



September 15, 2010

Mr. Darrin Polhemus
Deputy Director
Division of Water Quality
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812

Subject: State Water Board Staff Briefing on SSO WDR—for Sep 21st SWRCB meeting

Dear Mr. Polhemus

On behalf of the Southern California Alliance of Publicly Owned Treatment Works (SCAP), I wish to take exception to the SWRCB's staff statement that there is a "lack of availability of standardized training and certification programs," in relation to the GWDR-SSO.

For more than 70 years the California Water Environment Association (CWEA) has been offering wastewater certification programs, beginning with the Wastewater Treatment Plant Operator Certification Program. CWEA developed that certification and then turned it over to the State Water Board in 1974 when operator certification became mandatory as a result of the Clean Water Act. Furthermore, CWEA offers competency-based certification in the following vocations (up to four grade levels in each):

- Collection System Maintenance
- Wastewater Treatment Plant Maintenance (includes Electrical/Instrumentation and Mechanical Technology)
- Laboratory Analysis
- Biosolids Land Application Management
- Environmental Compliance Inspection
- Industrial Treatment Plant Operations

It is my understanding that CWEA recently addressed its concerns with you, however, I am writing to personally validate their experience and expertise. Nearly all of SCAP's 88 public members employ staff that have been trained and certified by CWEA and have come to rely on their certification programs. I am told that currently 2,917 individuals hold CWEA's Collection System Maintenance certification.

P.O. Box 231565

Encinitas, CA 92024-1565

Fax: 760-479-4881 Tel: 760-479-4880 Website: www.scap1.org Email: info@scap1.org

Furthermore, it is CWEA's Collection Systems Maintenance Certification that is tracked in the State Water Board's own enrollment questionnaire for the GWDR. At CWEA's urging, SCAP and other wastewater associations throughout the state supported the MOU entered into with the SWRCB during the rollout of the GWDR.

It is our hope that the SWRCB recognizes the availability of specialized training and certification that CWEA provides to the wastewater community.

Sincerely,

A handwritten signature in black ink that reads "John Pastore". The signature is written in a cursive style with a large, looped initial "J" and "P".

John Pastore, Executive Director

Cc: Tom Howard, Executive Director, SWRCB
Russell Norman, SWRCB
Enrique Zaldivar, President, SCAP
Elizabeth Allen, Executive Director, CWEA