



## **FY 2003 Environmental Enforcement Training Report**

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Office of Compliance  
Office of Enforcement and Compliance Assurance  
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# **FY 2003 Environmental Enforcement Training Report**

## **Compiled by U.S. EPA=s**

### **National Enforcement Training Institute**

This report captures environmental enforcement training activities by the U.S. Environmental Protection Agency (EPA) both at the Headquarters and Regional level. By reporting and coordinating these activities, the **National Enforcement Training Institute (NETI)** hopes to recognize the achievements of those involved and encourage continued efforts to provide quality training for environmental enforcement professionals around the country. The report is divided into two sections: Headquarters and Regional Offices.

NETI, created by Congress in 1991, is responsible for training Federal, state, local, and tribal enforcement professionals, such as lawyers, inspectors, civil and criminal investigators, and technical experts, in the enforcement of the nation=s environmental laws. Quality training courses are provided for enforcement personnel in a number of areas, such as case support, specific statute enforcement, compliance assistance, and environmental criminal enforcement. By using traditional classroom training, distance learning, and cooperative agreements with other organizations, NETI=s strategy is to promote a balanced training approach to environmental enforcement training.

NETI is a division within the Office of Criminal Enforcement, Forensics and Training (OCEFT) which is in the Office of Enforcement and Compliance Assurance (OECA). NETI serves as the coordinating office for enforcement and compliance monitoring training created, taught or paid for by OECA offices.

## **Office of Enforcement and Compliance Assurance at Headquarters**

The Office of Enforcement and Compliance Assurance (OECA) is located at EPA Headquarters and is composed of five program offices and three staff offices. Training resources are generally decentralized within the organization, thus each office within OECA is responsible for developing and delivering training courses for its areas of expertise and programs for which it serves as national manager.

### **Training Statistics**

**The Office of Enforcement and Compliance Assurance (OECA), as reported to NETI, trained 6,347 Federal, state, local, tribal and international personnel through 147 different course deliveries in FY 2003.**

Training **state, local and tribal personnel** remained a strong focus, as a combined total of 3,849 students, or 61 %, were trained from these organizations. A total of 2,178 **Federal employees** received training (34 %), and **international and other students** numbered 320 (5 %). A detailed list of courses offered this year is located in Appendix A.

**In FY 2003 2,232 persons were trained via non-classroom courses and products. A total of 1,981 students used computer-based products such as CD-ROM and web-based training, and 251 training videotapes and guides were mailed to enforcement personnel.**

Number of Students Trained					
Employer	FY 2003	FY 2002	FY 2001	FY 2000	FY 1999
<b>Federal</b>	2178	2508	2470	3462	3334
<b>State</b>	2912	2610	4462	3845	4156
<b>Local</b>	450	552	265	395	461
<b>Tribal</b>	487	250	428	132	150
<b>International</b>	155	138	557	220	25
<b>Other</b>	165	182	87	148	295
<b>TOTAL</b>	6347	6240	8269	8202	8421

## Government Performance and Results Act (GPRA) and Measures of Performance

NETI is responsible for reporting one measure of performance which tracks EPA=s efforts to provide capacity building activities, such as training, for state, local, and tribal agencies:

PM 235: Total Number of State, Local and Tribal Students Trained  
 Target: 4,400                      Total: 3,686

## Training Highlights

Various offices within the Office of Enforcement and Compliance Assurance (OECA) developed or delivered training this year. Following are highlights of the new or unique courses; a complete listing of courses held is in Appendix A.

### The Office of Criminal Enforcement, Forensics and Training (OCEFT)

The **National Enforcement Training Institute (NETI) division** debuted several new training products this year:

**FIFRA Environmental Compliance Inspector Training (FIF901)** - this Web-based course, designed for inspectors in the FIFRA program, prepares students to perform FIFRA inspections and conduct fieldwork. Topics include jurisdiction and authority, the inspector=s role, evidence gathering, types of inspections, inspection procedures, and report writing. Lesson quizzes and a comprehensive knowledge check reinforce learning.

**Timely Training Topics** - this series of training modules was introduced last year, and FY 2003 saw two new modules added: **Introduction to FIFRA Web-based Training (TTT102)**, which gives students a sample of the full FIFRA course (listed above). **Compliance-Focused Environmental Management Systems (TTT103)** or CFEMS introduces the 12 elements of CFEMS, the role of the compliance inspector in evaluating a company's environmental management system, and how an attorney uses CFEMS in settlement agreements. All of the Timely Training Topics are available at [www.netionline.com](http://www.netionline.com).

Several new training programs have been developed and delivered in FY 2003 to emphasize the correlation between environmental crimes and crimes associated with the release of a chemical, biological, or radiological weapon. These programs also enhance the response capabilities for local, state and Federal emergency responders whose primary or ancillary duties include the collection of forensic evidence. The **Environmental Crimes and Weapons of Terrorism Training** can be modified to include an extensive practical exercise that enhances students' emergency response and evidence collection skills.

NETI staff and representatives from EPA Region 3, Interpol, the Netherlands, Great Britain, and Hungary presented a course on **Environmental Criminal Investigations** in Bucharest, Romania during the week of September 8. The class of 35 students consisted of Romanian police officers, environmental personnel, and prosecutors, and was funded by an interagency agreement with the State Department and supported by the US Embassy in Romania.

The importance of teamwork in an enforcement action was the theme of the week-long course, **Enforcement Teamwork: Regulations to Resolutions (CST 208)**, which was held at the National Conservation Training Center in Shepherdstown, WV during the last week of July. A total of 25 Federal, state and tribal employees went from the classroom, to the computer room, to a mock facility, and finally to the courtroom in this interactive case study to show how each member of the enforcement team works together. Distinguished faculty from EPA and state agencies guided students through their case study experience. [picture?]

NETI has proposed the acquisition of an abandoned industrial steam generating plant located on the Denver Federal Center in Colorado for use as a practical exercise training site. Because this is an industrial facility, there are a number of scenarios that could be presented to provide realistic, hands-on experience to environmental professionals in both the civil and criminal programs. Besides NETI, other organizations such as emergency management agencies have expressed interest in using this unique site for training. NETI hopes to acquire and begin using this site in 2004 with a special use agreement from the General Services. [picture?]

### **The Office of Federal Activities (OFA)**

Several courses which provided international enforcement and compliance capacity building were taught by staff from OFA and EPA Region 2 this past June in Managua, Nicaragua. The

training was part of EPA=s cooperative activities with the US Agency for International Development (AID) and the Central American Commission for Environment and Development (CCAD). A total of 35 students from Belize, Guatemala, El Salvador, Honduras, Costa Rica, Nicaragua, and Panama attended this first-ever offering completely in Spanish. A session on facilitation skills was taught to better enable the attendees to deliver the courses to their colleagues in their own countries.

### **The Office of Compliance (OC)**

The 4<sup>th</sup> annual National EPA Inspector Workshop was held in Washington, DC on December 10-12, 2002. A total of 127 inspectors attended the workshop which included a number of training sessions such as **Environmental Management Systems (EMS), New Rule on Spill Prevention, Control and Countermeasure Plans, and Notetaking and Report Writing Techniques**. Other courses provided were **Facilitator Training, Improper Laboratory Practices at Environmental Laboratories, and Environmental Justice training**.

### **The Office of Regulatory Enforcement (ORE)**

The often-requested training on OECA=s economic computer models, BEN and ABEL, were also offered specifically for attorneys this year. **BEN for Attorneys** focused on legal considerations when calculating a violator=s economic savings from violating the law. **Ability to Pay for Attorneys** presents issues regarding how to prepare for and how to present cases involving ability to pay claims. A total of 63 students attended these specialized, CLE-approved courses this year.

## **Partnerships**

NETI continued to provide funding to four **Regional Environmental Enforcement Associations** to assist in providing training at the state and local level. These organizations are alliances of regulatory, law enforcement, and prosecution agencies and were created by the states to support the effective enforcement of environmental statutes, with an emphasis on criminal enforcement. In addition to providing training, they offer networking opportunities, information support services, and technical assistance to their 47 member states and four Canadian provinces. **In FY 2003, the State Associations trained a combined total of 1,212 students.**

- S Midwest Environmental Enforcement Association (MEEA), located in St. Charles, IL, trained 451 members
- S Northeast Environmental Enforcement Project (NEEP), located in Trenton, NJ, trained 40 members
- S Southern Environmental Enforcement Network (SEEN), located in Montgomery, AL, trained 186 members
- S Western States Project (WSP), located in Phoenix, AZ, trained 535 members

NETI also coordinated with the EPA Regional Offices on enforcement training. An **Enforcement Training Coordinator** in each Regional enforcement program worked with NETI to provide information and assistance on a variety of training matters, including reporting training needs, helping with classroom courses, and disseminating information to their colleagues.

## **Training Facilities**

Besides providing training in EPA=s Regional Offices around the country and at other state locations, NETI manages three state-of-the-art training sites:

- S **NETI-Headquarters:** approximately 23,600 people attended various training activities, meetings, and video conferences in this facility, located in the historic Ariel Rios building in downtown Washington, DC.
- S **NETI-West:** 1,457 persons used the training space at NETI-West, which is located in Lakewood, Colorado, a suburb of Denver.

The NETI-West facility underwent an expansion this year, completed as of September 15, 2003. The work included an expansion of classrooms, work space, and a first-class mock courtroom. The NETI-West facility now consists of 15,000 square feet of offices, three classrooms, a library, a computer training room, interview and observations rooms, and the new mock courtroom. The largest classroom will hold in excess of 100 people.

- S **NETI-FLETC:** 299 law enforcement personnel attended training at EPA=s criminal enforcement training program which is housed at the Federal Law Enforcement Training Center in southern Georgia.

## **For more information . . .**

NETI=s web site can be found at [www.epa.gov/compliance/training/neti](http://www.epa.gov/compliance/training/neti). The Catalog and Schedule of OECA=s courses, as well as other training information and materials, are available on the web site. If you have other questions, please contact NETI at 202-564-2430.

## EPA Regional Offices

EPA's Regional Offices provide a number of training opportunities for their staff as well as for state, local, and tribal government personnel located within their Region. For the purposes of this report, only enforcement and compliance monitoring training activities are included.

Following are training highlights in FY 2003 as reported by each Region:

### Region 4:

**Flow Measurement at Wastewater Treatment Facilities:** 18 state inspectors from the Florida Department of Environmental Protection attended this course in Tallahassee in May 2003. This course provides a detailed review of the various types of flow measurement systems encountered at NPDES facilities, and included a site visit at a water reclamation facility.

**Performance Evaluations of Wastewater Treatment Facilities:** on September 23-25, Region 4 staff presented this course for the Georgia Environmental Protection Division. A total of 22 inspectors attended the course, held at a Gwinnett County water reclamation facility. Students reviewed basic treatment units, principles of operation and key physical observations to evaluate treatment performance, and used their knowledge to evaluate the advanced biological nutrient removal and tertiary treatment processes.

### Region 6:

**NPDES Inspector Workshop:** over 100 inspectors, mostly from state agencies, attended this annual NPDES inspector training in February. Topics included legal aspects of inspections, biomonitoring and interpretation of results, records management, lab inspections, lab instrumentation and calibration, pretreatment, and sludge processes. A panel discussion, consisting of representatives from each state and the Regional office, afforded a unique opportunity for the audience to ask specific state-related questions and share experiences.

**Air Inspector Workshop:** the Region's 6<sup>th</sup> annual air inspector workshop was held in May in Sante Fe, New Mexico where 120 participants from EPA, state and municipal agencies, and tribal communities attended various presentations and breakout sessions. Topics included general enforcement-related presentations such as evidence collection and interviewing skills as well as program-specific sessions such as fugitive VOC emissions and flaring episodes.

## Regional Training Statistics

Following are training statistics for FY 2003, as reported by each Region. For the purposes of this report, only enforcement and compliance monitoring training activities are included.

<b>Regions</b>	<b># of Training Activities</b>	<b># of Federal Students</b>	<b># of State and/or Local Students</b>	<b># of Tribal Students</b>	<b>Student Totals</b>
<b>1</b>	<b>36</b>	<b>25</b>	<b>935</b>	<b>20</b>	<b>980</b>
<b>2</b>	<b>35</b>	<b>240</b>	<b>200</b>	<b>0</b>	<b>440</b>
<b>3</b>	<b>13</b>	<b>374</b>	<b>496</b>	<b>0</b>	<b>870</b>
<b>4</b>	<b>20</b>	<b>126</b>	<b>382</b>	<b>4</b>	<b>512</b>
<b>5</b>	<b>9</b>	<b>34</b>	<b>576</b>	<b>6</b>	<b>616</b>
<b>6</b>	<b>37</b>	<b>123</b>	<b>660</b>	<b>72</b>	<b>855</b>
<b>7</b>	<b>3</b>	<b>30</b>	<b>40</b>	<b>0</b>	<b>70</b>
<b>8</b>	<b>6</b>	<b>34</b>	<b>15</b>	<b>1</b>	<b>50</b>
<b>9</b>	<b>46</b>	<b>108</b>	<b>1383</b>	<b>191</b>	<b>1682</b>
<b>10</b>	<b>26</b>	<b>230</b>	<b>297</b>	<b>112</b>	<b>639</b>
<b>TOTALS</b>	<b>231</b>	<b>1324</b>	<b>4984</b>	<b>406</b>	<b>6714</b>

Appendix A

**FY 2003 Classroom Training  
Led or Provided by OECA**

<b>Course Name and Number</b>	<b>Locations</b>	<b>Total No. of Students</b>
<i><b>Office of Compliance (OC)</b></i>		
Secondary Aluminum MACT Course (AIR 126)	Atlanta, Kansas City	79
AIRS Input and Reporting Training (AIR 203)	Chicago, Philadelphia, Seattle	24
AIRS Input and Reporting Refresher (AIR 303)	Washington, DC	60
Permit Compliance Data System (PCS) Basic Training (CWA 102)	Washington, DC	4
Basic PCS Entry, Retrieval, Inquiry, and QNCR Training (CWA 104)	Atlanta, Kansas City, Memphis, Washington, DC	37
Permit Compliance Data System (PCS) Advanced Generalized Retrieval (CWA 304)	Washington, DC	2
PREP: Compliance Management Part I (FIF 101)	Davis, CA	25
PREP: Registration and Reregistration (FIF 108)	Asheville, NC	28
Pesticide Product Enforcement Course (FIF 204)	Asheville, NC	51
Use Enforcement Course - Worker Protection Standards (FIF 205)	Bloomington, MN	59
National Inspector Workshop Trainings	Washington, DC	127
<i><b>Office of Criminal Enforcement, Forensics and Training (OCEFT)</b></i>		
Criminal Investigator Training Program (CIT 101)	FLETC (Glynco, GA)	6
Environmental Investigations - Basic (CIT 102)	FLETC (Glynco, GA)	24
Environmental Crimes Awareness (CIT 104)	Vail, CO Union City, NJ Lakewood, CO Denver, CO Snowmass, CO Norfolk, VA	376
International Association of Chiefs of Police Environmental Crimes Training (CIT 105)	Charleston, SC	25
Special Agent In-Service Training (CIT 201)	FLETC (Glynco, GA)	16
Tribal Environmental Investigations Training		

<b>Course Name and Number</b>	<b>Locations</b>	<b>Total No. of Students</b>
Program (CIT 302)	Phoenix, AZ	55
Advanced Special Agent In-Service Training (CIT 303)	FLETC (Glynco, GA)	105
Advanced Environmental Crimes Training Program (CIT 311)	FLETC (Glynco, GA)	48
Environmental Crimes Awareness and Evidence Collection (CRM 110)	Denver, CO	16
Training for Regional Hearing Clerks (CST 105)	Washington, DC	12
Basic Inspector Training - Classroom (CST 109)	Atlanta, Chicago, Kansas City, Lakewood, CO, Las Vegas	224
Administrative Hearings and Trials (CST 207)	Washington, DC	48
Enforcement Teamwork: Regulations to Resolutions (CST 208)	Shepherdstown, WV	25
Advanced Negotiations Skills Training (CST 304)	Atlanta, Kansas City	40
Advanced Inspector Training (CST 309)	Kansas City, Lakewood, CO, Philadelphia, San Francisco	137
<b><i>Office of Environmental Justice</i></b>		
Fundamentals of Environmental Justice Workshop (OEJ 104)	Washington, DC (4)	110
<b><i>Office of Federal Activities (OFA)</i></b>		
Cross-Cutting Training (FED 108)	Chicago	30
Principles of Environmental Compliance and Enforcement (INT 102)	Managua, Nicaragua (2)	62
Conducting Multimedia Inspections (INT 104)	Managua, Nicaragua	35
International Environmental Compliance Inspections (INT 109)	Managua, Nicaragua	35
<b><i>Office of Planning, Policy Analysis and Communications (OPPAC)</i></b>		
OECA Regulatory Development Training Course (MLS 105)	Washington, DC	19
<b><i>Office of Regulatory Enforcement (ORE)</i></b>		
Basic ABEL Training (CST 101)	Charlestown, WV (2) Dallas, TX	117

<b>Course Name and Number</b>	<b>Locations</b>	<b>Total No. of Students</b>
	Denver, CO Honolulu, HI New York, NY Raleigh, NC Richmond, VA Washington, DC (2)	
Basic BEN Training (CST 103)	Boston, MA Charlestown, WV (2) Dallas, TX Denver, CO Honolulu, HI New York, NY Raleigh, NC Richmond, VA (2)	140
Basic INDIPAY Training (CST 114)	Charlestown, WV Dallas, TX Denver, CO Honolulu, HI Raleigh, NC Richmond, VA	76
Basic MUNIPAY Training (CST 115)	Dallas, TX Denver, CO Honolulu, HI Richmond, VA	37
Basic PROJECT Training -SEP Analysis (CST 116)	Boston, MA Dallas, TX Denver, CO Honolulu, HI New York, NY Raleigh, NC Richmond, VA (2)	94
BEN for Attorneys (CST 125)	Dallas, TX Denver, CO Honolulu, HI New York, NY Raleigh, NC Washington, DC	63
Ability to Pay for Attorneys (CST 127)	Dallas, TX Denver, CO Honolulu, HI New York, NY Raleigh, NC Washington, DC	57
Advanced Course on Economic Benefit of Noncompliance (CST 306)	Charlestown, WV Dallas, TX	46

Course Name and Number	Locations	Total No. of Students
	Denver, CO Honolulu, HI Raleigh, NC	
Case Development Training for FIFRA/TSCA/EPCRA (FIF 104)	Dallas, Denver	28
<b><i>Office of Site Remediation Enforcement (OSRE)</i></b>		
CEC: The Enforcement Process (CER 102)	Phoenix, AZ Shepherdstown, WV	76
New Attorney Orientation Training - Superfund (CER 103)	Washington, DC	57