



Redefining the Role of the Overall Responsible Operator

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Today's Presentation

- Potential changes in the Overall Responsible Operator Requirements
 - Result of consultation to date
 - Potential approach
- Operators-in-training working alone

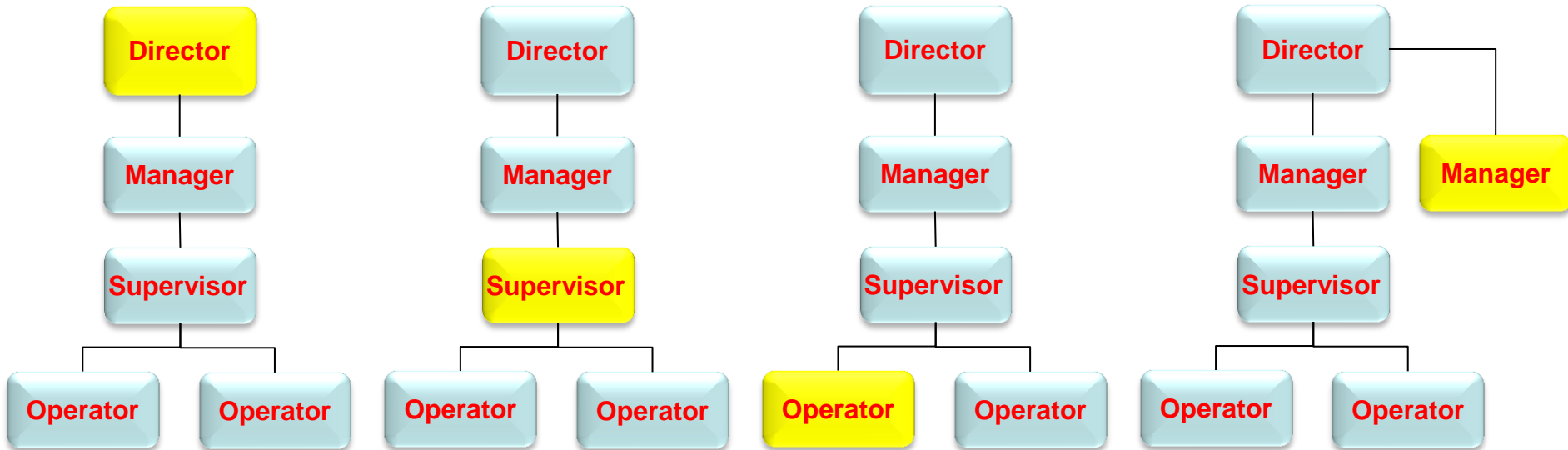
Overall Responsible Operator: Why Was It Established?

- Ensure the person responsible for **operational decisions** in a system has the skills, knowledge and experience required.
- The Overall Responsible Operator (ORO) was not intended to include persons in managerial, administrative, compliance or engineering positions who do not perform active daily operation of the a system.
- The ORO was intended to:
 - Be accountable for operational/process control decisions within the system.
 - Be accountable for ensuring applicable corrective actions within their authority are taken in the event of adverse operational conditions.
- Not about position title or union/management affiliation. Key is the performance of the duties.

Why Is the MOECC Considering Changes to the Overall Responsible Operator Designation?

- Municipal and operating authorities stakeholders have raised concerns regarding operator supply/succession planning.
- Lack of consistency in how ORO is adopted in municipalities.
 - In some municipalities designation does not address legal intent.
- Main issues are a result of:
 - Lack of clarity on requirements of an ORO;
 - On-call issues;
 - Operating experience seen as an barrier for persons to become an Overall Responsible Operator.
- Underlying these concerns are potentially large number of retirements of operators within next 5 years.

Range of Current Interpretations



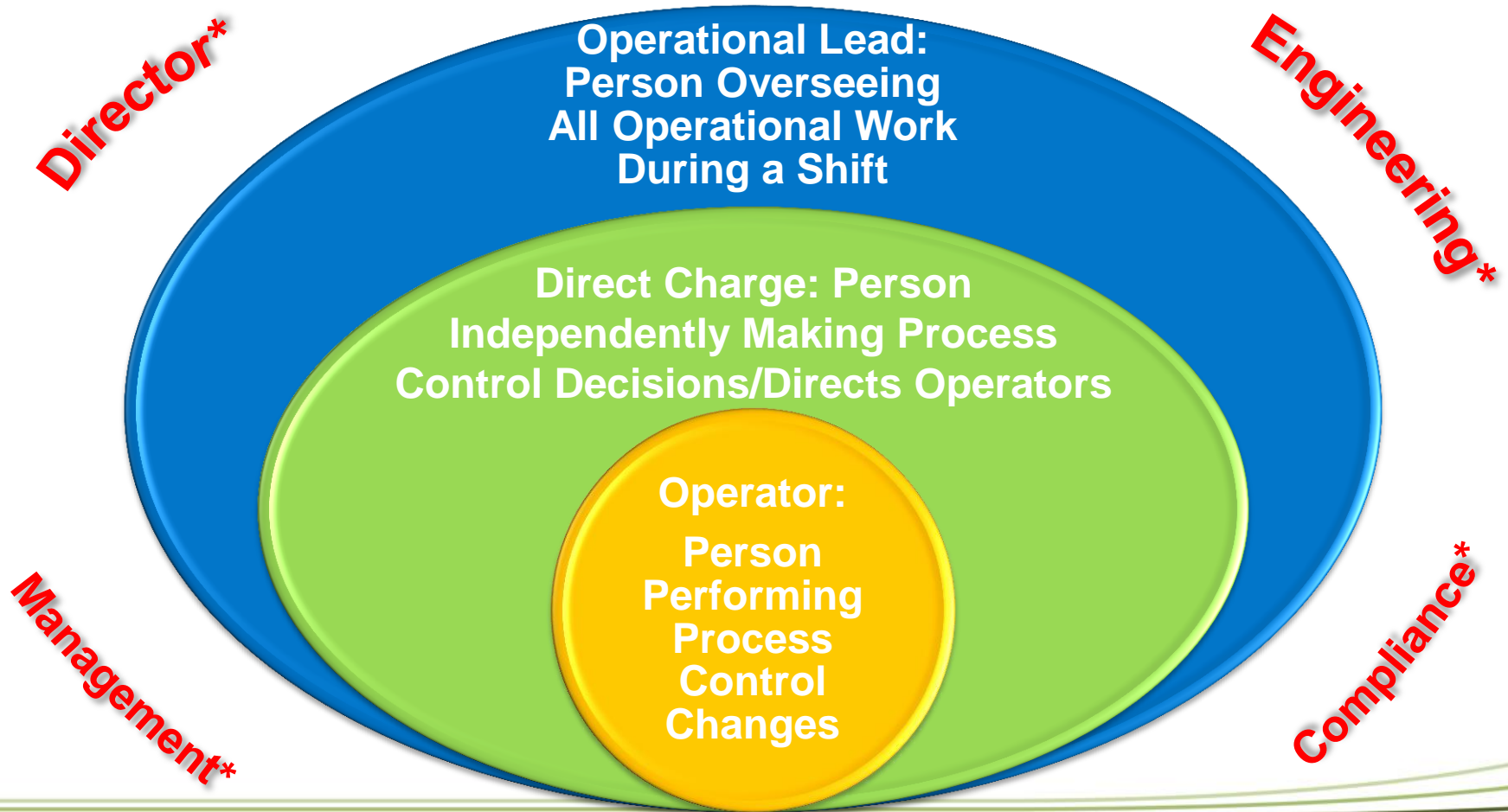
Findings of Consultation

- MOECC's Operator Certification Working Group and an ad hoc committee of operators/managers met throughout 2015 and early 2016 to review issues and options.
- Participants reported a diverse range of ways ORO is adopted:
 - Operational model
 - Managerial/oversight model
 - Emergency response model
- Several short listed options considered:
 - No clear preference was found.
 - Impact of options based on how municipality currently interprets ORO.

Findings of Consultation

- Other results from the consultation:
 - Allowance for non-operators to be able to fulfill the role of ORO.
 - Terminology ORO and OIC was found to be confusing and participants had difficulty understanding the difference in the roles.
 - Provisions in the regulations which allow for back-up OROs need to be maintained.
 - Impacts on Northern Ontario and remote operations need to be considered.
 - Hands-on operational experience is an important requirement for certification.

Approach To Be Considered



*If individuals perform day-to-day operational role they may be considered an Operational Lead or Direct Charge.

Purpose of Roles

Operational Lead*:

Identify a single accountable person for operation decisions made in a facility who has appropriate level of knowledge and experience as determined by class of certification.

Direct Charge:

Establish legal obligations on persons responsible for making process control /system integrity decisions which may impact quality of drinking water or effluent; and

Category of operational decision making responsibility which is required to obtain a Class III or IV certificate.

Operator:

Define persons who are required to hold an operators licence/certificate.

*Note: An operational lead would be a Direct Charge operator.

Operational Lead

- Redefine the Overall Responsible Operator as an operational role which has responsibility and oversight for day-to-day operations for the whole system/facility during a shift.

Roles and Responsibilities

Direct or supervise other operators during an operational shift on process control/system integrity decisions.

Ensure that all process control decisions within the facility are made in accordance with regulatory requirements, operational manuals or standard operating procedures and with the aim of protecting human health and the natural environment.

Ensure that applicable authorities are notified and proper procedures are followed in the event that he or she is aware of an adverse operational condition or event during an operational shift.

Direct Charge

- Redefine the Operator-in-Charge role to clarify and make distinct from the **Operational Lead** role.

Roles and Responsibilities

Independently makes process control or system integrity decisions.

Ensures processes within their control and responsibility are operated effectively, monitored, measured and sampled.

Ensures records of process control decisions within their authority are maintained.

- One or more operators may be assigned **Direct Charge** responsibilities.
- **Operational Lead** includes **Direct Charge** responsibilities.

System Requirements

- Owners must designate an operator who is certified to the level of the facility as the **Operational Lead** for each staff shift.
- This operator must be present or able to act (e.g. on call).
- During non-operational shifts a P.Eng. or C.E.T. may act as the operational lead provided that they consult with an **Direct Charge** operator certified to the level of the system prior to making any process control decisions.
 - P.Eng. or C.E.T. would be required to complete training through the Walkerton Clean Water Centre or pass applicable certification exams.
 - One or more operators with Direct Charge responsibilities must be assigned.

Operator Scope of Work

- “Scope of work” of an operator can be clarified and reviewed to ensure it addresses the modern role of an operator:
 - Current definition of operator is broad and includes language which can be ambiguous.
 - Align definition to duties typically performed by operational staff.
 - Need to consider distribution and collection work as part of that definition.
 - Potential to provide clarification as to certification requirements for “minor” process adjustments - for example taking equipment off-line for maintenance when approved by an **Direct Charge** operator.

Where In the Organization Does the “Operational Lead” Belong?

- May or may not be a supervisory role. If supervisory would normally be front line supervisor.
- Generally not intended as a manager or director role unless that person is involved in day-to-day operational process decisions.
- In smaller facilities the **Operational Lead** could be the sole operator or could be a senior manager with direct responsibility of day-to-day operations.

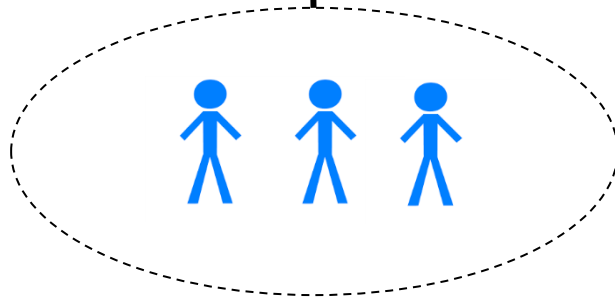
How Would New Definitions Work? 24/7 Operation

Shift 1



Operational Lead "A"
(On-site)

Oversee operational
work during shift

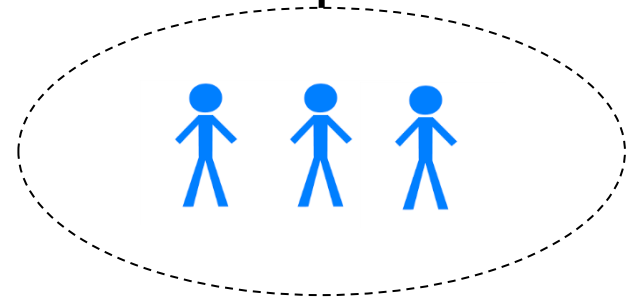


Shift 2



Operational Lead "B" (On-site)
or
Operational Lead "A" On-call (Off-site)

Oversee operational
work during shift



All operators who independently make process control decisions would need to be assigned as Direct Charge operators.

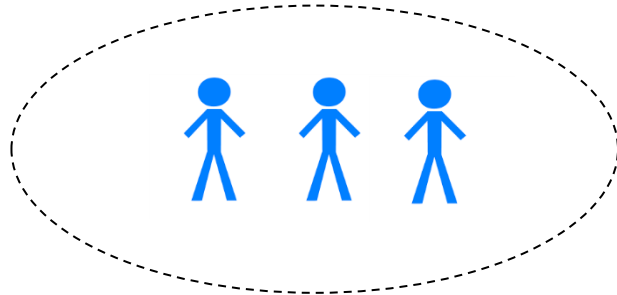
How Would New Definitions Work? Single Day Shift Operation

Day Shift



Operational Lead
(On-site)

Oversee operational
work during shift



Unstaffed Night Shift



Operational Lead
or
P.Eng. /C.E.T.
(On-call/Off-site)

(Ability to consult with Direct Charge Operator)

All operators who independently make process control decisions would be designated as Direct Charge operators (including Operational Lead)

Further Considerations

- Currently operators one class lower than the system classification may act as a “back-up” ORO for up to 150 days.
 - Would back-up provisions continue?
- Definition of “process control decisions” particularly in distribution/ collection systems.
- Definition of “present or able to act”.
- Impacts of potential changes on contingency planning.
- Implications for remote systems.

Operators-in-Training Working Alone

- Current regulations allow OITs and others not designated as **ORO** or **OIC** to work alone.
- MOECC considering clarification of conditions which must be in place for an OIT and others who are not designated as **Operational Lead** or **Direct Charge** to be able to work alone.
- Conditions may include:
 - OIT is trained on their scope of responsibilities.
 - OIT is not independently making process control decisions.
 - Approved process control changes are logged and reviewed by an OIC within a specific period of time (to be determined).
 - **Operational Lead** or **Direct Charge** operator “routinely” on site to monitor work and assess the overall operational condition of the system.
 - “Routinely” may be defined using a risk approach (i.e. frequency of visits may differ depending on situation)

Future Steps

- Ad hoc committee will continue to meet to help scope final option.
- If changes are anticipated through regulatory amendments or guidance, the changes will be posted on the Environmental Bill of Rights Registry for comment.

Questions



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