractor training may consist of language within contract documents to abide by Department and Bureau environmental policies, and all federal, state, and local regulations. Contractors on site will review the Contractor and Supplier Safety and Environmental Checklist (6b) with a Bureau representative. Other suppliers that deliver equipment or materials to a facility or project site will be under the direction of a Bureau representative.
- 8. The Bureau EMS Coordinator maintains all documentation and key records generated as part of this EIP in accordance with EIP-9: Documentation, Document Control, and Records Management.

Approved: 	Revision #: <u>3.4</u>
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