

Sienkiewicz Holdings

2774

Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105-8477

RECEIVED

2009 JUL 30 AM 11:59

INDEPENDENT REGULATORY
TECHNICAL ASSOCIATION

July 25, 2009

RECEIVED

JUL 29 2009

ENVIRONMENTAL QUALITY BOARD

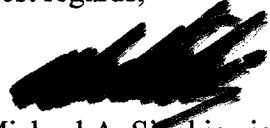
Subject: Administration of the Water and Wastewater
Systems Operator's Certification Program

To whom it may concern,

Attached is one page which addresses a small but important issue that is in
subject. Since it is one page, please consider this a summary and include it in the
members packets.

Thank you for allowing me the opportunity to comment.

Best regards,



Michael A. Sienkiewicz

PO Box 124
Carlisle, PA 17013
(717)-241-2555
E-mail: sienk@pa.net

July 25, 2009

**Subject: Administration of the Water and Wastewater
Systems Operator's Certification Program**

This letter is written to address the common bureaucratic habit of developing rules and regulations which include unnecessary "busywork" to satisfy the insecurities of the DEP, as you have done in Table 2, Estimated costs to the Operator, Section 302.1202, 302.1206 and 302.1207.

Roughly 12% of the public water systems supply roughly 80% of the population while 85-88% of the systems may supply 20% of the population. The 12% are water companies, while to the majority of the 85-88%, water is just another of the many responsibilities the owners have. A good number of them are manufactured housing communities where the owner has responsibilities that range from the water/wastewater plants to chasing "deadbeat" tenants so they can collect past due rent so they might have some extra income to afford an improvement to one of the plants.

The common objectionable thread running through the sections referenced above can be summed up as follows:

Paperwork Requirements #9

The owner will need to report the names, addresses and level of certification of all operators designated as available operators for the system ~~on an annual basis~~. Changes in available operators must be reported within 10 days. If the owner chooses to designate an operator in responsible charge to utilize standard operating procedures, the names, addresses and level of certification of these operators must also be reported to the Department ~~on an annual basis~~.

The requirement that the above has to be done on an annual basis is ludicrous. This is one of the "busy work" requirements that insures that a bureaucrat has enough paper to shuffle to look busy, while it adds another small, unnecessary, easy to forget step, that if not done will trigger a violation. It is also an affront to an intelligent person. Why should I be required to fill out the same form with the same information every year? Time is the most precious thing we have and everybody tries to steal it from us. This requirement is another "steal" and all the little ones add up.

If you read Paperwork requirements #9 and delete "on an annual basis", as I have done, in both places, nothing in the DEP will change, but another small bit of repeated bureaucratic paperwork is eliminated and one less worry exists for the overburdened small businessman. Frankly, I don't know how this can be justified in today's computer age.. Please eliminate the yearly requirement to submit the same information.

Thank you for allowing me to comment on this issue.

Regards,


Michael A. Sienkiewicz

PO Box 124
Carlisle, PA 17013
(717)-241-2555

E-mail: sienk@pa.net