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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Table 2- Estimated Costs to the Operator appears to inadequately address the potential cost for an operator to acquire contact hours by the Post Presentation Credit (PPC) process. Some operators may be restricted in acquiring sufficient contact hours through the normal process due to employment restrictions and therefore, must resort to a PPC process.

The cost for review of a post presentation credit (PPC) application appears to be excessive based on the following information.

As an example: If an operator take a one day course of 8 hours it may only yield 6 hours of contact time due to breaks and lunch throughout the training day. Additionally, the operator may also have to pay for the course or attend during non-work hours which are added expenses.

The proposed draft regulations shows a salary range of \$30,000 to 80,000 per year. Very few operators receive the upper salary which PADEP indicated. A survey of wastewater treatment plant operators in the commonwealth reflect a salary of approximately \$42,000/year which is a pay rate of approximately \$20/hour. Based on a tax rate of 25%, the operator receives a take home pay of \$15/hour. If a fee for the application is charged at \$250, the operator is incurring more two (2) days of work to pay for the fee imposed by PADEP. If an operator needs 30 contact hours to maintain their certification, they would need to take at least five (5) days of such training. Therefore the PADEP incurred PPC application fee could equal at least \$1,250 in fees to the PADEP

If a PPC application is submitted for a course with less than 6 hours per PPC application the cost further escalates.

Submitted by  
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