

2774

RECEIVED

AUG 7 2009

Nicholas Gerard Stark  
25 Terrace Hill Road  
Pine Grove PA, 17963  
Client ID: 199423  
570-345-2398

ENVIRONMENTAL QUALITY BOARD

To: Environmental Quality Board  
Post Office Box 8477  
Harrisburg, PA 17105-8477

Re: Proposed Rulemaking, July 11, 2009  
Chapter 302, Administration of the Water and Wastewater Systems Operators  
Certification Program  
Regulation I.D. # 7-433

2009 APR 12 PM 2:43  
RECEIVED  
INFORMATIONAL ONLY  
EPA/PA/REG/REG/REG

Dear Board Members:

I am writing to express my concerns regarding the referenced rulemaking. I am a professional certified wastewater operator and have been employed as such for 13 years. In my experience, the proposed regulations would significantly negatively impact my ability to do my job as a professional. I have many concerns, and I endorse the comments being prepared by the Eastern PA Water Pollution Control Operators Association. The issues discussed below are of special concern to me not only because they directly conflict with the Act (the Water and Wastewater Systems Operators Certification Act) but because they impose arbitrary and unreasonable requirements, including the creation of new forms of personal liability. In some cases these requirements are so poorly worded that I cannot determine what my risks as an operator would be under these rules.

These new rules are so radically different from the current program, I must state my deep concerns about the short time allotted for public comment and with DEP's refusal to meet with representatives from the professional operators' associations during the course of drafting the regulations. I urge the Board and the Commission to recommend strongly to DEP that it return to the drawing board and work with the regulated community to develop reasonable and practical regulations. Otherwise, this profession is in deep trouble, along with water quality. Listen to the operator's and plant supervisor's who have actual real time experience. My Staff and I together have over 75 years of combined experience. Focus more on the private environmental contract operations groups that are jeopardizing our water quality, due to understaffing and too much responsibility to do the job right and not cut corners. They only care about the bottom line. Please, I beg you **do not to pass this!** Listen to the real professionals.

If there is any way I could assist you please feel free to call me.

In conclusion: Below is a question to think about.

What happens if a lead operator or plant supervisor needs to relocate, accepts a position with another treatment plant and a serious problem occurred after taking on this new job and did not have enough time to fully review all the SOP's from the former disgruntled operator. Who then is responsible?

Respectfully submitted,



Nicholas G Stark