



Environmental, Health & Safety Management System (EMS)



Training, Awareness and Competency

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1 PURPOSE

To facilitate an integrated EMS, this procedure has been written in accordance with ISO 14001 4.4.2, OHSAS 18001 4.4.2, R2:2013: Provision 4 and Iowa EMS standards, element: Communication, Training, and Awareness.

The purpose of this procedure is to establish a process for identifying and implementing Environmental, Health and Safety training requirements for Commission employees. The Commission educates staff on the Waste Commission of Scott County’s (Commission) Environmental Health & Safety (EMS) policies, to motivate and encourage employees to practice environmental stewardship by raising awareness and sensitivity to environmental issues through Commission policies, regulations, training, and interactive dialogue. In addition, ensuring employees’ health and safety is a priority by providing training, tools, resources and review of policies, procedures and related documents.

2 SCOPE

This procedure addresses operations and activities that can have a significant impact on the environment, and the health & safety of Commission employees and others. It applies to Commission employees and outside contractors engaged in Commission-related work activities within the Environmental Health & Safety Management System (EMS) fence line.

3 RESPONSIBILITY & AUTHORITY

- 3.1 The Director is ultimately responsible for the health and safety of all employees, and for the EMS system as well as the following:
- ensuring that resources are available to establish, implement, maintain, and improve the EMS;
 - defining roles, responsibilities, accountability, and authorities;
 - ensuring all records are properly documented and communicated;
 - determining competency based on appropriate education, training, or experience. Competency requirements for auditors are outlined in the following table:

| Auditor Type | Requirements |
|---|---|
| Internal Auditor(s) | Iowa EMS - Training from outside EMS auditing training course or observed at least one internal audit. R2-2013/ISO 14001/OSHAS 18001 – Training from outside EMS audit training course on ISO 14001, OSHAS 18001 and/or R2-2013. |
| Compliance/Third Party Auditor(s) | Completion of lead auditor training for ISO 14001, OSHAS 18001 or R2-2013. Knowledge of hazardous materials (CHMM or equivalent training) and health and safety regulations (CIH or equivalent training). |
| External R2-2013/ISO 14001/OSHAS 18001 Auditor(s) | Registrar must comply with the requirements as outlined in the R2 Code of Practices, R2 Certification Process Requirements, Version 1.0, Effective Date: July 1, 2013. |
| Data Destruction | Microsoft Certified Solutions Expert (MCSE) certification and/or a minimum of 10 years' experience as a network administrator |

- 3.2 Managers are responsible for the following:
- identifying required training courses by job title, job description and by employee when applicable. Assure that scheduled training is completed by affected staff;
 - developing and identifying training courses in conjunction with Commission facilities;

- ensuring that employees are informed of the legal requirements affecting their jobs;
- demonstrating their commitment to continual improvement of the EMS.

3.3 Environmental Management Representative (EMR) is responsible for the following:

- ensure that appropriate employees are trained regarding significant EMS aspects that relate to their jobs;
- conducting EMS awareness training for new employees.

3.4 Special Waste Coordinator is responsible for the following:

- notifying and requiring employees to attend environmental, health & safety training classes;
- ensuring that the required course Training Attendance Sheet (Doc.No. 01157) is traceable retained, completed and recorded into Intellex
- ensuring that employees are informed regarding the consequences of deviating from procedures;
- assisting in determining training needs and competency requirements by job titles in conjunction with Core Team and affected Commission facilities;
- notifying employees of environmental, health & safety training opportunities;
- maintaining a list of job titles, employee names and required training in the Training Matrix (Doc.No. 01280)

4 PROCEDURES

The EMS training program is further described below:

4.1 Training Needs Assessment

- The Safety Committee will aid in the evaluation and implementation of the safety policies. (See Safety Committee Charter Procedure, Doc.No. 01384)
- The Core Team including the Special Waste Coordinator will meet throughout the year to talk about the status of safety policies, trainings and recommendations of the Safety Committee.
- The Core Team will review aspects and impacts and identify if new training is needed. (Environmental, Health and Safety Aspects, Impacts and Significance Criteria Procedure, Doc.No. 00116)

4.2 Training Schedule and Notification

- The Safety Committee in conjunction with the Special Waste Coordinator will develop a schedule for Commission-required training.
- At all internal and external EMS training courses/classes, the Training Attendance Sheet (Doc.No. 01157) and/or an external certificate will be used to document who attended the course. The Intelex system is also a means to show completed training. Training Attendance Sheets shall include the following information at a minimum:
 - Course Title
 - Course Date
 - Training Duration (hours/minutes)
 - Trainer's Name
 - Employee Name
 - Employee's Signature
 - Location of Training
- Training Attendance Sheets (Doc.No. 01157) will be kept in accordance with Document and Record Management Procedure (Doc.No. 01005).

4.3 Tiered Training Program

This procedure outlines the training classification of the Commission's EMS tiered training program to ensure the appropriate level of training is provided to Commission employees. These tiers include the following: Regulatory, Environmental Stewardship, Health & Safety, and EMS training, which are further described below. Training procedures take into account differing levels of responsibility, ability, language skills, literacy and risk.

- 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 activities with regulatory requirements have the appropriate tools to perform their job. Examples include but are not limited to: Operator Certification, SPCC, SP3, Hazardous Communication and Hazwoper. Scope of these types of trainings includes:

- Review of Commissions specific Health and Safety Policies

- Consequences with specific work activity and benefits of improper performance
- Roles and responsibilities
- Consequence of departure from procedures.

There may be regulatory training requirements which are not covered by the Commission classes. These classes may be taught by the appropriate outside regulatory agency or another qualified entity. Examples include but are not limited to: Operator Certification, Appliance Demanufacturing Permit, and Hazwoper. These training requirements shall be included on the Training Matrix.

4.4 Environmental Stewardship

These courses are designed to promote environmental awareness and/or assist employees in developing and implementing pollution prevention practices throughout Commission facilities. 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.

4.5 Environmental Health & Safety Management System (EMS)

EMS Awareness

This training is provided for those employees working within the EMS fence line. EMS awareness training is provided by the Core Team and/ or Safety Committee at quarterly staff meetings, toolbox talks, for new employees, special staff training sessions and at an annual EMS meeting. The scope of the training can include but is not limited to:

- Importance of adhering to policies and procedures;
- Review of the Commission's Environmental, Health & Safety (EMS) Policy (Doc.No. 00141) and commitments;
- EMS aspects;
- Significant environmental aspects;
- EMS objectives and targets;
- Roles and responsibilities;
- Best Management Practices for pollution prevention;
- Potential EMS consequences due to deviations from EMS procedures and/or work instructions;
- Successes from prior year;
- New aspects or impacts employees should be aware of.

EMS Awareness training may be conducted by the Core Team, Safety Committee, or the EMR.

- EMR Training

EMR training is conducted by or through a contractor of Iowa Department of Natural Resources (DNR) or through an existing or previously qualified EMR for ensuring the Commission's EMR has the necessary tools to perform the duties of the EMR. Periodic refreshers are conducted by the DNR or a contractor through DNR. The contents of the course shall include:

- review of EMS regulations and legislations;
- detailed description of the Commission's EMS implementation efforts using the plan, do, check, and act concept;
- document management/control;
- EMS auditing and corrective action process;
- root cause analysis and non-conformance handling;
- specific roles, responsibility and authority of the EMR and Core Team members;
- environmental performance and reporting.

- Internal Auditor Training

Internal auditor training can be conducted through a contractor of Iowa Department of Natural Resources, the facility's R2 registrar, a consultant or through an existing or previously qualified internal auditor. Periodic refreshers are conducted by a contractor through the Iowa Department of Natural Resources. The contents of the internal auditor training may include but are not limited to:

- purpose of assessment
- what is an EMS
- assessment process
- assessment preparation
- conducting an audit of EMS elements
- assessment reporting and follow-up
- best practices

4.6 Competency

Environmental, health and safety competency is based on a person's knowledge and experience of an operational task and its associated environmental, health or safety impact. Competency is determined by the Director in conjunction with facility managers, supervisors, EMR, the Administrative Services Coordinator,

Special Waste Coordinator and/or Core Team. The following has been implemented by the Commission to address competency:

- hiring and interview process
- education
- past experience
- job descriptions
- performance evaluations
- identification and tracking of required licenses or registrations for work activities
- formal training programs
- on-the-job training
- Iowa Department of Natural Resources-sponsored training programs

For additional EMS competency requirements, see Job Descriptions and Training Matrix (Doc.No. 01280). Also, additional competency requirements for auditors are located in the EMS Audit Procedure (Doc.No. 00131).

Facilities may substitute outside training classes to meet the training requirements of the Training Matrix (Doc.No. 01280). Examples of outside classes are online courses or training classes offered by organizations external to the Commission. The burden will be on the manager and/or facility supervisor to assure that the outside training fulfills all relevant requirements and to retain documentation of course content and attendance.

4.7 Training Records

Commission employee's attendance at all training sessions is documented through the use of the Training Attendance Sheet (Doc.No. 01157). The Training Attendance Sheet shall be used for all Core Team- taught classes and completed forms will be maintained by the Special Waste Coordinator. The Special Waste Coordinator shall enter all training-related documentation into the Commission's EMS Software, Intellex. These training records shall be readily available.

5 RELATED DOCUMENTATION

Audits Procedure, Doc.No.00131

Definitions Document, Doc.No.01342

Documents and Records Management Procedure, Doc.No.01005

Environmental, Health and Safety Aspects, Impacts and Significance Criteria Procedure, Doc.No. 00116

Environmental Health and Safety Policy, Doc.No. 00141

Safety Committee Charter Procedure, Doc.No. 01384

Training Attendance Sheet, Doc.No. 01157
Training Matrix, Doc.No. 01280

6 CHANGE HISTORY

02/20/2015 —Revisions were made to address auditor competency for data destruction and minor formatting changes.

All previous revision details are documented within Intelex.