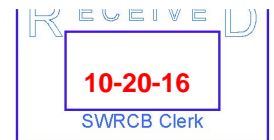




California
Water
Environment
Association



October 20, 2016

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

By email: commentletters@waterboards.ca.gov

Subject: Comment Letter - Draft Report to the Legislature on the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse

Dear State Water Resources Control Board:

Thank you for the opportunity to comment on the State Water Board's Draft Report to the Legislature on the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse.

We appreciate the thorough and collaborative approach the State Water Board staff took in completing this report. The staff from the Division of Drinking Water demonstrated patience, support and thoroughness as they worked with water professionals, scientists, public health experts, the environmental community and the public to determine the feasibility of Direct Potable Reuse. The Division of Drinking Water's thoughtful and careful process is a model water regulators from around the world can look to. State Water Board staff brought California's drinking water and wastewater professionals together to work more closely and faster than ever before to solve the State's complex water quality challenges. We thank the Division of Drinking Water staff for leading the effort and look forward to working with them to finalize regulations as quickly as possible while upholding our shared responsibilities of protecting the health and safety of all Californians.

CA-NV AWWA and CWEA wished to comment jointly on the recommendations in the report that relate to the need for Advanced Water Treatment (AWT) operator certification, providing a quick update on the status of our work together meeting that need and respectfully making some requests.

As you may know, the California-Nevada Section of the American Water Works Association is a non-profit professional association of 6,000 members founded in 1920 – following the creation of AWWA in 1881. Our members are professionals primarily employed in the drinking water sector, with a sizable percentage also involved with wastewater collection and/or treatment. Historically connected closely with protecting public health in drinking water, our mission is providing solutions to effectively manage water, the world's most important resource. CA-NV AWWA is a certifying body, offering 17 certificates of competency in 6 disciplines. This includes certifications for professionals engaged in drinking water treatment and distribution system operations, cross-connection and backflow prevention, laboratory

analysis, and water use efficiency (conservation), among others. CA-NV AWWA led creation of treatment plant operator certification in the 1950s, then developed the distribution operator certification before it was assumed by the Department of Health Services in 1998. CA-NV AWWA has traditionally named members each year to serve as representatives on the Drinking Water Operator Stakeholder Advisory Committee, which is now undergoing some changes as AB 2890 is implemented.

The California Water Environment Association is a non-profit, public benefit professional association of 9,800 members founded 1927. Our members are professionals in the water, wastewater and resource recovery sectors. Our mission is to protect California's water environment and public health through education and certification. CWEA is a certifying body, offering 24 certificates of competency in 7 vocations. This includes certifications for: Collection System Maintenance Technicians; Environmental Compliance Inspectors; Mechanical Technicians; Electrical Technicians and Laboratory professionals among others. CWEA developed the wastewater treatment plant operator certification in 1937 before transferring the program to the State Water Board's Office of Operator Certification in 1974. CWEA appoints several of our members each year to serve as representatives on the State Water Board's Wastewater Operator Certification Advisory Committee and the Environmental Laboratory Technical Advisory Committee.

Here are the combined comments from both CA-NV AWWA and CWEA regarding AWT certification and the need for competent operators in any DPR scenario:

- 1. Report recommends the need for our associations to construct an Advanced Water Treatment (AWT) Operator Certification Program (recommendation #11)** – Requests to construct an operator certification program are included in the State Water Board's draft DPR report (section 4.3.11), the Advisory and Expert Panel reports as well as separate reports from the California Urban Water Agencies (CUWA) and WaterReuse CA. Building upon our collaboration with CUWA on the white paper that recommended a framework for advanced water treatment operator certification, CA-NV AWWA and CWEA are actively engaged in jointly developing an Advanced water Treatment (AWT) operator certification program and we are fast-tracking this process. We have already run several surveys, conducted research, hired consultants and scheduled our first job analysis research session for October 2016. With the continued support of the State Water Board and staff for the project we will move forward rapidly on the basis that an operator certification program be available as soon as possible for future DPR project permits and for regulations.
- 2. State Water Board staff involvement is crucial** - We would appreciate the State Water Board staff's continuing participation in an advisory capacity by continuing to lend us leaders from the Division of Drinking Water. We would also appreciate clear and timely communication from the State Water Board and staff that our associations should proceed or should not proceed with constructing the certification program as it relates to the status of the development of DPR criteria and regulations.
- 3. Timing is important** – We find ourselves in the challenging position of developing a certification program to support DPR without the benefit of having a timeline for development of DPR criteria and regulations. We respectfully request that you include dates for the expected completion of each "milestone" in the implementation plan (Table 1 – pages 25-28) so that we can manage and marshal our resources effectively and efficiently.

We also look forward to working with the State Water Board staff to quickly complete the necessary research in order to develop DPR regulations. Please consider our associations and our members as resources for completing any of the necessary research. California faces numerous water resources and water quality challenges caused by drought, pollution, compounds of emerging concern and other threats. Developing DPR regulations sooner rather than later can help improve our overall approach to water treatment and improve the health, safety and availability of California's drinking water supplies.

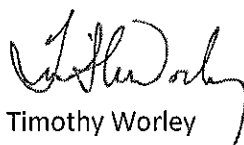
- 4. Financial support for the associations' certification development process might be necessary –** During this fiscal year we estimate that CA-NV AWWA and CWEA will invest as much as \$100,000 in budget and staff time on the preliminary steps of developing a certification program. We'll continue to invest two to three times that amount in the coming years to complete the process and establish training programs, hire consultants, publish exam practice materials and develop other collateral. CA-NV AWWA and CWEA would appreciate guidance from the State Water Board and staff about the availability of grants or other funding to help us complete this process. Members from both associations have always supported advancing our profession; however, in the first few years this certification will directly benefit only a small percentage of our sector. In addition, there is little certainty that a financially sustainable number of agencies or professionals will seek this voluntary certification. There is no clear timetable for implementation of DPR regulations, so uncertainty may last for years. While we will do the best we can to research and construct a financially stable program, the need to quickly develop the program places more financial risk on our associations and members.
- 5. Common terminology is important –** Just as it is vitally important to have clear and consistent definitions of terms such as "direct potable reuse" and the variations thereof, our associations understand that the same is true for a new operator certification. At this time we use the working title of Advanced Water Treatment (AWT) Operator Certification. Ultimately however, it will be important to avoid confusion with "advanced treatment" as the term is found in existing regulations and commonly used in tertiary wastewater treatment. CA-NV AWWA and CWEA will seek guidance and affirmation from State Water Board staff on key terminology decisions relative to DPR treatment facility operator certification.
- 6. The report should mention the need for more water reuse operators and remove current barriers to have experienced operators for DPR Projects –** We appreciate the State Water Board and staff's efforts to underscore the importance of operators in the water reuse process. "Operators" are mentioned 10 times in the State Water Board draft report; 55 times in the Expert Panel Report; and 26 times in the Advisory panel report. According to reports by the Water Research Foundation, AWWA, Baywork and Water Environment Federation one-third of water workers are currently eligible for retirement and will leave the profession in the coming years. We will soon need more water, wastewater and water reuse operators, mechanics, laboratory professionals, engineers, technicians and other professionals. As CUWA mentioned in their 2016 report on AWT certification, we need to work together to quickly develop an adequate population of certified operators. The State Water Board should publicly support outreach programs to encourage Californians to join the water profession as well as support water career pathway programs offered by the professional associations, California State Colleges and community colleges.

We agree with the Expert Panel's recommendation that "DPR systems should be operated by experienced and well-trained staff to ensure treatment processes function properly" (Page 249 of Expert Panel Report). However, there are currently advanced treatment facilities such as the plants at the Santa Clara Valley Water District (SCVWD) and Long Beach Water Department (LBWD) where operators are receiving only partial or no credit for their experience on these facilities. This issue stems from an oversight in the current regulations where water treatment operators can technically operate recycled water facilities but their experience cannot be used as credit to qualify them for their water treatment plant operator certifications. Resolving this current regulatory limitation now instead of waiting for DPR regulatory development is a critical element in advancing water reuse. This could become a "Technical, Operational, and Management Barrier" as discussed further on Page 251 of the Expert Panel Report.

- 7. Public Trust is important** – As water professionals we appreciate the importance the report places on public health and public trust. Since the founding of our associations (AWWA in 1881 and CWEA in 1927) California water professionals have focused on saving lives through clean, safe water. Our members take great pride in dedicating their career as drinking water or wastewater professionals to protecting the health and safety of all Californians. A statewide AWT operator certification program will ensure public health is protected and build public confidence in the purity and safety of water produced by an AWTF.

We appreciate the opportunity to work together with the State Water Board and staff from the Division of Drinking Water during each step of this important process. We look forward to working together to quickly and successfully build an Advanced Water Treatment Operator Certification program and DPR regulations.

Sincerely,



Timothy Worley
CA-NV AWWA Executive Director



Elizabeth Allan
CWEA Executive Director