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RE: Public Comment: Draft Fee Schedule for Wastewater Operator Certification, Fiscal Years 2026 and 2027

26 March 2025

Thank you for the opportunity to comment on the Washington Department of Ecology’s Wastewater Operator Certification Draft Fees. From the notice dated 26 March 2025, Ecology is not “proposing any changes to the operator certification fees for the next two years, the rationale for which “is based on the estimated administrative costs of the OpCert program and the projected account balance.”

By law, fees paid by Operators to Ecology, must fund the Wastewater Operator Certification (OpCert) Program. These fees are subject to change, dependent upon a budget and workload analysis completed by Ecology every biennium. Ecology proposes to maintain operator certification fees at their current level for fiscal year 2026-2027. This is based on the budget and workload analysis, which considered the estimated administrative costs and the projected account balance of the OpCert Program. [Ecology, Publication 25-10-027, Updated March 2025]

It is necessary to see a budget and workload analysis for the next biennium (2025-27) before such a proposal appropriate or justified at this juncture. Indeed, there is no rationale why these fees should remain fixed while others (presumably) variable in the budgeting process.

Water Quality Program

Operating Fund Sources	Amount	%	Uses
Wastewater Treatment Plant Operator Certification (21H)	722,000	<1%	This account funds our work to administer and oversee the certification process for plant operators.

[P168 Ecology – Budget & Program Overview 2023-2025 Publication 23-01-004]

Budget Overview

Dedicated Accounts	Amount	%	%
Wastewater Treatment Plant Operator Certification (21H)	801,000	0.1%	0.1%

[Publication 23-01-004 Ecology – Budget & Program Overview 2023-2025 p23]

Agency Administration Program

Operating Fund Sources	Amount	%
Wastewater Treatment Plant Operator Certification (21H)	79,000	<1%

[Publication 23-01-004 Ecology – Budget & Program Overview 2023-2025 p197]

Regards – Jim