

Kevin Walker

I am a licensed Water Operator in the State of Texas, specializing in Reverse Osmosis systems, water treatment operations. I currently serve as a Department of Defense Contractor, working alongside the U.S. Army and Air Force in the Middle East, maintaining and operating critical water infrastructure in demanding, mission-essential environments.

I'm writing to formally oppose the proposed rule under RPN 2025-027-030-WS (Occupational Licensing Updates). This proposal adds unnecessary cost and complexity for working operators while offering no measurable improvement to public safety or system reliability.

Texas already requires ongoing continuing education for every license renewal, which includes ethics, safety, and compliance content. On top of that, most employers including mine already provide mandatory ethics and conduct training as part of annual compliance requirements. Adding a separate ethics training requirement through TCEQ would duplicate existing programs and force operators to pay for redundant content that's already covered by their workplace and CE obligations.

The reality in the field is this: the biggest challenges we face are equipment failures, supply issues, system design problems, and understaffing not ethical misconduct. Introducing another mandatory class won't make the water any cleaner or the systems more reliable. What it will do is generate more revenue for training providers while draining the limited time and money of operators who already work long hours to keep their communities safe and compliant.

As someone who has represented Texas standards abroad while supporting military operations, I take pride in maintaining the highest levels of professionalism and ethics. But I also believe in fairness and practicality. This rule serves no practical purpose other than to charge operators more for what we're already required to do.

I strongly urge TCEQ to reconsider this proposal and focus instead on policies that strengthen operator support such as lowering training costs, expanding access to technical coursework, and allowing operators to complete certification and renewal testing through approved proctored services. Many licensed professionals, including those working out-of-state or overseas, are unable to travel back to Texas for in-person exams, particularly when there's no guarantee of passing on the first attempt. Providing secure, proctored testing options would expand accessibility, retain skilled operators, and help ensure Texas maintains a strong, qualified workforce without creating new financial burdens.

Respectfully,
Kevin Walker