



Pennsylvania Department of Environmental Protection

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Rachel Carson State Office Building

P.O. Box 8467

Harrisburg, PA 17105-8467

December 17, 2008

**Certification Program Advisory Committee**

717-787-5017

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

Dear Director Aunkst:

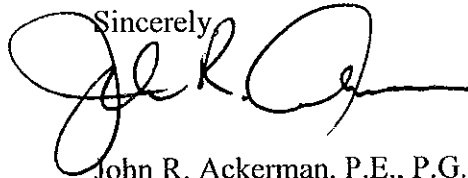
The Certification Program Advisory Committee met on December 2, 2008 to discuss the Department's concept paper on revisions to the proposed fee structure for the Drinking Water and Wastewater Systems Operator's Certification Program. We understand the Department will use this input to develop a final fee structure to cover all the costs of this program in the next draft of the draft regulations, Chapter 302, Administration of the Water and Wastewater Systems Operators' Certification Program.

1. We agree with the Small Systems Technical Assistance Center Advisory Board (TAC) that the Department needs to revisit the wastewater system numbers used in the proposal.
2. After considerable discussion, we recommend that the fee structure for systems should be based on a breakdown by flow because of the clear link between flow and the number of operators needed to effectively treat and manage that flow. The Department should look at the feasibility of a further breakout of the very small systems, with the intention of possibly not assessing a fee on these very small systems. A fee for stand alone collection and distribution systems should also be included. Again, size dependent for very small systems.
3. Some of our members recommend eliminating the post-presentation application process. Operators need to take on the responsibility to insure the training they take is approved by the Department before taking the course. Other members recognized this as a viable option in some cases and felt the post-presentation approval process should be kept.
4. We are concerned that fees for training providers would limit the development of new classes. We do not want to put the smaller training providers out of business.
5. The fees for courses developed and delivered by the Department should be high enough to cover any associated costs.
6. The Department should solicit information from neighboring states with similar programs on their program budget and fee structure to see if the final proposed fee structure and budget is realistic.

7. Option 3c as developed by TAC has merit. However, we suggest that the initial certification fee for operators be kept at \$150. The cost for initial certification should be higher than the cost of renewal to avoid having operators letting their license lapse every three years to avoid obtaining the required continuing education credits.

Thank you for the opportunity to comment. We look forward to continue to working with you both as these regulations move forward. If you have any questions concerning these comments, please don't hesitate to contact me.

Sincerely

A handwritten signature in black ink, appearing to read 'J.R.A.', with a long horizontal flourish extending to the right.

John R. Ackerman, P.E., P.G., BCEE, F.NSPE  
Chairman