



These photos show onsite training in 2019 that are typical of training sessions provided by KRWA. Onsite training has been limited in 2020 due to the risks associated with COVID-19; however, KRWA has provided online training and is planning for expanded onsite training to resume as soon as possible.

KDHE Proposes Changes in Operator Certification Requirements

The operator certification program in Kansas has a long history beginning many years ago as a voluntary program. In fact, the very first water operator training in Kansas was done in 1920; the first exams were given in 1954. Many operators across the state chose to participate in the program but a larger number of operators did not. Because of new rules promulgated by the Environmental Protection Agency (EPA) in the 1970's in both water (Safe Drinking Water Act) and wastewater (Clean Water Act) it was felt that all systems needed a certified operator with the proper training and that only a mandatory certification program would accomplish that.

A mandatory operator certification program began in Kansas 1975 as a result of laws passed by the Kansas Legislature. The law requires all public water supply systems and public wastewater treatment facilities to be under the supervision of an operator certified by the Kansas Department of Health and Environment (KDHE). The program currently in place has not changed all that much since being implemented. The only exception was in 2001 when the EPA issued mandatory program requirements for drinking water that required operators to have a high school diploma or GED.

For years, operators who operate groundwater systems and who are Class III or Class IV operators because of their system's population, have been concerned and have commented about being required to take examinations designed for surface water systems. As a result, KDHE has been lobbied by KRWA and others to develop a separate set of exams for groundwater and surface water system operators. After several committee meetings with various stakeholders, KDHE reviewed and considered all comments and has developed a new operator certification proposal. The proposal does not contain groundwater and surface water classes for all levels of certification because KDHE found it to be not workable from an administrative point of view. The plan has a maximum certification of Class II for groundwater and Class IV for surface water.

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KDHE now proposes to add a new certification class for distribution systems, separate from the treatment classifications. Small Systems with a population of less than 501 that provide treatment to their own source will only need the treatment class certification but will not be required to obtain a Distribution System Certificate – but all others will. The result is that a large number of operators will be required to take another examination and attend more continuing education.

The changes also include the following:

1) Applications with supporting documentation must reach the KDHE 30 days prior to the test, a change from the present two-week requirement.

KDHE notes that two weeks is not enough time to properly screen the applicants;

2) Each applicant shall attend department-approved training before taking the examination;

3) Training to retain certification has not changed for Small Systems (5 hours every two years) and Class I and II (10 hours every 2 years) but Class III and IV will require 15 hours every 2 years;

4) Operator-In-Training certificates will be valid for 18 months, a change from the previous 12 months;

5) Contract operators and system owners hiring contract operators will have more responsibilities, including record keeping;

6) Proposed regulations will allow anyone (non-operators) to take the examination. Requirements to take the examination are the same as for operators. Provisional

Water Supply Systems: Current Classification

As of January 2021, there are five certification classes from Small System to Class IV in the Kansas Public Water Supply program. They are as follows:

- ◆ Small System – Distribution only serving all populations or chlorination of groundwater only serving a population of less than 501;
- ◆ Class I – Chlorination of groundwater only serving a population from 501 to 1,500 or treatment of groundwater serving less than 501;
- ◆ Class II – Chlorination of groundwater only serving 1,501 to 5,000 or treatment of groundwater serving 501 to 2,500 or treatment of surface water serving less than 2,501;
- ◆ Class III – Chlorination of groundwater only serving 5,001 to 20,000 or treatment of groundwater or surface water serving 2,500 – 10,000;
- ◆ Class IV – Chlorination of groundwater only serving more than 20,000 or treatment of groundwater or surface water over 10,000.

Note: Treatment includes iron and manganese removal, membrane filtration, softening, coagulation, sedimentation and filtration, re-carbonation, and addition of chemicals other than chlorine for improved water quality.

Proposed Water Supply Operator Classifications

| Treatment/Class | Description | Population Served |
|-----------------|--|-------------------|
| *Small Systems | Chlorination (Free Chlorine, not gas) GW | < 501 |
| **Class I | Basic Treatment of Groundwater | All |
| ***Class II GW | Advanced Treatment of Groundwater | All |
| Class II SW | Treatment of Surface Water (SW) | < 2,501 |
| Class III | Treatment of Surface Water | 2,501 – 10,000 |
| Class IV | Treatment of Surface Water | > 10,000 |

| New Distribution Class Certification | Population Served |
|--------------------------------------|-------------------|
| Class I | 501 - 1,500 |
| Class II | 1,501 – 15,000 |
| Class III | 15,001 – 50,000 |
| Class IV | ≥ 50,001 |

Public Water Systems that purchase treated water will not be required to have a treatment certification, but will be required to have a distribution system certification based on population served.

- * Small Systems and all systems under 501 population do not require Distribution Certification
- ** Basic treatment of Groundwater (GW) includes gas chlorination, chloramination, corrosion control, pressure filtration, slow sand filtration, and/or fluoridation.
- *** Advanced treatment of Groundwater is any treatment not included in the Class I basic treatment.

certificates will be issued to those passing the examination. Provisional operators will be issued an operator certificate with the appropriate experience.

KDHE has a goal to have the new regulations adopted by the end of 2021.

The proposed changes in wastewater classifications are not as significant as those for water systems. The only major change is with secondary mechanical treatment facilities. The current program includes facilities with less than 1,000 population in the Class I category. The proposed program moves all of those facilities into Class II and above. The wastewater treatment facilities classifications are as follows:

- **Small Systems** – includes non-discharging waste stabilization lagoons serving all populations;
- **Class I** – includes discharging waste stabilization lagoons serving all populations;
- **Class II** – includes any secondary mechanical treatment facility serving less than 5,001;
- **Class III** – includes any secondary mechanical treatment facility serving 5,001 – 25,000 or advanced or specialized treatment facility of less than 5,001;

- **Class IV** – includes any secondary mechanical treatment facility serving over 25,000 or advanced or specialized treatment facility over 5,000.

Advanced or specialized facility means a facility that utilizes selected biological, physical, or chemical separation processes to remove organic and inorganic substances that resist conventional treatment practices including the nutrients nitrogen and phosphorus. Chemical, physical, or biological nutrient removal processes to meet NPDES permits with nutrient reduction limits shall be considered advanced or specialized treatment.

Training, training, training . . .

Training is an important part of the operator certification program. Operator training has been a primary function within the Kansas Rural Water Association (KRWA) since 1976. KRWA and other providers in Kansas will continue to provide the training needed to prepare operators to take the examinations along with allowing certified operators to obtain continuing education as required by the KDHE. But training is not just to help operators pass an exam. KRWA training sessions also help provide the lion’s share of information concerning new technologies and methods to local utilities.

The KRWA website (www.krwa.net/training) contains a schedule of training and study guides (<https://www.krwa.net/TRAINING/Online-Activities>) to assist operators as they prepare to take a certification exam. Another training opportunity available is the KRWA apprenticeship program which was recently introduced. KRWA has partnered with the National Rural Water Association to develop this program and anyone interested can log onto the KRWA website at: <https://krwa.net/> or go to the following links:

- <https://krwa.net/TECHNICAL-ASSISTANCE/Apprenticeship-Program>
- <https://krwa.net/TRAINING/Schedule-Register/c/training>
- <https://krwa.net/TECHNICAL-ASSISTANCE/Downloads>

The KDHE website contains both training and testing schedules along with a list of training providers. The links are as follows:

- <https://www.kdheks.gov/water/www.html>
- https://www.kdheks.gov/water/download/Operator_Training_Calendar.pdf

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