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June 5, 2015

Board of Certification of Operators of Drinking Water Supply Facilities
1000 Washington Street
Boston, MA 02118

RE: Comments on Regulations, 236 CMR 1.00 to 5.00
Via email to: wayne.e.thomas@state.ma.us

Dear Board Members:

Massachusetts Water Works Association (MWWA) thanks you for the opportunity to comment on the Board of Certification of Operators of Drinking Water Supply Facilities' (Board) regulations during today's listening session. MWWA represents over 1,100 members of the public water supply profession. I wanted to follow up with MWWA's comments in writing for the record.

Our representative on the Board, Blake Lukis, mentioned that as the Board reviews its regulations you might consider incorporating the current policy "Training Requirements to Sit for Exams" regarding prerequisite training into the regulations. MWWA spearheaded the effort regarding prerequisite training and believes it will help ensure that we have properly trained operators in the workforce. However, MWWA believes that it should remain in policy rather than be incorporated into the regulations to give the Board more flexibility to adjust the requirements if necessary.

Since it has been several years since the policy went into effect, MWWA suggests that the Board may want to hold a workshop with stakeholders of water works organizations, operators and training providers to review how the program is doing, lessons learned, issues that have arisen and successes achieved to determine if any adjustments are necessary. When we began the discussion regarding training requirements many years ago there was also discussion about the various levels of license required (i.e. do we need four grades of Distribution licenses?). MWWA also believes the Board should review its policy "Drinking Water Exams" during this process. MWWA would be happy to spearhead the effort to convene the stakeholders if the Board believes this would be useful.

While I did not mention it in my comments before the Board this morning, MWWA did review the report "Model Standards Conformity Assessment" (dated July 7, 2014) from the audit of the Massachusetts program that was performed by the Associated Boards of Certification (ABC). ABC had made some recommendations for changes to the Massachusetts program that MWWA does not support, such as increasing the amount of Training Contact Hours (TCHs) needed for license renewal. If the Board is considering incorporating any recommendations from the ABC audit into the regulations, then MWWA would suggest they run them by the stakeholders for feedback before incorporating them into draft regulations.

MWWA would also concur with the comments made this morning by Val Peter that the Board should consider reviewing the Education and Experience requirements associated with granting an operator a full license (236 CMR 4.01). In utilities where operators are increasingly having to juggle many responsibilities, it may not be possible for 100% of their time to be devoted to the water system; that should not preclude an operator with many years of experience from getting a full license.

Again, thank you for the opportunity to provide comment and we would be happy to meet with the Board further to discuss any of the issues we have raised.

With Water Works Pride,

A handwritten signature in black ink that reads "Jennifer A. Pederson". The signature is written in a cursive, flowing style.

Jennifer A. Pederson
Executive Director