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KWWOA Opposes Proposed Op Cert Regulatory Changes

KWWOA reviewed the proposed regulatory changes that the KY Divisions of Compliance Assistance (DCA) and Water (DOW) filed with the Legislative Research Commission (LRC), as well as sent out a survey to our members. Given this review, KWWOA elected to oppose the regulations in light of the specific changes and the process by which the Cabinet arrived at these changes. Outlined below is a summary of the comments that KWWOA made during the June 27th public hearing on the proposed regs. A full set of the actual comments submitted during the public comment period, which ended June 30th, are posted on the KWWOA website under the "Resources, Useful Links" tabs.

DOW nor DCA adhered to the intent of KRS 223.170 and 224.73-110 by securing the recommendations of the Kentucky Boards of Certification of Wastewater and Drinking Water Treatment and Distribution Systems Operators regarding the full content of these regulations. They did not initiate change to these regulations by first securing their input and failed to provide them with draft copies of all the regulations prior to filing them with LRC. While DOW has responsibility for enforcing these regulations, they have never been the lead on setting the standards, just as DCA does not set the KPDES requirements, etc. In fact, DOW initiated a discussion with their Water and

Advisory Boards, at least 18 months prior to the proposed regulations being discussed or brought before the Certification Boards.

The Regulatory Impact Analyses and Fiscal Notes for these proposed regulations, refer to an operator shortage as justification for reducing the operator qualifications for testing and broader authority for Operators in Training (OIT). If this is the basis for lessening the standards, where is the data to support this position? In addition, we question whether DOW consistently checks and enforces the current staffing requirements? If the staffing requirements were routinely being enforced, all systems would have been proactive about hiring and training staff versus waiting till an operator vacancy occurs to try and advertise for an operator. The drinking water system staffing requirements were enacted in the early 1990's. We are all aware that baby boomers are aging out. Given that these requirements are not new, why did some systems elect not to pursue and/or train new operators? Is this because the message received was that the operator staffing requirements are not a priority. Now, systems and/or their representatives who failed to be proactive in their staff development want a break in the operator qualifications and have found support within the Cabinet for reducing the operator standards they are charged with administering. In the wake of the Flint, Michigan disaster and mounting water quality standards, do we

Continued on page 19

63rd Annual KWWOA Conference
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Registration—Where it all begins



Keynote Speaker: Amanda LeFevre, Director of the Division of Compliance Assistance, talks about the proposed operator certification standards

Way to Represent Hardin County Water District No. 1—From left to right, Donta Samuels, Chris Gohman and Mandy Spalding



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62nd Annual KWWOA Conference Picts



Donald Compton, KWWOA Chairman, presented Robin Strader with a plaque thanking her for her service as the 2017-19 State Chairwoman.



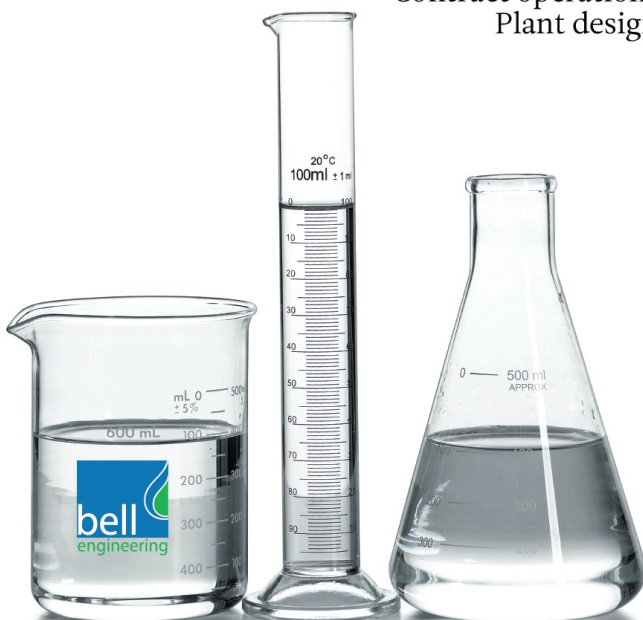
Cornhole Tournament—It can't be all work and no play!!!!

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Welcome StreamKey Exhibitors Mike Felton & Kyle Devlin to the KWWOA Conference!

Congratulations to the 2019 KWWOA State Award Winners!

J.C. Chambers Award

Chris Maloney

Mt. Sterling Wastewater Treatment Plant



Chris Maloney has been a supervisor at the Mt. Sterling Wastewater Treatment Plant since 2016. He holds a Class III WWTP Operator certification. He started at Mt. Sterling in 2002, with the old digester plant and helped open the new oxidation ditch plant in 2005. He came into the wastewater field with a mechanical background. From the beginning, he has taught a lot of operators how to tear down pumps, trouble shoot control panel problems and explain other operations. Over the years he has collected, researched and resolved many issues that have come up. He has acquired a wealth of knowledge and is aware of the need to train new and existing employees and hand down his knowledge of operations.

Chris has been a member of the KWWOA for 17 years and serves as wastewater representative for the Eastern Chapter of KWWOA.

Earl T. Mitchell Award Recipient

Nancy Parker

Henderson Water Utility



Nancy Parker, chief operator at the Henderson Water Utility's South Water Treatment Plant since 2004, holds a Class IVA Water Treatment and Class IV Distribution certifications. She earned an Associate in Science (1991) and Associate in Arts (1995) both from Henderson Community College, B. S. in Environmental Science (2000) from Chadwick University and an Associate of Applied Science in Design Technology (2006) from Ivy Tech Community College. Nancy has operated and taught others to operate an unconventional, nightmare claricone plant, exposed to the elements and source water which is extremely variable in quality. She was able to develop a jar test method for her plant for operators to use as a chemical adjusting tool. She has also worked to keep quality throughout the distribution system and consecutive systems by teaching about flushing, water age and tank turnover.

Nancy has been a member of the CKWWOA for 22 years.

Eugene Nicholas Award Recipient

Leslie Rogers

Retired—Hopkinsville Water Environment Authority



Leslie Rogers, supervisor at Hopkinsville Water Environment Authority's 10 MGD Moss Water Treatment Plant, has 27 years of experience in water treatment and holds a Class IVA Water Treatment certification. He most recently served as the Western Chapter water representative to the State KWWOA board. Les helps facilitate the annual spring training at Kentucky Dam Village and started a partnership between KWWOA and Cayce Mill Supply in which they sponsor a training event in Hopkinsville every year. In addition, he served on the KWWOA conference committee and represents KWWOA on the Division of Water's alternative staffing plan workgroup. Under the direction of Leslie Rogers, Moss WTP has won the 2014 KWWOA Outstanding Water Treatment Plant, 2013 WKWWOA Outstanding Water Treatment Plant and Area Wide Optimization certifications in 2012, 2013 and 2018.

Leslie has been an active member of KWWOA for 27 years and is currently serving as the President of the Western Chapter of KWWOA.

2019 KWWOA State Award Winners Continued

2019 Drinking Water Plant Award Moss Water Treatment Plant Received by Leslie Rogers



Leslie Rogers accepted the award for the Hopkinsville Water Environment Authority's (HWEA) Moss Water Treatment Plant (WTP) as KWWOA's Drinking Water Treatment Plant of the year from Robin Strader, Chairwoman of KWWOA. Hopkinsville's Moss WTP began operation in March 1997 with an original capacity of 10 MGD Raw/9 MGD finished water. In 2012, HWEA completed a plant expansion that increased its finished water capacity to 13.5 MGD. The Moss WTP operates 24 hours per day, 365 days per year with an average daily flow of around 6.0 to 6.5 MGD. During peak summer months, the plant will treat to around 8.0 MGD.

The main plant operation is performed by a five (5) operator rotation of Class IVA licensed operators, with one of the operators holding the position of Chief Operator. In addition the full-time certified lab tech is a Class IVA as well. The Moss WTP has an in-house state certified drinking water microbiology lab. It is staffed by a full-time analyst and an operator which serves a backup analyst. Both the analyst and backup analyst are certified lab analyst. In order to maintain the continuity of well trained, licensed operators, we have two (2) operator trainees working toward their licenses. The Moss WTP also maintains remote booster stations, elevated storage tanks, and a raw water intake structure. Moss WTP has a trained and licensed distribution operator that works out of the WTP to oversee the flushing program and any issues in the distribution system.

2019 Wastewater Plant Award London Utilities Wastewater Treatment Plant Received by James Poindexter



James Poindexter accepted the award for London Utility Commission's Wastewater Treatment Plant of the year from Robin Strader, KWWOA Chairwoman. Constructed in 2004, the London Utility Commission's Wastewater Treatment Plant (WWTP) has a capacity of 5 MGD and a peak flow capacity of 15 MGD. Utilizing oxidation ditches, clarifiers, UV disinfection and a certified wastewater laboratory, they consistently exceed their KPDES permit requirements while facing many challenges such as high BOD loading from an industry which does not provide any pretreatment. The London WWTP has an agreement with their local landfill which allows them to take their dewatered solids to the landfill in return for accepting leachate, reducing operating costs. They also have a unique partnership with Kentucky State University, allowing KSU to stock old basins with several species of fish. Effluent from the plant flows through these basins. KSU students perform studies on the fish and London Utility Commission uses the fish basins for community outreach, allowing area children and senior citizens to fish in them periodically. The plant has also welcomed hundreds of operators to their facility for KWWOA and Division of Water training events over the years.

Message from Robin Strader

Former KWWOA State Chair

Dear KWWOA Operator and Associate Members,

While working on award presentation information for the July newsletter, I noticed in the newsletter archive that David Goodrum gave his farewell address in January 2017 before his last conference. His "Letters From the Outhouse" appear to have come easy to him. I find it hard to write an article, let alone write one saying goodbye. Let me start by saying, thanks to David Goodrum for continuing to hold up and be a part of the KWWOA legacy, started by his father-in-law and peers.

It has been an honor and privilege to serve as KWWOA's Chair for the past two years. I could never have picked a better group of people to work with during my tenure. Lisa is the most amazing woman I have or will ever know. If we think we have it hard wrangling a crew of paid employees, think what kind of time she has keeping a bunch of working, volunteer officers in line and doing what is necessary to keep the association running like a finely tuned engine. I want every operator in this state to know Lisa put her heart and soul out there, fighting for us during the drafting process of the water and wastewater certification regulations. She truly is the operators' champion.

To my officers and conference committee members, thanks for your help! Thanks for taking time away from your family to help mine. KWWOA is as much my family, as the people I am actually related to. Unless you work with a state or chapter officer, you have no clue the hours of preparation that goes into putting on a training event. Your representatives are dedicated servants who work to fulfill KWWOA's mission, "To enhance Kentucky's Water Environment through training, education, certification and the exchange of operational and technical information with experienced water quality specialists."

To our Associate members and sponsors, I really appreciate all that you do to help our Association. None of what we do would be possible without your financial, technical and moral support. You all are amazing! I would like to remind our operator members to spend a little time with these folks at conference and training events. Invite them into your system. They are a great asset and have all kinds of solutions. As one of my lab buddies in Central City used to say, "They are a plethora of information" (I had to look that up the first time I heard it. It means a bunch!).

From the beginning of my employment at Leitchfield Water, I was encouraged to attend local quarterly KWWOA meetings by my mentor, Kevin Shaw, manager of the Grayson County Water District. I hope he is proud of his creation. And, I can't leave out Garry Crabtree, who prodded me years ago to take over KLA and "make it grow". The data points out that the average operator age is 50 to 55. We all need to reach out to a younger operator, whether in your system or a neighboring utility, and encourage them to grow in the profession and get involved in KWWOA. To cut cost, many utilities are opting for in-house or digital training. They have forgotten the value of networking with your peers and sharing



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experiences with other operators. I have always said "there is just as much training going on in the halls with operator interactions, as in the training room." Those of you lucky enough to have an employer who supports you in attending live training, put the cell phone away. Social interaction is face-to-face. Take advantage of the opportunity you are given to build lasting relationships with your peers.

Uh oh, here comes the mom talk. I could feel it coming on!

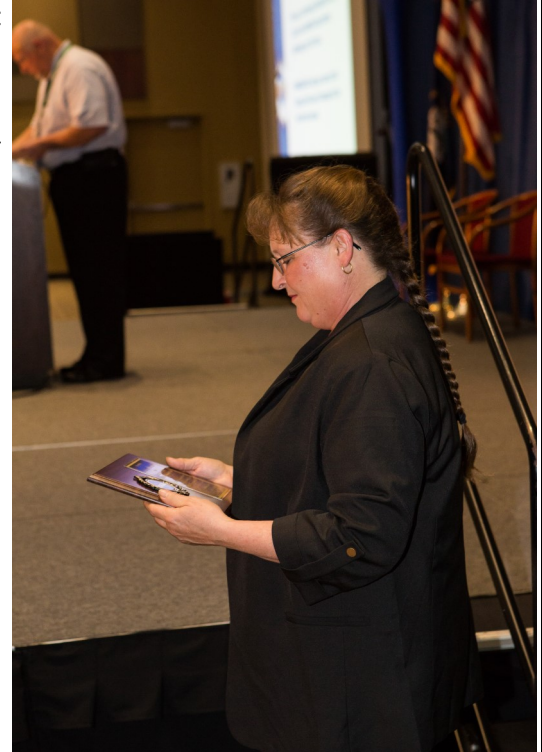
1. Be proud of what you do. It's not just a job, it's your profession. Treat it like one, even if your kids introduce you to their friends as "the head turd at the poo-poo plant." You'll be able to laugh about it someday.

2. Learn all you can and share what you learn. I am not the "lab guru" most people think I am, and I don't have all the answers. I just have a little education, experience and I'm not afraid to ask questions. Anybody with a willing heart to teach can help someone who wants help.

3. Be gracious and kind. Not all training is exciting and up your alley. A good class for you may not be beneficial to your neighbor. It's kind of like, you don't really like what your wife or husband cooked for supper, but if you want to keep eating supper, smile, say "Thanks" and go on. These guys and gals are volunteers. They put a lot of themselves into their presentations and you need to respect their effort. Right?

4. Co-workers now, friends for life. I only called out a few people in this article, but there are so many more. Your KWWOA friendships transcend employment and time. Next time you are at an event look around at the retirees still coming around.

5. Last, but certainly not least, find your niche and get involved. Every operator has something they can give to the local chapter and it does not have to be speaking (at first). Roast a hog, smoke a shoulder, move tables and chairs, offer up a training room at your facility, sit at the registration table, or offer up your hobby, like fishing or shooting trap, as a potential social event. We are an association of volunteers. No contribution is too small or not needed, given the work to be accomplished!



Robin Strader looks at the plaque presented to her during the 62nd KWWOA Conference for her service as KWWOA Chair of the State Board.

Don and Jeremy, I feel like I am handing my children over to you. Don't worry "kiddos" you are in good hands!

Love you all,
Robin

Gone, but not to far!

While Robin has stepped down from the position of Chair of the KWWOA State Board, she has not gone very far. She will once again be serving as the Program Coordinator for KWWOA's voluntary lab analyst certification program. As such, she will also attend all the State Board Meetings which will help provide continuity on the issues for which she was involved as the KWWOA Chair. It just goes to show, once a KWWOA volunteer, always a volunteer!

Western KWWOA Training & Exhibit Event

By Bobby Hewgley

As the new Wastewater representative for the Western Chapter, I am excited to be a voice for wastewater operators in the Chapter and for what I have already witnessed within the Association. I was able to attend the KWWOA Annual Conference, as well as the Western Chapter's KY Dam event, and both allowed me to learn so much about the industry and meet amazing people that understand the ups and downs of dealing with water and wastewater systems.

In addition to talking with other operators, I was also able to sit down with several vendors. JC Spalding, 502 Equipment, attended both the State and Western conferences too, sharing his knowledge about the various equipment he offers through hands-on demonstrations. He shared that "This was his first time attending the Western Chapter's event and it was fantastic. A ton of experience in one room and a really great opportunity to network and learn new things. The staff did an excellent job putting it together! It was a valuable experience and one I will definitely attend next year." Other vendors also offered their experience and words of wisdom regarding chemicals to metering used in the distribution system. As a first time attendee, I can also reiterate JC's sentiments. I had an opportunity to see and participate in the behind the scenes work required to pull off an event of this size and the professionalism of each officer. And don't even get me started on the food! I have heard rumors for years about the "spread" the Western chapter provides, and they did not disappoint!

Nikki Chambers, newly elected Drinking Water Representative from the Hopkinsville Water Environment Authority, and I look forward to seeing you at chapter events and serving as your voice to the Western Chapter and KWWOA State Boards. Feel free to contact either of us with any questions or concerns you might have (see contact information on page 17). We look forward to seeing you at Chapter events!

This year's Western KWWOA training and exhibit event at KY Dam State Resort can once again be counted a success. Not only did the exhibit show sell out, but we also provided training which benefited over 214 operator certificates and had fun in the process! During Tuesday's whole hog lunch, the Chapter recognized their 2018 Chapter award winners, many of whom went on to receive state awards (see related article on Page 8 & 9). Also during this event, the Chapter held a membership meeting and elected officers for a two-year term. (For a list of the newly elected officers and their contact information, reference page 17.) Shown below and on page 13 are pictures from this event!





Accepting the award for Drinking Water Plant of the Year for the Moss McGraw Water Plant in Hop-kinsville, from left to right, is Charlie Lane, presented by Jimmy Grimm, Nikki Cham-bers, Daniel Lancaster and Terry Meacham.



Accepting Western's Wastewater Operator of the Year award from Jimmy Grimm, is Charles Shelby, Mayor and Operator for the City of Wingo.

The Western Chapter would like to give a big "Shout Out" to our dear friend, and outgoing Western KWWOA President, Mr. Jimmy Grimm. Jimmy has been involved with the KWWOA as an active member since 1989 serving in different positions, both at the chapter and state board levels. Besides his Chapter service, he also served as the Vice-Chair and then State Board Chairman during two (2) separate terms, 2003 thru 2005 and 2009 thru 2011. As a board member within an organization of primary volunteers, you performed with dedication, professionalism and sincerity while representing the drinking water and wastewater operators though out the state. On both a professional and personal level, we at KWWOA would like to say "Thank You" for all you have done for the Association during your years of service . Jim-my, please don't be a stranger!

Also leaving will be Alan Todd who served as Western's Wastewater Representative for 8 years.



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Peristaltic Solution Keeps Plant Efficient

Submitted by Tom Guthrie

A US city required a pump capable of accurately dosing 15% sodium hypochlorite for their new wastewater treatment plant. Pumping this anti-bacterial chemical can cause vapor lock in some systems, but choosing a peristaltic pump helped ensure efficiency and provided a hygienic and leak-free solution.

Sodium hypochlorite is used in waste-water treatment to kill off bacteria before being discharged back into the environment, and in water treatment as one the primary methods of drinking water disinfection. It is also a challenging product to pump, because it tends to off-gas, causing some pump types to vapor lock. Diaphragm pumps are particularly prone to this.

After evaluating several pump choices from a number of manufacturers, engineers from the city of Eagan in North Minnesota, chose ten peristaltic hose pumps, which will be put to immediate use in a new area of the treatment plant. Peristaltic pumps are the pump choice for dosing sodium hypochlorite, and each pump is capable of flow rates up to 48 US GPH and at pressures up to 175 psi.

Peristaltic efficiency

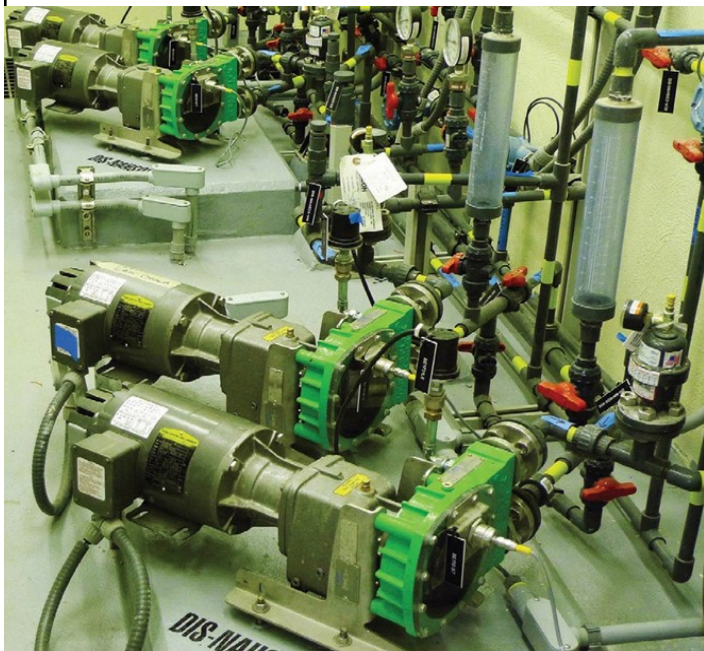
In the pump, the fluid being dosed is kept totally enclosed within the rubber hose which is then compressed by a rotating shoe forcing the liquid along. Upon restitution of the hose the resulting vacuum draws in more liquid. This process is known as peristalsis and is what makes the peristaltic pump the first choice for liquid metering. Variations in hose type allow for low strength and even high strength sodium hypochlorite dosing.

The nature of the pumping process used by peristaltic pumps results in only the hose coming into contact with the fluid being pumped. Not only does this mean that the pump is hygienic and leak free, it also means that there are no moving parts to become clogged or damaged. The only maintenance required is to change the hose which is done

quickly and efficiently, keeping down-time to an absolute minimum.

The wastewater plant needs to run as cost efficiently as possible and the City of Eagan engineers were impressed with the long life given by the hose and the ease of maintenance when the hose needed to be changed.

"We were really pleased with the installation at the treatment plant," explained Tom Eisemon. "As a result of this installation, a similar project located nearby chose peristaltic pumps for these same reasons and a third customer in the state recently purchased a new pump after hearing all the positive feedback and the new features of this design."



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"Home Grown" Operators

How Hardin County Water Dist. No. 1 takes on the challenge of filling operator positions

Submitted by Kenny Horn

Hardin County Water District No.1 (HCWD1) has been serving the communities of Northern Hardin County since 1952. In recent years HCWD1 has expanded their services to include the Ft. Knox Wastewater, Stormwater and Water systems and Wastewater system in Radcliff. With their home office located in Radcliff, KY, HCWD1 has a staff of 70 employees and of those, 43 are in the positions of Water Treatment/Distribution and Wastewater Treatment/Collection operators. As with most water/wastewater utilities across the state, filling operator vacancies has become increasingly challenging.

According to the Federal Bureau of Labor Statistics, in 2016 there were over 119,000 water/wastewater certified operators in the United States, and the average age of those operators was 43.6 years old. In Kentucky alone, there are over 5,000 certified water/wastewater operators. Another report by the Federal Bureau of Labor Statistics has projected that 8.2 percent of existing water operators will need to be replaced annually between 2016 and 2026. With more and more of those operators reaching retirement age every year, finding certified operators to fill those positions has become much more of a challenge.

With the increased rarity of finding certified operators with previous experience to fill vacancies, HCWD1 has taken the stance of looking to "grow-their-own" operators by seeking out applicants who may have experiences in other fields that would make the transition to becoming a certified operator much easier. According to Patrick Flanagan, Human Resources Specialist for HCWD1, "If we're looking for a Water Treatment Plant Operator or Intern we look for someone that has an interest in science. If we're looking for a Wastewater Treatment Plant Operator then we're looking for someone who has mechanical skills and likes to work outdoors. The biggest thing for us is the actual interview. This is where we meet face-to-face with the applicant and we can find out more about them and if they would be a good fit for the position." Many times, individuals who have worked in different fields will have skills in these areas that would apply and carry-over to the water/wastewater industry. These fields may include construction, laboratory positions, and even industrial manufacturing and agriculture.

As we all know, water/wastewater operators take on many task throughout a day that involve many different skills, especially when it comes to operating and maintaining equipment. As stated by Brett Pyles, Ft. Knox Systems Director, "One key component to hiring an operator with no previous experience is mechanical aptitude. If the operator can turn a wrench, we can teach them the rest." In addition, as the water/wastewater industry becomes more and more automated, basic computer skills are another valuable skill that most operators are required to have. Finding those applicants that have these "transferable skills" is very important in maintaining a competent operations staff.

Of the 43 employees that HCWD1 has in "certifiable positions", approx. half of those were hired with no previous experience in the water/wastewater industry. A key component to bringing these new employees on-board and most importantly, retaining these employees, requires the utility to have an atmosphere where all employees feel valued, have a sense of ownership and an environment where they are allowed to grow. HCWD1 accomplishes this through offering a pay and benefits package that is very competitive within our industry. HCWD1 has recently conducted surveys in-house (through Employee Attitude Surveys) and with outside resources to ensure they are meeting that challenge. In fact, in 2019, HCWD1 was selected as one of the "Best Places to Work in Kentucky" after a survey conducted by Kentucky Society for Human Resource Management (KYSHRM), the Kentucky Chamber of Commerce and Best Companies Group. Another benefit that is often not expressed enough to potential new hires is how our industry withstands fluctuations in the economy better than many other types of industries, especially manufacturing and construction positions.

Once these new/unexperienced operators come on-board, the challenge of "growing" them into certified operators begins. Explaining to these new operators that they are now on the front lines for public safety and environmental protection is very important to set the tone for what all of us do on a daily basis. Another key component is having an atmosphere in the workplace where these new employees feel that everyone is invested in their success as well as the company's success. For HCWD1, this starts with training. New hires are paired with a well-seasoned operator from the start. Every attempt is made to connect them with the most experienced operator at that facility. This is where the bulk of their "on the job" training comes from. Determining what the new hire's past experience and current skills are, and how that can transfer to the water/wastewater industry goes a long way to ensuring their success.

At HCWD1 safety is paramount. They dedicate the time and effort needed to ensure the operators are well trained. All new employees' complete awareness level safety training as part of the employee orientation process. HCWD1 also conducts monthly safety training for all employees on a vast range of topics from Lock-Out/Tag-Out, Workplace Violence, and Office Safety in addition to many others. HCWD1 safety training is designed to provide "real-world" application to the job that each operator is doing.



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KWWOA Chapter—Do You Know Your Chapter Officers?



Eastern Chapter Counties: Bath, Bell, Boyd, Breathitt, Carter, Clay, Elliott, Fleming, Floyd, Greenup, Harlan, Jackson, Johnson, Knott, Knox, Laurel, Lawrence, Lee, Leslie, Letcher, Lewis, Magoffin, Martin, Menifee, Montgomery, Morgan, Owsley, Perry, Pike, Powell, Rockcastle, Rowan, Whitley and Wolfe.

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North Central Chapter Counties: Anderson, Boone, Bourbon, Boyle, Bracken, Campbell, Carroll, Clark, Estill, Fayette, Franklin, Gallatin, Garrard, Grant, Harrison, Henry, Jessamine, Kenton, Lincoln, Madison, Marion, Mason, Mercer, Nicholas, Owen, Pendleton, Robertson, Scott, Shelby, Spencer, Trimble, Washington, and Woodford.

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Bobby Hewgley	Wastewater Rep	(270) 824-2170	bobby.hewgley@hkywater.org

KWWOA 2019 TRAINING & EVENT SCHEDULE

Chapter	Date	Training Cost	Location of Training	Type of Training*	Hours*
Central	Sept. 24-25	Free—KWWOA Members \$100.00—Non-Members	Rough River State Resort Park Falls of the Rough, KY	Water and Wastewater	12
Western	October 17	Free—KWWOA Members \$75.00—Non-Members	Murray Sate Uni. Regional Campus Hopkinsville, KY	Water & Wastewater	6
North Central & Eastern	Oct. 16—17	\$30—KWWOA Members \$100—Non-Members	4 Points by Sheraton Lexington, KY	Water and Wastewater	12
Central	October 24	\$100—KWWOA Members \$175—Non-members	Brooks Electric Brownsville, KY	Water & Wastewater	6
Eastern	Nov. 14	Free—KWWOA Members \$75.00—Non-Members	MCTC—Rowan Campus. Morehead, KY	Water	6 DW
Central	Oct. or Nov. TBD	Free—KWWOA Members \$75.00—Non-Members	TBD	Confined Space	6 DW & WW
Central	Dec. 5	Free—KWWOA Members	Mammoth Cave Natl. Park Mammoth Cave, KY	Holiday Event	N/A

***It is the intent of the KWWOA to solicit the KY Division of Compliance Assistance and Boards of Certification for approval of the hours and training type referenced above, prior to the class. If these hours are needed for renewal, you should inquire ahead of time as to whether approval has been received.**



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really want to dumb down our operators, either by allowing under qualified applicants to operate or by fast tracking existing operators to higher certification levels?

Instead of using the current mechanism available to approve Alternative Staffing Plans and holding systems accountable for the existing regulations, the Cabinet is advocating that we lessen the operator certification standards. Some of the proposed wastewater qualification changes have no basis other than to match those of the same level in the drinking water regulation. This after DOW and DCA were told by the Certification Boards that the qualifications are more extensive, as it is harder to operate a wastewater plant.

As referenced above, DOW has the ability within regulation to approve alternative staffing plans for systems that, due to unforeseen circumstances, have an operator leave and/or pass away. DOW convened a workgroup in May 2018, to solicit input on the information to be requested of a facility to secure this type approval, as their staff was struggling with this decision given the guidance within 401 KAR 8:030, Section 1 (2)(c)6. The group appeared to reach consensus on the information to be required and that all "Alternative Staffing Plans" should be incorporated into an Agreed Order, if the facility was out of compliance. To date, the group has yet to hear from DOW on how they have changed this process and the problematic language within 401 KAR 8:030 has been duplicated within the proposed changes to 401 KAR 5:010.

Based on data distributed by DCA, it appears that most of Kentucky's operators live in areas with a median yearly wage of less than \$38,000. If wages are not competitive (which is one of the reasons they cannot hire operators) and/or city and county employees lose additional pension benefits, what incentive will there be to work for a local government thereby increasing the "shortage"? These regulations increase fees for operators that barely make minimum wage in some systems. Many times the operator is responsible for the payment of these fees and the cost of attending training. Operators with multiple licenses have stated, as well as their utilities, that they will only renew their primary license(s). This could put some cities in a greater bind, as they will not have this operator's certifications as a backup in emergency situations. This doesn't even take into consideration the impact for small business owners that have Class I operator licenses for campgrounds, apartments, etc.

The language regarding OIT designation and how these regulations will work have been broken up into multiple chapters. The drinking water and wastewater regulations have different staffing requirements and would impact a system's ability to use OIT because of the number of required operators. The small systems needing relief in most cases have lost their only operator. OIT will be of no benefit to them because they may not have another operator working at the system to serve as mentor. Additionally, an operator could be forced by a system to take on multiple trainees leaving them personally liable for a potentially poor OIT. Mentors need some protection given that compliance is in reality the system's responsibility, not the mentor's.

Both regulations used to require a base year of experience after all substitutions for Class II – IV certifications. This requirement has been removed at some point and should be added back, as no one should be in responsible charge of a system, given the implications,

without a minimum amount of experience. All of the substitutions for "related" education, "other" education, work related experience, non-work related experience, etc., create a maze to navigate and adds additional work on DCA staff to become occupational experts on everything anyone wants to submit to determine how much credit can be granted. With multiple DCA trainers doing application reviews and the confusion of the substitution language, one could expect inconsistent application reviews which is already a complaint voiced by systems.

The bottom line is that a reduction of the operator qualifications could ultimately result in illness and/or damage to the waters of the Commonwealth. This doesn't make sense as the whole purpose of the operator certification standards is to prevent this from occurring. It is only natural for operators, systems, educators, regulators, etc., to have a different view on how to approach the standards, however, the regulations must ultimately be written and implemented such that they achieve safe drinking water and protection of the waters of the Commonwealth.

While we remain optimistic that our concerns will be considered and acted upon and that the Cabinet has these same goals, we will remain vigilant as these regs go through the review process and work diligently to fulfill our mission statement, "Working Together to Preserve the Environment and the Future of the Water and Wastewater Operator". If you have comments that you would like to share regarding the draft regs, please feel free to send these to info@kwwoa.org. Otherwise, we will pass along information as the various LRC review phases occur.

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There are other areas of training that may also be utilized to advance the new, unexperienced operator. KWWOA offers up to 100 hours of valuable training annually. These vast training topics are very valuable to all operators and can provide insight into areas for new employees that can help prepare them for state certification exams. The utilization of other resources such as California State University, Sacramento's Office of Water Programs has proven vital to HCWD1 in providing in-depth operational training to new hires and in preparing them for state certification exams. In many cases, these courses can also be used in lieu of experience to help shorten the time before new hires can qualify for state certification exams.

At the time of hire, HCWD1 sets six month goals for all new hires. These goals are always set to be specific to the position that they occupy. *Measurable*, to ensure proper completion; *attainable*, to ensure that an employee can get the training and grasp the concepts needed to obtain the goal; *relevant* to the position that they are in; and *timely*, for reviewing period. New hires meet and discuss these goals on a regular basis with new hires.

As with all other water/wastewater utilities in the state, HCWD1 encounters a wide range of challenges on a daily basis. Continuing to find and retain quality employees constantly remain at the forefront of these challenges. Having a plan in place to bring new, unexperienced operators on board and provide the best training for the new operators is one way that HCWD1 is striving to ensure quality service to its customers for years to come.

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