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Tate, Michele

From: Bill Edgar - CEU Plan [wwedgar@ceuplan.org]

Sent: Thursday, August 20, 2009 4:26 PM

To: EP, RegComments

Subject: Proposed Rulemaking – Environmental Quality Board – [25 PA Code CHS. 301, 302, 303, 305]

INDEPENDENT REGULATORY
REVIEW COMMISSION

Re: Proposed Rulemaking – Environmental Quality Board – [25 PA Code CHS. 301, 302, 303, 305]
Administration of the Water and Wastewater Systems Operators' Certification Program

Public Comments to the Board

As an approved Training Provider to PA DEP, CEU Plan would like to provide the following summary related to our concerns of the proposed changes:

- In your language and assessments, please create an equal playing field related to contact hours, contact credits, and the amount of course structure related to it. Some providers have forty hour, 80 hour, 120 hour classroom, correspondence, or webcasting activities with credit hours being assigned in those amounts. Some providers such as ourselves, provide multiple courses in one – two – three – five hours module arrangement providing the student with the unique concept of selecting curriculum related to areas of interest, troubled areas, or site specific topics. [20 hour manual = 20 one hour course; same amount of chapters in many cases, however not in a bound manual.] In the fee calculations, we would appreciate your consideration in a reasonable approach to contact time comparison with course content. I would like to suggest a flat across the board fee per course credit hour, in that, this would be easier to control in the long run.
- Maintain the current electronic reporting function to PA DEP of database reporting, with regards to the fee assessment, electronic credit card transactions to be included. Should a pre unit assessment fee be utilized like \$ 1.00 per course entry per student, this would minimize fee assessment charges and calculations; as many course rosters include multiple course credits for the same student (operator).
- CEU Plan does not have any problem assessing and submitting course fees, as proposed; however we do feel operators deserve a 15-20% pay raise to assist in their increased cost of living for being a public servant. Please keep any fee reasonable for hard working people that operate your water and wastewater utilities.
- An incentive idea for course credit - database reporting, make the Training Provider adhere to policy of reporting within 30 days, reasonable extension of 10 days, and a fine – fee for late reporting.

PA DEP has done an excellent job with the Earth Wise Academy. It has been our pleasure to provide our course catalog to operators across your state. It is our mission to provide operators with the high quality continuing education courses to meet your license renewal requirements. We work to maintain an affordable and reasonable approach in their personal growth and performance. Please keep the Operator in Mind.

William W. Edgar

8/21/2009