



Hi Debra

In reading the Initial Statement of Reasons, I noticed that the definition of a wastewater treatment plant (below) excludes Onsite Wastewater Treatment Systems (OWTS). This appears to also exclude Package Treatment Plants that our office regularly permits and requires a Grade 2 or 3 level WWTO. In the final draft of the OWTS regs:

http://www.waterboards.ca.gov/water_issues/programs/owts/docs/proposed_owtspolicy2012.pdf

Section 2.6 The following owners of OWTS shall notify the Regional Water Board by submitting a Report of Waste Discharge for the following:

2.6.32 any existing OWTS, not currently under individual waste discharge requirements or a waiver of individual waste discharge requirements issued by a Regional Water Board, with the projected flow of over 10,000 gallons-per-day;

We are often faced with privately owned and operated package treatment plants (Francis Ford Coppola for example) ranging from 3500 gpd to 20,000 gpd. Would the Operator Certification Program regs apply to the wastewater treatment plant operators we are currently requiring? And if not, should there be a separate category in either your regs or the OWTS regs?

Thank you
James

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"When the well is dry, we learn the worth of water."
-Benjamin Franklin

43. **“Wastewater treatment plant”** – (amended) The existing definition is amended to be consistent with changes to the Water Code enacted by chapter 422, statutes of 2002, which amended the definition of WWTP in Water Code section 13625.

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The proposed definition states clearly that a water recycling plant is a type of WWTP. It also states that an onsite sewage treatment system is not a WWTP because there are separate regulatory standards for onsite sewage treatment systems. Additionally, the

responsibilities involved in installing and maintaining these systems are unrelated to the day-to-day activities of an operator at a WWTP. For these reasons, it is not necessary to regulate people installing and maintaining onsite sewage treatment systems under these regulations.