



**Subject:** Comments on Proposed Operator Certification Regulations

We have reviewed the copy of the changes sent out about October 1, 2012. We would like to include these comments for consideration:

Section 3681 Lone Operator. This section seem unworkable for small wastewater treatment plants (wwtp). Our company is a Contract Operator and has several small plants spread out over a half dozen counties in Northern California. With new requirements that private wwtp will fall under operator certification rules in the next couple of years, the number of small plants covered will increase.

Our small plants are typically from 10,000 gpd to maybe 250,000 gpd. Most are ponds or extended air treatment plants with either subterranean or surface spray irrigation. None are large enough to have multiple operators. In fact, our business model is to hire circuit operators who handle several treatment plants on a daily basis. All operators are in contact with the Chief Plant Operator via telephone, text messaging or email. Many facilities also have SCADA systems to monitor the wwtp continuously.

In almost every plant, every day, the operator is on-site alone.

This section needs to be reworked to accommodate this reality. Operators work alone in many cases, especially in small wwtps.

Also the provisions for OIT need attention in this same scenerio. As the regulations are currently written we would never be able to hire an OIT. That doesn't seem reasonable that the only entry path to become a certified operator is via a large wwtp. Our company provides good training and plenty of oversight. Its just not face to face, but rather by modern communications systems.

Thank you

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