



California
Water
Environment
Association

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Public Comment
Operator Certification Regulations
Deadline: 7/30/12 by 5 PM



Via Electronic Mail

July 26, 2012

Charles R. Hoppin, Chair, and Members
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000

ATTN: Jeanine Townsend, commentletters@waterboards.ca.gov

SUBJECT: Comment Letter – Proposed Operator Certification Regulations

Dear Chairman Hoppin and Members of the Board:

Thank you for the opportunity to provide input to the Office of Operator Certification (OOC) as it develops amendments to the Operator Certification Regulations.

The California Water Environment Association (CWEA) supports the purpose of the Wastewater Treatment Plant Operator regulations to:

“protect public health and the environment by providing for the effective operation of wastewater and water recycling treatment plants through the certification of wastewater treatment plant operators.”

CWEA is in a unique position to provide feedback: CWEA is the organization that founded the Operator Certification Program. CWEA has been a certifying body for the water environment field for the past 75 years. And, CWEA nominates two members of the State Water Board’s Operator Certification Advisory Committee.

INTRODUCTION

CWEA is a tax-exempt California nonprofit corporation, with over 9,200 members. Our mission is to enhance the education and effectiveness of California wastewater professionals through training, certification, dissemination of technical information, and promotion of sound policies to benefit society through protection and enhancement of the water environment. CWEA is an active Member Association of the Water Environment Federation (WEF).

California has built a strong certification program over the last 75 years. Formed in the 1920s, CWEA initiated Operator Certification in 1937, administering the program until turning it over to the State in the 1970s when the Clean Water Act was being implemented. The Office of Operator Certification has since managed the program, including plant classification, examinations, and enforcement.

CWEA continues to offer validated, competency-based Certification for six wastewater professions, including Collection Systems Maintenance, Wastewater Treatment Plant Maintenance (both Mechanical and Electrical), Laboratory Analysis, Biosolids Land Management, Environmental Compliance Inspection, and Industrial Treatment Plant Operations. While CWEA's Certification Program is voluntary, many employers require it as a condition of employment or for promotion. Currently, there are close to 6,000 valid Certificates issued by CWEA, which are held by more than 5,000 individuals. CWEA manages about 1,600 certification candidates each year.

RELATIONSHIPS

Organizational relationships are important to CWEA. We seek to serve as a resource to our partners for training, technical information, and promotion of sound regulatory policy throughout California and the nation.

CWEA appreciates the deepening of our relationship with Doug Wilson, Christine Gordon, Wes Wilkinson, and the Office of Operator Certification (OOC) over the past year. Our members benefit greatly from the ongoing interaction with OOC staff at training conferences. We believe CWEA can add value to the OOC by sharing our experiences with technical certification. By growing in our cooperative efforts, both organizations will benefit as we uphold our closely aligned missions to protect the public health and environment by demonstrating competency through certification.

Recent collaborative efforts are:

1. The OOC has contracted with CWEA to provide testing venues and proctor exams for Plant Operators twice each year since at least 1999.
2. CWEA entered into a Memorandum of Understanding with the State in June 2006 to provide training to collections system personnel on the Sanitary Sewer System Waste Discharge Requirements (SSS WDR).
3. The SWRCB staff routinely attend CWEA conferences and add value by participating in forums that help educate the regulated community to achieve the desired result, namely, compliance.

CWEA is an active Member Association of the Water Environment Federation (WEF), with representation on several Operator-related initiatives at the national level:

1. WEF Operations & Maintenance Committee: CWEA Member, and Past President, is the Chairperson
2. WEF House of Delegates Operator Outreach: CWEA Board Member is a Co-Chair
3. WEF Wastewater Operator Apprenticeship: CWEA Member, and Past Board Member, is active participant, working with Department of Labor to develop a nationally recognized program.

CWEA is also a member of the Summit Partners (five state and regional water environment associations in California) and participates in regular discussions related to the training needs of various groups, including Plant Operators.

These relationships enable CWEA, with unique perspective, to better serve Plant Operators, members, and partners within California.

OPERATOR EXAMINATION

Moving forward, CWEA is keenly interested in exploring how it can help the State enhance the examination and certification of Operators, so that the OOC remains effective in helping Plant Operators achieve permit compliance and in protecting public health in an increasingly complex environment.

CWEA uses Computer-Based-Testing (CBT) to allow examination takers to select the most convenient testing location and time--including evenings and Saturdays. CWEA certification exams are given at professional test centers throughout the State. The test centers provide a carefully controlled and comfortable testing environment, allowing candidates to take the test under peak performance conditions while maintaining strict test security. CBT allows for more efficient scoring and tracking of test performance metrics. It also minimizes scoring errors and provides quicker results to individuals, which in turn, helps Agencies assign staff more effectively.

If the State decides to update the examination and testing process, the California Water Environment Association is well-equipped to assume a greater role with Operators. For example, CWEA routinely performs a job/task analysis for each certificate it offers. CWEA stands ready to discuss this work with the State in order to update the exam content, which reflects the Knowledge, Skills, and Abilities (KSAs) required for Operators. These updated KSAs can then be used to update the test questions for the various skill levels being tested. CWEA has the experience, including expert volunteer power, to offer assistance in this area as well.

EDUCATION

CWEA supports the advancement of minimum education requirements to ensure the public's confidence in the Operator Certification Program. We support the proposed requirement that Grade I Operators have a High School Diploma or GED equivalent.

We believe there is value in the State establishing a requirement for Continuing Education (CE) to ensure Operators stay current with evolving technologies and best practices. The purpose of a CE requirement is to ensure that Certified Operators remain knowledgeable of regulatory requirements, technology, and practices required in the ever-changing, and increasingly complex, field of wastewater treatment. Many states require CE for their Wastewater Treatment Plant Operators to remain certified; California does not; an unusual position for a State committed to leading in environmental protection. Ongoing education enhances the operation, maintenance, and management skills of the certificate-holders, thereby positively influencing the quality of wastewater reaching receiving waters.

Both CWEA and the California Department of Public Health (CDPH) require CE prior to the renewal of certificates. A CE program does not have to be burdensome or labor intensive to be effective. Many Operators are in a continuous training mode already, and for the Operators who are not, a CE requirement will ensure their skills are kept current during each renewal cycle. There is a wide variety of training options for CE, and it doesn't have to be burdensome on the agency or the individual. The training could come from free sources, in-plant sources, correspondence courses, vendor sources, etc.

CWEA believes CE is long overdue for wastewater Operators. Treatment technologies are changing, water reuse and energy recovery are topics of emerging concern in California, and the regulatory environment is rigorous. Continuing education assists Agencies in maintaining a workforce that is more adept at incorporating change and improving effectiveness of operations. Not requiring CE would likely have a greater cost...to agencies and to the environment.

A one-page summary of CWEA CE Information is attached for reference. The CDPH (potable water certification) has a few definitions in place that could be adapted for a CE requirement for Wastewater Operators as well:

Section 63750.35. Contact Hour. "Contact hour" means not less than 50 minutes of specialized training or a continuing education course.

Section 63750.40. Continuing Education Course. "Continuing education course" means a presentation that transmits information related to the operation of a treatment facility and/or distribution system.

The CDPH has some simple regulatory language that states its requirement:

(Section 63840) To be eligible for certificate renewal, certified operators possessing certificates that expire after December 31, 2003, shall have completed continuing education contact hours since the previous renewal or issuance of the certificate pursuant to Table 63840-A. No more than 25% of the contact hours shall be courses in operator safety.

Table 63840-A. Required Continuing Education Contact Hours for Certificate Renewal

Water Treatment Operators	Contact Hours Required
Grade T1	12
Grade T2	16
Grade T3	24
Grade T4	36
Grade T5	36

CWEA has developed over 20 Study Guides to assist wastewater personnel in seven (7) wastewater vocations, including Operator, with certification preparation. Study guides are a

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member benefit. CWEA is also experienced with hosting and conducting Study Sessions throughout the State.

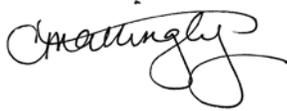
CLOSING

CWEA is supportive of the State's efforts to update the Operator Regulations. Much discussion and collaboration occurred with the various stakeholders over many years and we understand the herculean effort required by Staff to make it happen.

We appreciate our ongoing relationship with the Office of Operator Certification and believe Operators are best served with a continued collaboration between our two organizations for training and certification. CWEA's experience with 9,200 members, 5,000 certificate-holders, and 1,600 annual certification candidates, provides us a unique perspective to assist the State in maintaining service to our Operators so that they can continue to protect the public and our environment.

Thank you for the opportunity to offer feedback and we look forward to continued collaboration. If you have any questions regarding our input, please contact me at cmatting@slocity.org or (805) 781-7215.

Sincerely,

A handwritten signature in cursive script that reads "Carrie Mattingly". The signature is written in black ink and is positioned above the typed name and title.

Carrie Mattingly

President

California Water Environment Association

Grade 4 Certificate Holder CWEA Technical Certification Program,

Collection Systems Maintenance and Environmental Compliance Inspector

C: Doug Wilson; Christine Gordon



Certification

Info Page

Re-certification and Continuing Education

Certificate holders are required to participate in at least 12 hours of continuing education or training every two years. (Also known as contact hours.)

Continuing Education helps to ensure that you continue to be knowledgeable of technological advancements and regulatory requirements in the wastewater fields. Continuing education enhances the operation, maintenance and management skills of the certificate holders, and ensures the quality of wastewater treatment. This ultimately increases the value of your certificate and the professionalism of the wastewater vocations.

All contact hours need to be earned in the two year period just before the "Contact Hours Due Date".

How To Earn Contact Hours

Contact hours can be earned 4 ways:

1. Participating in a CWEA vocation related training or education program

Examples:

- On-the-job training
- Technical conferences, workshops and college courses
- Self-study and distance learning courses

1 (one) contact hour is earned for each 50 minutes of participation in a CWEA pre-approved training program. (Pre-approval not required)

2. Conduct a CWEA pre-approved training or education program

Examples:

- Training others
- Teaching technical courses
- Writing technical articles or books
- Giving technical presentations

2 (two) contact hours are earned for each 50 minutes of training or teaching.

3. In-house Training can be approved for the contact hour requirement. The training must be relevant to the vocations certified by CWEA.

1 (one) contact hour is earned for each 50 minutes of participation in a CWEA pre-approved training program. (Pre-approval not required)

4. Membership in a professional society

Examples:

- WEF or any WEF Member Association
- American Public Works Association
- American Society of Civil Engineers
- American Water Works Association

1 (one) contact hour given for each organization membership held during the two year renewal period for a maximum of 6 (six) contact hours.

Certificates of Completion



Once training is completed, trainers will need to issue certificates of completion. Trainees need to submit copies of the certificates to CWEA along with their renewal payment when their *contact hours* are due (every two years). Certificates of completion that are received at any other time, or without payment of renewal fees, will be rejected.

Certificates of completion can be in any form, but they must include the following information:

- Name of the training organization
- Program title or brief description of vocations addressed
- Name of the attendee who completed the program
- Number of Contact Hours earned
- Date of completion with signature or stamp

Continuing Education Checklist

- ✓ Check your *Contact Hour Due Date* on the right section of your Certificate #. This is the date your contact hours are due.
- ✓ Attend at least 12 hours of pre-approved training or educational training during the two years before your *Contact Hour Due Date*.
- ✓ Send in copies of your continuing education with your certificate renewal fee by your *Contact Hour Due Date*.
- ✓ You may apply your CH to more than one certificate as long as the training program focuses on some of the Essential Duties of each vocation.

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