



Regarding the proposed regulations: I have concerns about the Lone Operator Provision.

As contract operators, our niche is small treatment plants. Typically these are in a geographical clusters which we service with a "circuit staff" working alone. The circuit staff includes operators, technicians, engineers. In most cases a person works alone from a service vehicle, but under the direction of a Chief Plant Operator (CPO) The circuit operators are constantly under direction of the CPO and the CPO is available to come on-site, answer questions or resolve situations. Other circuit staff are also available to assist someone as necessary. All process control decisions are made by the CPO and in most cases the CPO has remote access to the facilities' SCADA systems..

Currently many of these plants are private, but will fall under the proposed regulations. We support including private owned plants with municipal owned plants.

My concern is that the proposed regulations seem to prohibit an OIT from being assigned as a circuit operator, due to the fact they would be alone. Also SCADA technology seems to be overlooked. We have no plants where there are multiple staff on-site routinely. How does an OIT get experience is they can't work alone, under supervision. In fact, how close does a fellow operator have to be to oversee the OIT? 5 feet, 20 feet, across the plant, or available within say and hour or two?

Another area of concern is that the trend in smaller treatment plants is automation and SCADA monitored and controlled systems, including video surveillance. Many actual process control functions are now performed over the Internet through SCADA systems. Actual on-site work is becoming more of a maintenance functions to mix chemicals, visually inspect the facilities, take samples and do service maintenance work. The actual on-site time may only be a few hours per week, although the facilities are constantly monitored by SCADA with operators in contact with the facilities and on-call 24/7 via smart phones and laptops. How does this fit into the proposed regulations and earned time?

I hope these regulations are carefully reviewed and unintended consequences are minimized.

Thank you,

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