



To,

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board

Ms. Townsend,

Veolia water has reviewed the proposed amendment to Title 23, Division 6 Chapter 26 Wastewater Treatment Plant Classification, Operator Certification, and Contract Operator Registration. We recognize that there has been a lot of work that has been put in to gather comments, review and finalize this amendment.

In general Veolia Water is very pleased to see the proposed changes in this amendment that should allow more flexibility for the owners to utilize their staffing such as changing the definition of a “shift-supervisor” to “operator-in-charge” , addition of lone operator provision, etc.

As contract operators we face similar staffing challenges as other agencies or municipality with an aging work force that will soon retire. We hope to see some change in the regulations in the future that will allow grade level reciprocity across the board with other states, such as Grade 1 for 1, grade 2 for 2, Grade 3 for 3 and so on.

We greatly appreciate the efforts of the State Board in addressing a lot of issues in this amendment. We are willing to assist you in any way we can that would mutually benefit the state, our company and our clients. Please free to contact me if you have any questions.

Sachin

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