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**North Carolina
Water Treatment Facility
Operators Certification Board**

March 30, 2016

THE HONORABLE FLETCHER HARTSELL
THE HONORABLE JONATHAN JORDAN
COMMITTEE COCHAIRS
JOINT LEGISLATIVE ADMINISTRATIVE PROCEDURE OVERSIGHT COMMITTEE
545 Legislative Office Building
300 North Salisbury St.
Raleigh, NC 27603

Dear Senator Hartsell and Representative Jordan:

Today, I write representing the NC Water Treatment Facility Operators Board of Certification (NCWTFOCB) regarding the draft Bill to Amend APA/Sunset Occupational Licensing Boards (Bill Draft 2015-TQz-40), page 19, Part VII, Section 28. At the meeting of the NCWTFOCB on March 24, 2016, the Board voted unanimously in opposition of consolidating the NCWTFOCB with the Water Pollution Control System Operator Certification Commission and/or the On-Site Wastewater Contractors and Inspectors Certification Board. The NCWTFOCB believes that the consolidation with these other two boards will affectively dilute the oversight and the protection of the drinking water and public health of the citizens of the great State of North Carolina.

In light of the major drinking water crisis in Flint, Michigan and the public outcry that followed, now is not the time to demonstrate such a lack of concern for drinking water in North Carolina. Currently, the public drinking water industry is under the intense scrutiny of the media, our legislators in Washington DC, and the entire country because of Flint, Michigan. Is this consolidation and dilution of oversight by peers in the water industry actually going to be good in the eyes of the media? Would it increase the public health relating to drinking water in North Carolina? The answer to both questions is NO.

Combining the NCWTFOCB with the other two boards will dilute the knowledge of water systems and operations amongst a more diverse board that would include members with little to no knowledge of drinking water standards or operations. Additionally, it will cause water systems and operators in North Carolina to lose the representation as defined in NCGS 90A-21(a). Currently, the eight gubernatorial appointed members all come from a diverse background that volunteer to serve the State with a wealth of knowledge and experience in the water industry. This knowledge base is not something that the citizens of North Carolina deserve to lose.

As of December 1, 2015, the NCWTFOCB oversaw more than 7,760 current certifications held by 5,519 citizens of the State. We also oversee 7,413 water treatment or distribution facilities. In 2015, we had 365 vendors teaching courses for either new certification or professional growth hours. Also in 2015, the

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NCWTFOCB administered 1,574 exams. All of this was done with minimal, if any, tax dollars being used. Certification activities are supported by operator fees generated by the program (as per 15A NC Administrative Code 18D .0304). The program does not receive money from the general fund nor does it regularly receive federally appropriated funds. Fee receipts are used for a variety of purposes, including salary support, IT services/software development, capital equipment, and expenditures associated with trainings and examinations administered throughout the state. Therefore if consolidated, there would be minimal savings to the taxpayer.

However, if required to consolidate, there will be a cost with the major rule change that would be required to merge the General Statutes of each board and the issuance of new certificates to all operators. Please realize that the NCWTFOCB works closely with NCDEQ-Public Water Supply Section and the Rules Governing Public Water Systems, NCAC Title 15A, Subchapter 18C, Section .0100 through .2200. This section of the NCAC contains 350+ pages of administrative code that would have to be understood by representatives of the Water Pollution industry and On-site Wastewater Contractors & Inspectors Industry.

Please do not lose sight of the importance of the NCWTFOCB's oversight of our certified water operators and water systems. Remember that each of these Boards have different, but important objectives and each deals with many issues. A combined board of all 3 would have to include representatives of municipal and industrial water treatment, animal waste disposal, and on-site treatment, which includes septic tank installers and inspectors. Are these the people who you want to make decisions pertaining to the WATER the public drinks?

In closing the NCWTFOCB asks that you eliminate their inclusion in the consolidation with the other boards from page 19, Section VII, so that we may continue to protect the health of our citizens through oversight of our water systems and certified operators in North Carolina. If you would like to learn more about the NCWTFOCB, please review our latest report to the Governor's Office and EPA which can be found on the Certification Board's website.

Sincerely on behalf of the NC Water Treatment Facility Operators Board of Certification,



Danny Sloan
Chairman of the Board

CC: N.C. JOINT LEGISLATIVE ADMINISTRATIVE PROCEDURE OVERSIGHT COMMITTEE MEMBERS