



# Are Changes to the Water System Operator Certification Program Really Needed?

It's been almost four years since the first meeting of the "Operator Certification Advisory Workgroup" was held on October 22, 2019. Additional meetings, including virtual meetings during COVID-19, have been held since. Still, more discussions are needed to finalize a program. KRWA staff members Delbert Zerr, who worked for 30 years as KDHE District Engineer in Salina until joining KRWA in 2004; Greg Metz who is a Class 2 Water Operator and Class 1 Wastewater Operator; and Jason Solomon, who worked for KDHE for a decade as an inspector and as a District Environmental Administrator and is a Class 4 Wastewater Operator have participated in discussions about possible changes in the regulations. The topics have also been discussed with KDHE at a KRWA Board of Directors' meeting. KRWA has also brought comments to others at the agency.

The question remains: "Why is KDHE addressing this issue now?" Is there really a problem with the current operator certification system? It probably depends on who you're asking but from KRWA's perspective, the main issue that needed to be addressed was that larger cities with groundwater systems that require either Class 3 or 4 level operators were required to take exams that were designed for surface water systems.

**Groundwater/Surface Water Exams:** The operator certification exams contain questions pertaining mostly to surface water treatment, making it difficult for operators of groundwater systems to pass the test. As a result, KRWA and others have lobbied for two sets of exams – one for groundwater and another for surface water systems. This scenario of splitting the water operator certification program between groundwater and surface water was eventually dropped because KDHE somehow found it was not feasible. Why? As a result, and to offer an entirely different proposal,

KDHE is considering a system where water utilities are evaluated and given a designation based on treatment processes and population. KRWA still prefers a program with separate testing developed for groundwater systems and the other for surface water operators.

**Distribution System Certification:** Another certification that is being proposed is that all operators working for a water utility serving 501 people or more will be required to obtain a distribution system certification. As we understand it, the current proposal will allow all existing certified operators to obtain this certification without taking an exam but future operators will be required to take a second exam. For many public water systems, this requirement would result in a single person holding two water operator certifications, requiring another test to be taken and even more training hours. Distribution system certification seems appropriate for purchase-only systems, but even now, those systems only need a Small System certification – and probably all operators need to know a little about water sources, etc. KRWA understands the need to provide training in this area but does not understand or agree with the need to develop an entirely new certification program that will require additional testing and the required continued education, in addition to the continued education certified operators are currently required to obtain. Larger water systems with designated distribution crews could easily establish their own recognition programs internally or through other certification organizations. The state of Kansas would not need to be involved. Why subject everyone else to this new regime by creating an entirely new program?

**Contract Operators:** KDHE is proposing a number of requirements for individuals who serve as contract operators for water systems. The issue of operators who are doing contract work just to take a paycheck without ever visiting the facility was suggested as the motivation for imposing stricter requirements on contract operators. KRWA has had the opposite experience with operators contracted as operators. Over the years, many operators have contacted the Association with questions about the requirements of serving as a contract operator. Those operators generally have stated that their only reason for considering doing contract work is to help out another system to be in compliance and to make sure the

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## KDHE proposes “provisional certifications”

KRWA was the driving force in requesting KDHE to allow anyone to take the water operator certification exam. The agency has always held to the policy that anyone taking the exam must first be employed by a public water system. The result of holding to that position over decades kept many people from even inquiring about water utility work because most public water system governing bodies and many managers would advertise for operators with the stipulation that they must have a Class X certification. Well, how is anyone going to possess a certification if they can't take an exam until a water system has employed them? The proposed provisional certificate is KDHE's method for keeping track of “non-operators” who pass the exam. It is KRWA's opinion that the overall goal should be to get more certified operators in the field, especially

when small systems are finding it more and more difficult, if not nearly impossible, to employ operators (full-time or contract operators) when the system loses its only certified operator. KDHE, however, is proposing to issue provisional certificates to many current operators who have a higher certification level than the system they are currently operating requires. For example, a person currently holding a Class III certificate who is operating a Class II water plant would receive a Class II operator certificate and a Class III provisional certificate. The proposal would allow this operator to convert the Class III provisional certificate to an actual Class III operator certification if and when the operator moves to a Class III system. KRWA appreciates the proposal to allow non-operators to take the exam but disagrees with the proposal to use the provisional certificate with current operators.

KRWA suggests that operators who have worked and prepared to take and pass a certain exam should receive and maintain the actual operator's certificate. The certification was earned by the operator – not the system. Given the challenges of maintaining the present tracking of operators, KRWA wonders why the agency wants to double down on keeping track of who's who, where and when. Under the KDHE proposal, an operator might hold multiple levels of certification, depending on which systems the operator is working for. The question is, “What's the real difference?” It's like telling a school teacher who has a master's degree that he/she doesn't need a master's degree to teach ... so the school district will just list the teacher on official documents as having a bachelor's degree because that's all that is required. That wouldn't fly.

system is operating appropriately. If this new regulation is adopted, contract operators and system owners hiring contract operators will have more responsibilities, including record keeping. While more accountability might be needed, KRWA believes that the proposed contract operator regulations will cause contract operators to decline to do so, causing even more problems for many really small systems that need this service. Many contract operators have already expressed those concerns. Two of them are directors on the KRWA board! This issue is REAL!

**Summary:** Back to the original question. Are all these proposed operator certification changes really needed? After numerous discussions at the KRWA board of directors' meetings and among staff and operators of KRWA member and non-members systems alike, it is the consensus that the current operator certification program has been excellent. It could continue to be an excellent program with a few basic changes, such as splitting the groundwater and surface water certifications, which was the original reason for looking into this issue in the first place.

Regarding creating splits in the exams between questions concerning surface water and groundwater, an option might be for KDHE to assemble a team of experienced persons – operators, engineers, and tech assistance providers – who know the operations of utilities – and pull questions together in an afternoon's time. As for the exam itself, KRWA suggests there be consideration of using software to provide exams that can randomize and auto-score the exams. Surely, there is a web-based exam tool that could automate the exam process.

KRWA used software 23 years ago that still handles up to 999 questions, randomizes those questions each time anyone logs on and scores the quiz at the end of the specified number of questions. It's that sort of concept that should make this “exam-taking” much more automated. Check out KRWA's quizzes at <https://krwa.net/TRAINING/Online-Activities> for the concept.

KRWA will continue to express concerns about these proposed changes because the way KRWA sees it, if passed in the proposed format, these changes will end up discouraging people from entering the water operator field and for existing contract operators to quit. Numerous operators have already made that decision. This is detrimental to the water utility industry in most communities and rural districts across Kansas.

KRWA recommends that those involved with the operator certification program contact their local elected officials in Topeka. Let your State Senators and Representatives know your opinion on these changes so they're informed when they go to Topeka in January.

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