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From: O'Neill, Kathleen [kathleen.oneill@veoliawaterna.com]
Sent: Friday, August 14, 2009 3:29 PM
To: EP, RegComments
Subject: Cert Op Rule Comments

2009 AUG 24 AM 9:18

INDEPENDENT REGULATORY
COMMISSION

Dear Sir or Madam,

Attached are my comments in reference to the Certified Operator Rule.

Thank you for the opportunity to comment,

Kate O'Neill

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Comments on Operator Certification Rule

1. 302.1201 Duties of Operators 15c: As the certified operator makes a monthly report to the system owners, which is then attached to the minutes of that month's meeting, could this then count as a method of notifying the owner's without sending certified mail? The certified operator could sign this report.
2. 302.1207 Duties of multiple treatment systems (Circuit Rider)
 - (k)2 Is this due to the actions of the circuit rider? If so, it should say that. Many emergencies happen when no one is present. The certified operator should be given time to work on the problem that caused the threat to public health, safety and the environment.
 - (k)3 Why not ask the circuit rider to update the system specific management plan before having the owner cease participation in a circuit rider program. Sometime changes are being tried to improve treatment. Until these changes are proven, the new SOP is not committed to paper.