Overview

- Operator certification board directed division to have project to update facility classification sections (100.4-100.8) of Regulation 100.
- Not intending an entirely new approach or sections. Intent is to improve clarity of sections, align with testing, reflect complexity in system, focus on the facility first, then consider implementation options.
- This project is not focused on changing current certification categories or tests, but aligning with the current testing.
- Project began in spring 2017 including planning meetings with the operator board and introductory listening meetings with Colorado Environmental Certification and Training Incorporated (CECTI), Colorado Water Distribution and Wastewater Collection Systems Certification Council, Colorado Rural Water Association board, and these stakeholder meetings in August.
- No specific proposals yet. Workgroups will be formed to generate/develop draft updates fall 2017. Please email Tyson or David if you want to help with workgroups. Please indicate which workgroup(s) including: drinking water treatment, distribution, domestic wastewater treatment, collection, and industrial wastewater treatment.
- Stakeholder outreach with draft language from workgroups expected in 2018 with meetings and discussion.
- Formal rulemaking process leading up to board hearing fall 2018.
- Examples of possible updates for clarity and alignment with testing:
  - Drinking water - row headings and text descriptions, surface water treatment, chloramines; surface water treatment requirements more complex than groundwater; division has observed more compliance issues at some surface water treatment facilities with lower facility classification.
  - Domestic wastewater - row headings and text descriptions, confirm categories match testing, consider where other technologies fit with testing.
  - Industrial wastewater - include additional technologies, aligned with testing.
  - Distribution and collection - begin with population as representation of risk level, but consider ways to incorporate complexity to meet board intent from year 2000 rulemaking.
- This project is limited to facility classifications. This project is not about other parts of Regulation 100 such as TUs, training, etc. However, comments for areas other than classification will be shared with the board.

Discussion by attendees

Classification

- Has board given direction? [note: Yes, The overview handout the division created outlines what we believe they want in terms of how we move forward. We met twice with the board, including extended discussion, and we understand this direction is what they have requested.]
- How does this parallel with the other stakeholder processes (drinking water) including design criteria, cross connection control, etc.? [note: Goal is for each process to be independent of each other, though there are many processes happening all the same time currently. Please make sure to visit our water]
quality stakeholder information web page] to stay up to date (and/or get involved with) current stakeholder processes.

- Goal is to provide safe drinking water and clean water discharged to streams and groundwater.
- Facility classifications impact operators and owners of facilities.
- With increased complexity, need more and more education with much more technical information.
- Can you change the plant certification to a higher level so that operator pay might increase? [note: Although operators with higher classifications may earn more, this project is focused on reviewing technologies and aligning with the testing levels, not divining particular pay structures.]
- Backflow device testing falls to distribution operators. Must be larger system to have dedicated individual for backflow device testing.
- Operator should not be in charge of a plant because the test does not require any experience.
- Population thresholds for distribution and collection are smaller for some states and ABC. Consider hybrid model to use current population thresholds, but add in some complexity considerations as noted by board in year 2000 rulemaking.
- Operator noted he had worked in another state where 0.8 MGD wastewater process required highest level of certification based on technology in use, not size, confirming his agreement with the approach to base classification on technology at the facility.
- How handle reclaim/reuse water treatment? [note: Anticipate workgroups dealing with traditional treatment scenarios initially and then considering reclaim/reuse similar to other treatment with focus on technology at facility and aligning classification with testing for operators. May need additional detail in a future rulemaking as the programs and applications expand.]

Implementation

- If classification sections can be more clear, the division anticipates probably having some type of self-certification aspect based on unit processes or components in system and then the division will confirm over time through inspections, compliance, design reviews, periodic review, etc.
- For changes to a classification, workgroup discussions will consider how to handle change for impacted facilities. Division anticipates targeted communications to groups of systems.
- Delayed implementation to allow test cycles for an operator to raise their level of certification.
- Possible “grandfathering” for an operator at a facility with change in classification. Considerations: Grandfathering limited to a specific site where operator has history of operating, no treatment changes, no compliance issues or violations that are responsibility of operator (vs. town decisions), operator still at existing certification level if move to another system, not grandfathering for contract operators.
- Outreach to town administrators to understand importance of operating drinking water and wastewater facilities.
- Contract operators are common where multiple systems are near each other.

Future stakeholder meetings

- Try to avoid sending multiple emails when other outreach emails are being sent by the division.
- Remote participation is needed at least for one meeting. Remember to repeat questions from the room for those listening remotely.
- Montrose is good central location.
- Denver location difficult, consider splitting Denver meeting to north of Denver and south of Denver
- Limon not typically well attended for similar meetings in the past.
- Colorado Rural Water Association (CRWA) conference is important since attended by many rural operators.
- Meeting times - Try for middle of day, middle of week, not first or last week of month.
- Inquire if TUs can be provided for stakeholder meetings to encourage attendance.
Discussion on topics other than classification

- How about requiring all workers to have some level of certification or training?
- 5 classification was intended for a sole proprietor, not to be a contract operator.
- Some contract operators are at too many facilities to be reliably involved in operation and control.
- Challenge to keep certified operators in small towns. Succession planning is important.
- Training - Need more options in rural areas and western Colorado, holding training locally, partnering with local community colleges, identify and communicate options available online and remotely. Can TUs be granted for training in Albuquerque for people in southern and southwestern Colorado?
- Training - Need training for testing topics, not just TUs.
- Testing - Unclear what to study and where to get information. Especially true between C and B test (and 2 and 3 test) due to breadth of information.
- Testing - Some people do not test well. Although test can be read to them, can there be oral examinations and evaluations of individuals understanding?
- Testing - Non-science college degree still granted experience. Consider distinction for science degrees for experience credit.
- Testing - Why can there not be some references available during the test, such as regulations?

Contact information

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