

2774

Tate, Michele

From: gwoodard@proactiveops.com
Sent: Tuesday, September 08, 2009 11:04 AM
To: EP, RegComments
Subject: Comments:Proposed Rulemaking Chapter 302; ID#7-433(IRRC#2774)



Comments_ID
433_IRRC 2772_Ch

Please see attached comments regarding the proposed regulation ID#7-433(IRRC#2774), Proposed Rulemaking 25 PA Code, Chapter 302.

Respectfully submitted,

Guy Woodard
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RECEIVED
2009 SEP 14 AM 10:09
INDEPENDENT REGULATORY
REVIEW COMMISSION

The ProActive Operator Source

Helping utility operators protect the health & vitality of their communities.

September 5, 2009

Re: Comments of Proposed Rulemaking 25 PA Code, Chapter 302; Administration of Water & Wastewater Systems Operator Certification Program

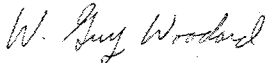
As a DEP approved Training and Examination Provider for Pennsylvania's water and wastewater treatment facility operators, *The ProActive Operator Source* respectfully requests consideration of the following **comments regarding proposed Regulation ID# 7-433 (IRRC#2744)**.

We feel the proposed fee structure for Examination Providers is unfair to small companies such as *The ProActive Operator Source* who would be charged exorbitantly more dollars per / registrant than some of the larger Associations simply because we won't be providing as many exam sessions. The fee structure as currently proposed would eliminate the possibility of *The ProActive Operator Source* providing any exams sessions.

We are also concerned that Pennsylvania operators will refrain from seeking new sub-class certifications if the proposed \$150.00 fee for new certifications is written into law. That is a heavy financial burden to place on operators, considering that there are 14 water subclasses and 4 wastewater subclasses.

The ProActive Operator Source recognizes the financial challenges that the Pennsylvania Department of Environmental Protection faces. Similarly, we are hopeful that the PADEP recognizes the financial challenges that operators and the companies that serve and support these operators are facing. We would suggest that ultimately cost burdens must be shared more equitably by the general public who are currently receiving unlimited and high quality water for artificially cheap prices. Future modest rate hikes will be unavoidable to fund regulatory compliance, required technology implementation and a well trained and certified work force. Therefore, we suggest that utilities share a larger portion of the certification programs as they are the entities who are empowered to adjust their rates to better reflect the true cost of producing safe and clean water.

Sincerely,



W. Guy Woodard
Owner of *The ProActive Operator Source*