

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 operator currently performing work 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 with colleagues that have been unable to acquire certification even as their knowledge and skills have increased. It is good to know that going forward, their hard work will be recognized by the State.

I hope the Board will take into consideration operators who fall between the lines. Some of my colleagues have taken certification tests, and have sufficient experience at facilities on tribal lands, but will be unable to acquire certificates without retesting due to the timing of these changes to the certification regulations. I hope the Board will consider these individuals as well.

I thank you for making these changes.

Sincerely,

Stan Duroford
Cert # 6590