

The Law & Ethics

Wastewater Treatment Operators

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Federal Law

The Federal Water Pollution Control Act, now known as the Clean Water Act

Establishes minimum standards for surface water quality across the country.

Requires permits for discharges of wastewater to surface waters.

Administered primarily by EPA.

Authorizes delegation of many functions to individual states.

Authorizes promulgation of EPA/Federal regulations.



Clean Water Act

(33 United States Code Section 1251 et seq.)

History-

1899 Refuse Act – prohibited throwing waste in navigable waters. First national “environmental statute”.

1948 Federal Water Pollution Control Act (FWPCA) – early version of Clean Water Act. Required basic treatment of sewage. Almost entirely re-written in 1972 and thereafter.



Clean Water Act (cont'd)

- **1972 Federal Water Pollution Control Act** – first version of current Clean Water Act.
- First to require effluent standards and mandate pollution controls. Created the NPDES (National Pollutant Discharge Elimination System) permit program.
 - EPA initially designed the NPDES program to focus on “conventional pollutants”, such as oil and grease, biological oxygen demand, pH, fecal coliform and suspended solids.
- EPA authorized to delegate administration of NPDES program to individual states.
- Prohibited many discharges without NPDES permit.



Clean Water Act (cont'd)

- **1976 Flannery Decree** – Settlement of lawsuit against EPA which contended that EPA was applying the FWPCA too narrowly. Required EPA to expand the NPDES program to limit discharge of individual toxic pollutants (“priority pollutants”). Added industrial pre-treatment requirements.
- **1977 Clean Water Act (amendments to FWPCA)** – enacted many of the elements of the Flannery decree.

Clean Water Act (cont'd)

- **1987– Amended CWA.**
 - Further emphasis on toxic pollutants.
 - Required emphasis on addressing “impaired waters”.
 - Added regulation of storm water discharges.
- **1990 Oil Pollution Act** – Amended FWPCA provisions dealing with oil spills (reaction to Exxon Valdez tanker spill).

Clean Water Act provisions:

Important terms and definitions (found in Section 502):

- **Pollutant** – very broadly defined! Includes not only just about anything that can be put into the water, but also characteristics like temperature and acidity.
 - Examples: dredge spoil, garbage, sewage sludge, munitions, chemical wastes, biological materials, wrecked or discarded equipment, rock, sand, cellar dirt, industrial, municipal and agricultural wastes...
- **Discharge of a pollutant** - “addition of any pollutant to navigable waters from any point source.”

Important terms & definitions

(found in Section 502):

- **Navigable Waters a/k/a Waters of the United States** – generally, all surface waters, but not groundwater. (all surface waters and almost all wetlands.)
 - Ignore the term “navigable.”

Important terms & definitions

(found in Section 502):

- **Addition** – placement of new material or increase in amount or type of existing material, including transfer of water from one water body to another.
- **Point source** - any pipe, ditch, channel or other discrete conveyance (including vehicles) from which a pollutant may be discharged.

- **BCT, BAT, BPT** - “Best Conventional Technology”, “Best Available Technology”, “Best Practicable Control Technology.”
- **MCL** – Maximum Contaminant Level” (Highest allowable concentration of a pollutant.)

Specific Sections of the CWA:

Section 301:

- Prohibits the discharge of pollutants into navigable waters except in compliance with the requirements of the CWA.

Section 303:

- Requires EPA to develop water quality standards.

Section 304:

- Requires EPA to establish guidelines for developing effluent limits.

Section 307:

- Requires pre-treatment of certain industrial waste water flows and development of discharge limits for toxic pollutants.

Penalties

Section 311:

- Provides for both civil and criminal penalties for violations by “any person”. This applies to **individual operators** as well as to the treatment plant owners.

Criminal penalties....

- For negligent discharges: Minimum \$2,500/Maximum \$50,000/day and up to 1 year in jail.
- For willful discharges: minimum \$5,000/Maximum \$100,000/day and up to 3 years in jail.
- For false reports (such as in DMRs or other required monitoring reports): up to \$10,000 and up to 2 years in jail.

Civil penalties:

- for any violation, up to \$25,000/day.

CWA

Section 402:

- Requires NPDES permit for discharges of pollutants into waters of the United States. NPDES permits can be issued by the EPA or by a state if that state has been delegated NPDES permitting authority from EPA. Pennsylvania has delegation for most aspects of the NPDES program.

Section 510:

- States retain authority to impose stricter water quality standards than the Federal standards.



Other features of Clean Water Act:

- Storm water management and permit requirements.
- Industrial pollutant pre-treatment program.
 - Industrial facilities which produce wastes which may not be treatable by standard sewage treatment plants must pre-treat their waste water before discharging it to a sewer system.

Safe Drinking Water Act - SDWA

- The SDWA is a Federal Law developed by the EPA and enacted by Congress in 1974
 - Reauthorized with amendments in 1986
 - Reauthorized with amendments in 1996



Safe Drinking Water Act

- **Summary of SDWA related to contaminants:**
 - Main federal law that ensures the quality of Americans' drinking water
 - Authorizes EPA to set national standards for drinking water to protect against health effects from exposure to naturally-occurring and man-made contaminants
 - EPA works with states (PADEP), localities, and water suppliers who carry out these standards.



SDWA statutory requirements

- The SDWA was amended in 1996 to specifically require cost-benefit analysis as part of the regulatory process.
- The SDWA places a significant responsibility upon EPA to realistically assess the capabilities of and resources available to those who could be affected as a result of any future drinking water rulemaking.

The SDWA:

- Establishes requirements for health risk reduction and cost analysis under which quantifiable and non-quantifiable benefits of a proposed rule must be measured against its cost.
- Addresses additional health risk reduction and cost considerations by allowing the Administrator in certain circumstances to set a contaminant level that maximizes health risk reduction benefits at a cost justified by the benefits.
- Requires EPA to look at costs and economic factors when considering whether or not to allow a variance or an exemption to a treatment requirement for a particular water system.



Drinking water standards apply to public water systems

- Drinking water standards only apply to public water systems (not individual private wells).
- Public water systems are those having at least 15 service connections or serve at least 25 people for at least 60 days a year.
- Over 150,000 public water systems across the U.S. serve more than 300 million people.

Three types of public water systems

Community Water Systems (CWSs)

- Provide water to the same population year-round (for example: homes, apartment buildings)
- Approximately 52,000 systems serving the majority of the U.S. population

Non-Transient Non-Community Water Systems (NTNCWSs)

- Provide water to same people at least six months a year, but not all year (for example: schools, factories, churches, office buildings that have their own water system)
- Approximately 85,000 systems in the US

Transient Non-Community Water System (TNCWS)

- Provide water where people do not remain for long periods of time (for example: campgrounds)
- Approximately 18,000 systems



Pennsylvania Clean Streams Law

History

Purity of Waters Act (1905)

- Regulated most sewage discharges (not from coal mines or tanneries)
- Dept. of Health had authority, starting in from 1920s to regulate and enforce

Clean Streams Law (1937)

- Early goal to protect only “clean waters”

Amended in 1965, 1970, 1976, 1980, 1989, and most recently in 2006

Permitting

- Discharges to Surface Water with NPDES Permit
- Discharge to Groundwater
- WQM Permits (Part II)
 - Construction
 - Certain Discharges

Wetlands Protection



Pennsylvania State Law

The Clean Streams Law

- One of the most powerful environmental laws.
- Pre-dates CWA in many respects.
- Requires permits for discharges.
- In practice, permit program generally coordinated with federal requirements.
- Authorizes promulgation of State regulations.

Pennsylvania State Law (continued)

Water and Wastewater Systems Operators' Certification Act

- Since 1989, the law governing certification requirements and duties of water and wastewater system operators
- To ensure that system operators are experienced/knowledgeable and responsible

Pennsylvania Regulations

Chapter 91 – General Provisions

Chapter 92 – NPDES Permitting

Chapter 93 – Water Quality Standards

Chapter 94 – Municipal Wasteload
Management

Chapter 95 – Wastewater Treatment
Requirements

Chapter 96 – Water Quality Standards
Implementation



Pennsylvania Published Policy

Chapter 16 – Water Quality Toxics Management Strategy

- Not a formal regulation, but equally important.

“Jargon”...and Acronyms

Many of these are not easy to decipher

NPDES – National Pollutant Discharge Elimination System; the name for the federally required permit program for discharges of wastewaters to waters of the United States.

DMR or eDMR - Discharge Monitoring Reports; the reports each NPDES permit holder must file listing their discharges.

POTW – Publicly owned treatment works; i.e., Municipal Wastewater Treatment Plants.

IU – Industrial User



Water Systems Requiring a Certified Operator

- A drinking water system requires a certified operator when it is classified as a:
- Community Water Systems A public water system which serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents.
- Nontransient Noncommunity Water Systems A noncommunity water system that regularly serves at least 25 of the same persons over 6 months per year. Examples of nontransient noncommunity water systems include schools, churches, restaurants, and shopping centers, or businesses that have their own supply and treatment systems.

Water Systems NOT Requiring a Certified Operator

- A drinking water system usually does not require a certified operator when it is a:
- A water system that is not public.
- Transient Noncommunity Water Systems which is not a community or nontransient noncommunity water system or a bottled or vended water system nor retail water facility.

Wastewater Systems Requiring a Certified Operator

- Pennsylvania's operator certification program was modified in 2010 as the result of a number of legislative amendments.
- Publicly owned or non-publicly owned wastewater plants with a hydraulic design capacity of over 2,000 gallons.
- Single entity owned collection system – A wastewater collection system that relies on treatment from a wastewater treatment system owned by the same owner.
- Satellite collection system with pump stations – A publicly owned wastewater collection system that conveys sewage to a treatment plant owned by a different entity.
- A wastewater treatment system that uses treatment technology for which a certification examination and subclassification is provided, prior to discharging on to the surface of the ground or in a subsurface manner.



Wastewater Systems NOT Requiring a Certified Operator

- A wastewater system usually does not require a certified operator when it is a:
- A wastewater treatment plant with a hydraulic design capacity of less than or equal to 2,000 gallons per day.
- A wastewater treatment system that uses a treatment tank and subsurface treatment to provide adequate wastewater renovation. IE: Septic Tank
- An industrial wastewater system used to treat, recycle, or impound industrial or agricultural wastes within the boundaries of the industrial or agricultural property.
- An industrial waste pretreatment system in which treated wastewater is released to the collection system of a wastewater treatment plant that is regulated by this chapter.
- An industrial waste treatment plant that is an NPDES permitted point source discharge.
- A system designed to collect and treat stormwater.



Water And Wastewater Systems Operators' Certification Act 63 P.S. §§ 1001, et seq.

A state law that:

- Creates the State Board for Certification of Water and Wastewater System Operators;
- Sets up a scheme for certification, including classifications;
- Specifies powers and duties of the Board and the Department with respect to certification;
- Provides for criminal and civil enforcement;
- Provides whistleblower protection.
- Specifies duties of operators and owners



Water And Wastewater Systems Operators' Certification Act (continued)

Key Definitions

- Certified Operator—Any operator who holds a valid certificate in accordance with the Act.
- Operator in Responsible Charge—An individual designated by the owner to be the certified operator who makes process control decisions.
- Process Control Decision—A decision which maintains or changes the water quality or quantity of a system in a manner that may affect the public health or environment.



Water And Wastewater Systems Operators' Certification Act (continued)

The State Board for Certification of Water and Wastewater Operators

- Within the Department of Environmental Protection (Department);
- Powers and duties of the Board include:
 - Reviewing and acting on applications for certification, recertification or renewal;
 - Administering examinations;
 - Collecting fees for examinations and applications;
 - Revoking, suspending, modifying or reinstating certificates;
 - Issuing written orders.



Water And Wastewater Systems Operators' Certification Act (continued)

Powers and Duties of the DEP Include:

- Initiating proceedings before the Board to modify, suspend, revoke, or reinstate certifications;
- Issuing written Orders as necessary to owners or operators to comply with the act or to correct violations.

Water Operators' Certification

Water Treatment Plant Operators Certificates:

Water Classes

Class A – Greater than 5 MGD

Class B – Greater than 1 MGD but less than or equal to 5 MGD

Class C – Greater than 100,000 gpd but less than or equal to 1 MGD

Class D – Less than or equal to 100,000 gpd

Class E – Distribution and Consecutive Water Systems

Class Dc – must meet all of the following conditions:

system serves less than 500 individuals or has no more than 150 connections, whichever is less;

the source of water for the system is exclusively groundwater,

requires only disinfection, and

is not in violation of DEP rules and regulations.

Class Dn – meets all the conditions of Dc and does not have any disinfection.



Water Operator Subclasses

Subclassification 1 – Conventional filtration – For drinking water, a series of processes for the purpose of substantial particulate removal consisting of coagulation, flocculation, sedimentation, and filtration.

Subclassification 2 – Direct filtration – For drinking water, a series of processes for the purpose of substantial particulate removal consisting of coagulation and filtration. The term normally includes flocculation after coagulation, but does not include sedimentation.

Subclassification 3 – Diatomaceous earth filtration – For drinking water, a process for the purpose of substantial particulate removal, in which a pre-coat cake of diatomaceous earth filter media is deposited on a support membrane (septum) and, while the water is filtered by passing through the cake on the septum, additional filter media, known as body feed, is continuously added to the feed water, to maintain the permeability of the filter cake.

Subclassification 4 – Slow sand filtration – For drinking water, a process for the purpose of substantial particulate removal by physical and biological mechanisms during the passage of raw water through a bed of sand at low velocity, generally less than 0.4 meters per hour.

Subclassification 5 – Cartridge or bag filtration – For drinking water, a process for the purpose of substantial particulate removal by straining with bag or cartridge filters manufactured of various materials and pore sizes.

Subclassification 6 – Membrane filtration – For drinking water, a process that uses a thin film that acts as a selective barrier (semi-permeable) to the transport of matter to remove contaminants from water and includes such processes as electrodialysis, reverse osmosis, nanofiltration, ultrafiltration, microfiltration, or other similar technologies.

Subclassification 7 – Corrosion control and sequestering – A water treatment process designed to mitigate the adverse effects of corrosion in drinking water.



Water Operator Subclasses

Subclassification 8 – Chemical addition – A water treatment process designed to improve the quality of the water being treated through the addition of chemicals such as lime, soda ash, caustic soda, and permanganate.

Subclassification 9 – Ion exchange and green sand – A water treatment process such as greensand filtration, ion exchange, or activated alumina designed to improve the quality of water being treated by the removal of inorganic constituents.

Subclassification 10 – Aeration and Activated Carbon Adsorption:

Aeration – A water treatment process designed to improve the quality of water being treated by introducing air or oxygen into water to remove undesirable dissolved gases, to remove volatile organic compounds or to oxidize inorganic compounds so they can be removed as particulates.

Activated carbon – A water treatment process designed to improve the quality of water being treated by using activated granular or powdered carbon to remove specific organic chemical compounds by adsorption.

Subclassification 11 – Gaseous chlorination disinfection – A water treatment process designed to inactivate pathogenic organisms from water being treated utilizing gaseous chlorine.

Subclassification 12 – Non-gaseous chemical disinfection - A water treatment process designed to inactivate pathogenic organisms from water being treated utilizing non-gaseous chemical elements or compounds.

Subclassification 13 – Ultraviolet disinfection – A water treatment process that inactivates pathogenic organisms using light with a wavelength range of 4000 to 40 angstroms.

Subclassification 14 – Ozonation – The water treatment process designed to inactivate pathogenic organisms from water being treated utilizing ozone.

Subclassification 15 – Laboratory Supervisor – An individual having 2 years of hands-on analytical testing, knowledge, skills and abilities necessary to supervise laboratory procedures and the reporting of analytical data for an environmental laboratory operated by a drinking water system in accordance with industry, State and Federal standards. An operator must already be certified in drinking water treatment Class A, B, C, or D to add this subclassification.



Wastewater Operators' Certification

Wastewater Treatment Plant Operators Certificates:

- Class A---Unlimited capacity
- Class B---5,000,000 gallons per day
- Class C---1,000,000 gallons per day
- Class D---100,000 gallons per day
- Class E---wastewater system consisting only of collection facilities with pumping stations
- **Subclassification 1 – Activated Sludge** – Treatment technology such as extended aeration, sequential batch reactors, contact stabilization, conventional, step fed, or oxidation ditch.
- **Subclassification 2 – Fixed film treatment** – Treatment technology such as trickling filters and rotating biological contactors.
- **Subclassification 3 – Treatment ponds and lagoons** – Treatment technology that uses aerated, anaerobic, facultative process, or wetlands to treat wastewater.
- **Subclassification 4 – Single entity collection system** – A wastewater collection system where the collection system relies on treatment from a wastewater treatment system owned by the owner of the collection system

Water And Wastewater Systems Operators' Certification Act (continued)

Operation of Wastewater Systems

Owners shall employ:

- The services of an operator certified in the required classification and sub-classification who shall have direct responsibility for the operation of the system;
- Available operators of the required classification and sub-classification who shall make process control decisions for the operation of the system during all periods of operation.
- The designated operator in responsible charge must be on file with the Department at all times.



Water And Wastewater Systems Operators' Certification Act (continued)

Process Control Decisions:

- Must be made by a certified operator.
- May be made:
 - On site
 - From a remote location and communicated to operators on site or
 - By means of an approved Standard Operating Procedure (SOP) as provided by the rules and regulations adopted under this act.

Water And Wastewater Systems Operators' Certification Act (continued)

Duties of Certified Operators Include:

- Compliance with all Applicable State and Federal laws and regulations associated with wastewater systems.
- Reporting to system owner any known violations or system conditions that may be or are causing violations of any regulation or permit conditions or requirements.
- Reporting to owner any action necessary to prevent or eliminate a violation.
- Providing for the suitable operation and maintenance of the system utilizing available resources.
- Making and implementing appropriate process control decisions necessary to prevent or eliminate violations.



Water And Wastewater Systems Operators' Certification Act (continued)

Enforcement-Criminal

- Operator who makes process control decisions without the required certification is guilty of a summary offense.
- Fine: \$50-\$500 per offense, upon conviction.
- Each day constitutes a separate offense.
- The Department has authority to initiate summary proceedings.

Water And Wastewater Systems Operators' Certification Act (continued)

Enforcement-Civil

- Department has authority to assess civil penalties against an operator for making process decisions without the required certification.
- Maximum \$1,000 per violation.
- Each day is separate violation.
- Willfulness not required.
- Can be appealed to the Environmental Hearing Board (EHB) within 30 days.
- I have seen DEP assess a fine of \$300 per day for just missing taking a daily test!



Water And Wastewater Systems Operators' Certification Act (continued)

Whistleblower Protection

- Prohibits discrimination or retaliation by an employer against a employee who makes or is about to make a good faith report of an instance of wrongdoing.
 - Employer—A person who supervises employees at a waste water system.
 - Wrongdoing—A violation of law, regulation, permit, etc. that relates to the operation of a wastewater system and is not of a merely technical or minimal nature.

Water And Wastewater Systems Operators' Certification Act (continued)

Whistleblower Protection (continued)

- Good Faith Report
 - Made without malice or consideration of personal benefit.
 - Reasonable cause to believe is true.
 - Made to the owner of the wastewater system or to an appropriate authority.



Water And Wastewater Systems Operators' Certification Act (continued)

Related Regulatory Requirements

Issuance of Certificates

- Applications for certificates must be submitted on Department forms.
- Include information that enables the Department and Board to determine if issuance is appropriate.
- Separate application required for each class and type of plant.
- Board gives written notice of action within 60 days.
- Hearing on adverse action may be requested within 30 days.

Water And Wastewater Systems Operators' Certification Act (continued)

Related Regulatory Requirements

- Suspension of certificates
 - Suspension for definite or indefinite period of time, after Hearing
 - If indefinite, reinstatement when Board is satisfied cause for suspension has been removed.
 - If suspension for incompetence, successful completion of an exam may be required.

Water And Wastewater Systems Operators' Certification Act (continued)

Related Regulatory Requirements

- Revocation of certificates
 - For incompetence.
 - If a prior suspension, for any reason.
 - Operator can apply for a new certificate after 6 months.
 - Hearing prior to revocation.

Operator Certification

Most drinking water or wastewater systems require a certified operator. A certified operator must hold the correct certification class and subclass to operate their system. The operator's certification subclasses must match the treatment technologies used at the system. The operator's class must match or exceed the size classification of the treatment system.



Certified Operator Responsibilities

The certified operator must meet the requirements of the Operator Certification Program. The following list provides some of the more important requirements:

- Successfully complete the required continuing education.
- Make timely application for certification renewal.
- Report to the system owner any known violations or system conditions that may be or are causing violations of any DEP regulation or permit condition or requirement.
- Provide for the suitable operation and maintenance of a water or wastewater system utilizing available resources needed to comply with all applicable laws, rules and regulations, and permit conditions and requirements.
- Report to the system owner any action necessary to prevent or eliminate a violation of applicable water or wastewater system laws, rules and regulations, and permit conditions and requirements. You must keep the system owner informed of all real or potential violations and what your plans are to deal with the situation.
- Make or implement appropriate process control decisions, or taking or directing actions related to process control decisions for specific water or wastewater systems.
- Approve in writing Standard Operations Plans (SOPs)



Operator Responsibilities

- A certified operator must make all the process decisions for the system.
- A certified operator must be onsite 24 hours a day or be available to be contacted if there is a need to make a process control decision.
- A process control decision is any action to change or maintain the quality or quantity of water being treated.
- Not all operators working at the system are required to be certified. These non-certified operators cannot make process control decisions.
- If a non-certified operator makes a process control decision, they are violating state law.



Standard Operating Procedures (SOP)

- The certification program allows certified operators to direct non-certified operators to take certain actions using Standard Operating Procedures (SOP). The SOP must be written and approved by a certified operator-in-charge for the system.
- An SOP cannot be used to operate a system by an owner in lieu of having a certified operator available at all times during system operations. While DEP allows the use of an SOP by a non-certified operator, it is the certified operator who is held responsible by law for the proper operation of the system.



System Owner Responsibilities

Act 11 and the Operator Certification Program set legal obligations for system owners.

Owners must:

- Employ an operator with the appropriate certification that matches their system's size and technology.
- Insure that a certified operator is available at all times to make process control decisions.
- Report on an annual basis to DEP the name(s) of their certified operators using the "Available Operator Annual Reporting Form".
- Provide the certified operators a copy of the permit requirements for their system.
- Meet all the applicable rules and regulations.



State Enforcement

- Notice Of Violation (“NOV”)
- Administrative Conference
- Consensual Agreement
- Consent Order & Agreement
- Complaint For Civil Penalties
- Judicial Enforcement
- Permitting Action
- Criminal Action
- Violation Reporting
 - Quarterly Reports of violators of NPDES permits
 - Provided to EPA



Duty to Report and Notify

25 Pa. Code § 91.33

- Accident or Other Activity Allowing Discharge or Possible Discharge
- Immediate Reporting by telephone
- Toxic or Other Substance
- Endanger Downstream Users, Otherwise Result in Pollution, Create Danger to Waters, or Damage Property
- Notify DEP by Phone; Notify Downstream Users
- Immediate Steps and 15-day Removal of Residuals
- Report orally within 24 hours of any non-compliance
- Written Report due within 5 days of non-compliance
- DEP may waive written report requirement if oral report is filed timely



What do we do if we have a plant upset???

- Call DEP and inform them.
- Start your sampler if it is a effluent discharge problem.
- Contain the spill if possible.
- Correct the problem as quickly as possible
- Keep records of time and efforts expended
- Follow-up with DEP in writing on detailed incident.
- Record sampling and exceptions on DMR if necessary.
- DEP Penalty Actions and Fines may or may not follow.
- Tell ALL THE TRUTH, HIDE NOTHING, YOUR CAREER AND LICENSE ARE ON THE LINE.



Annual Stormwater Outfall Monitoring

- If a WWTP has Stormwater Outfalls from a WWTP site Annual inspection of each outfall and completion of Form 3800-PM-WSFR0083v is required.
- Sampling of the flow during a storm event is required.
- The forms are kept on file and available to DEP.



DRBC Requirements

- The Delaware River Basin Commission issues a “Docket” for all WWTPs in the basin.
- Your Docket may have specific reporting requirements to DRBC.
- An Annual Effluent Summary is required to be submitted to DRBC in January each year
- A written notice is required to be sent to DRBC within 30 days if a non-compliance occurs.
- The DRBC Docket requires renewal every 5 years.

Recap

Federal Clean Streams Law, Chapters 16, 91, 92, 93

- Protect and Maintain Waters of the Commonwealth
- No pollutant discharges unless authorized by CSL and NPDES permit
- Understand permit terms and conditions
- Duty by owner, permittee or system operator to notify DEP and downstream users
- Duty by owner, permittee or system operator to prevent injury
- Duty to abate
- Civil and criminal liability



Recap (continued)

Duties of Certified Operators Revisited:

- Compliance with all Applicable State and Federal laws and regulations associated with wastewater systems.
- Reporting to system owner any known violations or system conditions that may be or are causing violations of any regulation or permit conditions or requirements.
- Reporting to owner any action necessary to prevent or eliminate a violation.
- Providing for the suitable operation and maintenance of the system utilizing available resources.
- Making and implementing appropriate process control decisions necessary to prevent or eliminate violations.

Violation Examples

- Operator shown on visual surveillance nodding off at times indicated that he was doing sampling on DMR's.
- Operator changes or cleans out a chlorine tank without following proper protocol.
- Operator fails to shut off sludge transfer pump and failed to note during review of facilities monitoring system that pump still running, resulting in sludge overflowing tank and entering stream.
- Operator posts an incorrect operating procedure without authorization.
- Falsifying lab results reported on DMRs.
- Clogged sewer line, flows or is pumped to nearby stream during a repair.



Questions?
An Example Story to Follow!

