VERMONT DEPARTMENT OF PERSONNEL
Request for Classification Review
Position Description Form A

➢ This form is to be used by managers and supervisors to request classification of a position (filled or vacant) when the duties have changed, and by managers and supervisors to request the creation of a new job class/title (for a filled, vacant, or new position), and by employees to request classification of their position.

➢ This form was designed in Microsoft Word to download and complete on your computer. This is a form-protected document, so information can only be entered in the shaded areas of the form.

➢ If you prefer to fill out a hard copy of the form, contact your Personnel Officer.

➢ To move from field to field use your mouse, the arrow keys or press Tab. Each form field has a limited number of characters. Use your mouse or the spacebar to mark and unmark a checkbox.

➢ Where additional space is needed to respond to a question, you might need to attach a separate page, and number the responses to correspond with the numbers of the questions on the form. Please contact your Personnel Officer if you have difficulty completing the form.

➢ The form must be complete, including required attachments and signatures or it will be returned to the department’s personnel office. All sections of this form are required to be completed unless otherwise stated.

INSTRUCTIONS: Tell us about the job. The information you provide will be used to evaluate the position. It will not be used in any way to evaluate an employee’s performance or qualifications.

Answer the questions carefully. The information you give will help ensure that the position is fairly evaluated. Here are some suggestions to consider in completing this questionnaire:

➢ Tell the facts about what an employee in this position is actually expected to do.

➢ Give specific examples to make it clear.

➢ Write in a way so a person unfamiliar with the job will be able to understand it.

➢ Describe the job as it is now; not the way it was or will become.

➢ Before answering each question, read it carefully.

To Submit this Request for Classification Review: If this is a filled position, the employee must sign the original* and forward to the supervisor for the supervisor’s review and signature. The Personnel Officer and the Appointing Authority must also review and sign this request before it is considered complete. The effective date of review is the beginning of the first pay period following the date the complete Request for Classification Review is date stamped by the Classification Division of the Department of Personnel.

*An employee may choose to sign the form, make a copy, submit original to supervisor as noted above, while concurrently sending the copy to the Classification Division, 144 State Street, Montpelier, with a cover note indicating that the employee has submitted the original to the supervisor and is submitting the copy as a Concurrent filing.

If this is a request (initiated by employees, VSEA, or management) for review of all positions in a class/title please contact the appropriate Classification Analyst or the Classification Manager to discuss the request prior to submitting.
### Request for Classification Review

**Position Description Form A**

**For Department of Personnel Use Only**

<table>
<thead>
<tr>
<th>Notice of Action #</th>
<th>Date Received (Stamp)</th>
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<tbody>
<tr>
<td>Action Taken:</td>
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<td>New Job Title</td>
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<td>Current Class Code</td>
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<td>Current Pay Grade</td>
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<td>New Mgt Level</td>
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<tr>
<td>Classification Analyst</td>
<td>Date</td>
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<td>Comments:</td>
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<td>Willis Rating/Components: Knowledge &amp; Skills: Mental Demands: Accountability: Working Conditions: Total:</td>
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</tbody>
</table>

### Incumbent Information:

Employee Name: **Stephen W. Simoes**  
Employee Number: **85236**

Position Number: **660151**  
Current Job/Class Title: **Environmental Analyst V**

Agency/Department/Unit: **ANR/DEC/WMPD**  
Work Station: **Montpelier**  
Zip Code: **05620 - 3704**

Supervisor's Name, Title, and Phone Number: **Lynn Metcalf, Hazardous Waste Program Supervisor; (802) 522-0466**

How should the notification to the employee be sent:  
- [X] employee's work location **WMPD, 1 National Life Drive - Davis 1** or [ ] other address, please provide mailing address: ____________

### New Position/Vacant Position Information:

New Position Authorization: __________  
Request Job/Class Title: **Environmental Analyst VI**

Position Type:  
- [ ] Permanent or  
- [ ] Limited / Funding Source:  
- [ ] Core,  
- [ ] Partnership, or  
- [ ] Sponsored

Vacant Position Number: __________  
Current Job/Class Title: __________

Agency/Department/Unit: __________  
Work Station: __________  
Zip Code: __________

Supervisor's Name, Title and Phone Number: __________

### Type of Request:

- [ ] Management: A management request to review the classification of an existing position, class, or create a new job class.
- [X] Employee: An employee's request to review the classification of his/her current position.
1. Job Duties

This is the most critical part of the form. Describe the activities and duties required in your job, noting changes (new duties, duties no longer required, etc.) since the last review. Place them in order of importance, beginning with the single most important activity or responsibility required in your job. The importance of the duties and expected end results should be clear, including the tolerance that may be permitted for error. Describe each job duty or activity as follows:

- **What** it is: The nature of the activity.
- **How** you do it: The steps you go through to perform the activity. Be specific so the reader can understand the steps.
- **Why** it is done: What you are attempting to accomplish and the end result of the activity.

For example a Tax Examiner might respond as follows: **(What)** Audits tax returns and/or taxpayer records. **(How)** By developing investigation strategy; reviewing materials submitted; when appropriate interviewing people, other than the taxpayer, who have information about the taxpayer's business or residency. **(Why)** To determine actual tax liabilities.

In general, this position requires: strong writing, organization and project management skills; the ability to work independently; in-depth understanding of both the federal Resource Conservation and Recovery Act (RCRA) hazardous waste program (administered by the U.S. Environmental Protection Agency (EPA)) and Vermont’s authorized hazardous waste program (implemented in Vermont in lieu of the federal RCRA program); and the ability to work with high level federal and state officials to ensure common understanding of hazardous waste management issues and set common direction.

Revision of the Vermont Hazardous Waste Management Regulations (Vermont Regulations):

This position works independently (in coordination with Department of Environmental Conservation (DEC) management) to revise the Vermont Regulations as necessary to ensure that Vermont’s Hazardous Waste Program remains equivalent to/no less stringent than the federal RCRA hazardous waste program. Revisions are typically made to: 1) incorporate new federal RCRA rules; 2) incorporate changes suggested by program inspectors and the regulated community; 3) incorporate flexibility; and 4) improve overall readability/clarity of the rule. In general, the Vermont Regulations must be revised every two to five years.

While many states adopt the complex federal RCRA rules either verbatim or by reference, Vermont strives to maintain regulations that are more user-friendly and clear. In addition, where possible, the Vermont Regulations include flexibilities that address the needs of the Vermont program and the regulated community. All proposed flexibilities must be approved by the EPA Region 1 office to ensure the Vermont Regulations remain "functionally equivalent" to (no less stringent than) the federal RCRA rules.

This position is expected to maintain working knowledge of DEC policies/procedures on rulemaking and the Secretary of State’s rules on rulemaking, manage all aspects of the rulemaking process; and work with DEC legal staff, EPA Region 1 technical staff and legal counsel, and the Vermont Attorney General’s office to ensure all proposed rule changes are equivalent to the federal RCRA rules for program authorization purposes (see "Prepare Applications for EPA Authorization..." below). This position is expected to seek stakeholder input early in the rulemaking process, and provide opportunity for DEC staff...
review of proposed changes. During the rulemaking process, this position is expected to coordinate as appropriate with other DEC programs; the Department of Health; the Agency of Agriculture, Food & Markets; the Vermont Secretary of State’s Office; and the Vermont Legislative Council.

Prepare Applications for EPA Authorization of Vermont's Hazardous Waste Program:

This position works independently to prepare applications for re-authorization of the Vermont hazardous waste program. Re-authorization occurs every two to five years following adoption of revised Vermont Regulations and ensures that the Vermont program remains equivalent to/no less stringent than the federal RCRA program. Applications consist of the revised Vermont Regulations; updated Memorandum of Understanding documents between the DEC and both the Agency of Agriculture, Food & Markets and the Department of Health; a Memorandum of Agreement with the EPA Region 1 office; a statement from the Vermont Attorney General certifying that the revised Vermont Regulations are no less stringent than the federal RCRA rules; checklists that compare the revised Vermont Regulations to the federal RCRA rules on a line-by-line basis to verify equivalency; and a Vermont program description. This position must coordinate extensively with DEC legal staff; EPA Region 1 technical staff and legal counsel; the Vermont Attorney General’s office; the Vermont Agency of Agriculture, Food & Markets; and the Vermont Department of Health.

Program Development and Coordination:

This position is expected to be an expert in the federal RCRA rules and Vermont Regulations, and to have thorough knowledge of Vermont’s authorized hazardous waste program. This position works independently (in consultation with the program supervisor) in all aspects of program development and coordination work.

Program development and coordination activities include: 1) development, in consultation with the program supervisor and DEC management, of the Vermont Regulations and program policies and procedures; 2) interpretation of the Vermont Regulations and the federal RCRA rules; 3) coordination/collaboration with other DEC programs and Vermont state government offices, departments and agencies on hazardous waste program implementation matters; 4) coordination/collaboration with, and timely reporting to, EPA Region 1 on program implementation matters; 5) coordination/collaboration with the other New England states, New Jersey and New York through the Northeast Waste Management Officials Association (NEWMOA) on program implementation matters; 6) coordination/collaboration on a national level (e.g., all states, EPA Headquarters, EPA Regions) through the Association of State and Territorial Waste Management Officials (ASTSWMO) on program implementation matters; 7) participation on NEWMOA and ASTSWMO committees and task forces as assigned; 8) participation on EPA Region 1- and EPA Headquarters-led workgroups as assigned; 9) providing assistance to other DEC programs with development of regulations, policies and procedures (e.g., Underground Storage Tanks, Aboveground Storage Tanks, Salvage Yards, Solid Waste, Air Pollution Control); 10) providing comment (in coordination with DEC management and other DEC programs) on proposed federal RCRA rules; 11) coordination and tracking of technical training for Vermont hazardous waste program staff; 12) participation in the Performance Partnership Grant/Agreement process as assigned; 13) participation in regular enforcement meetings between EPA Region 1 and the New England state hazardous waste programs; and (8) special projects as assigned (see below).

Program development and coordination activities routinely require preparation of briefing
memos on program implementation matters, recommendations for course of action to
DEC management, and drafting of correspondence describing program or Agency
positions. This is done according to schedules established in consultation with the
program supervisor and DEC management.

Hazardous Waste Facility Permitting:

This position is expected to be an expert in all aspects of hazardous waste treatment,
storage and disposal facility (TSDF) permitting. This position works independently (in
consultation with the program supervisor) in all aspects of TSDF permitting work. This
position is expected to complete TSDF permitting activities, mentor/assist other hazardous
waste program staff in all aspects of the permitting process, and develop/maintain
program implementation documents related to hazardous waste facility permitting.

Hazardous waste facility permitting activities include: 1) review of TSDF permit
applications for administrative and technical completeness in accordance with EPA and
Vermont procedures; 2) tracking timeliness of application review and permit issuance; 3)
communication of permit application deficiencies and the information necessary for
completeness to the applicant; 4) development of facility-specific permit
requirements/conditions necessary to ensure protection of human health and the
environment; 5) preparing draft facility permits and coordinating/completing all aspects of
the public participation process (e.g., public notice, public hearing, response to public
comment); 6) drafting final TSDF permits and ensuring permit issuance within established
timeframes; 7) functioning as the DEC point of contact for permittees; 8) tracking
compliance with permit-specific requirements (e.g., scheduled reporting, annual submittal
of financial assurance documents); 9) reviewing and processing requests to modify
existing facility permits in accordance with EPA and Vermont regulations/procedures; 10)
processing emergency permit applications in accordance with the Vermont Regulations,
as appropriate; 11) either conducting inspections or coordinating with program inspection
staff to ensure that permitted facilities maintain compliance with the Vermont Regulations
and permit requirements; and 12) coordination/collaboration with EPA Regional and
Headquarters staff on TSDF permitting matters.

Compliance Monitoring, Enforcement and Response to Complaints:

This position is expected to be an expert in all aspects of monitoring compliance of
hazardous waste generators, transporters and permitted treatment, storage and disposal
facilities, and enforcement of the Vermont Regulations. This position works independently
(in consultation with the program supervisor) and is expected to mentor/assist hazardous
waste program inspection staff in compliance monitoring and enforcement activities,
develop/implement innovative compliance monitoring strategies (in lieu of traditional
inspections), and develop/maintain program implementation documents related to
compliance monitoring and enforcement.

In addition, this position is expected to: 1) conduct thorough initial and follow-up
inspections to evaluate compliance with the Vermont Regulations; 2) draft detailed
inspection reports that meet established program criteria; 3) draft post-inspection letters
and/or Notices of Alleged Violation, as appropriate; 4) as appropriate, initiate and
coordinate formal enforcement actions (e.g., administrative order, assurance of
discontinuance, attorney general referral) in accordance with Agency of Natural Resources
(Agency) procedures, including the calculation of penalty amounts; 5) provide testimony in
civil or criminal proceedings; 6) provide assistance to the Agency's Compliance and
Enforcement Division and the Vermont Attorney General's Office in cases related to
hazardous waste management; 7) assist in determining program compliance monitoring priorities in consultation with the program supervisor; 8) coordinate with EPA Region 1 enforcement staff to ensure that, when conducting inspections in Vermont, EPA interprets the Vermont Regulations properly; and 9) coordinate/collaborate with EPA Regional and Headquarters staff and with other state hazardous waste programs on hazardous waste compliance monitoring and enforcement matters.

With respect to citizen complaints, this position is expected to: 1) respond to complaints in a timely manner; 2) document complaints received by entering them into the Agency’s complaint database; direct complaints to other regulatory program(s) with potential jurisdiction or the Agency’s Compliance and Enforcement Division, as appropriate; 3) assess the priority of complaints in terms of potential threat posed to human health and/or the environment; and 4) coordinate site visits (which may involve interviews and/or sampling), assess site visit findings and either resolve the complaint or coordinate further investigation.

Compliance Assistance:

As an expert on the Vermont Regulations and authorized hazardous waste program, this position is expected to: 1) respond (in writing, as appropriate) to requests for information related to hazardous waste management, and interpretation of the Vermont Regulations and federal RCRA rules; 2) take a lead role in developing hazardous waste program assistance documents (in collaboration with the program supervisor and the Environmental Assistance Office); 3) participate/present at meetings and workshops designed to assist the regulated community with understanding/implementing the Vermont Regulations and other hazardous waste program requirements; 4) maintain sufficient working knowledge of other DEC regulatory programs (e.g., Underground Storage Tanks, Aboveground Storage Tanks, Salvage Yards, Solid Waste, Air Pollution Control, Wastewater) to ensure that program conflicts are avoided and persons requesting information/regulatory interpretation/assistance are directed to other DEC programs as appropriate; 5) assess sampling/laboratory results to determine potential hazardous waste program jurisdiction; and 6) organize/archive written regulatory interpretations in the hazardous waste program’s regulatory interpretation compendium.

DEC Hazardous Materials Spill Response Team (Spill Team):

This position serves as a member of the DEC spill team and the team expert on the Vermont Regulations. This position acts as an on-call/standby spill responder one week out of every nine and is expected to take spill calls and enter them into the DEC Spills database in a timely manner. Incidents can range from minor fuel spills to major accidents that result in the release of large quantities of hazardous material. Most spills are handled over the phone, but large spills require traveling to the incident scene and require coordination/collaboration with local police, fire departments, the Vermont Hazardous Materials Response Team, other agencies and spill clean-up contractors to coordinate response and clean-up. This position is expected assess the environmental impacts of spills and ensure that the responsible party hires a qualified clean-up contractor when needed. This position is expected to review/approve spill clean-up work plans (and all associated costs) submitted by clean-up contractors in accordance with established DEC procedures and current DEC spill response contracts, and if a spill clean-up qualifies for coverage by Vermont’s Petroleum Clean-up Fund or Environmental Contingency Fund, coordinate the payment process. This position is also expected to provide guidance/assistance to responsible parties and property owners.
Special Projects as Assigned:

This position works independently to manage special projects (in consulting with the program supervisor, as appropriate). This position is expected to complete projects within established timeframes and coordinate projects with daily workload. Recent examples of special projects include (project status indicated within parentheses):

- Participating in NEWMOA and DEC workgroups tasked with identifying and addressing environmental impacts of pharmaceutical waste management (on-going projects)

- Participated in a NEWMOA workgroup tasked with drafting a letter to the Director of the EPA Headquarters Office of Resource Conservation and Recovery on the (currently inadequate) regulation of pharmaceutical waste under RCRA (completed, 2012)

- Preparation (by ASTSWMO’s Compliance Monitoring and Enforcement Task Force) of an ASTSWMO position paper on the (currently inadequate) EPA regulation of pharmaceutical waste under RCRA (completed, 2013)

- Participation in various EPA Headquarters-led workgroups tasked with: 1) revising EPA’s "Waste Analysis Plan" guidance (on-going project); 2) developing guidance and checklist to assist EPA and state inspectors in distinguishing "commercial chemical products" from waste when conducting RCRA inspections (completed 2012); and 3) developing web-based RCRA inspector training on Waste Analysis and Data Evaluation (on-going project)

- Developed a Waste Analysis Plan for a Vermont hazardous waste storage facility that is currently being used by EPA Region 1 as a model and that has been incorporated into EPA’s revised (draft) Waste Analysis Plan guidance (completed, 2010)

- For the purpose of determining applicability of the federal RCRA Subpart BB air emission standards, clarified the “boundary” of IBM’s permitted hazardous waste storage/treatment facility operations (within the IBM site in Essex Junction); this required in-depth review of federal RCRA policy and regulatory background documents, and collaboration with EPA Region 1, EPA Headquarters, and hazardous waste programs in other states (completed, 2014)

- Processed IBM’s request for a variance from the Vermont Regulations for lead-contaminated scrap wafers (the IBM variance petition is currently out to public comment); coordinated with DEC management and the DEC general counsel to revise the DEC’s Variance Procedure to address problems with the procedure’s public participation requirements (variance procedure revised, 2014)

- Addressed regulatory concern identified by Green Mountain Coffee Roasters regarding the applicability of the Vermont Regulations to "waste food products" that are reclaimed by developing an interim program policy (consistent with the federal RCRA rules) until such time that the Vermont Regulations can be revised (completed, 2014)

- Participated in an EPA Region 1-led workgroup tasked with developing a proposal (for review/approval by the EPA Headquarters Office of Enforcement and Compliance Assurance) requesting flexibility from the federal RCRA statutory requirement for state programs to inspect 20% of their Large Quantity Generator (LQG) universe, as that requirement applies to retail pharmacies recently notified as LQGs; this first-ever EPA Region-wide flexibility proposal was approved (completed, 2014)

- Participated in a NEWMOA workgroup tasked with drafting a letter to the Director of the EPA Headquarters Office of Resource Conservation and Recovery on the currently conflicting EPA policies about how “zero discharge units” (e.g., evaporators) are regulated under RCRA (completed, 2014)
- Developing (in collaboration with the program supervisor and the Environmental Assistance Office) a self-certification compliance monitoring program for Vermont Small Quantity Generators (modeled after a Colorado program) (on-going project)

- Collaborated (through ASTSWMO's Compliance Monitoring and Enforcement Task Force) with the EPA Headquarters Office of Enforcement and Compliance Assurance on the development of EPA's Compliance Monitoring Strategy (CMS) for RCRA and corresponding guidance for flexibilities allowed under the CMS (completed, 2012)

- Collaborated with the DEC's Solid Waste Program and the Chittenden and Addison County Solid Waste District Managers to develop a model "Facility Management Plan" for fixed solid waste management facilities that accept hazardous waste from households and conditionally exempt hazardous waste generators to identify specific "points of compliance" for applicability of the Vermont (hazardous waste) Regulations (completed, 2013)

- Collaborating with DEC's Solid Waste Program, the Department of Public Safety, and Solid Waste District Managers to identify/implement safe and compliant management practices for accepting/storing/treating explosive wastes brought to Solid Waste Districts collection events and fixed facilities (on-going project)

- Participating in the DEC workgroup tasked with overseeing aspects of decommissioning the Vermont Yankee Nuclear Power Plant related to known/potential chemical contamination at the Vermont Yankee site (on-going project)

2. Key Contacts

This question deals with the personal contacts and interactions that occur in this job. Provide brief typical examples indicating your primary contacts (not an exhaustive or all-inclusive list of contacts) other than those persons to whom you report or who report to you. If you work as part of a team, or if your primary contacts are with other agencies or groups outside State government describe those interactions, and what your role is. For example: you may collaborate, monitor, guide, or facilitate change.

Vermont DEC:

Matt Chapman, DEC, General Counsel
Gary Gulka, Director, DEC Environmental Assistance Office
Various program managers throughout the DEC

Other Vermont State Departments/Agencies:

Jeff Comstock, Agency of Agriculture, Food & Markets (Collaborate; waste "economic poisons"/pesticides)
William Irwin, Radiological & Toxicological Sciences Chief, Vermont Department of Health (Collaborate; Vermont Yankee, mixed radiological/hazardous wastes)

Vermont Attorney General's Office:

Scot Kline, Environmental Protection Division Chief, Vermont Office of the Attorney General (Collaborate, Assist)
Kyle Landis-Marinello, Assistant Attorney General, Environmental Protection Division,
Vermont Office of the Attorney General (Collaborate, Assist)
Regional/National Organizations of State Waste Management Officials:
Terri Goldberg, Executive Director, Northeast Waste Management Officials' Association (Collaborate)
Dania Rodriguez, Executive Director, Association of State and Territorial Waste Management Officials (Collaborate)

U.S. Environmental Protection Agency (Region 1 and Headquarters):
Beth Deabay, RCRA Waste Management & UST Section Chief, EPA Region 1 (Collaborate)
Jeff Fowley, Regional Counsel, EPA Region 1 (Collaborate)
Lisa Papetti, Senior Enforcement Coordinator, EPA Region 1 (Collaborate)
Sharon Leitch, RCRA Waste Management & UST Section, EPA Region 1 (Collaborate)
Emily Chow, RCRA Team Leader, Office of Enforcement & Compliance Assurance, EPA Headquarters (Collaborate)
Gail Hansen, Health Scientist, Office of Resource Conservation & Recovery, EPA Headquarters (Collaborate)
Jim O'Leary, Office of Resource Conservation & Recovery, EPA Headquarters (Collaborate)
Hazardous Waste Program managers and staff in many other states (Collaborate)

Vermont Permitted Hazardous Waste Facilities:
Candice Callahan, Environmental Compliance Program Manager, IBM Burlington (Collaborate, Guide)
Jeffrey Baker, Facility Manager, ENPRO Services of Vermont, Inc. (Collaborate Guide)
Eric Bailey, Facility Manager, Safety-Kleen, Inc.
John Greenan / Tim Upton, Environmental Program Managers, Green Mountain Power Corporation
Francis Churchill, Assistant Director for Health & Safety, University of Vermont - Environmental Safety Facility

Designated environmental compliance managers in businesses throughout Vermont (i.e., hazardous waste generators)

3. Are there licensing, registration, or certification requirements; or special or unusual skills necessary to perform this job?
Include any special licenses, registrations, certifications, skills; (such as counseling, engineering, computer programming, graphic design, strategic planning, keyboarding) including skills with specific equipment, tools,
technology, etc. (such as mainframe computers, power tools, trucks, road equipment, specific software packages). Be specific, if you must be able to drive a commercial vehicle, or must know Visual Basic, indicate so.

OSHA 1910.120 Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) 40 hour training and annual 8 hour HAZWOPER refresher training
Strong organic and analytical chemistry background
CAMEO (Computer-Aided Management of Emergency Operations)
Defensive driver training
Keyboarding, Word, Outlook, etc.

4. Do you supervise?
In this question “supervise” means if you direct the work of others where you are held directly responsible for assigning work; performance ratings; training; reward and discipline or effectively recommend such action; and other personnel matters. List the names, titles, and position numbers of the classified employees reporting to you:

No

5. In what way does your supervisor provide you with work assignments and review your work?
This question deals with how you are supervised. Explain how you receive work assignments, how priorities are determined, and how your work is reviewed. There are a wide variety of ways a job can be supervised, so there may not be just one answer to this question. For example, some aspects of your work may be reviewed on a regular basis and in others you may operate within general guidelines with much independence in determining how you accomplish tasks.

This position works independently to accomplish the goals and commitments of the hazardous waste program. Priorities and work product timelines are established in consultation with the program supervisor. This position operates within general guidelines established with the program supervisor but has considerable independence in determining how tasks are accomplished.

6. Mental Effort
This section addresses the mental demands associated with this job. Describe the most mentally challenging part of your job or the most difficult typical problems you are expected to solve. Be sure to give a specific response and describe the situation(s) by example.

➢ For example, a purchasing clerk might respond: In pricing purchase orders, I frequently must find the cost of materials not listed in the pricing guides. This involves locating vendors or other sources of pricing information for a great variety of materials.

➢ Or, a systems developer might say: Understanding the ways in which a database or program will be used, and what the users must accomplish and then developing a system to meet their needs, often with limited time and resources.

Considerable mental effort is necessary to maintain a thorough understanding of the complex state and federal hazardous waste laws and regulations, as well as the federal rulemaking background documents (e.g., Federal Register notices) and state and federal policies/procedures that support the laws and regulations (the federal RCRA rules alone are over 1,300 pages long). This position must have the ability to apply these regulations to real
life situations and be able to communicate the rationale for these applicability determinations to the regulated community, attorneys, consultants, and other state/federal regulators (in Vermont, the regulated community includes businesses that range in size from very small one person shops to large manufacturing facilities such as IBM and General Electric, municipalities, and any other non-household entity that generates/handles hazardous waste). In addition, a strong chemistry background in necessary in order to evaluate analytical testing data and waste constituent information (e.g., Material Safety Data sheets, chemical product labels) to determine the applicability of the regulations to wastes generated/handled by the regulated community.

Other challenging aspects of this position include:

- Drafting state regulations that are legally equivalent/no less stringent than the federal RCRA rules and corresponding policies

- Dealing with members of the regulated community (e.g., business owners, subjects of citizen complaints) who are angry about having to deal with a regulatory program (inspections are typically unannounced), being told that their facility in not in compliance with the Vermont Regulations, or having to spend money to achieve compliance

- Managing unexpected events and/or requests from DEC management or the regulated community in addition to planned daily work load/priorities; such events/requests can require a significant time commitment and alter established short-term priorities and timelines

- Managing extremely complicated projects that must be completed within specified timeframes in order to meet federal grant commitments

7. Accountability

This section evaluates the job’s expected results. In weighing the importance of results, consideration should be given to responsibility for the safety and well-being of people, protection of confidential information and protection of resources.

What is needed here is information not already presented about the job’s scope of responsibility. What is the job’s most significant influence upon the organization, or in what way does the job contribute to the organization’s mission?

Provide annualized dollar figures if it makes sense to do so, explaining what the amount(s) represent.

For example:

- A social worker might respond: To promote permanence for children through coordination and delivery of services;

- A financial officer might state: Overseeing preparation and ongoing management of division budget: $2M Operating/Personal Services, $1.5M Federal Grants.

The primary goals of the hazardous waste program is to prevent the mismanagement of hazardous waste, to protect public health and the environment, and to educate the general public and regulated community about proper waste management.

There are over 3,000 regulated hazardous waste generators and six permitted hazardous waste treatment, storage, and disposal facilities currently operating in Vermont. To prevent mismanagement of hazardous waste, generators and permitted facilities are subject to routine (unannounced) compliance monitoring inspections; in addition, the review and issuance of hazardous waste facility permits ensures that each hazardous waste
treatment, storage or disposal facility operates in an environmentally sound manner and is held financially accountable for proper closure of the facility. My work (see the job duties described in Section 1) directly supports the regulation and oversight of all these hazardous waste handlers.

Vermont's hazardous waste program receives an annual federal grant (from EPA Region 1) of approximately $314,000. I am directly responsible for meeting some grant commitments (e.g., rulemaking, program authorization, permitting) and supporting the program in meeting the remaining commitments (e.g., permitting, inspections) as the program expert/mentor. Permitting aspects of the program generate between $8,000 - $10,000 annually, hazardous waste generators submit annual fees totaling approximately $250,000 annually, and hazardous waste generator taxes typically exceed $200,000 annually. Hazardous waste transporters also pay annual licensing fees which generate approximately $50,000 per year.

Finally, with respect to my work with the Spills Team, for spill clean-up activities that qualify for coverage under Vermont's Petroleum Clean-up Fund, I must review and approve invoices submitted by clean-up contractors for amounts up to $25,000 per clean-up.

8. Working Conditions

The intent of this question is to describe any adverse conditions that are routine and expected in your job. It is not to identify special situations such as overcrowded conditions or understaffing.

a) What significant mental stress are you exposed to? All jobs contain some amount of stress. If your job stands out as having a significant degree of mental or emotional pressure or tension associated with it, this should be described.

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<tr>
<th>Type</th>
<th>How Much of the Time?</th>
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<tr>
<td>Significant mental stress is associated with managing a large work load, changing short-term priorities, and the need to produce thorough briefing documents to DEC managers within typically fast turnaround times</td>
<td>Frequent</td>
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<tr>
<td>Dealing with members of the regulated community (e.g., business owners, subjects of citizen complaints) who are angry about having to deal with a regulatory program (inspections are typically unannounced), being told that their facility is not in compliance with the Vermont Regulations, or having to spend money to achieve compliance</td>
<td>Occasional</td>
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<tr>
<td>Presenting complex regulations, concepts and policies to members of the (not always receptive) regulated community</td>
<td>Frequent</td>
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b) What hazards, special conditions or discomfort are you exposed to? (Clarification of terms: hazards include such things as potential accidents, illness, chronic health conditions or other harm. Typical examples might involve exposure to dangerous persons, including potentially violent customers and clients, fumes, toxic waste, contaminated materials, vehicle accident, disease, cuts, falls, etc.; and discomfort includes exposure to such things as cold, dirt, dust, rain or snow, heat, etc.)

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Potential chemical exposures (i.e., hazardous waste, contaminated materials), physical hazards (e.g., cuts, slips/trips/falls) and discomfort when conducting facility inspections, complaint investigations and hazardous material spill response activities

<table>
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<tbody>
<tr>
<td>Exposure to potentially violent persons (i.e., members of the regulated community who are angry about having to deal with a regulatory program)</td>
<td>Occasional</td>
</tr>
</tbody>
</table>

c) What weights do you lift; how much do they weigh and how much time per day/week do you spend lifting?

<table>
<thead>
<tr>
<th>Type</th>
<th>How Heavy?</th>
<th>How Much of the Time?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Handling spill clean-up materials (e.g., clay absorbents)</td>
<td>50 lbs</td>
<td>Infrequent</td>
</tr>
</tbody>
</table>

d) What working positions (sitting, standing, bending, reaching) or types of effort (hiking, walking, driving) are required?

<table>
<thead>
<tr>
<th>Type</th>
<th>How Much of the Time?</th>
</tr>
</thead>
<tbody>
<tr>
<td>This position is primarily office-based and requires sitting, standing, bending and reaching</td>
<td>Frequent</td>
</tr>
<tr>
<td>Inspections, complaint investigations and spill response activities require walking (in some cases, to remote locations) and driving</td>
<td>Occasional</td>
</tr>
</tbody>
</table>

Additional Information:
Carefully review your job description responses so far. If there is anything that you feel is important in understanding your job that you haven't clearly described, use this space for that purpose. Perhaps your job has some unique aspects or characteristics that weren't brought out by your answers to the previous questions. In this space, add any additional comments that you feel will add to a clear understanding of the requirements of your job.

Employee's Signature (required): [Signature] Date: 9/24/14
Supervisor's Section:

Carefully review this completed job description, but do not alter or eliminate any portion of the original response. Please answer the questions listed below.

1. What do you consider the most important duties of this job and why?
   
   Rule writing and authorization; Interpretation of our regulations and policies and communication to regulated community and other stakeholders; Coordination with other state and federal agencies in the application and interpretation of our regulations; Permit application review; Projects as assigned that involve the above

2. What do you consider the most important knowledge, skills, and abilities of an employee in this job (not necessarily the qualifications of the present employee) and why?

   Ability to understand and interpret complex regulations (including the code of federal regulations) and policy documents; Ability to research complex regulatory and technical questions and synthesize a variety of information from multiple sources to arrive at policy recommendations; Ability to communicate complex subjects clearly in person, on the phone and in writing; Ability to understand nuances of regulatory and legal language; Ability to coordinate with multiple parties and agencies to arrive at an interpretation or recommendation; Ability to pay close attention to detail in drafting rules and permits and completing authorization checklists;

3. Comment on the accuracy and completeness of the responses by the employee. List below any missing items and/or differences where appropriate.

   The employees responses are thorough, complete and accurate

4. Suggested Title and/or Pay Grade:

   Environmental Analyst VII

Supervisor's Signature (required): [Signature]  Date: 9/24/14

Personnel Administrator's Section:

Please complete any missing information on the front page of this form before submitting it for review.

Are there other changes to this position, for example: Change of supervisor, GUC, work station?

☐ Yes ☐ No  If yes, please provide detailed information.

Attachments:

☐ Organizational charts are required and must indicate where the position reports.
☐ Draft job specification is **required** for proposed new job classes.

Will this change affect other positions within the organization? If so, describe how, (for example, have duties been shifted within the unit requiring review of other positions; or are there other issues relevant to the classification review process).

Suggested Title and/or Pay Grade:

Personnel Administrator’s Signature *(required)*: __________________________ Date: __________________________

**Appointing Authority’s Section:**

Please review this completed job description but **do not alter** or eliminate any of the entries. Add any clarifying information and/or additional comments (if necessary) in the space below.

Suggested Title and/or Pay Grade:

Appointing Authority or Authorized Representative Signature *(required)*

Date