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The City of York Pennsylvania



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Mayor John S. Brenner

RECEIVED

August 19, 2009

AUG 28 2009

Steven E. Douglas
General Manager
York City Wastewater Treatment Plant
1701 Black Bridge Road
York, Pennsylvania 17404

ENVIRONMENTAL QUALITY BOARD

Independent Regulatory Review Commission
14th Floor, Harrisstown 2
333 Market Street
Harrisburg, PA 17101

Environmental Quality Board
Post Office Box 8477
Harrisburg, PA 17105-8477

INDEPENDENT REGULATORY
REVIEW COMMISSION
2009 SEP -8 AM 10:25
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Re: Environmental Quality Board
Proposed Rulemaking, July 11, 2009
Chapter 302, Administration of the Water and Wastewater Systems Operators
Certification Program
Regulation I.D. # 7-433

Dear Commissioners and Board Members:

In my 25+ years as a certified wastewater operator I have reviewed many proposed regulations and never thought a comment was necessary. After reading the above referenced rulemaking I've finally had to voice my strong concerns with the language as it now stands.

Over my career I've been fortunate to advance my position from Chemist, to Assistant Chief Operator to Chief Operator and finally to General Manager. I am responsible for the proper operation and maintenance of our 26-mgd POTW as well as 102 miles of sanitary sewers. I have 39 staff members which includes 19 operators and five mechanics. We are quite proud of our operation, not having a violation to our NPDES permit in over 18 years.

I have read the proposed regulations and I have several concerns. I understand that many of my concerns have already been enumerated by others so I will just comment on the following section:

Section 302.1201(c) – "Certified operators shall submit a written report to the system owner documenting any known violations or system conditions that may potentially cause or are causing violations of any Department regulation or permit conditions or

requirements.” In any 24-hour period there are many circumstances that arise that, left unattended, could result in a violation. Most of these are minor in nature and only take a few minutes to resolve. If I had to prepare written reports for all of these instances I wouldn’t have time to properly manage the York WWTP. In addition, the “owner” of the York City Wastewater Treatment Plant is a Sewer Authority made up of volunteer members that meet one time per month. The proposed reports that would be generated would be sent to solicitor for the Sewer Authority. Then they would be distributed and discussed at their regular meeting. I certainly do not want to burden them with a massive amount of paperwork if the circumstance surrounding a potential violation is corrected in a matter of minutes. They all have jobs that take up enough of their valuable time.

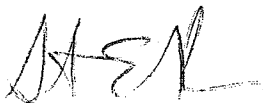
The level of detail that these reports require is unreasonable. This language also has the operator speculating on the “severity or threat to public health”. One operator might not give a certain situation the same level of seriousness as another, both within the same facility or between POTWs.

The system currently being used at the York WWTP has worked very well for many years.

- a. Malfunctioning equipment and operational changes are logged in our Control Room for plant operators to read. The comment is dated and initialed by the operator.
- b. Malfunctioning equipment is entered into a maintenance program (Infor MP2) as a “repair” work order. Our mechanics then repair the equipment (priority given to those pieces of equipment that are considered critical to the operation) and close out the work order. Preventive or scheduled equipment work orders are handled in much the same way.
- c. Weekly staff meetings are held to discuss both operations and maintenance issues. This information is recorded in a report and distributed to the plant staff.
- d. The Process Control Manager issues a weekly memorandum to all of the plant staff outlining process changes, malfunctioning equipment, or other information.
- e. As General Manager, I prepare a monthly report for members of the Sewer Authority. This report highlights the activities of the previous month.

If these changes are adopted it will negatively impact the efficient operation of this facility. More manhours will be spent writing reports. Of course, this cost will then have to be passed on to our ratepayers. In these tough economic times, at least for the City of York, this cost is one that should be avoided.

Sincerely,



Steven E. Douglas
Certificate No. S-8120