

January 10, 2025

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

Subject: Phase 1 Operator Course Renewal Request for CEU's

Good afternoon Judy,

Thank you for your recent correspondence with our team. We appreciate your consideration towards renewing accreditation of the 14 Section **Phase 1 Operator Course** for Wastewater and Drinking water Operators. The course content remains the same and unchanged since 2022's accreditation approval.


This classroom style course emphasizes the process of environmental compliance and reporting, as required by state and federal law and our contracts. This course serves as a reminder to Operators/Associates about our commitment to environmental compliance and the consequences of non-compliance to both the Company and individuals.

This classroom course will take an enrolled Jacobs' Operator/Associate approximately 8.5 hours to complete. The module is complimented with PowerPoint slides led by our Companywide Compliance Trainer so the Operator/Associate can more effectively comprehend and relate to the material presented. Course accountability will be documented by a signed course completion sheet and the Final Exam score will be tracked and recorded.

As the course author, I have 25 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.

We hope your State will renew this course with the CEU equivalency of 0.85 CEUs. Thank you for your review and assigning the appropriate CEUs. If you require any additional information, please feel free to reply via email or call.

Sincerely,



Elisabeth A. Smith
Companywide Compliance Trainer
(208)420-9800
elisabeth.smith@jacobs.com

Attachments: Course Approval Form
Phase 1 Operator Course Syllabus
Elisabeth A. Smith, Curriculum Vitae



Phase 1: Compliance & Reporting

OMFS Training Series for Jacobs (formerly CH2M)

2025 Syllabus Course Description

Operations Management Group

Document history and status

Revision	Date	Description	Author	Checked	Reviewed	Approved

Phase 1: Compliance & Reporting

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Executive Summary

As a company we know that without our ethics and integrity—without a clear understanding of who we are and what we hold true—we cannot succeed. Therefore Jacobs (formerly CH2M) has established a corporate values process that is designed to help all associates understand the Company's values regarding ethics and integrity as well as to help them understand the corporate resources available to assist them with ethical issues and questions. A MAJOR component of this process is environmental compliance and reporting, as required by state and federal law in addition to our contracts. This process serves as a reminder to associates about our commitment to environmental compliance, and the consequences of non-compliance to both the Company and individuals.

We are here today because this is important and urgent for us - our objective is PERFECT compliance, PERFECT REPORTING, and PERFECT REPORTING of non-compliance.

Phase 1: Compliance & Reporting

This training includes a case study which associates are required to work through and think about. The study includes many types of issues an Associate might not recognize during the normal course of work as important, but which could lead to serious compliance and reporting concerns. Associates are instructed to determine the root cause whenever a situation of non-compliance occurs and correct it at the source to prevent future occurrence. Additionally, they are instructed that the Company will not accept the following answers as reasons for preventable non-compliance or failure to properly report non-compliance:

1. "We had a problem, and we informed the Client." –because the Client is not the proper authority to notify.
2. "We have an agreement on this compliance issue with the state."-because state regulators work through permits not handshakes.
3. "The regulators in this state don't enforce that."-because all laws and permits derived thereof are enforceable and should be treated as such.
4. "The regulator told me to do it that way."- because permits are the authority on compliance and can only be changed through formal modification.
5. Commit to understand and follow the compliance process.

These are necessary for the future success of our Company, protection of associates and protection of the environment. The course finishes with the instructor facilitating an action planning session at the project for employees to review their operation and determine if improvements are required. During Phase 1 training associates are notified of the risk both personally and to the Company of not achieving Perfect compliance and Perfect Reporting of non-compliance. The following key points are heavily emphasized in the overall presentation:

- Compliance is the law and the right thing to do.
- Compliance and reporting is a process, not an event or activity.
- Always report non-compliance appropriately.
- Always report instances of bypass or spills.
- Accountability and responsibility for compliance is everyone's job.
- Proper recordkeeping and written documentation supports accurate reporting.
- Chlorine issues pose greatest liability due to the variability of this system and must be handled carefully.
- Communicate effectively within the Company and with regulators and clients.
- Never sacrifice compliance for budget, customer, or other reasons.
- Protect the environment at all times.
- Our goal: Perfect compliance, Perfect Reporting of non-compliance.

1. Course Syllabus Description

Compliance and Reporting – Phase 1

This first companywide training provides an 8.5 hour introduction to the Company's ethics program and covers issues that are of the highest concern to both the EPA and the Company. Phase 1 attempts to capitalize on the training policies and procedures developed for the Jacobs Quality Process and begins with a review of Jacobs' past accomplishments. It then introduces the purpose of Jacobs' C&R effort and explains how evolving regulatory requirements have become complex and need to be strictly adhered to. A topical approach is then taken to discuss:

- The need for comprehensive and absolutely accurate Discharge Monitoring Reports.
- Better control of Chlorine systems and reporting of all properly conducted monitoring using approved methods.
- Proper Sampling and the difference between approved, accepted and unaccepted analysis procedures.
- The need for concise Recordkeeping and minimum required elements for log notations.

Actions we take to achieve the Company's strategic objectives are diminished without exemplary environmental compliance and reporting of non-compliance:

- 1) Customers desire it.
- 2) Performance excellence encompasses it.
- 3) Ownership culture enables it.
- 4) Business growth needs it.
- 5) Market leadership requires it.

Each Section encourages personal accountability and provides examples of the evolving requirements, communication and due diligence required in Compliance & Reporting. The course materials provide confidence, direction and guidance 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 and practice / apply what they have learned.

Final exam questions require the Associate to fill out an attendance sheet that includes Course title, Date, Printed name, and Signature. The Project Manager (or designee) will be required to ensure Employees are utilizing the course material appropriately and, in the field, are successfully applying what they have learned.

The Course content and brief description is provided in the Appendix.

2. Module Lesson Plan

Phase 1: Compliance & Reporting is a presentation given in a classroom / training room setting designed to allow the participant the opportunity to read course materials and PowerPoint presentation slides while being guided by the presenter, our Companywide Compliance Trainer, and observing / experiencing examples of the content. The presentation accompanied by discussion, questions and answers will encourage understanding and learned knowledge through course completion. This course has a Final Course Exam at the end that will be scored and tracked.

The learning environment will be a quiet area in a training room or conference room with site associates where the Companywide Trainer presents the course in a classroom setting. The Project Manager will be responsible for providing the Employee with the assigned Course questions, Course completion sign off sheet, along with 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 Course 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.

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 objectives.

Appendix A. Course Module Descriptions

The following Modules are offered in the recommended progression:

Module	Description	Duration
Section 1 – Course Learning Objectives	<ul style="list-style-type: none">• Mental health topic• Topic of compliance and reporting introduced• Agenda for day explained, reviewed• Each attendee introduces themselves and describes <u>job responsibilities related to compliance</u>	30 min.
Section 2 – Overview, Accomplishments	<ul style="list-style-type: none">• Review our company values for ethics and integrity• A MAJOR component of our ethics program is environmental compliance and reporting as required by state and federal law• Exemplary environmental compliance is a critical part of our customers' expectations• Perfect compliance is a process: identify compliance issue, resolve, document issue and resolution, notify and report, train and prevent• Compliance and Reporting are the culmination of every associate's activity each day• Review our award-winning performance with <u>quality, safety, and laboratory</u>	30 min.
Section 3 – Why are We Here	<ul style="list-style-type: none">• Enhancing the environment is our primary business, as described in the Purpose Statement• The objective is to learn processes for compliance analysis, recordkeeping, and reporting• Our clients affirm that excellent records of compliance is the expectation• Our contracts include provisions that require compliance• Ensure compliance through due diligence through documentation	30 min.
Section 4 – Evolving Requirements	<ul style="list-style-type: none">• History of NPDES, evolution of water and/or wastewater regulations, the Clean Water Act is one of the first environmental laws that criminalizes negligence• Review highlights of Clean Water Act and Safe Drinking Water Act.• Permit compliance perspectives have changed from administrative awareness to perfection• Determine root cause of every water and/or wastewater non-compliance event, use of tools to analyze and determine where to focus improvement	30 min.

Phase 1: Compliance & Reporting

Module	Description	Duration
Section 5 – Discharge Monitoring Reports	<ul style="list-style-type: none"> Understand importance of DMR process, other permit requirements Use measurements and trends Take action to prevent non-compliance or return to compliance Document actions and compliance status Notify supervisor, project manager, Client, regulator Always report any bypass, overflow, equipment offline, process operational changes, periods of upset (define and explain those conditions) Ensure continuous monitoring records analyzed. 	30 min.
Section 6 – Chlorine Systems and Monitoring	<ul style="list-style-type: none"> Most difficult parameter to control, assure 100% compliance Difficult because of fallibility of systems, pumps, creating variance in effluent; monitoring more frequently Know permit obligations – testing using alternative methods, process testing Data generated by approved methods is reportable Review permit for exact testing protocols, reporting conditions Chlorine analyzers and records, critical to compliance monitoring – require frequent calibration, checking Review circular charts, examples of good notes and unclear ones Analyzers require frequent calibration Recording devices must be checked DAILY Analyzers are primary data source 	90 min.
Section 7 – Review Key Points	<ul style="list-style-type: none"> Ensure everyone understands: <ol style="list-style-type: none"> Importance of Perfect compliance and Perfect Reporting of non-compliance The changing regulatory environment The critical nature of the DMR process Chlorine systems requirements Chlorine monitoring equipment 	15 min.
Section 8 – Sampling and Analysis Procedures	<ul style="list-style-type: none"> Avoid pre-testing, selective monitoring (define and explain those conditions) Sampling and analysis methods: 40 CFR 136, 141 methods are approved <p style="text-align: right;">Continued on next page</p>	30 min.

Phase 1: Compliance & Reporting

	<ul style="list-style-type: none"> • Considerations for continuous monitoring • Color wheels and color comparators are NOT accepted or approved methods for chlorine • Hach methods with colorimeter and spectrophotometer are accepted, if own curve drawn 	
Section 9 – Recordkeeping	<ul style="list-style-type: none"> • Always record time, date, initial entry, carefully explain compliance data, promptly retest a non-compliance event • Review good sample entries to model and emulate • Check other areas: state, permit requirements for certifications • Documented calibration of flow meters, scales, lab equipment • Minimum requirements for logbook entries 	60 min.
Section 10 – Communication	<ul style="list-style-type: none"> • Solutions include informing manager(s), communicating with regulators, and clients promptly in writing • Always treat regulators as customers, give notice and get advice in writing • Tips for demand/unannounced/non-routine inspections • Call supervisor and manager(s), be cordial and cooperative • Ask for credentials and scope of inspection • Escort inspector at all times and provide appropriate safety equipment • Answer all questions truthfully, provide information requested • Provide copies of information requested • Do not discuss past environmental problems • Never hide information • Split samples with regulator • Pictures can be taken • Project manager to attend all interviews • Take thorough notes • Discuss preliminary findings at conclusion; review and respond to report 	60 min.
Section 11 – Case Study Exercise, Action Planning	<ul style="list-style-type: none"> • Break into small groups, review case study, discuss, answer questions, report out to group <ol style="list-style-type: none"> 1. Follow official regulatory protocol 2. Document actions regulator ask to implement 3. No handshake deals 4. Regulators can interpret, but can't change permits 	30 min.


Continued on next page

Phase 1: Compliance & Reporting

	5. How to properly annotate charts 6. Understand how small operational issues can become big compliance problems	
Section 12 – Action Planning	<ul style="list-style-type: none"> Review actions needed to meet compliance and reporting requirements <ol style="list-style-type: none"> Create action plan for areas to improve Include actions that are already completed well Assign someone to support each area with deadlines for new activities 	15 min.
Section 13 – Review Key Points	<ul style="list-style-type: none"> Ensure everyone understands: <ol style="list-style-type: none"> Sampling, analysis procedures Approved and accepted methods Recordkeeping standards Communications with inspectors 	30 min
Section 14 – Closing	<ul style="list-style-type: none"> Compliance is the law, the right thing to do Compliance and reporting is a process Always report non-compliance appropriately Accountability, responsibility – everyone's job Proper recordkeeping supports accurate reporting Pay attention to chlorine monitoring, reporting Communicate effectively with regulators, clients Never sacrifice compliance for any reason Always protect the environment Our goal: perfect compliance, perfect reporting of non-compliance 	15 min.
Phase 1 Final Exam	12 Question Exam Followed by Closing Discussion	30 min.
Total Hours (minus lunch break)	All Hours Listed are Firm Estimates	8.5 Hours

Appendix B. Course Completion Sign-Off Sheet

Upon completion of each Section, the Employee 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.

 Learning & Talent Management		Course Completion Sign-Off Sheet State: __ Course # _____ Employee Name _____		
Operator Course				
Phase 1: Compliance & Reporting	Start Date	Completion Date	Hours to Complete	Supervisor Signature
Section 1 – Course Learning Objectives			0.5	
Section 2 – Overview, Accomplishments			0.5	
Section 3 – Why are We Here			0.5	
Section 4 – Evolving Requirements			0.5	
Section 5 – Discharge Monitoring Reports			0.5	
Course Pause – Question Review # 1-6				
Section 6 – Chlorine Systems and Monitoring			1.5	
Section 7 – Review Key Points			0.25	
Section 8 – Sampling and Analysis Procedures			0.5	
Section 9 – Recordkeeping			1	
Section 10 – Communication			1	
Section 11 – Case Study Exercise, Action Planning			0.5	
Section 12 – Action Planning			0.25	
Section 13 – Review Key Points			0.5	
Section 14 – Closing			0.25	
Phase 1 Final Exam			0.5	
Total Hours Awarded for CEU Credit			8.5 Hrs	.85 CEU
I understand that it is incumbent upon me to complete all modules in this Course and that Jacobs verifies and audits the completion of training by employees. My signature indicates that I personally reviewed and completed all portions of this Course and no one has completed any portion of this course on my behalf.				
Employee Signature _____		DD/MM/20YY Date	# License /Certification #	

Appendix C. Compliance & Reporting Certificate of Completion

Upon completion of the Course, the Project Administrator will complete this Certificate and provide a copy to the Employee for their records. At the site level, the Employee is responsible for submitting this 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 State specific information.

The form is titled "Jacobs CERTIFICATE OF COMPLETION" in large, bold, black and green letters. Below the title, it says "First Last Name" in bold black text, followed by a line for the name. To the right of the name line, it says "has successfully completed:". Below this, it says "Phase 1 – Compliance & Reporting" in bold black text. Then, it lists "Awarded ____ CEU", "Course ID # ____", and "License / Certification # ____" in bold black text. Below these, it says "On ____ (Date)" and "As reviewed and approved by:". At the bottom, there is a line for the signature, followed by "Elisabeth Smith, Companywide Compliance Trainer" in bold black text. The form has a decorative graphic on the left side consisting of several overlapping diagonal lines in shades of green and grey.

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:
 - 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 **Jacobs** **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.