

Salary Range: \$75,920 - \$107,182 Hiring Range: 75,920 - \$\$89,315

SECTION 1			
Job Title	Environmental Compliance Specialist	Division	Operations
Department	Environmental, Health & Safety	Reports To (Job Title)	Director of Operations
Full-Time / Part-Time	Full Time	Part-Time (Hrs per Wk)	
Pay Grade	12	Exempt/Non-exempt	Exempt
Adoption Date (original job description date)	November 8, 2012	Last Revision Date	January 11, 2021
Approved By (generally same as "Reports To")	Director of Operations	Human Resources Approval Date	January 12, 2021
Director Approved By (Job Title)	Director of Operations		

SECTION 2 JOB SUMMARY

In support of the NEW Water culture of Safety, Respect, Team, and Environment, the Environmental Compliance Specialist assumes overall responsibility for ensuring that NEW Water achieves compliance with all applicable environmental regulatory requirements.

The Environmental Compliance Specialist assumes overall responsibility for ensuring that NEW Water achieves compliance with all applicable requirements under the following regulatory programs: National/Wisconsin Permit Discharge Elimination Systems (NPDES/WPDES) for water quality; the Clean Air Act for air quality; the Resource Conservation and Recovery Act (RCRA) for hazardous waste management; Spill Prevention Control and Countermeasures (SPCC) for oil storage and management; the Emergency Planning and Community Right-to-Know Act (EPCRA) for safe storage of hazardous materials and communication with local emergency responders; Wisconsin Administrative Code ATCP 93 for proper storage of flammable, combustible, and hazardous materials; 40 CFR Part 503 for biosolids management; OSHA 1910.120 for hazardous materials spill response; Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and NR 706 for hazardous materials spill reporting.

This is highly responsible, self-directed, professional work that involves the application of a wide range of advanced skills and knowledge of the regulatory framework. The Environmental Compliance Specialist ensures that current requirements are met while also anticipating future needs by keeping up to date as new regulations are introduced and existing regulations are changed. The Environmental Compliance Specialist also evaluates proposed NEW Water projects for potential regulatory impacts so preparations can be made as far in advance as possible.

Frequency: Daily, Weekly, Biweekly, Monthly, Quarterly, Annually, or As Needed

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Description of Duties	Frequency
Key Area: WPDES Permit Compliance.	35% of job
Provides oversight for compliance with NEW Water's WPDES discharge permit; evaluates proposed permit limits; evaluates permit conditions for impacts to NEW Water's operations; works with regulators to resolve compliance challenges, questions, and issues.	Weekly
Evaluates proposed State or Federal rule changes for possible impacts to NEW Water's WPDES permit; communicates pertinent permit related information to NEW Water management and Commission. Ensures NEW Water is in compliance with environmental regulations related to effluent discharge; develops environmental management programs designed to maintain full compliance with WPDES permit.	As Needed
Solicits and manages various consultants and environmental testing firms as required; manages special projects related to WPDES permit compliance or conditions as required.	As Needed
Responsible for ensuring that all environmental plans, proposals, and reports required under NEW Water's WPDES effluent discharge permit are completed correctly and on time.	Monthly
Responsible for preparing and submitting annual discharge monitoring reports for biosolids management: sludge characteristic report, sludge land application report, sludge incineration report.	Annually

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Responsible for ensuring compliance with the mercury pollutant minimization plan under the WPDES permit. Prepares questionnaires related to mercury management for and mails to all dental facilities in service area and analyzes responses. Prepares mercury questionnaires and mails to academic, medical, and industrial facilities in service area and analyzes responses. Prepares annual compliance report and submits to WDNR.	Annually
Responsible for meeting WPDES permit requirement to analyze biosolids for PCBs and priority pollutants prior to landfilling the biosolids.	As needed
Oversees compliance related to unpermitted discharges of wastewater. Leads NEW Water effort to develop a program for identifying and responding to reportable discharges; works with WDNR to obtain approval. (Finalize and implement CMOM.)	As Needed
Serves as liaison to WDNR to document reportable discharges. Works with applicable NEW Water personnel to prepare reports and follow through with WDNR to resolution.	As needed
Communicates and trains all affected NEW Water personnel on response to unpermitted discharges of wastewater.	Annual
Serves as primary resource for NEW Water staff for WPDES compliance related questions and concerns.	As needed
Key Area: Air Permit Compliance	35% of job
Provides primary oversight for compliance with air emission (Title V) permit as well as air regulations not included in the facility permit (sludge quality regulations under 40 CFR, Part 503 and sewage sludge incinerator rules for existing incinerators under 40 CFR 62, Subpart LLL); evaluates proposed permit limits and conditions for impacts to NEW Water; evaluates proposed rule changes for permit impacts; communicates pertinent permit related information to NEW Water management, completes permit renewal applications and submits supporting compliance documentation to WDNR and US EPA; negotiates permit conditions with regulatory authorities; develops and implements appropriate procedures related to air emissions; communicates environmental compliance issues to executive staff and Commission.	Daily
Develops strategy and schedule to achieve compliance with new air regulations.	As Needed
Develops and maintains compliance files.	Weekly
Coordinates required emissions testing for thefluid bed incinerator, generators, heating boiler, thermal oil heater, digesters with flare, sand silo, ash handling system. Ensures that test notices are submitted to regulators within deadlines. Reviews test results, submits reports to regulators within deadlines. Where applicable, calculates operating limits after each test series using methods required in permit.	Annually
Develops thorough understanding of air permit requirements to anticipate, prepare for, and meet compliance milestones and deadlines.	Monthly
Submits quarterly deviation report to WDNR for opacity.	Quarterly
Prepares and submits semi-annual compliance report to WDNR to document compliance or non-compliance with each permit condition. (Certified by Executive Director.)	Twice Annually
Prepares and submits annual air emission inventory. Using operating data, calculates and reports actual air emissions to WDNR. (Certified by Executive Director.)	Annually
Prepares and submits annual certification of compliance declaring overall facility compliance status. (Certified by Executive Director.)	Annually
Prepares and submits deviation reports required every six months to identify emission exceedances or deviations from operating limits for fluid bed incinerator (required under sewage sludge incinerator rules, Sub LLLL). (Certified by Executive Director.)	Twice Annually
Prepares and submits annual compliance report for fluid bed incinerator required under sewage sludge incinerator rules, Sub LLLL. (Certified by Executive Director.)	Annually
Contributes to annual operator certification training as required under sewage sludge incinerator rules.	Annually
Prepares and submits semi-annual fuel certification report for thermal oil heater and heating boiler.	Twice Annually
Administers registration air permit for DPF related to generator.	As Needed
Researches applicability of air regulations for proposed projects. Considers and communicates potential impacts	As Needed
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and risks to NEW Water. Serves as resource for all NEW Water personnel regarding air permit and air regulations.	Weekly

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Job Description	
Key Area: Hazardous Materials Management	20% of job
Spill prevention and response :	
 Develops hazardous materials spill prevention procedures for all staff. Provides annual safety training session on spill response for all NEW Water staff. 	Annually
Assists in response to hazardous materials spills. Ensures that all staff members are trained to safely respond to spills they may encounter in their work. (Staff currently trained to OSHA general awareness level to initiate emergency response	Annually
 Identifies and establishes contacts with qualified consultants and emergency response firms who can assist NEW Water in the event of an environmental spill. 	Annually
 Determines when a spill is reportable to a regulatory authority and makes required notifications. Prepares spill reports for WDNR and/or US EPA as required, follows up to ensure that report is resolved. 	As Needed (typ 1-2/year)
 Develops, implements, and manages mercury reduction initiative; coordinates these activities with other NEW Water personnel. Develops and presents mercury preparedness program to ensure safe handling of mercury-containing devices and mercury spill response. 	Annually
 Serves as primary mercury spill responder. Provides annual mercury spill response training to in-house mercury spill team. 	Annually and As Needed
SPCC (Spill Prevention, Control, and Countermeasures) Program. NEW Water is subject to US EPA's SPCC rules pertaining to oil storage, spill prevention, and spill preparedness	
 Ensures that SPCC plan is updated every five years, at minimum, or as needed when oil storage systems are modified in a way that requires an update. 	Annually
 Prepares and delivers annual SPCC training to all NEW Water staff identified as "oil handling personnel" 	Annually
Ensures ongoing compliance, recordkeeping, and maintenance of SPCC program.	Quarterly
Hazardous Materials Storage. Ensures that NEW Water's storage of hazardous materials in storage tanks is in compliance with Wisconsin Ch. ATCP 93.	
 Evaluates new and existing hazardous material storage tanks (proposed and existing) for code compliance. Recommends corrective actions for existing deficiencies. 	As Needed
 Develops and implements inspection program for hazardous materials storage tanks. Works with NEW Water staff who conduct monthly and annual inspections of tank systems. Selects and hires qualified professionals to conduct American Petroleum Institute (API)-653 internal and external tank inspections as required. 	Quarterly
 Identifies and hires qualified and appropriately-credentialed contractors to ensure compliance with storage tank regulations. (Any work performed on tank systems subject to C. ATCP 93 must be "qualified engineers" or "certified installers") 	As Needed
 Maintains records and files related to compliance with hazardous materials storage regulations. 	Monthly
 Serves as liaison with inspectors and regulators regarding NEW Water's compliance with applicable regulations. 	Annually, As Needed
 Evaluates proposed projects for applicability of hazardous materials storage regulations. 	As Needed
 Serves as resource to NEW Water personnel regarding hazardous materials storage. 	As Needed
Prepares and submits annual EPCRA Tier 2 reports to Wisconsin Emergency Management to detail chemicals stored at GBF and DPF. Serves as liaison with local emergency planning commission as it pertains to EPCRA requirements.	Annually
Hazardous and Special Waste:	
 Completes hazardous waste determinations for each non-standard waste generated. 	Monthly
 Researches, evaluates, selects, and hires hazardous waste contractors to transport and dispose of hazardous waste safely and legally while keeping cost low and minimizing risk to the organization. 	As Needed (typ 1-2 times per year)
 Coordinates and oversees NEW Water hazardous waste disposal program. 	Monthly
 Tracks, reviews, files, and submits hazardous waste manifests as required for each hazardous waste shipment. 	Monthly
 Ensures that hazardous waste storage, signage, training, emergency response, and recordkeeping requirements are met. 	Monthly
 Ensures that storage, generation, transport, and disposal of special waste and universal waste at NEW Water are completed in compliance with applicable regulations. 	Quarterly

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 Prepares and submits annual hazardous waste reports to WDNR for GBF and DPF. 	Annually
 Serves as technical liaison with WDNR for hazardous waste management at NEW Water. 	Quarterly
 Serves as primary in-house resource for NEW Water personnel for hazardous and special waste requirements. 	Quarterly
Key Area: Program Budgeting and Requisitioning	10% of job
Organizes the Environmental Compliance budget and presents to the Director of Operations and Executive Director.	Annually
Manages expenditures for in-house and contracted activities to insure budget compliance.	Weekly
Approves requisitions and purchases from the Environmental Compliance budget	Weekly
Other:	
Perform other job related duties as assigned.	
Promote and enhance environmental, health, and safety compliance within the work environment and actively engage in improvement efforts.	
Follow organizational policies and procedures.	

Section 4Education Required		
Minimum Level of Education	Field(s) of Study	
Bachelor's Degree	Environmental Engineering, Environmental Science, Environmental Health and Safety or related field	
Additional Information Regarding the Required Education:	An equivalent combination of education, training, and relevant experience will also be considered.	

Section 5 Experience Required	
Years of Experience	6 years
Other Specific Experience Required or Preferred	Experience in environmental regulatory compliance related to the following: Clean Air Act/Title V Compliance; hazardous, non-hazardous, and universal waste management; Clean Water Act, including NPDES permits and SPCC; spill management; hazardous materials storage (ATCH Ch. 93); EPCRA is preferred

Section 6Certification / Licens			
Required Certification/Licensure	Required Upon Hire?	If no, timeframe to obtain?	
Current and valid Wisconsin motor vehicle operator's license.	Y		
US DOT Hazardous materials training (to sign hazardous waste manifests)	Y		
Preferred Certification/Licensure			
Certified Hazardous Materials Manager			

SECTION 7 ADDITIONAL KNOWLEDGE, SKILLS, AND ABILITIES

The role requires independent judgment and initiative. Work is often performed independently, but requires frequent communication with internal stakeholders throughout the organization, as well as regulators, consultants, contractors, and vendors. The role requires a proactive approach to ensuring that objectives are achieved.

Must have a demonstrated ability to communicate effectively, both orally and in writing; ability to establish and maintain working relationships with regulators, consultants, contractors, employees, and general citizenry. Must have considerable skills in analytical problem solving, effective decision making and work prioritization abilities. Must be able to organize, supervise and evaluate the work of consultants, contractors and employees. Must have considerable ability to use word-processing, spreadsheet, and presentation

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computer programs to analyze information and communicate results.

Must have a demonstrated ability to understand, follow, and handle highly complex policy, procedural, and environmental regulations. Must have the ability to keep accurate records and prepare reports from such records. Must be proactive in anticipating and addressing emerging compliance issues.

Maintains professional and technical knowledge by attending educational workshops; reviewing professional publications; establishing personal networks; participating in professional industry groups.

Section 8Software / Technology Utilized

Microsoft Outlook, Word, Excel, SharePoint, Wisconsin DNR WAMS online reporting site, US EPA CDX reporting site, Wisconsin WHOPRS for Tier II reporting, Maxcom GHS (SDS database), Maximo, StackVision, Starlims, financial software platforms.

Section 9	EQUIPMENT / MACHINERY UTILIZED
Computers, copier/scanners, telephone, motor vehicle.	

SECTION 10	
Description of Duties	Check One
Job Centered / Work Unit: Decisions made are typically isolated to an individual's job or work unit.	
Department-Wide : Decisions made may impact across work units, and involve a significant function of the department. Supervision or management is typically—but not always—a component of the job.	
Multiple Departments : <u>Decisions</u> are made on behalf of and impact across multiple departments; or across several sections of a significantly large department.	X
Entire Organization : <u>Decisions</u> are made on behalf of and affect the entire organization including, but not limited to: employees, customers, vendors, governing body, etc.	

SECTION 11			
Frequency: Daily, Weekly, Biweekly, Monthly, Quarterly, Annually, or As Needed			
Example of Decision / Judgment (3-5 examples)	Job Title of Who Reviews (If Anyone)	Frequency	
Responsible for making all hazardous waste determinations to ensure that NEW Water is managing all hazardous waste "from cradle to grave" as required. Ensures that any hazardous waste is identified, documented, backaged, labeled, transported, and disposed of in a safe and legal way.		Monthly	
Responsible for determining whether a release of a hazardous material is eportable. If so, determines which regulatory authority/authorities must be notified.		As Needed	
Responsible for evaluating a variety of compliance issues and questions as hey arise. Determines whether a reportable deviation or other infraction has occurred, determines whether the issue requires notification or discussion with regulators. Determines whether a formal written report is required or if an initial conversation to discuss issue with regulators is appropriate.		Weekly	
Reviews and interprets published information regarding future environmental ule changes for possible impacts to NEW Water; prepares informational summaries for management; develops and recommends proposed compliance strategies in the best interest of NEW Water, prepares draft statements for submittal to regulatory agencies.	Treatment Manager, Executive Staff, Engineering Personnel	As Needed	
For Title V permits and WPDES Permit: Considers and recommends compliance options for proposed permit conditions, reviews draft permits and supporting information received from the DNR; verifies that permit calculation procedures as outlined in State Codes were followed; summarizes and interprets information for presentation to upper management; works directly	Treatment Manager, Executive Staff, Engineering Personnel	As Needed	

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with DNR to recommend negotiating strategy for desired modifications.				
Researches and recommends approaches for complying with hazardous materials storage tank system regulations.	Engineering, Treatment	As Needed		

SECTION 12PROBLEM SOLVING		
Example of Problem (3-5 examples)	Resources Used	
Air permit – Interpret and understand complex air regulations to develop the best compliance strategy. Understand and evaluate plant operation and other issues to determine need to apply for permit modification or new Operating or Construction permit; need to evaluate wide variety of continuous plant data and historical stack tests; review state code guidelines from the NR 400 series; determine need for additional stack testing or computer modeling for air emissions from sources.	State administrative code, rule language from Federal Register, existing air permits from other facilities, conversations with regulators from DNR, EPA, Treatment Manager, Engineering personnel, Executive Staff, are consulted, consultants and legal counsel are occasionally hired when necessary.	
If any oil or chemical is released outside of containment, it may be a reportable spill. There are different requirements for different materials. Every release needs to be evaluated and reported according to requirements under WDNR, US EPA, US Coast Guard, and other agencies.	Environmental reporting requirements of WDNR and EPA, any NEW Water personnel familiar with the circumstances surrounding the conditions, Operations Staff, Technical Services Staff, Environmental Programs Staff, Executive Director.	
All hazardous waste must be identified, packaged, labeled, transported, and disposed properly in accordance with RCRA and US Department of Transportation regulations. A hazardous waste determination must be completed for any waste generated that's not typical trash.	Published hazardous waste rules and determination guidelines and documents, published Department of Transportation requirements, Safety Data Sheets, hazardous waste regulators at WDNR and US EPA, contacts at waste transport and disposal firms.	
Interpreting operating data on a regular basis to determine level of compliance.	Treatment Manager	

SECTION 13WORKING RELATIONSHIPS / INTERACTIONS / CONTACTS			
Frequency: Daily, Weekly, Biweekly, Monthly, Quarterly, Annually, or As Needed			
Title/Description of Contact	Purpose of Contact	Frequency	
Commission	Provide specialized reports and presentations which communicate current environmental matters.	As Needed	
Executive Director	Prepares compliance reports and explains the contents and implications to Executive Director, who signs the reports as the Responsible Official.	Monthly	
Executive staff	Update on pertinent environmental initiatives and compliance issues. Recommend strategies for compliance with existing and upcoming regulations.	Quarterly	
Treatment Manager	Discuss air permit compliance and WPDES permit compliance, obtain data related to permit reporting, and collaborate to develop strategy for compliance with existing and future regulations.	Weekly	
Water Resources Specialist	To provide understanding of WET testing program and results, as well as general water quality impacts of NEW Water operations.	Bi-weekly	
IT Manager, Watershed Programs Manager, Staff Engineer	Discuss issues pertaining to their assigned portions under the WPDES permit, confirm that WPDES permit requirements are met.	Quarterly	
All employees.	Train and advise on new regulations. Provide training sessions on existing or upcoming regulations as well as the elements of existing regulations that NEW Water is subject to. Collaborate to understand plant operations and roles within it.	Quarterly	

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Technical Services Personnel	Discuss construction projects to provide oversight for compliance with existing environmental regulations and anticipate compliance with pending and upcoming regulations.	As Needed
NEW Water staff	Coordinate efforts to evaluate state and regional environmental issues and participate in the rule development process.	As Needed
Consultants	Administer consulting contracts or specialized services contracts (eg. Emissions stack testing, petroleum storage tank inspection, hazardous waste disposal.	Quarterly
Wisconsin DNR, US EPA, DATCP, Wisconsin Emergency Management.	Permit issues; achieve compliance with environmental regulations for special projects and ongoing issues.	Bi-weekly

SECTION 14SUPERVISION / MANAGEMENT AUTHORITY			
Action	Yes	No	Provides Input
Screen / Interview Applicants	Х		
Hire / Promote Employees			Х
Provide Written / Verbal Warnings		Х	
Suspend Employees		Х	
Terminate Employees		Х	
Prepare Work Schedules		Х	
Project Management	Х		
Provide Work Direction			Х
Evaluate Performance		Х	
Coach Employees			Х
Train Employees	Х		
Approve Overtime		Х	
Approve Time Off		Х	
Develop / Implement Policies	Х		
Evaluate and Approve Exceptions to Policies	Х		
Classification / Compensation Changes		Х	

Employees <u>Directly</u> Supervised			
# Employees	Job Title		
n/a			
Employees Indirectly Supervised			
# Employees	Job Title		
n/a			

SECTION 15WORK ENVI	CONMENT / WORKING CONDITIONS / PHYSICAL REQUIREMEN	ITS
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Refer to ErgoFactor Job Analysis for this position for details. S:\Safety\Blankenheim Project\Environmental Programs\Environmental Compliance Specialist.pdf

SECTION 16ADDITIONAL COMMENTS

The Environmental Compliance Specialist is expected to be accessible outside of standard business hours (evenings, weekends, and holidays) to respond to unpermitted discharges (spills), unpermitted exceedances and deviations of air emissions, and hazardous materials releases.

THIS JOB DESCRIPTION IS INTENDED TO IDENTIFY ESSENTIAL DUTIES AND ALSO ILLUSTRATES OTHER TYPES OF DUTIES THAT MAY BE

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ASSIGNED TO ITS INCUMBENTS. IT SHOULD NOT BE INTERPRETED AS DESCRIBING ALL OF THE DUTIES THAT WILL BE REQUIRED OF EMPLOYEES OR BE USED TO LIMIT THE NATURE AND EXTENT OF ASSIGNMENTS THAT AN INDIVIDUAL IS REQUIRED TO PERFORM.

JOB DESCRIPTIONS ARE SUBJECT TO REVISION AT ANY TIME AT THE DISCRETION OF MANAGEMENT.

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