



# Facility Operator Certification Written Operating Plan

## FREQUENTLY ASKED QUESTIONS

### WHAT'S THE GOAL OF THE WRITTEN OPERATING PLAN REQUIREMENT?

A clear, written operating plan helps everyone understand their roles and responsibilities for the day to day operation and maintenance of the water or wastewater facility. Following the written operating plan ensures the facility remains under the direct supervision of the certified operator in responsible charge as required by Regulation 100. This is required even when they are not physically on-site.

### WHAT ARE THE REQUIRED ELEMENTS OF A WRITTEN OPERATING PLAN?

- Define who is delegated to perform the tasks or activities.
- Define the limits of such tasks or activities, including the operating parameters.
- Clearly state that any operational activity beyond the limits defined in the operating plan requires the immediate and direct consultation with and participation of a certified operator in responsible charge (including who needs to be notified and who to contact for further instructions as appropriate).

### WHAT TYPES OF FACILITIES ARE REQUIRED TO HAVE A WRITTEN OPERATING PLAN?

All facilities that delegate tasks to operators that are not designated as certified operators in responsible charge are required to have a written operating plan. Specifically, these include: drinking water treatment, domestic wastewater treatment and industrial wastewater treatment facilities, distribution systems, and collections systems.

### DO WE SUBMIT OUR OPERATING PLAN TO THE DIVISION FOR REVIEW?

No. The operating plan is reviewed as part of the drinking water sanitary survey or wastewater on-site inspection. These reviews include the treatment works and/or the distribution or collection system.

### IS THE OPERATING PLAN REQUIRED TO BE PART OF THE FACILITIES STANDARD OPERATING PROCEDURES?

No. The division recommends each facility have an operations and maintenance manual, which includes standard operating procedures, as best management practices. Many facilities already have operations and maintenance manuals and incorporating the requirements into an existing document is easier than creating a separate document.

### I AM THE CERTIFIED OPERATOR IN RESPONSIBLE CHARGE OF A SMALL FACILITY. I'M THE ONLY PERSON WORKING THERE. AM I REQUIRED TO HAVE A WRITTEN OPERATING PLAN?

No. The written operating plan is for delegation of certified operator in responsible charge duties to other operators. If no one else performs any tasks or activities related to the water or wastewater facility, you are not be required to have a written operating plan.

### **WHEN DEFINING WHO IS DELEGATED TO PERFORM TASKS OR ACTIVITIES, DOES THE OPERATING PLAN REQUIRE THE PERSON(S) BE IDENTIFIED BY NAME?**

No. The persons can be identified by individual name, by position title, or by skill level (i.e., based on the organizations training plan, etc.).

### **DOES THE OPERATING PLAN INCLUDE ALL ACTIVITIES AND THEN CALL OUT WHICH ARE DELEGATED TO OTHERS AND WHICH MUST BE DONE BY CERTIFIED OPERATORS IN RESPONSIBLE CHARGE?**

No. However, it is recommended that the operating plan include all activities to help everyone understand their roles and responsibilities for the day to day operation and maintenance of the water or wastewater facility.

The regulation requires the operating plan to cover delgated routine tasks, activities and scope of any decision making (note: decision making can only be delegated to an operator holding a certificate at least equal to the classification of the facility).

### **IF EVERYONE WORKING AT A FACILITY IS CERTIFIED AT OR ABOVE THE CLASSIFICATION OF THE FACILITY, IS A WRITTEN OPERATING PLAN REQUIRED?**

No. If the operators at your facility meet both criteria below, a written operating plan is not required.

- All operators performing tasks and activities are certified at the level of the facility.
- All operators have been designated as operators in responsible charge by the facility owner.

### **I AM THE CERTIFIED OPERATOR IN RESPONSIBLE CHARGE AND HAVE STAFF OPERATORS THAT ARE NOT CERTIFIED, CAN I DELEGATE ROUTINE TASKS AND ACTIVITIES TO THEM?**

Yes. By regulatory definition an operator is any person who performs activities and/or tasks pertinent to the operation of a water or wastewater facility. An operator may or may not be certified.

### **CAN A FACILITY OWNER DESIGNATE MORE THAN ONE CERTIFIED OPERATOR IN RESPONSIBLE CHARGE FOR THE FACILITY?**

Yes. As long each operator is certified at or above the classification level of the facility. The facility must maintain a record of all staff designated as certified operators in responsible charge and make it available upon request.

### **CAN FULL CERTIFIED OPERATOR IN RESPONSIBLE CHARGE RESPONSIBILITIES BE DESIGNATED TO MULTIPLE OPERATORS IN THE STANDARD OPERATING PROCEDURE?**

Yes. Regulation 100 authorizes the owner to designate more than one certified operator in responsible charge for a facility. When that is done, the standard operating procedure would indicate to "consult with the certified operator in responsible charge," meaning the certified operator in responsible charge on duty.

### **WE USE DIFFERENT TITLES, SUCH AS LEAD OPERATOR OR SHIFT OPERATOR; DO WE NEED TO CHANGE THE TITLES TO CERTIFIED OPERATOR IN RESPONSIBLE CHARGE?**

No. Working titles are determined by the organization, as long as it is clear within the organization who has authority to make process control or system integrity decisions. Those decisions are reserved to certified operators in responsible charge.



## ARE THE NAMES OF ALL CERTIFIED OPERATORS IN RESPONSIBLE CHARGE REQUIRED TO BE REPORTED TO THE WATER QUALITY CONTROL DIVISION?

No. The facility owner is only required to report the primary certified operator in responsible charge for each facility, it is optional to report additional certified operators in responsible charge. The facility must maintain a formal record of all staff designated as certified operators in responsible charge and include it in the written operating plan. The plan must be available to all staff operators. This list must also be made available upon request by representatives of the division.

## WHEN IS IT REQUIRED FOR AN ON DUTY OPERATOR TO CONTACT A CERTIFIED OPERATOR IN RESPONSIBLE CHARGE? WHAT IF IT'S OUTSIDE THEIR NORMAL/SCHEDULED HOURS?

A certified operator in responsible charge must be contacted when:

- A decision must be made that is not covered in the standard operating procedure for that task or activity.
- The operator on duty is not certified at least at the level of the facility.
- The operator on duty is certified at the required level but has not been delegated authority to make the decisions necessary.

Regarding the second question, the certified operator in responsible charge must be available to make the decisions. Available means either on-site or able to be contacted as needed to make decisions and to initiate appropriate actions in a timely manner, section 100.18.3(b).

## IS THERE A LIST OF TASKS THAT IS CONSIDERED THE MOST IMPORTANT TO HAVE DEFINED IN THE OPERATING PLAN?

No. There is not a specific or prioritized list. All delegated tasks or activities that could affect water quality or quantity, effluent quality or quantity, or the facility's integrity must be included in the operating plan. This may include routine tasks involved in daily facility operations, or tasks that are completed in an emergency and found in the emergency response plan.

## IS THERE ASSISTANCE AVAILABLE TO DEVELOP AND WRITE OUR OPERATING PLAN?

Yes. The division offers assistance to develop the written operating plan because we recommend the operating plan be part of the facility's operations and maintenance manual. You can request a drinking water coach's assistance or attend one of the free trainings coming up.

Instructions and forms for requesting coaching assistance, as well as dates and locations of trainings can be found at [www.colorado.gov/cdphe/drinking-water-training-opportunities](http://www.colorado.gov/cdphe/drinking-water-training-opportunities).