



California  
Water  
Environment  
Association  
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May 14, 2007

Christopher Stevens  
Supervising Water Resources Control Engineer  
State Water Resources Control Board  
Division of Financial Assistance  
1001 I Street, 16th Floor  
Sacramento, CA 95814-2828  
cstevens@waterboards.ca.gov

Re: Operator Certification Regulations

Dear Christopher:

Thank you for the opportunity to provide input to the Office of Operator Certification (OOC) as it develops amendments to the Operator Certification Regulations. CWEA is in a unique position to provide feedback from our perspective as a certifying body, as well as having representatives on the Operator Certification Advisory Committee who reflect the wastewater treatment plant operator and supervisor perspective.

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.”

The primary mechanism for achieving that objective is the efficient and effective certification of competent operators. CWEA strongly encourages the Office of Operator Certification to assess and revise the regulations within the context of the standard of operator competency required to protect public health and the environment.

As a certifying body, CWEA is ultimately concerned with the standard of operator competency evaluated through certification. Maintaining the certification standard at an appropriate level is critical to ensure that all certified operators possess the knowledge, skills, and abilities to protect the public health and the environment. Any revisions to the regulations must be assessed first and foremost based on their effect on the standard of competency.

CWEA strongly encourages the OOC to propose revisions that reflect a minimum standard of competency at which certified operators, at any given grade level, possess the experience, education, knowledge, skills, and abilities to perform the essential duties of that grade level safely and effectively. The set of essential duties is especially important to the discussion of revising the operator experience requirements. If there is significant evidence that the essential duties have changed, then they should be reassessed through a job analysis and the experience

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requirements adjusted accordingly. If the essential duties have not changed, then there does not appear to be justification to revise the experience requirements. The regulations should prescribe a standard of competency required to perform the essential duties of an operator. Administrative revisions that do not affect the standard of competency should focus on improving the clarity, efficiency, and effectiveness of the regulations.

There are many groups with interests affected by the regulations. Framing any revisions to the regulations within the context of a threshold level of competency should help to focus these groups on what really matters: ensuring a minimum standard of competency to protect the public health and our environment while providing access to all qualified and competent operators.

Regards,

A handwritten signature in black ink, reading "Maura A. Bonnarens". The signature is written in a cursive style with a large initial "M".

Maura A. Bonnarens  
CWEA President

Cc: Tam Doduc, State Water Board Chair  
Dorothy Rice, State Water Board Executive Director  
Hugh Logan, Operator Certification Advisory Committee  
Jack Frazier, Operator Certification Advisory Committee  
CWEA Board of Directors