



Honorable Board Members, Advisory Committee Members and Staff:

The following are my comments regarding the proposed amendments to the California Code of Regulations, title 23, division 3, chapter 26 (commencing with section 3670) relating to the Wastewater Treatment Plant Classification, Operator Certification, and Contract Operator Registration Program (Operator Certification Program).

The new section 3702.2 (b) states in part "...shall send written notice of expiration to the operator." The term "operator" has been changed from the current code which, purposefully, uses the term "certificate holder." The reason why the term "certificate holder" was used was so as not to limit certificate renewals to those who are currently employed in the operation of a treatment plant. For instance, a certificate holder may be in between operator jobs when it is time for renewal. I was the one who commented when the regulations last were revised 12-15 years ago, and the term "certificate holder" replaced "operator" in various sections.

The reasoning still holds. Please do not use the more restrictive term "operator" in section 3702.2 (b). Instead, use the more inclusive term "certificate holder."

Thank you for your consideration.

David Michel,
2561 20th Avenue
Kingsburg, CA 93631
(559) 897-7738
WWTPO V, No. 4160