



Association of Ohio Metropolitan Wastewater Agencies
Brian Gresser, President
S.B. 246 Proponent Written Testimony
Before the Senate General Government and Agency Review Committee
December 8, 2020

Chairman Schuring, Vice Chair Rulli, Ranking Member O'Brien, members of the committee, thank you for the opportunity to present written testimony on behalf of the Association of Ohio Metropolitan Wastewater Agencies ("AOMWA"). My name is Brian Gresser and I serve as President of AOMWA and work for the City of Akron as Manager of Water Reclamation Services. AOMWA supports Senate Bill 246, which will enhance reciprocity in a variety of professional licensing and certification laws in Ohio, and requests a modification of the bill language to apply the reciprocity provisions to wastewater treatment systems. We understand that our opportunity to amend Senate Bill 246 may be limited at this point in the process and provide our comments for consideration to this bill or future iterations of the legislation.

AOMWA represents the interests of Ohio's public wastewater agencies, serving more than 4 million Ohioans and successfully treating more than 300 billion gallons of wastewater each year. AOMWA members include Akron, Avon Lake, Bowling Green, Butler County, Canton, Columbus, Dayton, Fairfield, City of Hamilton, Hamilton County, Lancaster, Lima, Marysville, Metropolitan Sewer District of Greater Cincinnati, Middletown, Newark, Northeast Ohio Regional Sewer District, Portsmouth, Springfield, Wadsworth, and Warren. The fundamental purpose of our organization and its members is to protect the water resources on which Ohio's communities depend.

As a result, AOMWA has a great interest in promoting an operator certification program that ensures treatment systems have both (1) a sufficient pool of certified operators to run Ohio's wastewater treatment systems and (2) a sufficiently *qualified* pool. Many wastewater utilities face challenges in both recruiting and retaining certified operators. AOMWA expects these problems to grow more severe as the bulk of certified operators are nearing retirement age, causing the already-limited supply of certified operators to decrease.

In light of the shortage of available wastewater certified operators, S.B. 246 presents a unique opportunity to promote reciprocity to the benefit of a wide variety of municipal entities. The current version of S.B. 246 already includes reciprocity for certified operators in drinking water treatment systems (see page 767 of 777 of the 7th version, R.C. 6109.04(E)). AOMWA respectfully requests that a similar modification be made for wastewater treatment systems as well.

In particular, AOMWA requests that the Committee modify S.B. 246 to promote reciprocity associated with the Association of Boards of Certification ("ABC") Operator Certification Program. ABC is a national, standardized system for evaluating and certifying operators of wastewater treatment systems. In Ohio, the applicable rules impose unnecessary restrictions on reciprocity for operators who have been certified through the ABC system. See OAC 3745-7-13.

First, Ohio should also grant reciprocity to Class I, II, and III ABC certification levels. By way of background, depending on the size of the treatment system, additional levels of certification are required to operate the system. See 3745-7-02(A)(2). (Class A is the most basic level, followed by I, II, III, and

IV). For at least Classes A, I, II, and III level certified operators, Ohio should grant reciprocity to operators who have achieved these classifications in other states through the ABC certification program.

Second, even when an out-of-state certified operator has taken and passed a written examination through ABC, under current Ohio law, a “council” of individuals will review each national standardized test that was passed to ensure it is equivalent to each of Ohio’s own tests. See OAC 3745-7-13(B). Yet wastewater treatment does not vary sufficiently state-to-state in a manner that would justify this restrictive approach.

By permitting an ABC-certified operator to be granted more open access to certification in Ohio, Ohio law could significantly expand the pool of available certified operators to the benefit of many large, medium, and small Ohio wastewater utilities. AOMWA has proposed amendment language to include wastewater treatment systems to the legislation, but our support of the intent behind S.B. 246 is not contingent upon inclusion.

Mr. Chairman, members of the committee, your attention and consideration in this matter are very much appreciated.