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## State of Maine

# Annual Operator Certification Program Report

January 1, 2015 through December 31, 2015



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The State of Maine, Department of Health and Human Services, Center of Disease Control and Prevention, Division of Environmental Health, Drinking Water Program (DWP) is responsible for regulating public water systems and overseeing compliance with requirements of the Safe Drinking Water Act and Maine's Rules Relating to Drinking Water. In 1995 the Maine State Legislature re-established the Board of Licensure of Water System Operators (Board) to further improve the level of professionalism of water system operators. The Board, comprised of nine appointees from the Governor, in conjunction with DWP assures the content of training, examination and licensing of operators of public water systems in Maine. Operators of Maine's public water systems (PWS) are the first and foremost protectors of the safety of drinking water. Maine's water systems span a spectrum of complexities and sizes with each and every operator responsible for the same end results: safe and adequate drinking water supply. The Board assures that operators meet standards through evaluating experience and education through application review, and performance through successful completion of a nationally verified examination. The Operator Certification Program assists operators in achieving and maintaining this professionalism, through training and assurance of appropriate operator coverage at public water systems.

## **1. Authorization**

Maine's Operator Certification Program has met EPA's Baseline Standards since major changes were implemented in 2000 and continues to meet and implement EPA's *Final Guidelines for the Certification and Recertification of Community and Non-transient Non-community Public Water Systems*.

No changes to statute or operator board rules were made during 2015. Attorney General's Certification is attached as Appendix A.

## **2. Classification of Systems and Operators**

### **A. System Classification:**

The history of classification of water systems has been documented in previous reviews.

Classification of systems according to the point system adopted with the Board's Rules continues to be determined and reassessed during sanitary surveys. PWSs are required to notify DWP and receive approval for any changes to treatment processes. These changes are also evaluated to assure appropriate classification. The objective is to have the PWS classification match the processes in place at the time of inspections. An inspection could reveal process changes that either elevate or lower classification levels. Changing a PWS to a lower classification does not conflict with anti-backsliding as the system classification and operator qualifications are reviewed through examination and experience qualifications. This maintains the protection to public health while

keeping the accuracy of the point system. When classification level is raised the PWS is given 90 days to designate an appropriately licensed operator.

Table 1 illustrates the basis of classification and the number of systems in each classification. Very Small Water System, VSWS, classification includes both treatment and distribution categories. Class I through Class IV systems are classified according to complexity and population served for treatment and according population served for distribution. Utility operated community PWS that were previously classified as Class I are not reclassified to VSWS even if the population is below 500.

<b>Table 1 Public Water Systems Classification</b>			
<b>PWS Classification</b>	<b>Treatment Points Appendix A Operator Rules</b>	<b>Distribution points Population</b>	<b>Number of PWS with this classification</b>
Very Small Water System	19 or less	<500	559
Treatment Class I	19 or less		65
Treatment Class II	20 to 34		77
Treatment Class III	35 to 47		27
Treatment Class IV	48 or more		20
Distribution Class I		1,500 or less	116
Distribution Class II		1501 to 15,000	63
Distribution Class III		15,001 to 50,000	9
Distribution Class IV		>50,000	1

**B. Operator Classification:**

Operators in responsible charge of community, NTNC and surface water transient systems are required to hold licenses that match system classifications. ABC examinations are designed to review applicable knowledge base for levels of systems matching the ABC point system. Maine’s point system is similar to ABC’s but not identical. The ABC Need-to Know and question sets have been reviewed to assure topics covered are applicable to systems within the appropriate categories.

Maine’s program licenses persons to operate systems. Licenses are by discipline either treatment (T) or distribution (D) or if an operator holds licenses in both disciplines of the same level it is often referred to as a system license. All fees and renewal requirements are based on the person not the number of disciplines. If a person holds a license in both categories the renewal requirements for the higher level must be met. Table 2 describes the breakdown of licensed operators and their respective disciplines. There are 1077 persons holding an active license, 86 persons with an inactive license that may be renewed within 2 years, a total of 1163 licensed persons. In 2015,

61 licensed persons permanently expired. This number does not include deceased persons but may include retired operators. Added to Table 2, in the interest of looking into the future, are persons who also hold OIT licenses. OIT may not be in responsible charge but have shown the water system or future employers their capability to pass the examination while they are gaining appropriate experience. Often times an individual will hold a full license of a lower level and an OIT license in a higher level while attaining experience.

<b>Table 2. Licensed Operator Classification</b>			
<b>Category of License</b>	<b>Number of Active Licenses- 1077 persons</b>	<b>Number of Active OIT Licenses- 23 persons</b>	<b>Number licenses not renewed in 2015 total persons 86</b>
Very Small Water System	237	0	26
Class I Distribution	166	3	13
Class I Treatment	159	4	7
Class II Distribution	279	6	9
Class II Treatment	260	2	8
Class III Distribution	138	1	5
Class III Treatment	113	0	3
Class IV Distribution	214	3	6
Class IV Treatment	203	4	5

### **3. Operator Qualifications**

Maine operators are evaluated on education, experience and job task knowledge measured through successful ABC examinations. Operators must have a high school diploma or equivalent. Relevant post-secondary education may be used for up to two years' credit toward experience. On-the-job experience may be in a water system or prorated for related professional experience. The level of license is not dependent upon experience in same level of system. OIT licenses are available for all levels of operators. The OIT license requires maintenance through continuing education just as a standard license. An OIT licensee has up to 4 years to complete required experience. Certification from the OIT licensee and the employer(s) is required to obtain full licensure. The number of persons using OIT option seems to be lessening at the entry level but remains stable for individuals at higher levels gaining experience.

#### **A. Operator Preparation**

Preparation classes are held by independent trainers and several large utilities are developing in-house as well as hiring established trainers for in-house presentation of preparation classes. Due to the availability of exams through computer based testing, preparation classes may be offered throughout the year. Maine's Capacity Development set aside established a Capacity Development Training Reimbursement Fund that reimburses trainers for class attendance for approved classes. This has allowed trainers to market directly to systems as well as hold traditional classes. The reimbursement is \$20/TCH/student for exam preparation classes with a maximum of \$3000 reimbursement to trainers for multi-day classes. In 2015, 14 classes were held with 138 attendees.

Maine maintained a lending library of self-study materials originally funded through the Operator Expense Reimbursement Grant. Due to continual examination availability and a lower rate of return the library is short on books. Efforts are being made to collect the books if this is unsuccessful this benefit may cease to exist in the near future. At this point in time Maine has stopped advertising this resource due to lack of materials being returned.

On-line and CD based training. The 2005 Operator Basics CD and online training was a great help to VSWS and Class 1 operators. During 2015 this became unavailable. This is a great loss to Maine systems and we have not found a free study process available and equal to the Operator Basics 2005. Many operators liked the clarity of the lessons and the practice of problems helped many overcome the fears of math or computers. Maine used this CD not only for new operators but also allowed credits from it for license renewals.

During 2015 one Maine based training provider developed an on-line Class 2 course. This course allowed for a 10 week study time and the instructor was available for questions throughout the course of study. This course ran continually not as a specific time. There was an expensive fee process to enable the course and the offering was discontinued. New for fee courses from this provider have been found.

## **B. Examination Options and Success Rates**

Maine holds an agreement with ABC for the purchase of paper exams. Due to the smaller number of paper exams given, a purchase contract is not necessary. Fifteen paper tests were given in 2015. These exams were proctored in Presque Isle due to the time and distance needed to have operators take computer-based exams. Paper exams are also available for persons demonstrating a need for reading comprehension assistance or who are uncomfortable with computer based exams.

ABC also holds an agreement with Applied Measurements Professionals (AMP) to proctor computer based testing (CBT). AMP offers CBT in Portland and Holden, Maine. Maine tests may be taken at these locations or any AMP location in the United States and Canada. The availability has brought about many improvements to the program especially in recruitment of operators.

Examination record-keeping has moved to an all-electronic basis. Operators receive results and mastery reports when they take the exam. Examination reports are submitted to the licensing officer monthly and kept in this electronic format. No personal results are filed by the operator until a license application is received. The certification program maintains the electronic report but does not enter the information into the operator's record until a license or an upgrade is applied for. An operator's record will contain no failed exams.

Since exams are given on an individual basis it is more difficult to track overall concepts that need reinforcement. Examinees are encouraged to read, understand and ask for assistance with topics reported to them as not mastered. This can lead to trainers concentrating on these topics not only for exam preparation but on continuing education. The reporting process makes it much more difficult to address topics examinees have difficulty with as a group in order to inform trainers of topics that need more attention.

The number of exams administered in 2015 was 205 of which 15 were paper; 119 exams were successfully passed. The overall average score was 50 and the overall pass rate was 58%. The pass rates for VSWS, Class I D, 1T and Class 2 D were 72%, 84%, 82% and 72 % respectively. All others were below a 70% pass rate. The Class 2T exam is experiencing lower pass rates than in the past.

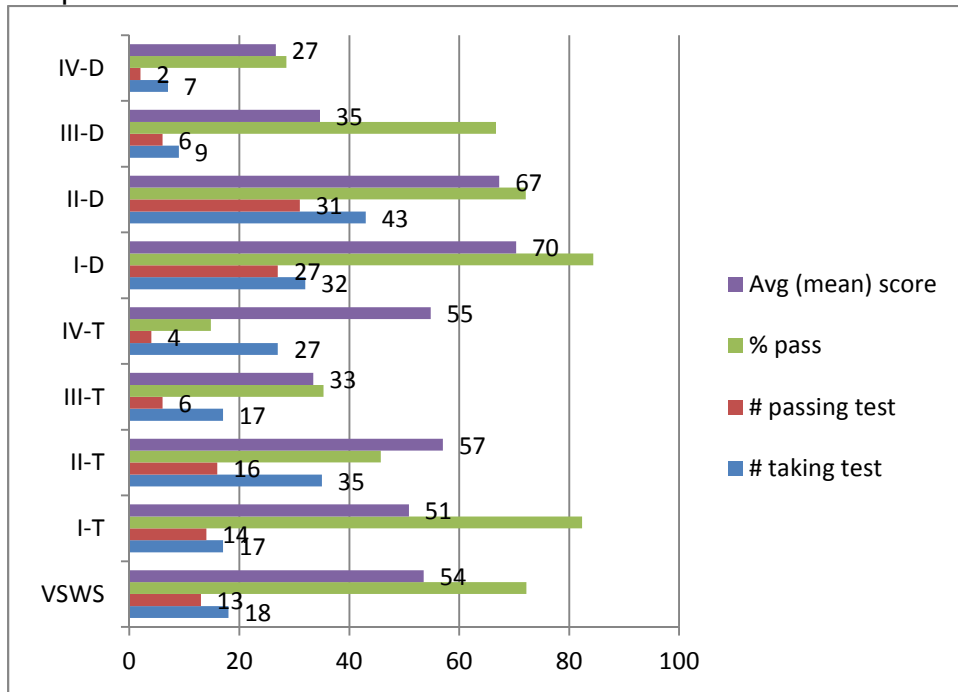
There are several possible reasons for lower pass rates. Examinee preparation may have turned to more self-study. Preparation classes are not as frequent as in the past due mostly to the provider's expense to prepare and conduct these classes and little financial support to off-set the higher cost. The low average scores may represent poor preparation. An analysis of exam pass rates and class attendance was not done in 2015.

Table 3 Average Test Scores 2015

VSWS	I-T	II-T	III-T	IV-T	I-D	II-D	III-D	IV-D
54	51	57	33	55	70	67	35	27

Maine does not have a waiting period between tests or an application review process to sit for an exam. There is no control over who can take an exam, how many times an exam may be taken and there is no sequential requirement. Graph 1 illustrates the pass rate of various levels of exams. All statistical results must take into consideration the small sample set Maine examinees represent. ABC usually distributes national numbers which would represent exam appropriateness more than just Maine results.

Graph 1



## 4. Enforcement

### A. System Compliance

System compliance with operator requirements is measured by documentation of persons in responsible charge recorded in SDWIS and assurance of up to date active licenses recorded in SWOCS. This process flows through several DWP teams. Operator compliance changes with retirements, newly found systems and seasonal system activity. Systems are normally given five days to secure an operator when DWP learns of the lack of an operator in responsible charge.

In the mode of operator licensing; renewals are due December 31<sup>st</sup> with a 60 day grace period. The grace period was established to allow operators to achieve required TCH and submit documentation for late year training. Often times though operators are listed as in responsible charge and do not intend on renewing a license, most often due to retirement. System communication with DWP often fails at this point. The staff changes are usually found at the end of the grace period with communication that the licensee has not renewed the license. A date that reflects the lowest point of compliance due to valid operator licensing is March 2<sup>nd</sup> after the grace period ends.

Another factor in the December 31<sup>st</sup> date is that seasonal systems are not in operation and often the operator or contract to operate is not in place. Systems are required to have an operator before starting up. The Board is reviewing the 60 day grace period for a number of reasons this is one of them.

Maine requires that each system have a minimum of one licensed operator that hold both Treatment and Distribution licenses at the same level as the system is classified. This operator is referred to as the Primary Designated Operator. Systems may have more than one appropriately licensed operator in responsible charge of treatment, distribution or both. These operators are referred to as Designated Operators and may make water quality and quantity decisions. Unlicensed or under- licensed or Operators-in-Training may not make decisions and must follow established Standard Operating Procedures established by a designated operator.

Table 4 details the number of PWSs that are affected by the State of Maine’s Operator Certification Program for 2015. In summary, the three NTNC systems are in the process of obtaining an operator, one is a consecutive system to a municipal system. The transient surface water system without an operator is a seasonal system. The system is very good at obtaining an operator that actively participates in operations, while the system is serving water to the public. An Operator was obtained before start-up in spring 2016.

<b>Table 4 Systems in Compliance Summary 2015</b>			
<b>System Type</b>	<b>Number of PWS</b>	<b>Number of PWS with licensed operators</b>	<b>Percentage in Compliance</b>
Community	365	365	100
Non-Transient, Non-Community	366	363	99.2
Transient*	21	20	95
<b>Total</b>	<b>752</b>	<b>748</b>	<b>99.46</b>
* Transient systems on surface water only.			

Documentation of compliance with operator requirements begins with the PWS submitting a Designated Operator Form (DOF) signed by the operator and the PWS owner. The DOF is the control point to connect a licensed operator with a PWS. The updating of operators associated with systems is an ongoing process performed by the operator licensing staff. Operators and PWSs are expected to notify DWP of changes and the majority does. The DOF also serves as an acknowledgement by the operator of the acceptance of responsibility and by the owner of delegation of tasks determined to be “water quality and quantity” related that should be under the operator’s supervision. Operator qualifications and system requirements are confirmed and the Point of Contact is recorded in SDWIS. Licensing staff are responsible for data accuracy, filing and timely reporting. When completed, DWP staff is informed by email of the changes at a PWS. When an operator is no longer responsible for a system the process is



similar but no form is necessary. Communication remains the same. On a monthly basis DWP Information Management Team (IMT) produces queries to summarize designated operator changes at systems. Some PWSs or operators may fail to report changes. These systems that fail to self-report are found during annual queries, biennial operator renewals and sanitary surveys done on a 3 year for community and 5 year for non-community basis.

System compliance with operator requirements is handled by the Field Inspection Team (FIT) from IMT query notifications of removed and added designated operators. FIT staff review IMT notifications to assure systems have one designated operator, now referred to as the Primary Designated Operator. Systems needing a designated licensed operator are required to immediately hire a contract operator or have a qualified operator in responsible charge of water quality and quantity decisions. The 2015 compliance numbers are based on each system having one licensed operator

New systems or those found to be in need of licensed operators are referred by FIT to operator licensing staff for assistance in becoming licensed or finding a contract operator.

## **B. Operator Compliance**

During 2015, DWP staff used their professional judgement if a violation placed on the system can be attributed to operator competency. If so the DWP pursues a complaint against the operator to the Board. The Board then determines if the issue is under their jurisdiction and hears the complaint.

Since the development of the DWP policy (2013) to address an operator's failure to perform duties satisfactorily, the Board has received three complaints from the DWP. Pertinent documents are included in Appendix B.

By statute the Board has three reasons to suspend or revoke a license: MRS Title 22 Chapter 601 Paragraph 2625

“The board may suspend or revoke a license of a certified operator when it is determined that the operator has practiced fraud or deception; that the operator has been negligent in that reasonable care, judgment or the application of knowledge or ability was not used in the performance of the operator's duties; or that the operator is incompetent or unable to perform the operator's duties properly.”

Board policy includes a list of Offenses Providing a Basis for Enforcement Action, copy in Appendix B. These actions can fit the above reasons to suspend or revoke. The complaints submitted by DWP were based on system compliance with DWP Drinking Water Rules and an opinion by DWP that the operator appeared negligent in following these rules. The need to assure a separation of rules pertinent to various parties showed Board policy and Rule in need of review and possible revision to more adequately detail circumstances leading to a need to correct operator behavior. The Board sought the advice from the Maine

Attorney General's office, see Appendix B. The Board is actively revising the Policy and Procedure for Filing a Complaint against a Water Operator. The final revision will be included in the next annual report.

The Board heard 2 of the 3 complaints in 2015. Both were for negligence of the operator in assuring system compliance with DWP rules and both operators received letters of reprimand with no suspension.

## 5. Certification Renewal

Maine requires relevant continuing education training for the two-year license renewal period according to highest level of license held. Training is applied to both disciplines of licensure.

Relevant training is defined as:

- The training shows a direct link to water quality, water supply, or protection of public health; **and**
- The training is relevant to managing the operation or maintenance of public water systems; or
- The training is relevant to the operation or maintenance of public water systems.

Trainers are becoming very conscientious of reporting attendance to the Board for license recordkeeping. Although this is a year-long task in small pieces it assures 100% compliance with TCH requirements and expedites the renewal process. Operators can refer to a TCH report on the DWP website to check their record on file with the Board. They may submit training attended throughout the year also.

It is desirable to have an automated process both for continuing education tracking and for the renewal process. On-line payments are being pursued with the intention of being in place for the 2016 renewal cycle. Automation of attendance is used by some training organizations. Compatibility of the electronic reports needs to be investigated. On an annual basis over 10,000 hours of training is expected of water operators.

### A. Training Providers

Maine training providers present excellent training to operators. Operators participate in surveys, workshops and serve on committees to address training needs. Regulators also address needs according to compliance and field experiences. This participation assures training topics are pertinent to needs and timely to advances in the profession. Renewal requirements do not allow for the same topic to be taken twice in a renewal period so operators must have a variety of topics in the two year cycle. In 2015 there were 83 new and different training opportunities were approved for TCH. This included classes, conferences, seminars, webcasts, online training and in-house (utility) training.

There is still a need for very small water system, VSWS, operators to find reasonably priced available training. These persons operate small community systems such as mobile home parks or apartment houses; often this is not their primary occupation. Others work for schools and businesses where the training is during business hours making attendance difficult. By the nature of these systems they are not near larger populations where the training is held. Online training and CD courses are requested by many operators. EPA and partners have made free webinars available for small systems. Again these are during the work-day and the VSWS operator is seldom able to attend. On-line training available in the evening or at the operator's convenience worked well for the AWWA, RCAP and EPA funded training. The RTCR topic was very useful. This path could be continued and enhanced.

Present training costs vary but could be \$15-\$50 per training hour for in-person courses and on-line training might be \$50-\$125 per hour per person. Webcast training is improving as far as participation tracking is concerned. Advertisement lead time for many webcasts is too short to have training providers develop a proctored site and potentially a discussion forum related to the topic.

Capacity Development Funds were used to supplement continuing education training in a defined set of topics (Appendix C). The funding process of reimbursement to the provider for attendee hours earned has reinforced the need for providers to have a good business plan for developing, planning, locating and facilitating training services. The funding is open to all providers offering accepted relevant training on annually selected topics. Topics are determined by DWP staff and the scope is technical, managerial or financial capacity. This has worked much better than a contract process awarded to one provider. The program in its fifth year is used by many providers. The process also facilitates the submittal of attendance forms in a timely manner.

## **B. Renewal Database**

The Safe Water Operator Certification System, SWOCS, program is in the ninth year. SWOCS performed well during 2015. Global Environmental Consultants, GEC, addressed issues that minimized TCH rounding up for inaccurate credits. GEC will also work with DWP in the online licensing process. An issue affecting less than 2 dozen operators was solved. These operators could not be updated in SWOCS, allowing for no TCH record, renewal of licensure etc. Once corrected, no additional issues have been identified.

## **C. Workforce Forecast**

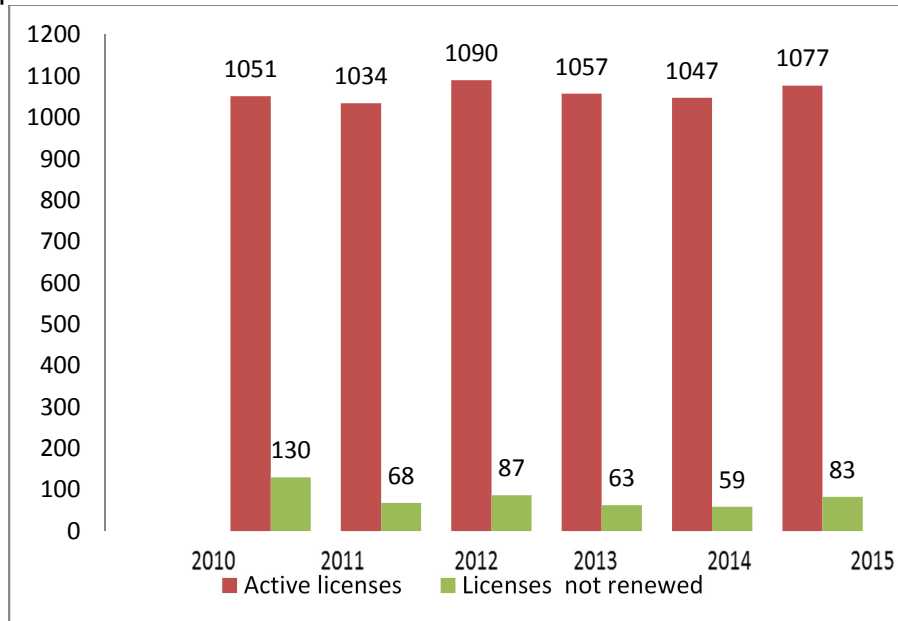
There seems to be an uptick in persons interested in the water profession. Many of these are young persons out of college with environmental backgrounds. Some persons are retired or changing from another profession. Some have positions in

the field; others are taking exams and getting licensed to show their qualifications to perspective employers. This is all good news. The veteran sector appears to be under represented. Discussions with the local Veterans Administration have continued.

Maine operators are retiring at a fairly constant rate. With a six year average of un-renewed licenses at 81, the reason for not renewing varies. The result to the profession however is the same. Many operators leave the field for another profession or the system hires a contract operator, as is the case with many small systems. Many retiring operators maintain their license. There are also many licensed operators that maintain their license but do not work directly in the field.

Below is a graph of active operators and non-renewed operators for the years 2010-2015. Many of these have retired.

Graph 2



## 6. Resources Needed to Continue the Program

- The Board is reviewing licensing fees and strongly supports that fees cover time required for DWP staff to perform licensing tasks. Continued financial support provided by license renewal fees will need to cover the half time clerical position. The Licensing Officer position is funded through SRF Operator Certification funds. Efficiency of tasks while maintaining and improving the level of service are the Board's policy and DWP goal. Efficiencies will allow for cost savings to hold fees in check. Online renewal may improve the efficiency of many tasks. Development of electronic attendance reporting would also be an improvement on task energy.

- Quality training and at a low cost is very important to the sustainability of reliable and knowledgeable workforce. EPA funding provides basic training and has been well received. Increased communication to operators with an adequate lead time for planning and reminders of training offerings will assist in these efforts to reach operators. Continued use of the Capacity Development Grants for training will also assure higher level topic availability. This also assures operators are up to date on newest technologies and regulations.
- Training directly for VSWS operators and often owners that is low cost, free and possibly on-line would benefit these operators and make the renewal process much more efficient. This remains an underserved population for training.
- Streamlined or multi-program training approval would assist in time savings for the licensing officer and assure quality training. ABC has developed such a program but it has not yet been used by trainers that offer training to multiple agencies or been widely used by certifying authorities. If states could agree on some relevant training topics and parameters for the trainers, it is feasible that on-line training could go through such a process. A trainers fee could support such a process; application to one organization and receive multi-agency approval. This would be a good resource to develop.

## **7. Staff**

The dispersal of tasks throughout the DWP program has enhanced the operator licensing program and increased the understanding of DWP and Board operations between the entities.

The Licensing Officer, Teresa Trott, no longer serves on the Board. The majority of Board tasks are completed by Board Clerk Julia Kimball. Roger Crouse, Drinking Water Program Manager has returned to the Department of Health and Human Resources seat on the Board. Julia Kimball began the 50% FTE clerical position in July of 2015 and has taken on more tasks throughout the year. These tasks include general operation of the Board, approval of training for relevancy credits, communication with applicants or systems concerning finding a contract operator, becoming an operator, maintaining and upgrading a license. Julia also assures system designated operators qualifications match system operating categories. Julia is funded through Water Operator Board licensing fees for 50% of her salary. Teresa Trott as the Licensing Officer remains involved in policy, rule and statute review and development to assure consistency between Board and DWP actions. Fifty percent of Teresa's salary is funded through the DWSRF.

The team structure continued to support Operator Certification Program throughout 2015. Field Inspection team members (9) communicated with systems concerning operator requirements. The time delay for systems to have an operator on record has greatly diminished with the assistance provided by field inspectors. The Information Management Team created sub routines between databases that

improved tasks and the associated efficiencies. Team members provided assistance prior to hiring of Julia Kimball and this provided opportunity to review task processes and develop quality control points. The Water Resources Team supports the Operator Licensing program through website access and capacity development initiatives. Teresa is a member of this team.

## **8. Stakeholder Involvement**

- The Board met four times in 2015. Three Board vacancies, the Engineer, System Management and Non-Transient -Non-Community representatives were filled in 2015. The Board membership consists of very experienced operators even though most of the Board has only begun serving three-year terms.
- No members attended the 2015 Association of Boards of Certification Annual Conference.
- The Operator Licensing Officer serves on several committees to help develop training courses and increase small water systems capacity. Association of State Drinking Water Administrators – Small Systems Committee, EPA Operator Re-energizing Committee, New England Water Works Association, Operator Certification and Education Committees, Maine Joint Environmental Training Committee, Maine Water Utilities Education Committee. Participation increases the observance of other state practices and helps to inform the Board of practices. The Board in-turn develops goals to achieve best practices.
- The Board updates operators regularly through the *DWP Service Connection* quarterly newsletter and website.
- The Board continues to review policies to assure that alignment with rules and DWP initiatives.
- The licensing officer participated in training planning opportunities with Maine Rural Water Association, Rural Community Assistance Partnership and Environmental Finance Center to assist in state-wide training opportunities funded through EPA grants.
- The training calendar continues in electronic form on the website only. Trainers are requested to put any training on the calendar they wish to advertise. Training that is funded in whole or in part with DWP funds must be advertised on the calendar. Many operators call with questions about training. Hard copies are available by request.

## **9. Program Review**

- Through the training process of Julia Kimball as a new employee SOPs and data processes were reviewed. In the data review process tracking of decision making was reviewed to show the importance of completing steps and recording information. A Quality Control process which included oversight by the Information Management Team of DWP was developed for license renewal.

This helped to catch errors and show the importance of data integrity. These processes not only improve water operator licensing but will also improve Well Driller and Site Evaluator licensing performed at the DWP.

- Although not a complete review much was also accomplished as paper records were transferred to electronic information and put into electronic document retrieval process. Some errors were noted and followed up to correct.
- The Board fees continue to be closely watched. With no fees from examinations; licensing fees must carry the expenses mid-way through the following fiscal year without replenishment. The Board operates on a July- June fiscal year, receiving most funding in December. Clerical efficiencies while maintaining high customer service remain top goals. State level initiatives are for zero-based budgeting, cover only the cost of services with little or no carry-over from year to year.
- The Training Contact Hour policies and training approval process continues to work well. Approval process is smooth but continues to be time consuming. The attendance process works well but again has opportunities for electronic improvements. The SWOCS program has become more dependable.

## **10. Planned Activities Update**

- At this writing the Maine Center of Disease Control and the Maine Drinking Water Program are undergoing reorganization. Teresa Trott will be working more closely with rule administration. This will limit the time devoted to operator certification. Investigation of complaints will be performed by other DWP staff; System compliance with operator requirements will be performed by Public Water System Inspectors in much the same way as previously. Julia Kimball, Board Clerk will take on more responsibilities in the day to day operator information needs, training approval and record keeping.
- Policy and Procedure Review  
While program efficiencies remain drivers for fiscal reasons, customer service is seen as an opportunity to implement many of these efficiencies. On-line license renewal and payment by credit card will be best put into place with accurate up-to date TCH tracking. Online renewal will need assistance from State of Maine Office of Information Technology, ME-OIT and SWOCS programmers, GEC. On-line renewal is actively being pursued.

The Board and DWP will continue work on operator competency as related to system violations.

Due to the many changes in task re-organization all procedures will be reviewed to assure they are efficient and accurate. Board policies will also be

reviewed not only for the education and clarity for new Board members but to include those members insight into the policies.

- Funding for Training

SRF Capacity Development Training Reimbursement Fund, \$100,000 per fiscal year was established to assist in funding operator training and will continue. The 15% Capacity Development Grant funds this program. The Capacity Development Coordinator, Sara Flanagan will manage the funding of funded training programs in cooperation with Board approval of courses. Trainers develop classes and request funding to be “set-aside” until the class is completed. The attendance and length of class determines final funding. Trainers are reimbursed for all operators or utility employees attending the training \$20 per Training Contact Hour. Trainers take advantage of the program for operator exam preparation courses as well as topics selected annually by DWP staff to increase capacity in topics commonly seen by inspectors. These funds are usually dedicated many months before the end of the fiscal year.

The Board's funding is based on licensing renewal fees and the tasks associated with maintaining the licensing program. There are no budgeted amounts for training of operators.

The 2015 EPA funded training brought valuable training to operators and systems. Attendance has improved. The webinar based training still has a very short notice to get to operators. It would be good to see details on cost of training per operator or per hours of training received. Competition is good for the industry. Free training is good for the operators. On-site basic training is covered in Maine by Maine instructors. Training operators is these instructors' profession, they have established clients. It is difficult for EPA contractors to compete with the local providers and local providers are not happy competing with free training.