

# Operator Certification Stakeholders Workgroup Meeting Summary July 20, 2005

- I. Introductions
- II. Mike Baker welcomed the attendees and gave a brief discussion related to Ohio EPA's view of the importance of establishing minimum staffing times at water and wastewater treatment facilities.
- III. Ramesh Kashinkunti reviewed the preliminary results of the Ohio Section of AWWA's survey of 106 water and wastewater facility managers. A copy of the presentation can be found on the Ohio AWWA website at <http://www.ohiowater.org/oawwa>. Andy Barienbrock presented the results of a survey Ohio EPA conducted with approximately 230 operators who had contacted the certification unit in the past few weeks. The results of that survey indicate that the operators in responsible charge (ORC) of Class III and IV facilities were on-site more than 30 hours per week. ORC's at Class II facilities were on-site 20 or more hours per week and ORC's at Class I facilities spent 1-1.5 hours per week on-site. Andy indicated that this closely mirrored the minimum staffing requirements that are being proposed in the draft rules.
- IV. A majority of the meeting was devoted to a discussion of the minimum staffing requirements that had been proposed in the draft rule revisions. The initial draft has been revised to require the following onsite staffing by the ORC:
  - a. Class III and IV water facilities: 8 hours/day, 5 days/week and certified operators present when the ORC is not onsite.
  - b. Class III and IV wastewater facilities: 8 hours/day, 5 days/week.
  - c. Class II facilities: 5 days/week, 10 hours/week.
  - d. Class I water facilities: 3 non-consecutive visits/week, 1 hour/visit.
  - e. Class I wastewater facilities: 3 non-consecutive visits/week, ½ hour/visit.
  - f. Class A facilities: 2 non-consecutive visits/week, ½ hour/visit
- V. Spirited conversations were held regarding the appropriateness of staffing times and what individual utilities felt was reasonable. During the meeting, Cincinnati MSD expressed a desire to move towards unmanned operations and suggested that minimum staffing at Class IV plants should be limited to two hours per day. This was based on the fact that they have a high degree of automation and staff that are

present on-site who are not necessarily certified at the level of the plant. Discussions continued on the benefits and drawbacks of such a plan. Ron Volkerding suggested that utilities be able to submit an operating plan that would document the number of operators on duty, level of automation, etc. This plan could be reviewed in Columbus and appropriate reductions in staffing time could be granted by the Director. The group agreed that this sounded like a good compromise and that the minimum staffing times for Class III and IV facilities should remain the same as proposed in the draft rules. Language regarding submittal of an operation plan should be included in the revised drafts of the rules. The group also agreed that the maximum reduction that could be granted would be 6 hours per day resulting in a minimum staffing time of 2 hours/day, 5 days/week. Ohio EPA agreed to drop requirements for certified operators on all shifts for Class III and IV water facilities and to reduce the class I minimum staffing requirements to 3 nonconsecutive visits/week, on half hour/visit to be consistent with the wastewater language. The stakeholders indicated that based on Ohio EPA survey results the minimum staffing times for Class II facilities should be increased to 20 hours/week. As a result of the meeting the minimum staffing requirements for ORC's will be revised to the following:

- a. Class III and IV facilities 8 hours/day, 5 days/week.
  - b. Class II facilities 5 days/week, 20 hours/week.
  - c. Class I facilities 3 non-consecutive visits/week, ½ hour/visit.
  - d. Class A facilities 2 non-consecutive visits/week, ½ hour/visit.
- VI. Andy indicated that he believed all of the major issues had been addressed and that OEPA would begin putting the draft rules into an acceptable format to begin interested party review. Ohio EPA hopes to have the rules adopted by late spring of 2006. Ohio EPA will schedule an August meeting to work out the details of the operational plan and the reductions that would be granted.