



## **FY 2004 Environmental Enforcement Training Report**

December 2004

Office of Compliance  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (MC 2224-A)  
Washington, D.C. 20460

<http://www.epa.gov/compliance/data/results/training/index.html>

# **FY 2004 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)** recognizes the achievements of those involved and encourages continued efforts to provide quality training for environmental enforcement professionals around the country. The detail of the report is divided into two sections: Headquarters and Regional Offices.

**In summary, EPA's enforcement and compliance program trained 15,066 persons in fiscal year 2004, through a combination of classroom, computer and videotape training. This includes 5,748 by Headquarters' offices and 9,318 by Regional offices. The total is a 15% increase over last year.**

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). In FY 2005, NETI will be moving laterally within OECA to the Office of Compliance. NETI serves as the coordinating office for enforcement and compliance monitoring training created, taught or contracted for by OECA offices, and reports Regional office activities.

## **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 5,748 federal, state, local, tribal and international personnel through 237 different course deliveries in FY 2004.** Training state, local and tribal personnel remained a strong focus, as a combined total of 2,871 students, or 50%, were trained from these organizations. A total of 2,500 **Federal employees** received training (43%), and **international and other students** numbered 377 (7%). A detailed list of classroom courses offered this year is located in Appendix A.

**Of the total number of trainees, 1,350 persons were trained via non-classroom courses and products this year. Most students (1,320) used computer-based products such as CD-ROM and web-based training, and 30 training videotapes and guides were mailed to enforcement personnel.**

Number of Students Trained					
Employer	FY 2004	FY 2003	FY 2002	FY 2001	FY 2000
<b>Federal</b>	2500	2178	2508	2470	3462
<b>State</b>	2617	2912	2610	4462	3845
<b>Local*</b>	0	450	552	265	395
<b>Tribal</b>	254	487	250	428	132
<b>International</b>	280	155	138	557	220
<b>Other</b>	97	165	182	87	148
<b>TOTAL</b>	5748	6347	6240	8269	8202

\* state and local numbers combined in FY 2004

## Training Highlights

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

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

In March 2004, 28 law enforcement officers and regulatory personnel from state and local agencies throughout the United States completed the 2-week **Advanced Environmental Crimes Training Program** conducted at the EPA training facility at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA. The EPA Criminal Investigation Division developed this course to assist and prepare personnel for the complexities associated with environmental crimes investigations. The program combines classroom lectures with practical application of demonstrated techniques in a mock business practical exercise on-site.



This offering was unique in that two teams of international students participated, one from Australia and one from the Netherlands. In addition to these, members from a newly formed environmental crimes unit from Hawaii attended the course.

NETI has acquired an abandoned industrial steam generating plant located at the Denver Federal Center in Colorado for use as a practical exercise training site. Because it is an industrial facility, there are a number of scenarios that could be presented to provide realistic, hands-on training 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 has prepared the site and plans to use it for training courses in 2005.



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

At the request of the U.S. Embassy in Belgrade, Serbia, OFA led a team of EPA staff in presenting the **Principles of Enforcement Course** to 27 participants in February 2004. Students were from the Serbian Ministry for Protection of Natural Resources and Environment, the Ministry for Environmental Protection and Spatial Planning of Montenegro, other personnel of the government of Serbia, and local non-government organizations. This was the first in a series of environmental training courses EPA will offer in Serbia and Montenegro.

EPA continued its longstanding efforts in working with different levels of the Brazilian government by presenting the **Principles of Enforcement Course** in December 2003 in the city of Brasilia.

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

The debut of the new **Clean Water Act (CWA) / National Pollutant Discharge Elimination System (NPDES) Inspector Training** was held in Athens, GA on March 22-25, 2004. This 3-day workshop was designed as a train-the-trainer course for experienced NPDES inspectors at EPA. Besides instructional and facilitator skills, the participants received content materials and instructional aids necessary to instruct other inspectors in the CWA/NPDES program. The first two days of training were held in the classroom, then the last day included a visit to a local Publicly Owned Treatment Works (POTW) facility where the students experienced hands-on activities such as records review, flow measurement and sampling.

## 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 2004, the State Associations trained a combined total of 1,310 students.**

- Midwest Environmental Enforcement Association (MEEA), located in St. Charles, IL, trained 344 members
- Northeast Environmental Enforcement Project (NEEP), located in Trenton, NJ, trained 300 members
- Southern Environmental Enforcement Network (SEEN), located in Montgomery, AL, trained 190 members
- Western States Project (WSP), located in Phoenix, AZ, trained 476 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:

- **NETI-Headquarters:** over 22,000 people attended various training activities, meetings, and video conferences in this facility, located in the historic Ariel Rios building in downtown Washington, DC.
- **NETI-West:** 2,207 people used the training space at NETI-West, which is located in Lakewood, Colorado, a suburb of Denver. The NETI-West facility expansion was completed this year, and now includes offices, three classrooms, a library, computer training room, interview and observation rooms and a mock courtroom. The largest classroom

now holds more than 100 people in a classroom setting.

- **NETI-FLETC:** 108 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 for FY 2004:



#### **Region 4:**

The Science and Ecosystem Division, located at the Athens, GA office, regularly offers training courses for Region 4 federal, state, and local agency personnel. This year, a number of water and hazardous waste courses were held in various locations, including Alabama, Georgia, Kentucky and Florida.

One example is the **Hazardous Waste Site Sampling Course** which was held twice this year. The course included discussions of water, soil, waste, and groundwater sampling. Lectures on geophysics, field QA/QC procedures, proper sample handling, chain-of-custody procedures, and modern study designs were also included. The students participated in an outdoor exercise to observe the equipment used in environmental investigations.

The course was held near Frankfort, KY in October 2003, where 42 students participated. The EPA office in Athens, GA was the site of the course in April 2004, where 46 students participated, including personnel from the states of Georgia, Tennessee, Alabama, Florida, and North Carolina.

## **Region 6:**

In January of each year, Region 6 offers a **Basic Inspector Workshop** for personnel of state, local and tribal agencies located within Region 6. Other annual training workshops held this year included:

**RCRA Inspector Workshop:** approximately 160 federal, state, local and tribal inspectors and enforcement officers came to Little Rock, Arkansas during the first week in April. The agenda included a field trip to a hazardous materials recycling center as well as presentations on new RCRA rules, fuel blenders, wood treaters, wastewater treatment unit exemptions, Subparts AA, BB, and CC, and evidence collection and preservation.

**NPDES Inspector Workshop:** March 2004 in New Orleans, approximately 125 inspectors participated in sessions on topics such as industrial pretreatment, evidence collection and preservation, Phase 2 stormwater requirements, Pollution prevention, Compliance Assistance, lab audits, field sampling equipment and techniques, flow measurement and others.

**Air Inspector Workshop:** Almost 200 state and local air inspectors, mostly from states located in Region 6, attended this workshop in San Antonio. A total of 28 different topics and keynote speeches were offered, including EPA Region 6 RSC Space Shuttle Recovery Effort, Clean Air Act National Stack Testing Guidance, Annual Compliance Certifications, High Priority Violations, Clear Skies Initiative, and Toxicology for Air Inspectors.

## **Regional Training Statistics**

Following are training statistics for FY 2004, 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>16</b>	<b>130</b>	<b>224</b>	<b>106</b>	<b>460</b>
<b>2</b>	<b>23</b>	<b>11</b>	<b>609</b>	<b>0</b>	<b>620</b>
<b>3</b>	<b>16</b>	<b>255</b>	<b>288</b>	<b>3</b>	<b>546</b>
<b>4</b>	<b>16</b>	<b>95</b>	<b>514</b>	<b>23</b>	<b>632</b>

<b>5</b>	<b>67</b>	<b>301</b>	<b>723</b>	<b>83</b>	<b>1107</b>
<b>6</b>	<b>44</b>	<b>310</b>	<b>1346</b>	<b>138</b>	<b>1794</b>
<b>7</b>	<b>9</b>	<b>62</b>	<b>45</b>	<b>5</b>	<b>112</b>
<b>8</b>	<b>10</b>	<b>32</b>	<b>84</b>	<b>3</b>	<b>119</b>
<b>9</b>	<b>62</b>	<b>82</b>	<b>2441</b>	<b>389</b>	<b>2912</b>
<b>10</b>	<b>34</b>	<b>360</b>	<b>551</b>	<b>105</b>	<b>1016</b>
<b>TOTALS</b>	<b>297</b>	<b>1638</b>	<b>6825</b>	<b>855</b>	<b>9318</b>

Appendix A

**FY 2004 Classroom Training  
Led or Provided by OECA**

<b>Course Name and Number</b>	<b>Locations</b>	<b>Total No. of Students</b>
<b><i>Office of Compliance (OC)</i></b>		
Misc. Organic National Emissions Standard for Hazardous Air Pollutants (NESHAP) (AIR 206)	Chicago, Dallas	60
Permit Compliance Data System (PCS) Basic Training (CWA 102)	Tennessee, Washington, DC	22
Basic PCS Entry, Retrieval, Inquiry, and QNCR Training (CWA 104)	Atlanta, Las Vegas, Washington, DC	33
PCS QNCR Training (CWA 305)	Washington, DC	11
CWA/NPDES Inspector Train-the-Trainer Course (CWA 306)	Athens, GA, Denver	34
Pesticide Product Enforcement Course (FIF 204)	Ft. Myers, FL	50
Pesticide Regulatory Education Program (FIF 305)	Davis, CA	158
<b><i>Office of Criminal Enforcement, Forensics and Training (OCEFT)</i></b>		
Criminal Investigator Training Program (CIT 101)	FLETC (Glynco, GA)	1
Environmental Investigations - Basic (CIT 102)	Poland	35
Environmental Crimes Awareness (CIT 104)	Lakewood, CO (25) Gallup, NM (2)	729

<b>Course Name and Number</b>	<b>Locations</b>	<b>Total No. of Students</b>
	Lisle, IL East Lansing, MI Snowmass, CO	
International Association of Chiefs of Police Environmental Crimes Training (CIT 105)	Frederick, MD	24
Environmental Crimes Instructor Training Program (CIT 111)	Whilmington, CA	64
Special Agent In-Service Training (CIT 201)	FLETC (Glynco, GA)	43
Tribal Environmental Investigations Training Program (CIT 302)	Phoenix, AZ	65
Advanced Special Agent In-Service Training (CIT 303)	FLETC (Glynco, GA) (8)	8
Advanced Environmental Crimes Training Program (CIT 311)	FLETC (Glynco, GA) (2)	56
Environmental Crimes Awareness and Evidence Collection (CRM 110)	Sayreville, NJ (2) Salem, VA Brentwood, NY Hauppauge, NY Ft. Meade, MD Westchester Ct. Airport, NY Bohemia, NY Denver, CO	364
Environmental Crimes, Homeland Security, and Hot Zone Forensics (CRM 120)	Edison, NJ	11
Training for Regional Hearing Clerks (CST 105)	Washington, DC	9
Basic Inspector Training - Classroom (CST 109)	Boston Kansas City Lakewood, CO (3) Edgartown, MA, Oneida, WI San Francisco Raleigh, NC	253
Administrative Hearings and Trials (CST 207)	Denver, Washington, DC	128
Enforcement Teamwork: Regulations to Resolutions (CST 208)	Shepherdstown, WV	22
Pleading and Litigating Civil Penalties (CST 303)	Denver	31
Advanced Negotiations Skills Training (CST 304)	Denver, San Francisco, Anchorage, AK	40

<b>Course Name and Number</b>	<b>Locations</b>	<b>Total No. of Students</b>
Advanced Inspector Training (CST 309)	Atlanta, New York, Chicago, American Samoa	106
<b><i>Office of Environmental Justice</i></b>		
Fundamentals of Environmental Justice Workshop (OEJ 104)	Atlanta, Kansas City, Washington, DC (6)	215
OECA Environmental Justice Training Course (OEJ 107)	Washington, DC (11)	275
<b><i>Office of Federal Activities (OFA)</i></b>		
NEPA / 309 Review (FED 103)	Washington, DC	31
Principles of Environmental Compliance and Enforcement (INT 102)	Brazil, Serbia, Morocco (2), Washington, DC	117
International Environmental Compliance Inspections (INT 109)	Philippines, Honduras, Belize, El Salvador	106
<b><i>Office of Regulatory Enforcement (ORE)</i></b>		
Basic ABEL Training (CST 101)	San Francisco (2) Columbus, OH Philadelphia Indianapolis Chicago Kansas City (2) Boise, ID Boston Phoenix Washington, DC	146
Basic BEN Training (CST 103)	San Francisco (2) Columbus, OH Philadelphia Indianapolis Chicago Chicago Kansas City Yakima, WA Seattle (2) Boise, ID Boston Phoenix	181
Basic INDIPAY Training (CST 114)	San Francisco Columbus, OH Indianapolis Chicago	79

<b>Course Name and Number</b>	<b>Locations</b>	<b>Total No. of Students</b>
	Kansas City Boise, ID Phoenix Washington, DC	
Basic MUNIPAY Training (CST 115)	San Francisco Columbus, OH Philadelphia Indianapolis Chicago Kansas City Boise, ID Phoenix	70
Basic PROJECT Training -SEP Analysis (CST 116)	San Francisco Philadelphia Indianapolis Chicago Kansas City Seattle Boise, ID Boston Phoenix	116
Primer and Overview of Ability to Pay (CST 124)	San Francisco	26
BEN for Attorneys (CST 125)	San Francisco Chicago Kansas City Washington, DC Boston Phoenix	61
Ability to Pay for Attorneys (CST 127)	San Francisco Columbus, OH Philadelphia Indianapolis Chicago Kansas City Seattle Washington, DC Boston Phoenix	116
Financial Analysts Workshop (CST 203)	San Francisco	54
Advanced Course on Economic Benefit of Noncompliance (CST 306)	San Francisco Columbus, OH (2) Philadelphia Indianapolis Chicago	145

Course Name and Number	Locations	Total No. of Students
	Kansas City Yakima, WA Puget Sound, WA Washington, DC Boston Phoenix	
Case Development Training for FIFRA/TSCA/EPCRA (FIF 104)	Chicago	30
RCRA Subtitle C Financial Assurance Training (RCR 206)	Alexandria, VA	60
<b><i>Office of Site Remediation Enforcement (OSRE)</i></b>		
CEC: The Enforcement Process (CER 102)	Washington, DC	33