

Operator Certification Stakeholders Workgroup Meeting Summary February 23, 2005

- A. Introductions
- B. The group discussed the fact that AWWA was developing a survey for utilities in order to help document current levels of staffing. Their plan is to use the survey results to get a better idea of what minimum staffing times are appropriate for facilities. Andy indicated that for the next few months it would be best to hold off on discussing the minimum staffing time issue until some feedback is received from the surveys.
- C. Andy began with discussions on 3745-7-05 "Classification of operator certification" and indicated that no substantial revisions had been made to the tables. The revisions that were made were just to make language consistent throughout the rules. Discussion ensued about the possibility of adding a new classification of Class A wastewater operators for smaller facilities. Andy indicated he would discuss this with the Division of Surface Water. Due to the logistics of developing a new certification classification and program, the addition of a Class A wastewater classification may need to be included in future revisions.
- D. OAC Rule 3745-7-06 "Certification of operators" was the next draft rule discussed. Discussions were held regarding the proposed change to a semi-sequential examination process. Andy once again explained Ohio EPA's position regarding this issue. The current testing procedure does not allow the agency to adequately test operators who chose to skip taking either the Class I, II or both examinations. In order to have a representative test, Ohio EPA would have to expand the examination to a broad test covering Class I, Class II, and Class III facilities and distribution/collection systems rather than a test that focuses on Class III facilities only. Ohio EPA believes this would make an already difficult examination nearly impossible. Operators currently take a majority of the six hours to complete the current examination that covers only Class III facilities. The addition of questions from the Class I and II examinations would result in a test that most likely could not be completed in the six hours currently provided for the completion of the Class III examination. The major concern seems to be the amount experience an operator would have to achieve before reaching the Class III level of certification. However, the way the draft is currently written the amount of experience necessary under the proposed rule is equivalent to that required under the existing rules. The only difference is that under the proposed rule those examinees with college diplomas would be required to have at least three

years of hands on experience prior to obtaining the Class III certification. Ohio EPA's position is that three years is a reasonable amount of time to ensure that an operator is well trained before he/she has the ability to operate any Class III or lower facility in the state of Ohio. The opinions of the stakeholders were split with several supporting the draft revision and several in opposition. Ohio EPA indicated that they were committed to the concept of semi-sequential testing, but would be willing to consider alternative proposals on the amount of experience required at certain levels. The stakeholders agreed to develop alternatives. Ohio EPA indicated a willingness to include an OIT status for the Class II examination in the semi-sequential testing process. This item will be discussed when the group revisits 3745-7-06.

- E. OAC Rules 3745-7-07, 08, 10 and 11 were quickly reviewed and the consensus of the group was that the proposed rules were acceptable.
- F. The January 10, 2005 version of OAC Rule 3745-7-09 "Duties of an Operator" was the last draft rule discussed. Stakeholders expressed appreciation for the amount of changes that had been made to the original proposal based on the comments received during the early involvement review. However, there were still some concerns with portions of the language. The group suggested changing the following language:
 - 1. Paragraph (A) "operation and maintenance" should be replaced with "their."
 - 2. Paragraph (D)(3) should be moved back under duties of a certified operator not just responsible charge operator.
 - 3. Paragraph (D)(3)(b) remove second sentence and replace with "Logs may be maintained in an alternative format as approved by the divisions. Such requests shall be made in writing to the appropriate district office."
 - 4. Remove paragraph (D)(4)

A meeting will be scheduled for March.

Note: We are actively seeking input to the proposed revisions. If you have concerns please draft alternative language or options.