



Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000

How nice of you to afford Drinking Water Operators (DWO) the ability to become wastewater operators without testing. I'm sure you will correct the proposed changes to, likewise, allow WasteWater Operators the same choice without further testing, or wouldn't DHS acquiesce to that request.

Wastewater Operators have been taught/trained in much more than just dosing wastewater with inorganic chemicals and then settling or filtering it. Perhaps you, or your children, have never swam in receiving water and don't care whether DWOs know how to keep it clean -- since they are not tested in the CWA (But you could try it outside of our borders or remember the state of Waters of the United States before the law). You also do not seem to care whether the food, or fodder that has been grown on class 'A' biosolids meet class 'A' EPA permit levels. Crossover DWOs, who don't have to test in wastewater don't know how to operate anaerobic bioreactors to the Class 'A' level and in fact are unaware of the CFR involved.

Perhaps the lack of knowledge of heavy metals leaching from biosolid or cysts, and enteric organisms in activated sludges are also of no concern to you after they leave the plant of a former DWO, now WWO.

Or is it that DWOs don't have to report an upset for 45 days after contaminating a drinking water line that makes your job easier: although that luxury doesn't exist for wastewater operators who must report any incident over a NPDES limit immediately.

Drinking Water Operators are not Wastewater Operators any more than Chinese is Japanese, or as your office tried to create in the early 1990s, engineers into Wastewater Operators. Water may be water to you, (and if so care to drink my effluent?) but treated wastewater is not treated drinking water, and MCRT in the reactor/clarifiers is not surface overflow rate from a settling tank. Nor is final effluent the product of microfiltration. Drinking Water operators have a lot to learn: Modified Ludzack-Ettinger comes to mind, but not if I were a DWO turned WWO

Will you next allow a general practicing doctor to operate as a surgeon, on you, without at least taking a board exam; your line of thinking makes that a given. We all know the effect that lack of training has. The environment is already severely degraded (if you haven't noticed compare pictures of our national parks with the view from your window). Why would you want to subject the environment, OUR CALIFORNIA environment, to unqualified, untrained environmental protectors? DWOs don't protect the

environment they settle and poison (chlorinate) water. WWOs remove contaminants and remove the poison chlorine: we don't leave residuals. Drinking water laws and the CWA are in contradiction; the untrained fall back on what they know from early adulthood (What do you remember best? Duh, teen to 25, the rest is a blur.)

So how much did some contractor pay you to change the law? Must be less than the cost to retrain their DWOs as WWO.

One last time: operating a chemical metering pump for potable water (eg.: a water softener or chlorinator) is not the same as maintaining a mass balance in activated sludge, keeping a digester from turning sour, nor is it like running centrifuges, or releasing final effluent to receiving waters.

THIS RULE CHANGE WILL ENDANGER THE WATERS OF THE UNITED STATES which we are trained, tested and experienced and licensed to protect IMMEDIATELY. DWOs, licenced under the DHS, have 45 days to notify after haphazard drinking water treatment. Where would a WWTP be 45 days after a primary ferric, or polymer pump problem. Bubble-Up like you never tasted.

This rule will probably be found in violation of the CWA.

Orazio Belsito, Grade V, #7700
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at Hyperion Treatment Plant, not some tiny package drinking water plant.