



## Phase 1: Compliance & Reporting

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

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

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

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

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

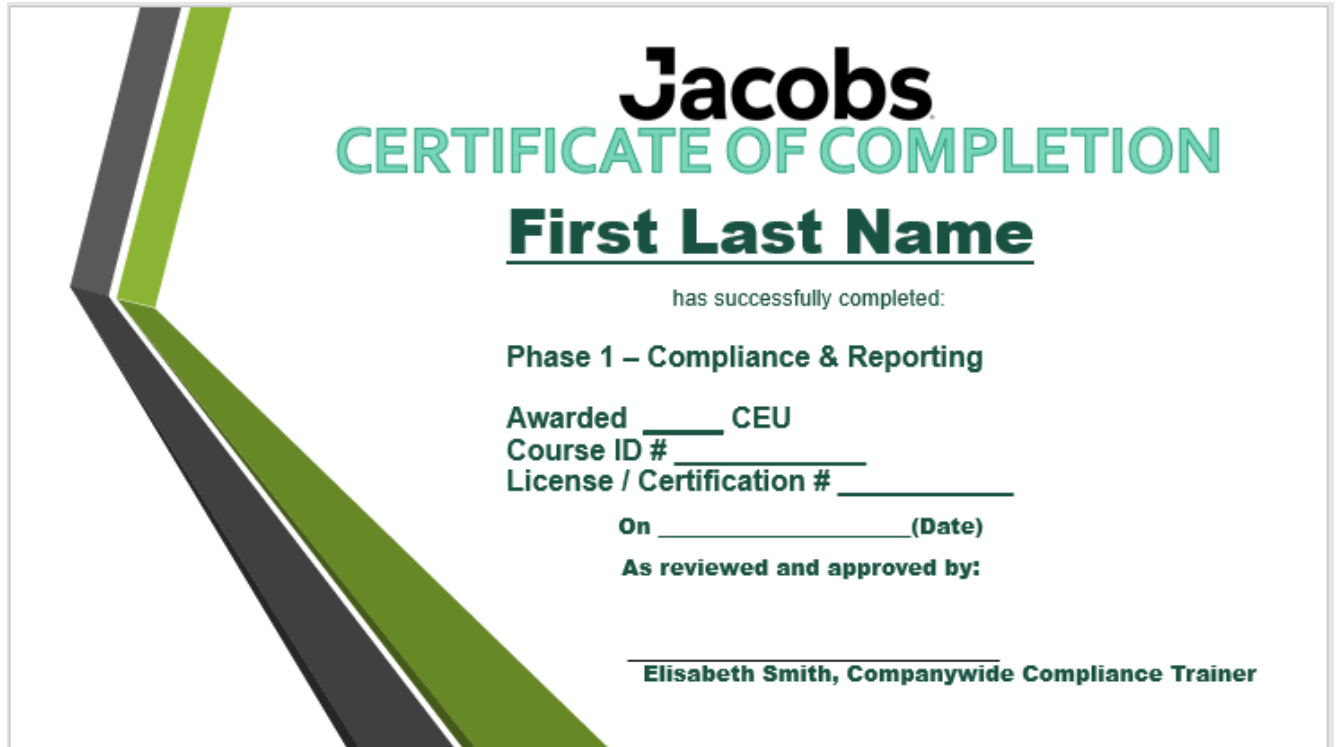
## Appendix B. Course Completion Sign-Off Sheet

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		<b>Course Completion Sign-Off Sheet</b> State: __ Course # _____ Employee Name _____		
Phase 1: Compliance & Reporting	Start Date	Completion Date	Hours to Complete	Supervisor Signature
Section 1 - Opening and Introductions				
Section 2 - Overview, Accomplishments				
Section 3 - Why are We Here				
Section 4 - Evolving Requirements				
Section 5 - Discharge Monitoring Reports				
Course Pause - Question Review # 1-6				
Section 6 - Chlorine Systems and Monitoring				
Section 7 - Review Key Points				
Section 8 - Sampling and Analysis Procedures				
Section 9 - Recordkeeping				
Section 10 - Communication				
Section 11 - Case Study Exercise, Action Planning				
Section 12 - Action Planning				
Section 13 - Review Key Points				
Section 14 - Closing				
I understand that it is encumbant 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.				
_____ <b>Employee Signature</b>		DD/MM/20YY _____ <b>Date</b>	# _____ <b>License /Certification #</b>	

## 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 image shows a certificate template for Jacobs Engineering Group Inc. The certificate is titled "Jacobs CERTIFICATE OF COMPLETION" in large, bold, black and green letters. Below the title, the name "First Last Name" is printed in a large, bold, black font, followed by a line for the signature. The text "has successfully completed:" is printed in a smaller, black font. Below this, the course title "Phase 1 – Compliance & Reporting" is printed in a bold, black font. The certificate also includes fields for "Awarded \_\_\_\_ CEU", "Course ID # \_\_\_\_", and "License / Certification # \_\_\_\_". The date "On \_\_\_\_ (Date)" is printed in a bold, black font. The signature line is followed by the text "As reviewed and approved by:" and a line for the signature. The signature is "Elisabeth Smith, Companywide Compliance Trainer". The certificate is framed by a grey border and features a decorative graphic on the left side consisting of several overlapping, angled lines in shades of green and grey.