



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box 8467

Harrisburg, PA 17105-8467

December 30, 2009

Small Systems Technical Assistance Center Advisory Board

717-787-5017

Mr. Dana Aunkst
Director
Bureau of Water Standards and Facility Regulation
P. O. Box 8467
Harrisburg, PA 17105-8467

Dear Mr. Aunkst:

The Small Systems Technical Assistance Center Advisory Board (TAC) met on December 17, 2009 to review and comment on the Department's revisions to Chapter 302, Administration of the Water and Wastewater Systems Operators' Certification Program, regulations. After careful review of the regulations, we support the changes the Department has made in response to the comments received. We had one member vote against support of the regulations.

We also have the following comments for you to consider:

- We would like the Department to revisit its current position on not allowing operators to carry over a limited number of contact hours to a subsequent renewal cycle. We ask that the Department follow-up with the US Environmental Protection Agency (EPA) to verify that this would be in conflict with EPA Guidelines and cannot be permitted. If this is the case, we would also like a written response from EPA as to why this proposal cannot be permitted. We feel any data management concerns the Department has expressed for accomplishing this bookkeeping can be addressed, and should not be grounds for eliminating this option for operators to meet the continuing education requirements.

- The wording in 1202(a)(5) should be combined with 1202(d). Both sections are related to the owner's duty to supply copies of relevant permits to the appropriate operators for their system..
- Delete Section 302.1202(b)(1) through (b)(6). This language is duplicative of Section 302.1202(c).

Finally, a more immediate concern for the TAC members is the Department's decision to stop the delivery of examinations and the processing of new applications for certification, certificate upgrade and certification through reciprocity. We understand that these services were stopped for an indefinite period of time due to staff and budget cuts for the Drinking Water and Wastewater Systems Operator Certification Program. The inability for the regulated community to hire new certified operators can have a significant impact on public health and safety. We recommend the Department restore funding to re-instate the existing program to provide these services as soon as possible.

Thank you for the opportunity to comment on these regulations. We look forward to working with the Department and the State Board for Certification of Water and Wastewater Systems Operators as you move forward with the implementation of this very important program.

Sincerely,

Brion Johnson
Chairman

cc: CPAC Members
State Board for Certification of Water and Wastewater System Operators Members
Cheri Sansoni
Scott Sykes
File