



OPERATOR CERTIFICATION PROGRAM ANNUAL REPORT FY2013

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TABLE OF CONTENTS

1. AUTHORIZATION.....	2
2. CLASSIFICATION OF SYSTEMS, FACILITIES, AND OPERATORS.....	2
3. OPERATOR QUALIFICATIONS	3
4. ENFORCEMENT	3
5. CERTIFICATION RENEWAL.....	3
6. OPERATOR CERTIFICATION TRAINING.....	4
7. RESOURCES NEEDED TO IMPLEMENT THE PROGRAM	4
8. STAKEHOLDER INVOLVEMENT	4
9. PROGRAM REVIEW	5
10. IMPLEMENTATION SCHEDULE UPDATE	5

TABLES

1. FY13 PWSs Without a Certified Operator.....	1
2. Summary of Examination Results from July 1, 2012 through June 30, 2013	7

AUTHORIZATION

The previously submitted Arizona Attorney General’s certification remains in effect as there have been no statutory and/or regulatory changes made to the program. The Arizona Department of Environmental Quality (ADEQ) has statutory authority to establish and enforce rules relating to operator certification under Arizona Revised Statutes (ARS) § 49-352 and § 49-361.

1. CLASSIFICATION OF SYSTEMS, FACILITIES, AND OPERATORS

At the end of fiscal year 2013 (FY13), there were 1,536 active regulated public water systems in Arizona. Pursuant to R18-4-104(A) of the Arizona Administrative Code (A.A.C.), all public water systems (PWSs) in Arizona must retain the services of a certified operator. In FY13, a total of 22 PWSs did not properly notify ADEQ of their certified operator in direct responsible charge (as required by rule), or that the PWSs were currently operating without a certified operator. This information is presented in Table 1. Compared to FY12, this is a 54 percent decrease in the number of public water systems that have not provided the required certified operator related information to ADEQ. More specifically, this represents a 25 percent decrease in the percentage of community water systems without a certified operator, no change in the percentage of non-transient, non-community water systems without a certified operator, and a 68 percent decrease in the percentage of transient, non-community water systems without a certified operator.

In FY13, the Operator Certification Program initiated a total of 45 notification letters in August 2012, March 2013 and June 2013, for PWSs not listed as having a certified operator of record in ADEQ’s drinking water database (Safe Drinking Water Information System-SDWIS/State). A total of nine PWSs without an operator of record were referred to ADEQ’s Compliance Section for enforcement follow-up which may result in the issuance of an enforcement action (e.g., Notice of Violation, Notice of Opportunity to Correct Deficiencies, etc.). The fewer number of PWSs operating without a certified operator of record is likely associated with increased levels of Operator Certification Program related follow-up actions, enhanced database tracking functions, and the issuance of multiple notification letters and NOV’s distributed over the course of FY13. In many cases the lack of a certified operator in SDWIS/State was attributable to inadequate communication on the part of the PWS and/or operator, and not necessarily due to the PWS operating without the required certified operator.

Table 1. FY12 PWSs Without a Certified Operator

Criteria	Number
Total number of Community Water Systems (C)	758
Total number of Community Water Systems without a certified operator	9 / 1%
Total number of Nontransient Noncommunity Water Systems (NTNC)	204
Total number of NTNCs without a certified operator	2 / 1%
Total number of Transient Noncommunity Water Systems (NC)	574
Total number of NCs without a certified operator	11 / 2%

3. OPERATOR QUALIFICATIONS

ADEQ coordinates and manages all drinking water and wastewater operator certifications in the State of Arizona in accordance with A.A.C. Title 18, Chapter 5, Article 1. ADEQ contracts with GateWay Community College (GWCC) to proctor exams provided and graded by the Association of Boards of Certification (ABC). GWCC proctors the majority of operator examinations at their Phoenix campus, but also provides exam opportunities at various locations throughout the state. A minimum score of 70 percent correct on an examination is required to pass and become certified. To determine eligibility for admission to a certification exam, ADEQ takes into account an individual's amount and type of qualifying experience and prior education. A.A.C. R18-5-112(D) sets specific qualifying experience and educational requirements for applicants for certification exams for Grades 1 through 4.

New operators that do not meet the minimum experience and/or educational requirements for a specific grade are not permitted to test for that grade; however, operators in place before these regulations were enacted (i.e., grandfathered operators) were allowed to continue in their current positions as long as the facility did not change to require a higher grade operator. At the end of FY13 there were four public water systems solely under the supervision of a grandfathered operator. In addition, four active certified operators with grandfathered certificates remain on file. Eighteen certified operators with historic grandfathered certificates have either renewed or upgraded their certifications by successfully passing an operator certification exam which consequently invalidated their historic grandfathered certificates.

4. ENFORCEMENT

ADEQ maintains authority and reserves the right to initiate an enforcement action against a PWS if the facility does not:

- Maintain the services of a certified operator
- The certified operator does not possess a certificate of the grade and type required for the facility, or
- The certified operator does not reside within a 200 mile ground travel radius of the facility.

In FY13, ADEQ issued nine enforcement actions, in the form of a Notice of Violation (NOV), against nine PWSs for the failure to retain the services of a certified operator.

5. CERTIFICATION RENEWAL

Operator certificates are valid for a three-year period and to maintain eligibility for operator certification renewal, an operator must complete at least 30 professional development hours (PDHs) within that three-year period. A total of 3616 certificates were renewed by the program in FY13.

An operator has 90 days from the date of certificate expiration to submit the required renewal documentation to ADEQ pursuant to A.A.C. R18-5-108. If an operator fails to do so within the

required timeframe, the operator must reapply for certification and will be examined as a new applicant.

6. OPERATOR CERTIFICATION TRAINING

For FY13, training was offered through eleven one-day workshops, and six two-day workshops held at various locations throughout Arizona. Each workshop provided operators the opportunity to earn professional development hours (PDHs). Attendees can earn a maximum of seven PDHs for a one-day and a maximum of 14 PDHs for a two-day workshop. Four of the two-day events were accomplished using capacity development monies. These events were focused on many aspects of water treatment and distribution. The event coordinator used for these events was tasked with managing event registration, reservation confirmations, workshop reminders for registered attendees, providing event directions and in some cases secured the meeting facilities.. Five of the events focused on emergency management issues for water and wastewater systems and eight of the events were focused on drinking water rules. During FY13, a total of 482 received training.

7. RESOURCES NEEDED TO IMPLEMENT THE PROGRAM

Detailed certified operator and associated certificate related information is maintained and tracked in ADEQ's Safe Water Operator Certification System (SWOCS) database. In addition, information on certified operators for each regulated PWS is also maintained in ADEQ's Safe Drinking Water Information System (SDWIS/State) database.

The operator certification program currently utilizes three full-time equivalents (FTEs), funded by the federal PWSS grant, to accomplish program objectives. There were no staff level changes to the program in FY13.

8. STAKEHOLDER INVOLVEMENT

A.A.C. R18-5-103 establishes a certification committee of eleven members to make recommendations and to provide ADEQ with technical advice and assistance when requested. Members of this committee include an ADEQ employee, Grade 4 certified operators, professional engineers, municipal officials, water system representatives, and college faculty members in sanitary science. In FY13, the certification committee did not meet as there were no operator certification rule revisions or operational changes proposed or implemented.

9. PROGRAM REVIEW

The ADEQ Drinking Water Section (DWS) conducts an annual internal review of the operator certification program. This review includes tracking requests for reciprocity, early examination requests, and certificate renewal audits. In FY13, ADEQ processed and approved 283 requests for reciprocity. The DWS also processed 128 requests for early examinations with 114 approvals and fourteen denials. In FY13 approximately ten to fifteen percent of all renewal requests were audited for PDH verification purposes. There were no implemented changes to the operator certification rules or program operations for FY13.

10. IMPLEMENTATION SCHEDULE UPDATE

All permanent regulations have been implemented; however, modifications to program operations have been made on an as needed basis.

Historically, ADEQ utilized third-party examination contractors to develop and proctor all operator exams. In FY08, ADEQ returned to managing all examination services “in house” while staff undertook a review of all available examination options (e.g., nationalized testing services, continuation of third-party contractors).

In early FY09, ADEQ entered into a contract with the Association of Boards of Certification (ABC) and GateWay Community College (GWCC). ABC currently provides all operator certification exams and grading services while GWCC oversees all exam proctoring services. An examination fee of \$77 per exam was adopted at the beginning of this contract. The fee was increased to the current rate of \$87 per exam in FY11 due to increases in testing service administrative costs.

In FY13, a total of 1709 operator examinations were proctored in approximately 140 testing sessions held by GWCC across the State of Arizona. A breakdown of the examinations conducted by classification and grade are shown on Table 2.

Table 2. Summary of Examination Results from July 1, 2012 through June 30, 2013

Classification	Grade 1	Grade 2	Grade 3	Grade 4	Total
Wastewater Collection Pass	98	68	27	22	215
Wastewater Collection Fail	44	25	17	21	107
Wastewater Collection Total	142	93	44	43	322
Wastewater Collection % Pass	69%	73%	61%	52%	67%
Water Distribution Pass	179	70	38	20	307
Water Distribution Fail	133	53	62	28	276
Water Distribution Total	312	123	100	48	583
Water Distribution % Pass	57%	57%	38%	42%	53%
Water Treatment Pass	101	62	32	28	223
Water Treatment Fail	94	27	25	13	159
Water Treatment Total	195	89	57	41	382
Water Treatment % Pass	52%	70%	56%	68%	58%
Wastewater Treatment Pass	90	66	35	19	210
Wastewater Treatment Fail	91	33	63	25	212
Wastewater Treatment Total	181	99	98	44	422
Wastewater Treatment % Pass	50%	67%	36%	43%	50%
TOTAL EXAMS					1709
OVERALL % PASS					56%