



The new fees shown starting on page 62 of the proposed regulations are outrageous! 80% to 100% increases! Really? In a time when city's are going bankrupt, budgets are stretched past their limits, operators are furloughed, and high grade certified operators are hard to find? The additional burden of the overreaching fee structure will prove problematic for many municipalities, districts, and individual operators. You must reconsider such an untimely and dramatic increase in fees. The fees should not be increased at this time.

As well, I see that CWEA is presenting a sales pitch for the State to consider adding Continuing Education requirements to WWTP operator certification. This serves CWEA well as they would increase their own training classes and plant themselves securely as a nonregulated entity having certain control over certification renewal. Again, additional burdens toward certification and renewal does not serve the communities well. It will be difficult to fund the required training, and provide additional staff while operators are training up to 40 hours/year. CWEA is dead wrong when they claim that a CEU program would not be an additional burden to operators and budgets. A continuing education requirement for certification renewal should not be considered at this time.

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