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November 14, 2022

Judy Grycko OESAC CEU Committee PO Box 577 Canby, OR 97013-0577

Subject: Request for Approval of Module 4 Operator Course Application for CEU's

Good afternoon Judy,

Thank you for your recent correspondence with our team. We are following the submission of our Module 3 Compliance & Reporting Operator Course asking for accreditation CEU's of 2.25 hours for our 3 Section – Operator Course **Module 4**: *Not Enough Time*.

Module 4 demonstrates why we must make good records. We need to recognize how important good records are and take the time to document all of our work. As you will see and come to understand, it is important to always make time. This course supports associates with the documentation of their operations and improving the records they produce. Specifically, associates will learn the importance of their records and that good recordkeeping gives individuals a better legal position should their actions ever be questioned. When records do not accurately explain actions and events, the situation can quickly become a serious problem.

The purpose of this module is to ensure all Operators know how to properly document a sampling record, accurately document a changed record including the reason for the change, understand the Company's policy regarding falsification and what it means, why it is important to take the time to write correct records and documentation, what the benefit of self-disclosure of information to regulators is and what types of records at your project site require detailed records to be recorded.

As the course author, I have 23 years of wastewater experience as a compliance inspector, manager and trainer. I hold an active Grade 1 Environmental Compliance Inspector license in California, and work with a group of 15 members in the C&R group who contribute to our courses and collectively have over 300 years of wastewater and water utility experience.

Sincerely,

Elisabeth A. Smith

Elisafmith

Companywide Compliance Trainer elisabeth.smith@jacobs.com

Attachments: Module 4 Course Application and Payment

Module 4 Operator Course Syllabus Elisabeth A. Smith, Curriculum Vitae

Pay Registration Fees

Below is the course you just entered. You must now pay the registration fee(s). You will be able to add documents attached to the course after paying.

Paypal

Cancel Registration

Course Title

Module 4 Operator

Course

Target Audience DW and WW Operators

Instructor Elisabeth Smith

Training Location Online

Dates To Be Determined

DWP CEUs .225

ww **CEUs** .225

OnsiteInstall CEUs

OnsiteOandM

CEUs

MaxCEUs 0.225 Fees Charged

75

SponsorID 522

CurrentContactName

Annie **Business**

Name **Jacobs Engineering**

Group, Inc.

ContactAddress Jacobs Engineering Group, Inc., 101 N First Ave Ste 2600

ContactCity Portland

ContactState

OR

ContactZip 97201

CurrentContactPhone

4807719300

CurrentContactFax

CurrentContactEmail Annie.Smith@jacobs.com

Date Course Received 11/14/2022

Fees **Paid**

CheckNumber **PrelimAprvDate** MailedReceipt

Final Approval Date 1/1/1900

HomeStudy

no

Recurring yes

URL

TakeOffWeb

Inactive

✓

Moderated

Does Course **Promote**

Product? no

BetaTested NA

Comments

The purpose of this module is to ensure all Operators know how to properly document a sampling record, accurately document a changed record including the reason for the change, understand policy regarding falsification and what it means, why it is important to take the time to write correct records and documentation, what the benefit of self-disclosure of information to regulators is and what types of records at your project site require detailed records to be recorded.

SponsorID 522 Sponsor's **Business** Name

Jacobs Engineering Group, Inc.

Sponsor's **Address** 2020 SW Fourth Ave.,, Ste 300 Sponsor's

City Portland Sponsor's State OR

Sponsor's **Zipcode** 97201 Sponsor's **Phone**

4807719300 Sponsor's Fax

Sponsor's Name **Annie Smith** Sponsor's

Email

Annie.Smith@jacobs.com

thank you

This is your receipt for:

Module 4 Operator Course

Course ID: 10728
Fees Charged: \$75.00
date paid: 11/14/2022

Next steps:

Your course application will be reviewed and the administrator will contact you with any concerns. Accurate course applications will be forwarded to the CEU committee for approval.

Until moderator ok's your course you will see your course in the "Waiting for Moderator's OK"

Jacobs



Module 4: Not Enough Time?

OMFS Training Series for Jacobs (formerly CH2M)

2022 Syllabus Course Description

Operations Management Group

Document history and status

Revision	Date	Description	Author	Checked	Reviewed	Approved

Module 4: Not Enough Time?

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Executive Summary

Our focus is on Values, Integrity and Quality. It is the way we do business, not just something we talk about. Our values concentrate on:

- Exceeding the Customers Expectations.
- Empowering our People.
- Enhancing the Environment.

Together we must work hard to preserve our heritage and reputation, to make sure we are successful in the future. Because of this, there are policies for ethics and environmental compliance that we need to follow. We should each promise to do our best to meet these policies for yourself and the Company.

Module 4: Not Enough Time?

Our work protects both the environment and the people we serve. For this reason, each of our jobs is important. We must strive to achieve compliance and to properly complete records of the decisions that we make and the circumstances that we deal with. This is especially true if during the workday a problem arises, or a mistake is made.

Purpose

This training demonstrates why we must make good records. We need to recognize how important good records are and take the time to document all of our work. As you will see and come to understand, it is important to always make time. This course supports associates with the documentation of their operations and improving the records they produce. Specifically, associates will learn the importance of their records and that good recordkeeping gives individuals a better legal position should their actions ever be questioned. When records do not accurately explain actions and events, the situation can quickly become a serious problem.

- All employee records are important and must be carefully and thoughtfully made.
- Of course, because we are human, it is always possible to make a mistake. The best course of action is to make a good record of what that mistake was and explain what we did to correct the problem. The writing of honest records at the time an event occurs, is the best opportunity to explain ourselves and can prevent problems later on.
- What we say or what we do not say in our records can help those who review our records to a correct conclusion or an incorrect conclusion about what happened.
- We often feel we will remember and understand the things that we experience. As time goes by however, we inevitably forget details or even complete events. When it comes to documentation in our records, one issue with not making a note about changes or non-routine events is later the person who made the record often cannot remember what happened.

1. Course Syllabus Description

The intended audience of the course is all Operators, regardless of their length of service. Because all Operators make records in the course of their work, this training is applicable to all positions.

We are committed to the goal of "Perfect Compliance and Perfect Reporting". This means all associates are expected to take any and all reasonable actions to achieve perfect compliance and then to fairly and accurately reflect the results of their efforts in their monthly reports to their regulators.

The Company has long recognized its greatest asset is its associates who are the key to all of the Company's goals including the goal of Perfect Compliance. One of the most important jobs associates have in reaching this goal is making good records. You will remember from previous compliance trainings that records must always include: the actual time something happened, the date, the year, the initials of the person making the record, and a good description of what happened or how data was generated. The description can be the most difficult of these to prepare, but it is also critically important.

Know how to:

- Properly document a sampling record.
- Accurately document a changed record and the reason for the change.

Know:

- What Selective Monitoring is and why it is not proper or allowed.
- What the Company's policy on Falsification and what it means.
- What you would like your records to look like if they were reviewed or audited.
- Why it is important to take the time to write correct records and documentation.
- What the benefit of self-disclosure of information to the regulators is.
- Understand a government investigation can result from inaccurately documented records.
- What information should be included in all records.
- What types of records at your project require detailed records to be recorded.

The operator course Module 4: *Not Enough Time?* consists of 3 Sections in a 25.5 minute video to watch, review and complete by each Operator. Each Section includes:

- 1. Simple Text (designed for ease of reading and comprehension).
- 2. Content Examples.
- 3. Content Illustrations within the videos.
- 4. Module Final Exam.

Each Section encourages personal accountability, provides examples of the evolving requirements, communication and due diligence required in Compliance & Reporting. The course provides guidance, direction and confidence for attaining our goal "Perfect Compliance and Perfect Reporting of Non-Compliance" to be achieved. Course retention is critical with our Clients' / Customers' satisfaction in our perfect compliance with all laws and regulations. Our Companywide Compliance Trainer and Program Administrator will be available to help Employees understand, practice and apply what they have learned.

Each Section will require the Employee to complete an attendance sheet that includes Course title with approval ID, Date, Printed name, and Signature. The Project Manager (or designee) is also required to provide their signature ensuring Operators are utilizing the course material appropriately, for the noted duration and following up with their performance in the field, confirming Operators are successfully applying what they have learned.

The course content, duration and brief description of each section is provided within the Appendix.

2. Module Lesson Plan

Module 4: Not Enough Time? is a self-paced video presentation designed to allow the participant an opportunity to read the course materials and then observe or experience examples of the content. The video presentation accompanied by questions and answers will encourage understanding and learned knowledge through course completion. This module will have a Final Exam at the end that will be scored, recorded and tracked.

The learning environment will be in a quiet area (the training room for example), furnished with a desktop, or laptop computer loaded with the assigned course files. The Project Manager will be responsible for providing the Employee with a computer, assigned Courses, Sign-In Sheet, and other materials (calculator, scratch paper for notes and computations) and will collect the Final Exam after completion.

The Final Exam will serve to confirm the Employees retention of the Module and may be utilized as part of the Employee Performance Program internally known as e3.

3. Program Tracking and Accountability

The Companywide Compliance Trainer, or e3 corporate software framework, will score and file the Final Course Exams. A score of 70% is required to Pass. Results will be made available to the site supervisor. If the Employee does not achieve the minimum score of 70%, the Employee will repeat the course.

The Companywide Compliance Trainer and Program Administrator will be available to those participants showing a need for specific course assistance. Employees will be given the course material objectives as part of their quarterly performance evaluation.

Appendix A. Course Module Descriptions

The following Sections are offered in the recommended progression:

Section	Description	Duration
Learning Objectives	Discuss Course Learning Objectives and Expectations.	10.00 min.
Section 1 – Not Enough Time	 DVD topics covered: Keeping Good Records. Communication. Documentation mistakes with no reference. Remembering the past and non-routine events. How much time does it take to make proper records? Documenting your work / changes for revisions. Has training helped you find the time to properly document records? 	7.50 min.
Operator Group 1	Real life examples with enactment/participation, Q&A and digging deeper in expanding Operator knowledge base.	
Section 1 – Continued	 Driving the Point Home – Video section with additional: Details. Definitions. Explanation. 	4.10 min.
Section 2 – What if you were being investigated by the USEP? Investigations Provide Answers. Prior notations provide required documentation. Records accurately and honestly reflect steps take. Disclosure.		6.15 min.
Operator Group 2	Real life examples with enactment/participation, Q&A and digging deeper in expanding Operator knowledge base.	

Cont. on next page

Continued from previous page:

Section	Description	Duration
Section 2 –	Driving the Point Home – Video section with additional:	2.30 min.
Continued	Details.Definitions.Clarification.	
Section 3 –	This section demonstrates the methods for	5.30 min.
The Client	calculating averages, using the method specified in your permit, reporting maximum and minimum values with no averaging unless your permit allows. Read your permit very carefully for the means of reporting, i.e. geometric means versus averaging.	
Section 3 –	Driving the Point Home – Video section with additional:	10.00 min.
Continued	Details.Definitions.Explanation.	
Group 3	Real life examples with enactment/participation, Q&A and digging deeper in expanding Operator knowledge base.	
Module 4 – Final Exam	12 Question Exam with story problems requiring 70% or higher score.	30.00 min.
Evaluation Report	Provide Operator Evaluation.	15.00 min
Total Hours	All Hours Listed are Firm Estimates.	2.25 Hours

Appendix B. Course Completion Sign-Off Sheet

Upon completion of each Section, the Operator will legibly print their name and provide a valid signature and date to receive credit. The Companywide Compliance Trainer (or designee) is responsible for Attendee enrollment. The Attendee must commit to full participation, and application of acquired knowledge towards individual professional growth. The Program Administrator will file the signature sheets with the Companywide Trainer into a secure filing network.

	Course Completion Sign-Off Sheet					
Jacobs	State: Course #					
Learning & Talent Management	Employee Name					
Module 4: Not Enough Time	Start Date	Completion Date	Minutes to Complete	Supervisor Signature		
Course – Learning Objectives						
Section 1 – Not Enough Time						
Operator Group 1 – Enactment/Participation, Digging Deeper						
Section 1 Continued – Driving the Point Home						
Section 2 – The Power of Evidence						
Operator Group 2 – Enactment/Participation, Digging Deeper						
Section 2 Continued – Driving the Point Home						
Section 3 – The Client						
Section 3 Continued – Driving the Point Home						
Operator Group 3 – Enactment/Participation, Digging Deeper						
Module 4 Final Exam						
Evaluation Report						
Total Hours Awarded for CEU Credit			2.25 TCH	0.225 CEU		
I understand that it is encumbant upon me to comple training by employees. My signature indicates that I p completed any portion of this course on my behalf.						
		DD/MM/20YY				
Employee Signature		Date		# License /Certification #		

Appendix C. Compliance & Reporting Certificate of Completion

Upon completion of the Module, the Program Administrator will complete the below Completion Certificate and provide a copy to the Operator for their records. At the site level, the Operator is responsible for submitting their Certificate to the State and paying any applicable state CEU fees. The Program Administrator may assist, as needed. When required, this form will be customized to include necessary State specific information.





Elisabeth Anne Smith

Companywide Compliance Trainer

EDUCATION

- Awarded Air Force ROTC college scholarship
- University of California, Riverside, California
- Harvey Mudd College, Claremont, California
- University of California, Sacramento, California, Office of Water Programs:
 - o Industrial Pretreatment Inspections
 - Water Treatment Plant Operation, Volumes 1 and 2
 - Operation of Wastewater Treatment Plants Volumes 1 and 2

CERTIFICATIONS

 California Water Environmental Association (CWEA) Grade I Environmental Compliance Inspector

PROFESSIONAL AFFILIATIONS

- American Water Works Association (Emergency Preparedness & Security committee member)
- CWEA (member)

AWARDS

- Rocky Mountain Water Environment Association Industrial Pretreatment Coordinator of the Year, 2004
- CWEA Safety Award, Santa Ana River Basin Section, 2002

Summary/Profile

Ms. Smith is skilled in all aspects of compliance training, managing industrial pretreatment programs, and treatment facility security. She has conducted environmental auditing, prepared legal framework to support local industrial pretreatment, and supported investigative teams working under attorney privilege. Ms. Smith is a certified California Grade 1 Environmental Compliance Inspector.

Project Experience

Companywide Compliance Trainer

Iacobs

Colorado Springs, Colorado

Ms. Smith provides regulatory compliance training to O&M staff for Jacobs. She provides training to project management staff on company tools to facilitate understanding, tracking, and improving permit compliance. Ms. Smith works closely with the Compliance and Reporting Group to update compliance training as new regulatory changes and issues arise.

Ms. Smith has been instrumental in developing and producing a series of multimedia training on a variety of topics that are delivered to all eligible associates and then become part of required onboarding training for new hires. An external review of systems by a nationally recognized authority described the program as "far and away the leader in the environmental field."

She regularly delivers webinars on a variety of topics to project workers in the field. Previous topics include cybersecurity, active shooter, data handling, workplace security, sampling protocols, and spill reporting.

Ms. Smith has studied security issues related to O&M facilities – cybersecurity and physical security. She sits on the AWWA Emergency Preparedness & Security committee, which works to shape and influence regulations and industry guidance. She monitors security warnings and communicates them to company personnel.

Industrial Pretreatment Coordinator

CH2M HILL

Rio Rancho, New Mexico

Ms. Smith served as the Industrial Pretreatment Inspector, developing a pretreatment program under a compliance order from the U.S. Environmental Protection Agency. She conducted an industrial waste survey, developed the monitoring and reporting program, identified and categorized significant industrial users, developed the implementation manual, developed local limits, drafted the sewer use ordinance, and drafted the enforcement response plan. During this process, Ms. Smith met regularly with the Utility Director, City Attorney, City Clerk, and other city departments to coordinate program elements. In addition, she made several presentations to the Utility Commission and the City Council regarding pretreatment program implementation. For her work in Rio Rancho, Ms. Smith received the 2004 Industrial Pretreatment Coordinator of the Year Award from the Rocky Mountain Water Environment Association.

Industrial Pretreatment Inspector

CH2M HILL

Rialto, California

As Industrial Pretreatment Inspector, Ms. Smith managed the pretreatment program and served as the program inspector. She conducted inspections, performed grab and composite sampling, and documented results. She prepared monthly client reports and quarterly and annual regulatory reports. Ms. Smith also surveyed and inspected new businesses in the City to determine if they needed regulation under the pretreatment program. She interfaced with regulatory agencies, industrial users, and the City of Rialto, preparing documents for permitting and enforcement activities.

Ms. Smith also served as Project Safety Team Leader. She implemented a comprehensive training program to comply with Occupational Safety and Health Administration (OSHA) requirements as well as California OSHA requirements. She coordinated weekly staff safety training topics, monthly plant inspections by the safety team, and annual plant inspections by the company. She presented Rialto project's training system during the Project Safety Team Leader Summit 2000 as a model for other projects. Under her leadership, the Rialto project earned the 2002 Safety Program of the Year Award from the Santa Ana River Basin Section of the CWEA.

Legal Secretary

Bonne, Bridges, Mueller, O'Keefe and Nichols Riverside, California

As a legal secretary in a medical malpractice defense firm, Ms. Smith worked with an attorney responsible for 10 to 20 cases. Familiar with each local district's rules for court and filing, she managed the attorney's calendar and filed motions and documents in court on a wide variety of alleged medical malpractice cases. She established cooperative relationships with insurance carrier representatives, doctors, attorneys, courtroom clerks, and attorney service personnel.