

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000



RE: Letter of Support for Proposed Operator Certification Regulations



To the Board:

As the owner of a Contract Operations company that operates water and wastewater treatment facilities on tribal lands, I am pleased to see that the Board has decided to accept experience gained on tribal lands as reciprocal experience for operator certification. I would like to indicate my support for the proposed amendments to the Operator Certification Regulations stated in section Article 6, Minimum Qualifications for Wastewater Treatment Plant Operator Certification.

It has long seemed unfair that our operations team could not become State-certified due to a simple oversight in the regulations. Section 3684 (Qualifying Experience Credit) appears to correct this problem by allowing operators to gain qualifying experience credit for experience at water treatment plants regulated by a territory or an Indian tribe when the work performed is comparable to the experience gained working at treatment plants regulated by California or other states. This change is important to ensuring that tribal facilities are able to hire and retain skilled and reliable operations staff. Operators need to know at the beginning of their careers that the time and experience they gain at these facilities will be recognized by the State. Otherwise, they will seek work elsewhere. This change is vital to ensuring that our facilities remain fully staffed and run by professional, career-oriented staff.

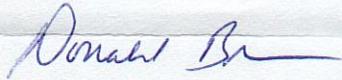
Aquality Water Management, formerly HydroScience Operations, has supported these proposed changes since the inception of including tribal facilities was first discussed. Although the process has taken much longer than we anticipated, we implemented programs to put our staff through the training and certification process in anticipation of the changes. As a result several members of our staff have trained for, studied for, and passed the certification examinations at several grade levels during this process and would have been able to demonstrate that they had the requisite experience for the grades within the required time frames, however due the length of time this process has taken the time limits have expired. We currently have staff at our facilities that may be required to retest in order to acquire their certificates due to the amount of time that has passed. I hope the Board will consider

retroactively granting these operators certificates based on their qualifications and experience at the time they took the test and the allowed time periods. As you are aware the preparation for the examinations is difficult and time consuming and the expenses for application and testing costly. I believe in fairness to their dedication to the process that these operators should be grandfathered into the program without retesting.

I thank you for making these changes going forward.

Sincerely,

Aquality Water Management

A handwritten signature in blue ink, appearing to read "Donald Brown", with a long horizontal flourish extending to the right.

Donald Brown, General Manager