

## Richard J. Ludlow

In my opinion, the overall Wastewater Operator Certification rule is clear and describes necessary requirements and procedures well. The following comments are suggestions for clarification:

WAC 173-230-200 Definitions - the definition for "Newly certified operator" was not clear whether it applies to Group I OIT certificate holders who don't meet requirements for full certification or to Group I applicants who have passed their exam but not yet received the certification documents, or both. Clarification would be helpful.

WAC 173-230-240 (5) Fee schedule - the increases to Group II-IV Applications and Renewals are understood to be based on budget estimate development, but rationale for not increasing Group I Application fees is not explained and appears disproportionate.

WAC 173-230-290 Certificate (3) - states "The department may deny certification if an operator's certificate is revoked during the renewal process while the certificate is under probation." It makes sense that the department would deny certification that is revoked, but probation is not defined. Perhaps the language "while the certificate is under probation" is not necessary. If necessary, please define probation.

Thank you for the opportunity to comment.