Oregon
Tina Kotek, Governor

Department of Administrative Services
Chief Human Resources Office
155 Cottage Street NE
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MEMORANDUM

To: Classification and Compensation Section - DAS

From: Analyst Name

Date: 07/01/202X

Subject: Analysis to establish position #123456 – Environmental Engineer 3

POSITION AND EMPLOYEE DATA

PPDB Position Number:	123456
Workday Position ID:	0000000000001
Incumbent:	Vacant
Supervisor:	Supervisor Name
Division/Section:	Office of Greenhouse Gas Programs
Requested by:	Management
Establish Classification:	Environmental Engineer 3 (3412)
Working Title:	Greenhouse Gas Permitting Engineer
Establish FLSA:	Exempt (Professional exemption)
Establish Service Type:	Represented

BACKGROUND & BUSINESS NEEDS JUSTIFICATION

The agency is requesting a new Environmental Engineer 3 position as part of the agency's Office of Greenhouse Gas Programs to perform the most complex permitting work for facilities producing the largest carbon emissions in the state. Because this position will be working with multiple industries that produce the most emissions, such as cement, steel, and electronics manufactures, the position will need to oversee and develop innovative solutions to GHG emissions to reduce and control pollution at Title V (the largest and most complex air quality permits) and ACDP (Air Contaminant Discharge Permit) facilities. This work will require advance environmental science and engineering education with an understanding of the principles of pollution control, experience and knowledge in source operations, pollution control devices and industrial emission processes, compliance inspection methods, and source permitting, including the ability to correctly interpret air toxics emission information and toxicity data for a variety of business operations covering many different industry types and complexities of commercial and industrial processes. This work will also require someone who is a registered professional engineer. Because of the complexities of this work, an Environmental Engineer 3 is being requested.

Commented [BR1]: Verify this information matches what's on the Position Description.

Commented [BR2]: The Background and Business Needs Justification explains *why* the agency/program is requesting this position.

For **establishment requests,** this should be more than stating that it was received in the legislative budget. The more clearly you can articulate *why* this position is necessary, the background of what's going on, and the plan for what the program has for the position, the better the reader will understand why this position is important and what the ultimate goal for it is. This will also help you in explain why the requested classification is necessary.

Some example questions that can help develop the business needs:
- Why did the legislature give the program the position?
- How will this position help the agency and program meet their goals?

For **reclassification requests**, *what's changed* that has created the need to reclassify the position? This should be more details that just that the position's duties have changed over time.

Some example questions that can help determine what's changed and why the program is requesting a new classification:
- Why have the duties and responsibilities changed?
- Has the scope of work and level of authority changed, why?
- Why does the program need this position to do different work than before?
- How have these changes impacted the agency and program's long range plans?

CLASSIFICATION SPECIFICATIONS CONSIDERED

- 3411 – Environmental Engineer 2
- 3412 – Environmental Engineer 3

Environmental Engineer 2

The ENVIRONMENTAL ENGINEER 2 applies comprehensive engineering knowledge and experience to review engineering plans and specifications, evaluate the operational performance of major/complex sources, investigate, and characterize the impact of air contaminant emissions, wastewater discharges, and/or hazardous and solid waste disposal on the environment, and investigate major or critical environmental problems.

DISTINGUISHING FEATURES

This is the second level of a three-level series. It is distinguished form the lower level by work assignments of more technical difficulty and complexity which require more in-depth engineering knowledge and expertise in a diversity of disciplines and environmental experience. The Environmental Engineer 2 is a primary resource of specialized technical assistance on current pollution control facility design, discharge, or emission control strategies, and waste disposal and/or contaminated site cleanup methods and techniques. The Environmental Engineer 2 is distinguished from the higher level by less involvement in work assignments which involve feasibility evaluation of major new industry, unconventional pollution control technologies, or problems for which there are no procedural precedents. The employee has the authority to initiate a non-prescribed course of action on a case-by-case basis.

Environmental Engineer 3

The ENVIRONMENTAL ENGINEER 3 applies extensive advanced environmental engineering knowledge and experience in the areas of engineering project management; technical/professional consultation on the most difficult environmental issues; final plan review and approval of major or complex sources; development of technical strategies, guidelines, rules, and policies; and the evaluation of new and emerging pollution control technology.

DISTINGUISHING FEATURES

This is the third level of a three-level series. It is distinguished from the lower levels by the extensive, progressive engineering and environmental knowledge and experience which is applied to a broad range of complex and often unprecedented environmental issues or concerns and require innovative solutions. Employees make decisions having significant public health, economic, or environmental impact. They advise agency management, Economic Development Department staff, and local governments on technical and environmental concerns.

The Environmental Engineer 3 is considered by the Department and by the outside engineering community as an expert in a particular field. These employees are usually assigned project leader responsibility for planning, staffing, reviewing, and completing work assignments. They function as a senior resource and expert within their assigned unit and assist management in developing the technical expertise of other Department engineers and scientific professionals.

Commented [BR3]: List **all** classifications relevant to this analysis that you will consider. For classifications in the same series, perform an analysis of the classifications above and below the requested classification.

In this section list the General Description and Distinguishing Features of the classifications you will be reviewing. This is important because this information can change and you want to capture the point in time when this classification specification was reviewed.

In addition, some arbitrators may only want to include information listed in the review, so this allows for any relevant information to be considered.

ANALYSIS/CONCLUSION

Recommended Classification: Environmental Engineer 3

Position Summary

This position serves as a Greenhouse Gas Project Manager and Permit Writer for the Greenhouse Gas Programs section at the agency. It is responsible for initiating and overseeing the completion of greenhouse gas reduction assessments by air permitted sources. The position develops both broad guidance on how these assessments should be conducted as well as site or industry-specific guidance applicable to the distinct characteristics of that site or industry. The position oversees and conducts independent evaluations of greenhouse gas reductions for these air permitted sources that ultimately inform permitting requires adopted into those air permits.

Working with other technical staff, the position has overall project responsibility for all phases of the emissions identification, including review of emission sources and options for emission control devices. This position also independently performs and oversees reviews of facility process flow diagrams, control devices, pollution reduction activities, and associated engineering documents, and develops and draft permits and permit conditions to formalize any reduction requirements or other limitations.

This position will serve as a technical resource for internal and external stakeholders on greenhouse gas assessments, inventory and emission control technologies and other issues related to assigned sources.

Environmental Engineer 2 analysis

The Environmental Engineer 2 is not the correct classification level for this position. **(Statement)** The Environmental Engineer 2 applies comprehensive engineering knowledge and experience to review engineering plans and specifications, evaluate the operational performance of major/complex sources, investigate, and characterize the impact of air contaminant emissions, wastewater discharges, and/or hazardous and solid waste disposal on the environment, and investigate major or critical environmental problems. It is distinguished from the higher level by less involvement in work assignments which involve feasibility evaluation of major new industry, unconventional pollution control technologies, or problems for which there are no procedural precedents. The employee has the authority to initiate a non-prescribed course of action on a case-by-case basis. **(General Description and Distinguishing Features detail from the class spec)** This position will be doing the most complex engineering pollution emission control work for the GHG program at the agency, including analyzing new and existing greenhouse gas control technologies and strategies and evaluating engineering feasibility of various technologies that may be applied to emissions units. This requires extensive advanced environmental engineering knowledge and experience in the areas of engineering project management, as well as providing technical/ professional consultation on the most difficult environmental issues. This level of work does not fit into the Environmental Engineer 2, which does not have the involvement in feasibility evaluation of major new industries, unconventional pollution control technologies, or problems for which there are no procedural precedents, which are all responsibilities this position will be expected to perform. **(Supporting Statement from the PD)**

Environmental Engineer 3

The Environmental Engineer 3 is the correct classification level for this position. **(Statement)** The Environmental

Commented [BR4]: When evaluating the classification, you should use the position description to provide examples and support for how the position is or is not performing work at the level you are evaluating.

Analysis must include:
- ***At least*** one reason why the position doesn't meet a specific classification.
- ***At least*** two to three reasons why it does meet the requested classification.
- The number of reasons will be dependent on the situation. Your goal should always be to make all necessary arguments to effectively and completely evaluate the classifications.
- Consideration should be given to the General Description and Distinguishing Features listed on the class spec.

NOTE: Do not reference the Duties and Responsibilities section of the class specs as those duties can be performed at multiple levels and are often ***outcomes of duties performed, not duties found in a PD***.

The class spec's duties and responsibilities are examples of the type of work the classification does, but should generally not be used as an argument for why the position fits into that level of the classification series, because multiple levels of the series may perform the same or similar duties.

Commented [BR5]: Including the Position Summary from the Position Description here sets the parameters for what you will be evaluating as part of your analysis and gives the reader the purpose for why the position exists. Including this here makes it easy for the reader to reference the position's primary purpose when reading the analysis. It also ties the PD to this analysis document.

Engineer 3 applies extensive advanced environmental engineering knowledge and experience in the areas of engineering project management; technical/professional consultation on the most difficult environmental issues; final plan review and approval of major or complex sources; development of technical strategies, guidelines, rules, and policies; and the evaluation of new and emerging pollution control technology. **(General Description detail)** The work this position will be responsible for is involved with pollution emission and permitting for the most challenging and complex sources in Oregon requiring working on emission sources that require tailored solutions that are novel and innovative. This level of work will require someone with extensive advanced environmental engineering knowledge and experience in the areas of engineering project management. This position will also act as an **agency expert** and resource for GHG pollution control to agency leadership, the public, industries, cities, counties, State and Federal officials, and others on plans, permits, and requirements affecting the design, construction, and operation of GHG sources and control equipment. **(Supporting Statement from the PD)**

The Environmental Engineer 3 is distinguished from the lower levels by the extensive, progressive engineering and environmental knowledge and experience which is applied to a broad range of complex and often unprecedented environmental issues or concerns and require innovative solutions. **(Distinguishing Features detail)** This position will be doing work involving a broad range of complex and often unprecedented environmental issues or concerns that require innovative solutions. For example, after conversation with the manager it was explained that the Ash Grove cement manufacturing facility uses a chemical process that is the largest single source of GHG emissions in Oregon. As a matter of fact, the cement kiln used for the pyroprocessing (a process in which materials are subjected to high temperatures (typically over 800 °C) to bring about a chemical or physical change) stage of manufacturing of portland and other types of hydraulic cement at the Ash Grove facility is physically the hottest spot in the state of Oregon. The process of manufacturing cement uses an extreme amount of fuel from old tires, coal, natural gas, and other forms of highly pollutant fuel sources. This position will need to work with this facility to develop a starting point to reduce pollution emissions, determine if there are other reduction options that exist elsewhere that could be effective for this facility, and how those other sources might affect the manufacturing of the product. As an example, the burning of tires for fuel in the kiln emits much more GHG than natural gas, but is switching to natural gas as the only fuel source a viable option? Is the natural gas infrastructure sufficient to handle the switch? What else would be impacted by such a switch? Also, in this example, this position would be dealing with the chemical process used to manufacture cement and figuring out if there's a way to change the process to reduce the amount of CO^2 emitted. Working with the manufacturing facilities to come up with new emission control solutions that still allow the facility to produce its product, as required by state and federal regulations. This will require the position to look globally to find alternatives that are effective. This specific example is for the cement manufacturing industry, one of 13 or more manufacturing pollution sources this position will be responsible for addressing. Another example would be that this position will be working with electronics manufacturing companies such as Intel, which has multiple emission sources of pollution that are completely different than the emission sources of other industries. This work requires extensive, progressive engineering and environmental knowledge and experience which is applied to a broad range of complex and often unprecedented environmental issues or concerns and requires innovative solutions. **(Supporting Statement from manager conversation)**

At the Environment Engineer 3 level, employees make decisions having significant public health, economic, or environmental impact. They advise agency management, Economic Development Department staff, and local governments on technical and environmental concerns. **(more Distinguishing Features detail from the class spec)** This position's permitting work will involve making decisions that have significant public health, economic, and environmental impact. As stated above in the examples, the emission reduction work this position will be doing

Commented [BR6]: The statement that the position is an agency expert is support in multiple areas of the PD:

- Maintains sufficient knowledge of and expertise on environmental issues locally and nationally and in sufficient technical depth to allow for reasoned policy, administrative rule, and enforcement recommendations to manage greenhouse gas emissions (e.g. through membership in professional associations, trade journals, conferences, etc.)
- Provides expert assistance to agency staff and other interested parties regarding interpretation of state/federal greenhouse gas regulations.
- Prepares for and attends community and other public meetings as a permitting expert, including informational briefings and formal public meetings/hearings, prepares information and answers questions to support meetings and other interactions with community and other stakeholders.
- Requires expert level experience and knowledge in source operations, pollution control devices and industrial emission processes, compliance inspection methods, and source permitting, including the ability to correctly interpret air toxics emission information and toxicity data.

Commented [BR7]: Both this specific General Description and Distinguishing Feature statement from the class spec are supported by information obtained from discussion with the program manager that details the innovate solutions to complex environmental issues the position will be responsible for.

This level of work matches the EE3 classification level and is included to draw the connection for the reader. It's not just making the statement that the position is responsible for innovative solutions to complex environmental issues, it's describing those issues to the reader so they can understand how and why the work reaches the EE3 level.

This was necessary because the PD did not go into detail as to how the position was performing innovative solutions to these complex environmental issues, nor would it make sense to put that level of detail into a PD. But it's necessary to explain it in the analysis so the reader understands how the position is doing work at this level. Keep in mind that while the manager understands this work, the reader, especially someone outside of the agency, might not, so it's necessary to explain it in such a way that they can see the connection.

will impact Oregon's environment, the state's health of its residents, and have an economic impact on the industries under the agency's permitting oversight. This position will make decisions and recommendations that directly affect decisions regarding the levels of greenhouse gases emitted by industrial sources and the methods of assessing potential reductions pursuant to Division 271 (Oregon Climate Protection Program) requirements for specific sources. Determines the acceptability of both proposed and existing greenhouse gas assessments, and current and future permit conditions to require regarding those emissions. This position will also collaborate with appropriate technical staff to evaluate facilities under Division 271 and determine any additional requirements. Decisions must be made on the adequacy of greenhouse gas risk assessments, existing permit limits and conditions to fully implement Division 271 and related source-specific greenhouse gas regulations. Improper decisions can result legal and credibility problems for the agency, as well as failure to meet long-term statewide objectives on reducing greenhouse gases. This is work which fits into the level of responsibilities for an Environmental Engineer 3. Circumstances and issues are often high profile with decisions having the potential for significant impact on the operational status of a facility and agency goals and objectives. **(Supporting Statement from the PD)**

The Environmental Engineer 3 is considered by the Department and by the outside engineering community as an expert in a particular field. These employees are usually assigned project leader responsibility for planning, staffing, reviewing, and completing work assignments. They function as a senior resource and expert within their assigned unit and assist management in developing the technical expertise of other Department engineers and scientific professionals. **(the final Distinguishing Features Detail)** This position is responsible for providing expert assistance to agency staff and other interested parties regarding interpretation of state and federal greenhouse gas regulations, **(1)** prepares for and attends community and other public meetings as the agency's permitting expert, including informational briefings and formal public meetings/hearings, prepares information and answers questions to support meetings and other interactions with community and other stakeholders, **(2)** and is expected to have expert level experience and knowledge in source operations, pollution control devices and industrial emission processes, compliance inspection methods, and source permitting, including the ability to correctly interpret air toxics emission information and toxicity data. **(3)** This position is a senior staff and project manager for the implementation and ongoing administration of greenhouse gas regulations and related permitting actions affecting TV and ACDP facilities **(4)** and acts as the overall project lead in completing all work in finalizing information and documents necessary to support finalization and agency approval of permit conditions related to greenhouse gas emissions, **(5)** leads team review for greenhouse gas assessments conducted by certain air permitted sources. Assigns review tasks and deadlines, checks progress, and adjusts timelines as needed. Reviews or delegates review of extensive project information and makes recommendations for greenhouse gas abatement requirements to include in air permits. **(6) (Supporting Statement from the PD – each number is listed on the PD for cross reference examples)**

The level of complex, innovative, and unprecedented work this position will be responsible for best fits into the Environmental Engineer 3 classification. **(Conclusion)**

FLSA

This position meets the criteria to be classified as exempt from overtime under the FLSA's Professional exemption. **(Statement)**

To meet this exemption, the position must be paid on a salary basis and earn a salary of at least $684 per week,

Commented [BR8]: FLSA requires an actual analysis of why it does or doesn't meet a specific designation, not just a statement for what the agency wants the position to be.

If requesting an FLSA exemption, the analysis should support that exemption request with evidence from the PD that the position meets the necessary criteria, and how.

Note: The boilerplate language for FLSA exemptions does not provide a sufficient argument to support your request for Exempt positions.

For Non-Exempt:
This position meets the criteria under the FLSA to be non-exempt. This position does not customarily and regularly exercise discretion and independent judgment. Additionally this position does not perform work requiring knowledge of an advance type in a field of science or learning, work that is original and creative in character in a recognized field of artistic endeavor, or teaching, tutoring, or lecturing in the activity of imparting knowledge. This position does not perform as a primary duty the management of the enterprise or of a customarily recognized department or subdivision. Therefore, non-exempt and eligible for overtime is appropriate.

(Salary Basis Requirement) and the position's primary duty must be the performance of work requiring advanced knowledge in a field of science or learning customarily acquired by a prolonged course of specialized intellectual instruction. This primary duty test includes three elements:

1) The employee must perform work requiring advanced knowledge;
2) The advanced knowledge must be in a field of science or learning; and
3) The advanced knowledge must be customarily acquired by a prolonged course of specialized intellectual instruction.

The phrase "work requiring advanced knowledge" means work which is predominantly intellectual in character, and which includes work requiring the consistent exercise of discretion and judgment, as distinguished from performance of routine mental, manual, mechanical or physical work. An employee who performs work requiring advanced knowledge generally uses the advanced knowledge to analyze, interpret or make deductions from varying facts or circumstances. Advanced knowledge cannot be attained at the high school level.

The phrase "field of science or learning" includes the traditional professions of law, medicine, theology, accounting, actuarial computation, engineering, architecture, teaching, various types of physical, chemical, and biological sciences, pharmacy and other similar occupations that have a recognized professional status as distinguished from the mechanical arts or skilled trades where in some instances the knowledge is of an advanced type but is not in a field of science or learning.

The phrase "customarily acquired by a prolonged course of specialized intellectual instruction" restricts the exemption to professions where specialized academic training is a standard prerequisite for entrance into the profession. The best prima facie evidence that an employee meets this requirement is possession of the appropriate academic degree. However, the word "customarily" means that the exemption is also available to employees in such professions who have substantially the same knowledge level and perform substantially the same work as the degreed employees, but who attained the advanced knowledge through a combination of work experience and intellectual instruction. Thus, for example, the learned professional exemption is available to the occasional lawyer who has not gone to law school, or the occasional chemist who is not the possessor of a degree in chemistry. However, the learned professional exemption is not available for occupations that customarily may be performed with only the general knowledge acquired by an academic degree in any field, with knowledge acquired through an apprenticeship, or with training in the performance of routine mental, manual, mechanical or physical processes. The learned professional exemption also does not apply to occupations in which most employees have acquired their skill by experience rather than by advanced specialized intellectual instruction. **(Professional Exemption Detail)**

This position is paid on a salary basis and earns a salary of at least $684 per week. **(Salary Test Supporting Statement)** and requires four years of engineering experience; with two years of experience in an environmental protection/control program; and a bachelor's degree in an engineering field such as Environmental, Chemical, Civil, or Mechanical or three more years of engineering experience. In addition, this position requires a professional engineer certification.

The level of responsibility and independent decision making necessary for this position goes beyond following well-established techniques and procedures which have been catalogued and described in manuals or other sources and in which the employee has some leeway in the performance of their work but only within closely

prescribed limits, or in gathering factual information, applying known standards or prescribed procedures, determining which procedure to follow, or determining whether prescribed standards or criteria are met.

This position is responsible for initiating and overseeing the completion of greenhouse gas reduction assessments by air permitted sources. The position develops both broad guidance on how these assessments should be conducted as well as site or industry-specific guidance applicable to the distinct characteristics of that site or industry. The position oversees and conducts independent evaluations of greenhouse gas reductions for these air permitted sources that ultimately inform permitting requires adopted into those air permits.

Working with other technical staff, the position has overall project responsibility for all phases of the emissions identification, including review of emission sources and options for emission control devices. This position also independently performs and oversees reviews of facility process flow diagrams, control devices, pollution reduction activities, and associated engineering documents, and develops and draft permits and permit conditions to formalize any reduction requirements or other limitations.

This position will serve as a technical resource for internal and external stakeholders on greenhouse gas assessments, inventory and emission control technologies and other issues related to assigned sources.

This position is a senior staff and project manager for the implementation and ongoing administration of greenhouse gas regulations and related permitting actions affecting Title V and ACDP facilities. This position is responsible for determining the regulatory requirements pertaining to current and proposed facilities pertaining to greenhouse gases, and provides overall technical, engineering, and program review and guidance to ensure compliance by the largest and often most complex sources of greenhouse gas emissions in the state.

This position will also collaborate with appropriate technical staff to evaluate facilities under Division 271 (Climate Protection Program) and determine any additional requirements. Decisions must be made on the overall compliance status of a complex source and on the effectiveness of a proposed emission control device, often with inadequate or suspect data, unclear basis for past permitting conditions, or in the absence of a clear precedent within existing agency rules or guidance. Decisions rendered are often based on existing policy, in consideration of advanced program knowledge and guidelines. Circumstances and issues are often high profile with decisions having the potential for significant impact on the operational status of a facility and agency goals and objectives.

This position also makes decisions and recommendations that directly affect decisions regarding the levels of greenhouse gases emitted by industrial sources and the methods of assessing potential reductions pursuant to Division 271 requirements for specific sources. Determines the acceptability of both proposed and existing greenhouse gas assessments, and current and future permit conditions to require regarding those emissions.

Decisions must be made on the proper approach to take regarding violations. Decisions must be made on the adequacy of greenhouse gas risk assessments, existing permit limits and conditions to fully implement Division 271 and related source-specific greenhouse gas regulations. Improper decisions can result legal and credibility problems for the agency, as well as failure to meet long-term statewide objectives on reducing greenhouse gases. **(Professional Exemption Supporting Statement)**

Therefore, this position requires advanced knowledge in a field of science or learning customarily acquired by a prolonged course of specialized intellectual instruction and the necessary level of consistent exercise of discretion

and judgment in its performance to meet the Professional exemption criteria. **(Conclusion)**

SERVICE TYPE

This position does not meet managerial, confidential or supervisory exclusion criteria. **(Statement)** This position does not make decisions in the collective bargaining process or assist a decision maker in the collective bargaining process. **(Non-Confidential Supporting Statement)** This position does not possess the authority to order or effectively recommend the service or product to be produced by the agency, or to formulate and carry out management decisions, or represents management's interests and does not have the discretion in the performance of these management responsibilities beyond the routine discharge of duties. **(Non-Managerial Supporting Statement)** This position does not exercise supervisory authority to hire, discharge, reward or discipline. **(Non-Supervisory Supporting Statement)** Therefore, classified and represented is appropriate. **(Conclusion)**

Commented [BR9]: Service Type – requires an analysis, detailing why or why not a specific exclusion is appropriate.

For example: Management Service designation, there must be an evaluation of how the position meets the statutory requirements, "it meets the ORS requirements to be Management Service" is insufficient. How does it meet the ORS?

There should be evidence included from the PD as to how the position meets the exclusion criteria.

STATE OF OREGON
POSITION DESCRIPTION

Position Revised Date:
07/15/202X

This position is:
☒ Classified
☐ Unclassified
☐ Executive Service
☐ Mgmt Svc – Supervisory
☐ Mgmt Svc – Managerial
☐ Mgmt Svc - Confidential

Agency:

Facility: Headquarters

☒ New ☐ Revised

SECTION 1. POSITION INFORMATION

a. Classification Title:	Environmental Engineer 3	**b.** Classification No:	C3412
c. Effective Date:	07/01/202X	**d.** Position No:	123456
e. Working Title:	Greenhouse Gas Permitting Engineer	**f.** Agency No:	
g. Section Title:	Office of Greenhouse Gas Programs	**h.** Budget Auth No:	
i. Employee Name:		**j.** Repr. Code:	

k. Work Location (City – County):

l. Supervisor Name:

m. Position: ☒ Permanent ☐ Seasonal ☐ Limited Duration ☐ Academic Year
☒ Full-Time ☐ Part-Time ☐ Intermittent ☐ Job Share

n. FLSA: ☒ Exempt ☐ Non-Exempt

If Exempt: ☐ Executive ☐ Administrative ☒ Professional ☐ Computer

o. Eligible for Overtime: ☐ Yes ☒ No

SECTION 2. PROGRAM AND POSITION INFORMATION

a. Describe the program in which this position exists. Include program purpose, who's affected, size, and scope. Include relationship to agency mission.

The Office of Greenhouse Gas Programs is primarily responsible for leading the agency's efforts to develop and implement programs to reduce Oregon's greenhouse gas emissions. The Office includes a program that collects data on Oregon's greenhouse emissions, as well as a market-based program that reduces the greenhouse gas intensity of Oregon's transportation fuels. The Office is also designs and implements other programs to reduce greenhouse gas emissions across the state.

b. Describe the primary purpose of this position, and how it functions within this program. Complete this statement. The primary purpose of this position is to:

This position serves as a Greenhouse Gas Project Manager and Permit Writer for the Greenhouse Gas Programs section at the agency. It is responsible for initiating and overseeing the completion of greenhouse gas reduction assessments by air permitted sources. The position develops both broad guidance on how these assessments should be conducted as well as site or industry-specific guidance applicable to the distinct characteristics of that site or industry. The position oversees and conducts independent evaluations of greenhouse gas reductions for these air permitted sources that ultimately inform permitting requirements adopted into those air permits.

Working with other technical staff, the position has overall project responsibility for all phases of the emissions identification, including review of emission sources and options for emission control devices. This position also independently performs and oversees reviews of facility process flow diagrams, control devices, pollution reduction activities, and associated engineering documents, and develops and draft permits and permit conditions to formalize any reduction requirements or other limitations.

This position will serve as a technical resource for internal and external stakeholders on greenhouse gas assessments, inventory and emission control technologies and other issues related to assigned sources.

SECTION 3. DESCRIPTION OF DUTIES

List the major duties of the position. State the percentage of time for each duty. Mark "N" for new duties, "R" for revised duties or "NC" for no change in duties. Indicate whether the duty is an "Essential" (E) or "Non-Essential" (NE) function.

% of Time	N/R/NC	E/NE	DUTIES
Note: *If additional rows of the below table are needed, place cursor at end of a row (outside table) and hit "Enter".*			
70%			**I. Project Management**
	N	E	a) Provides primary administrative, process and technical oversight for completion of refined emissions inventories, source testing objectives, modeling parameters, and other engineering data related to facility greenhouse gas emissions for new and existing facilities. Evaluates and approves work plans, reports and results of assessments and inventories.
	N	E	b) Serves as overall project lead in completing all work in finalizing information and documents necessary to support finalization and agency approval of permit conditions related to greenhouse gas emissions. **(5)**
	N	E	c) Evaluates/integrates recommendations from project team members, consultants, attorneys, and public on project issues. Makes final determination regarding which comments are included and works with senior team members and manager to resolve issues.
	N	NE	d) Evaluates monitoring or other testing data to determine emission sources and to inform determinations of abatement options.
	N	E	e) Leads team review for greenhouse gas assessments conducted by certain air permitted sources. Assigns review tasks and deadlines, checks progress, and adjusts timelines as needed. Reviews or delegates review of extensive project information and makes recommendations for greenhouse gas abatement requirements to include in air permits. **(6)**
	N	E	f) Develops and monitors project schedules and prepares reports summarizing project status, including progress and problems encountered.
	N	E	g) Analyze new and existing greenhouse gas control technologies and strategies and evaluate engineering feasibility of various technologies that may be applied to emissions units. Review

			upgrades and adjustments to existing technologies against control requirements and approve/ disapprove applications.
	N	E	h) Using engineering practices and principles, evaluate engineering studies and literature for greenhouse gas control devices and processes to evaluate effectiveness of emissions reductions options. Establish control efficiency levels based on engineering calculations and existing technology demonstrations.
	N	E	i) Reviews design and engineering parameters, reports and performs engineering and other calculations to determine consistency and conformance with agency rules, policy, ensuring sound engineering practices are adhered to; recommends changes as needed.
	N	E	j) Serves as Project Team Leader for assigned source assessments and associated emission reduction determinations. Develops and maintains a site strategy for project progress and completion. Identifies issues requiring agency staff and management attention concerning project implementation.
	N	E	k) Represents agency on negotiating teams with sources and, in consultation with manager and/or Project Team & State Attorney General, establishing agency negotiating position and the overall parameters, objectives and timeframes for emissions assessments and subsequent emission reduction requirements added to air permits.
	N	E	l) Serves as primary contact for source/permittee communications, including day-to-day and overall project administration.
	N	E	m) Coordinates project activities with other Department programs, including agency Regional Offices, and communicates project issues with the public, State Attorney General, sources, EPA and other regulatory agencies as applicable.
10%			**II. Permitting**
	N	E	a) Analyses, drafts, and issues complex Title V and ACDP permits and/or permitting terms and conditions. Completes new permit language, review reports and engineering data. Manages public outreach during permit issuance, including hearings and public comments. Evaluates new conditions and public input and provides recommendations for resolution and permit issuance to regional AQ manager.
	N	E	b) Performs detailed and comprehensive reviews of plans, applications, modifications, and specifications for existing or proposed new sources, modified existing sources, and related industrial greenhouse gas control equipment and monitoring systems. Drafts and reviews control technology specifications for significant sources.
	N	E	c) Reviews emissions from sources, and determines allowable emission rates and testing requirements.

	N	NE	d) Contacts and coordinates with permit applicant to obtain additional information.
	N	NE	e) Responds to public comments and inquiries regarding all aspects of permitting actions pertaining to greenhouse gas emissions.
	N	NE	f) Serves as program representative at public hearings and formal and informal meetings, and may occasionally serve as hearings officer.
	N	NE	g) Consults with peers, management, enforcement and DOJ in the evaluation of applicable permit conditions.
5%			**III. Compliance Assurance**
	N	NE	a) Inspects complex air sources, reviews reports, excess emission reports, testing results, and compliance studies and determines compliance status. Evaluates facility upsets and other non-conforming events.
	N	NE	b) Drafts, recommends and issues warning letters and pre-enforcement notices, prepares referrals and develops and negotiates compliance programs and schedules for non-complying sources.
	N	NE	c) Drafts comprehensive inspection reports and conducts analysis of greenhouse gas emissions.
	N	NE	d) Interprets data from sources or information derived from other non-compliance situations to determine compliance with established rules and/or permit conditions.
	N	NE	e) Inspects complex situations at unpermitted facilities for compliance.
10%			**IV. Program Development and Administration**
	N	E	a) Draft, and/or provide technical assistance and consultation to assist with rule and policy development of regional and statewide rules and policies necessary to address new and emerging complex issues related to industrial greenhouse gas emissions.
	N	E	b) Maintains sufficient knowledge of and expertise on environmental issues locally and nationally and in sufficient technical depth to allow for reasoned policy, administrative rule, and enforcement recommendations to manage greenhouse gas emissions (e.g. through membership in professional associations, trade journals, conferences, etc.).
	N	E	c) Leads or otherwise participates in project specific teams to address identified and defined problems, or to expand agency capabilities. Participates with and often leads other regional air quality staff in assessing impact of industrial sources of greenhouse gas emissions and develops strategies to achieve compliance with state or federal air regulations or permit conditions.

5%			**V. Technical Assistance and Outreach**
	N	E	a) Provides assistance, consultation, and education to the public, industry, cities, counties, State and Federal officials, and others on plans, permits and requirements affecting the design, construction and operation of greenhouse gas sources and control equipment.
	N	E	b) Provides expert assistance to agency staff and other interested parties regarding interpretation of state/federal greenhouse gas regulations. **(1)**
			c) Assists sources, the public, and consultants in identifying and interpreting state and federal environmental rules and guidance.
	N	E	d) Assists other staff by reviewing draft permits, plan reviews, compliance actions and other issues and concerns on significant greenhouse gas sources.
	N	E	e) Prepares for and attends community and other public meetings as permitting expert, including informational briefings and formal public meetings/hearings, prepares information and answers questions to support meetings and other interactions with community and other stakeholders. **(2)**
	N	NE	f) Provides standard as well as non-routine recommendations to sources for efficiently operating their facilities in compliance with greenhouse gas requirements in the sources' air permits.
	N	NE	g) Elevates issues of dispute or broader policy importance as needed to manager for timely resolution to ensure projects meet established timelines.

SECTION 4. WORKING CONDITIONS

Describe any on-going working conditions. Include any physical, sensory, and environmental demands. State the frequency of exposure to these conditions.

Most work is performed in a professional office setting requiring frequent use of a computer with word processing, database, email, and spreadsheet applications. Physical outdoor activity involved during field activities that may include adverse weather conditions, exposure to pollutants, chemicals, contaminated soil, water, fumes, airborne contaminants, fall or tripping hazards, climbing stairs to gain access to multilevel facilities, kneeling, crouching, climbing, substantial walking, etc. Such conditions may require use of personal safety equipment and protective clothing. Employee must be trained, monitored and equipped, in accordance with applicable Health and Safety Rules.

This position has regular in-person or telephone contact with staff from agency and other state agencies, regulated community representatives, project participants, special interest groups, and the public who are sometimes hostile or angry requiring good judgment and ability to communicate clearly and effectively in stressful situations.

This position requires occasional travel on official State business for fieldwork, assessments, meetings, training, conferences, or public hearings that may include overnight stays. Meetings and public hearings are often held in the evenings. Occasional extended work hours and weekend work may also be required.

Should you choose to drive a motor vehicle you must have a valid driver license. If not, you must have an alternate method of transportation. Compliance with ORS 807.020 (1) is required. It is required that drivers of state-owned vehicles complete a defensive driving safety class every two years.

Regular, consistent, and punctual attendance is a requirement of this position.

SECTION 5. GUIDELINES

a. List any established guidelines used in this position, such as state or federal laws or regulations, policies, manuals, or desk procedures.

1. Department guidance manuals, policies, and procedures.
2. Clean Air Act
3. Code of Federal Regulations
4. US Environmental Protection Agency agreements and guidance documents.
5. Technical Manuals on Pollution Control Equipment and associated Engineers Handbooks
6. Oregon Revised Statutes
7. Oregon Administrative Rules
8. All State and Federal Statutes regulations governing air pollution emissions

b. How are these guidelines used?

The job involves interpretation, application and enforcement of these guidelines. These guidelines outline the statutory and administrative requirements for implementation of the Air Quality program position.

SECTION 6. WORK CONTACTS

With whom, outside of co-workers in this work unit, must the employee in this position regularly come in contact?

Who Contacted	How	Purpose	How Often?
Note: *If additional rows of the below table are needed, place curser at end of a row (outside table) and hit "Enter".*			
Agency Staff	In person, phone, meetings, email, writing.	Review and discuss reports, agency policy, state and federal rules, potential public health effects, projects and permits.	Daily/as needed
PEM Mgr. E	In person, phone, meetings, email, writing.	Appraise of significant issues, seek policy guidance to assure adherence to Agency policy/procedures.	Daily/as needed
Local, State or Federal Government	In person, phone, meetings, email, writing.	Review and discuss reports, agency policy, state and federal rules, potential public health effects, projects and permits.	Daily/as needed
Regulated Entities	In person, phone, meetings, email, writing.	Review and discuss reports, agency policy, state and federal rules, potential public health effects, projects and permits.	Daily/as needed
Industry	In person, phone, meetings, email, writing.	Review and discuss reports, agency policy, state and federal rules, potential public health effects, projects and permits.	Daily/as needed
Public	In person, phone, meetings, email, writing.	Review and discuss reports, agency policy, state and federal rules, potential public health effects, projects and permits.	Daily/as needed

SECTION 7. POSITION RELATED DECISION MAKING

Describe the typical decisions of this position. Explain the direct effect of these decisions.

The employee in this position is a senior staff and project manager for the implementation and ongoing administration of greenhouse gas regulations and related permitting actions affecting TV and ACDP facilities. **(4)** This position is responsible for determining the regulatory requirements pertaining to current and proposed facilities pertaining to greenhouse gases. This position provides overall technical, engineering, and program review and guidance to ensure compliance by the largest and often most complex sources of greenhouse gas emissions in the state.

This position will also collaborate with appropriate technical staff to evaluate facilities under Division 271 (Climate Protection Program) and determine any additional requirements. Decisions must be made on the overall compliance status of a complex source and on the effectiveness of a proposed emission control device, often with inadequate or suspect data, unclear basis for past permitting conditions, or in the absence of a clear precedent within existing agency rules or guidance. Decisions rendered are often based on existing policy, in consideration of advanced program knowledge and guidelines. Circumstances and issues are often high profile with decisions having the potential for significant impact on the operational status of a facility and agency goals and objectives.

Makes decisions and recommendations that directly affect decisions regarding the levels of greenhouse gases emitted by industrial sources and the methods of assessing potential reductions pursuant to Division 271 requirements for specific sources. Determines the acceptability of both proposed and existing greenhouse gas assessments, and current and future permit conditions to require regarding those emissions.

Decisions must be made on the proper approach to take regarding violations. Decisions must be made on the adequacy of greenhouse gas risk assessments, existing permit limits and conditions to fully implement Division 271 and related source-specific greenhouse gas regulations. Improper decisions can result legal and credibility problems for the agency, as well as failure to meet long-term statewide objectives on reducing greenhouse gases.

SECTION 8. REVIEW OF WORK

Who reviews the work of the position?

Classification Title	Position Number	How	How Often	Purpose of Review
PEME		Phone, e-mail, in writing and in person.	As needed	Provides general supervision with periodic review and conducts annual written performance appraisal.
Senior Staff		Phone, e-mail, in writing and in person.	As needed	Provides internal reviews of drafted documents, including permits, inspection reports, and public notices.

Note: *If additional rows of the below table are needed, place curser at end of a row (outside table) and hit "Enter".*

SECTION 9. OVERSIGHT FUNCTIONS

THIS SECTION IS FOR SUPERVISORY POSITIONS ONLY

a. How many employees are directly supervised by this position? 0

How many employees are supervised through a subordinate supervisor? 0

b. Which of the following activities does this position do?

- ☐ Plan work
- ☐ Assigns work
- ☐ Approves work
- ☐ Responds to grievances
- ☐ Disciplines and rewards
- ☐ Coordinates schedules
- ☐ Hires and discharges
- ☐ Recommends hiring
- ☐ Gives input for performance evaluations
- ☐ Prepares & signs performance evaluations

SECTION 10. ADDITIONAL POSITION-RELATED INFORMATION

ADDITIONAL REQUIREMENTS: List any knowledge and skills needed at time of hire that are not already required in the classification specification:

Advanced environmental, science or engineering education; understanding of the principles of pollution control; ability to deal effectively with angry or hostile people; ability to work well with other staff members; skill in writing concise and clear reports describing complex industries and regulatory determinations. Excellent communication skills, oral and written, are required.

Expert level experience and knowledge in source operations, pollution control devices and industrial emission processes, compliance inspection methods, and source permitting, including the ability to correctly interpret air toxics emission information and toxicity data. **(3)**

Position operates with a large degree of independence. Person in the position is required to make program decisions and advise the manager of the impact after-the-fact. Ability to work in a team environment and occasionally lead a team effort. Ability to learn, and occasionally contribute to the development of, the policies and procedures of the air quality program. Ability to read and understand lengthy and involved rules and regulations.

This position requires knowledge of a variety of business operations covering many different industry types and complexities of commercial and industrial processes. Compliance determinations are therefore typically unique to each individual source or business.

The person filling this position is required to be a registered professional engineer.

BUDGET AUTHORITY: If this position has authority to commit agency operating money, indicate the following:

Operating Area	Biennial Amount ($00000.00)	Fund Type

Note: *If additional rows of the below table are needed, place curser at end of a row (outside table) and hit "Enter".*

N/A		

SECTION 11. ORGANIZATIONAL CHART

Attach a current organizational chart. Be sure the following information is shown on the chart for each position: classification title, classification number, salary range, employee name and position number.

SECTION 12. SIGNATURES

Employee Signature	Date	Supervisor Signature	Date

Appointing Authority Signature	Date