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Tate, Michele

From: . Tate, Michele
Sent: Wednesday, August 12, 2009 9:08 AM
To: 'lambert.patrick@verizon.net'
Subject: RE: Operator Certification Comments

2009 AUG 12 PM 2: 52

INDEPENDENT REGULATORY
REVIEW COMMISSION

Mr. Lambert:

Thank you for the comments you submitted to the Environmental Quality Board (EQB) concerning the proposed Administration of the Water and Wastewater Systems Operators' Certification Program regulations. Your comments are valuable to the EQB and will be included in the official record of public comments. At the conclusion of the public comment period for this proposal, the Department of Environmental Protection will prepare a comment/response document responding to all the comments received during the comment period. The comment/response document will be submitted to the EQB for consideration as part of the final rulemaking. You will receive notice when the final rulemaking is sent to the EQB, and a copy of the rulemaking package will be sent to you upon request. In addition, if you would like to receive a copy of the final rulemaking following the EQB's action, please contact me. The Department will provide the final rulemaking package to you when it is submitted to the Independent Regulatory Review Commission and the House and Senate Environmental Resources and Energy Committees.

The Department is committed to encouraging public participation in the development of new regulations. The Department's eNews Report is available free of charge and provides subscribers with daily e-mails on the most up-to-date information from the Department. To subscribe, please visit <http://www.dep.state.pa.us/Listrak/listraksubscriberform.htm>. In addition, you may want to subscribe to receive electronic notices from the Department through its eNOTICE system. By signing up for eNOTICE at the following website (<http://www.ahs2.dep.state.pa.us/eNOTICEWeb/>), subscribers receive e-mail notices (or eNOTICES) from the Department concerning a number of Departmental actions, including notices from the time a regulation is initially developed until it is published as a final rulemaking.

Please contact me if you have any questions concerning the status of this rulemaking or any other regulatory initiative.

Thank you.

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-----Original Message-----

From: Patrick Lambert [mailto:lambert.patrick@verizon.net]
Sent: Friday, August 07, 2009 8:31 AM

To: EP, RegComments

Subject: FW: Operator Certification Comments

Here are the comments for the operator certification:

1. (302.704) An operator trainee should be able to make a process control change under the direct supervision of a certified operator. Experience or adequate training for the processes cannot be gained by just observation alone.
2. (302.704) During an emergency a certified operator may need the operator trainee to make adjustments to equipment. If the certified operator has to make every quantity and quality process control decision during an emergency there may be a catastrophic failure or incident.
3. (302.704) Additional experience from source water examination under DEP or other acceptable programs. An operator should be able to apply experience gained from source water programs or other training associated with sources. Water quality at its source is a valuable tool. We need to train operators in an approved treatment mechanism.
4. (302.84) What type of security training is acceptable from DEP? This needs to be expanded upon. This may need to have a certain number of approved contact hour attached to it. If operators need security training to become certified then what type of training should we have (NIMS, local Police or active shooter?)