

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 an uncertified operator currently working at a facility on tribal land, 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.

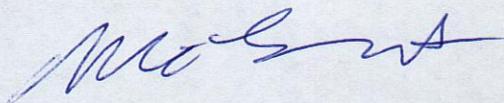
Section 3684 (Qualifying Experience Credit) now appears to allow operators to gain qualifying experience credit for experience at water treatment plants regulated by a territory or an Indian tribe when the work performed is comparable to the experience gained working at treatment plants regulated by California or other states. I have been working at a treatment facility on Indian tribal land for several years without being able to acquire certification.

The Board began the process of incorporating reciprocity for tribal lands into the regulations several years ago. Operators like me took certifying examinations in good faith, under the belief that the regulations would change soon enough that our experience would count towards certification before the sanctioned 4-year window expired. I have taken operations courses, put in my time onsite, and taken the required exams. If the Board counts past time working at a facility on tribal lands, I will be able to receive my certificate. I hope the Board will be basing certification on time worked prior to this decision.

I hope the Board will take into consideration people like me, who followed the rules and had the requisite experience within the time frame required for certification, but were unable to acquire certificates without these changes to the Operator Certification Regulations. Those of us who have already put the time, effort, and expense into preparing for and taking our certification exams should be allowed to receive certification based on past time worked.

I thank you for making these changes going forward.

Sincerely,


Norman DeSilva