

April 29, 2022

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

Subject: Request for Approval of Module 1 Operator Course Application for CEU's

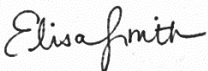
Good afternoon Judy,

Thank you for your recent correspondence with our team. We are following the submission of our **Phase 1 Compliance & Reporting Course** asking for accreditation CEU's of 2 hours for our 9 Section – **Module 1 Operator course**.

Module 1 encourages personal accountability and provides the new hire with examples of 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' and Customers' satisfaction in our perfect compliance with all laws and regulations.

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

Attachments: Module 1 C&R Course Syllabus
Elisabeth A. Smith, Curriculum Vitae



Module 1: Operator Course
Introduction to Jacobs (formerly CH2M) and Compliance
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

The Compliance & Reporting Group within the OM (Operations Management) Services Group has a proud tradition of dedication to the highest ethics and the best compliance record in our industry. The work we perform protects public health, the environment and communities in which we live and work. Our compliance goal for the Company is "Perfect compliance and Perfect Reporting of non-compliance". Compliance is each of our jobs, and given its importance, we hold each other personally accountable for compliance. Our Environmental Compliance Director oversees and directs the Company's compliance program, our communication with regulators and ensures our compliance processes and actions are appropriate and fully compliant.

Module 1: Operator Course Introduction to Jacobs (formerly CH2M) and Compliance

"Compliance" is more than producing clean water and creating monthly reports.

Compliance is meeting all of a project's permit and regulatory requirements. It's how we professionally communicate with our regulators. It's how we make sure that our data is accurate. It's how our records reflect that we have taken every reasonable action to make sure that we continue to stay in compliance.

Our mission statement:

1. "Our customers need clean water and wastewater."
2. "We remain continually focused on the preservation of our environment."
3. "We obey all laws and demand of ourselves the highest ethical standards."
4. "As good corporate citizens, we commit our resources to improve public health and the environment."
5. We live up to this statement because it's the law and it's the right thing to do!

Why are we here?

1. Our Company's legacy of excellence.
2. Our performance, excellence journey culminated in winning 'Malcolm Baldrige National Quality Award'.
3. Our clear vision is expressed in our strategic imperatives.
4. Enhancing the environment is our primary business.
 - a. Company's e3 motto: We know we're enhancing the environment because we are meeting (and exceeding) our permit limits.

Course Summary - facilitating an understanding for employees that:

1. Compliance is everyone's job and one of the Company's top priorities.
2. Practicing due diligence contributes directly to the strategic imperative of Performance Excellence.
3. Be attentive to the compliance aspects of our duties.
4. Understand compliance issues to the best of our abilities.
5. Working together we can achieve the goal 'Perfect compliance and Perfect Reporting of non-compliance'.
6. Understanding this training material is the first step in the compliance process.
7. Strive for continuous improvement.
8. Personally commit to achieve the best compliance possible.
9. 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.

1. Course Syllabus Description

Module 1: Operator Course Introduction to Jacobs (formerly CH2M) and Compliance has been developed with the new hire, new to the Company, in mind. This Module is intended to provide employees with an understanding of who we are as a Company, and every job in our Company depends on performing work for our clients in compliance with all regulations and permits.

1. Jacobs and Compliance.
2. Why Are We Here?
3. Customers, Contracts and Compliance.
4. Whose Job is Compliance?
5. Evolving Requirements.
6. Criminal Negligence and Due Diligence.
7. Compliance and Reporting Group (C&R).
8. The Cost of Compliance.
9. Summary.

Module 1: Operator Course Introduction to Jacobs (formerly CH2M) and Compliance consists of 9 Sections in a 26+ minute video to watch, review and complete at the Employee's convenience. Each Section includes:

10. Simple Text (designed for ease of reading and comprehension).
11. Content Examples.
12. Content Illustrations within the videos.
13. Module Final Exam.

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.

Each Section will require the Employee 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

Module 1: Operator Course Introduction to Jacobs (formerly CH2M) and Compliance is a self-paced video presentation designed to allow the participant opportunity to read 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 and tracked.

The learning environment will be in a quiet area, 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 Modules are offered in the recommended progression:


Module	Description	Duration
Section 1 – Operator Course: Jacobs and Compliance	This Section explains the importance of C&R to New Hires; Every job in our Company is interdependent on performing work for our clients in Compliance with all regulations and permits; Compliance is your job, and Compliance is my job; Our Company has a proud tradition dedicated to the highest ethics and the best compliance record in our industry; Meaning and definition of Compliance in our Company.	2.5 min.
Section 2 – Why Are We Here?	This Section describes our legacy of excellence; Our journey towards performance excellence winning National Awards; Our clear vision expressing our strategic imperatives; Enhancing the environment is our primary business; Water and wastewater treatment is reported to be the second most significant advance of the 20 th century toward saving lives.	4 min.
Section 3 – Customers, Contracts and Compliance	This Section reviews the importance of our customers' satisfaction to us; Our contracts with customers often require compliance with laws and regulations; Both regulatory wastewater permits and contracts are legally binding documents; Regulatory wastewater permits are based on law so when we break our permit, we break the law.	1.5 min.
Section 4 – Whose Job is Compliance?	This Section explains our work is interdependent; Each of us plays an important role in compliance; We must each know our job responsibilities; If we are unsure of our responsibilities, ask a supervisor.	2 min.
Section 5 – Evolving Requirements	This Section gives Legislative History regarding the NPDES Program, reviews the Clean Water Act, and describes how it criminalizes negligence. We also discuss the shift in level of enforcement from the legislative requirements in 1996.	3.5 min.
Course Pause / Discussion – Question Review # 1-6	This Section takes a pause for review questions 1 – 6 to be answered, reviewed and discussed in additional detail.	15 min.

Module 1: Operator Course
Introduction to Jacobs (formerly CH2M) and Compliance

Module	Description	Duration
Section 6 – Criminal Negligence + Due Diligence	This Section provides understanding between the difference and definitions of 'Negligence' and 'Due Diligence' with examples and thought-provoking questions. Wastewater and water operators must understand which actions they take at work could be viewed as negligent.	3 min.
Section 7 – Compliance & Reporting Group (C&R)	This Section discusses how our Company is: Chartered to protect our Company and associates; Helps associates understand their legal obligations and make better records; Developed process and procedures; We are committed to the environment and cooperating with the EPA and other agencies in investigating any permit excursions at any of our projects; We will provide assistance by preparing self-disclosures.	2 min.
Section 8 – The Cost of Compliance	This section explains: Poor compliance and inaccurate reporting are risky; Wastewater violations can damage the environment, water violations can harm people, debarment can result in not being able to perform federal work. Our best defense against debarment is perfect compliance.	2.5 min.
Course Pause / Discussion – Question Review # 7-10	This Section takes a pause for review questions 7 – 10 to be answered, reviewed and discussed in additional detail.	20 min.
Section 9 – Closing Summary	This Section reviews: Compliance is everyone's job and one of the Company's top priorities; Practicing due diligence contributes directly to the strategic imperative of Performance Excellence; Understand compliance issues to the best of our abilities; Understanding this training material is the first step in the compliance process; Strive for continuous improvement; Personally commit to achieve the best compliance possible.	4 min.
Evaluation Discussion –	Group discussion regarding how the training relates to site specific operations and contract obligations.	15 min
Module 1 Final Exam	11 Question Exam – Followed by Closing Discussion	30 min.
Total Hours	All Hours Listed are Firm Estimates	2 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 _____			
Module 1: Operator Course Introduction to Jacobs (formerly CH2M) and Compliance	Start Date	Completion Date	Minutes to Complete	Supervisor Signature
Section 1 - Operator Course Jacobs and Compliance				
Section 2 - Why Are We Here?				
Section 3 - Customers, Contracts and Compliance				
Section 4 - Whose Job is Compliance?				
Section 5 - Evolving Requirements				
Course Pause - Question Review # 1-6				
Section 6 - Criminal Negligence + Due Diligence				
Section 7 - Compliance & Reporting Group (C&R)				
Section 8 - The Cost of Compliance				
Course Pause - Question Review # 7 - 10				
Section 9 - Closing Summary				
Course Pause / Discussion - Question Review # 11				
Evaluation Discussion - Site Specific re Applicability				
Final Exam				
Total Hours Awarded for CEU Credit			2.0 Hrs	.20 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		____/____/20__ Date	# _____ License / Certification #	

Appendix C. Compliance & Reporting Certificate of Completion

Upon completion of the Module, 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.

Jacobs
CERTIFICATE OF COMPLETION
First Last Name

has successfully completed:

**Module 1: Operator Course Introduction to Jacobs
(formerly CH2M) and Compliance**

Awarded _____ CEU
Course ID # _____
License / Certification # _____
On _____ (Date)
As reviewed and approved by:

Elisabeth 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:
 - 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.