

Rationale for Support of Clean Water Act Section 104(g) Funding—Consistent Permit Compliance and Operator Replacement

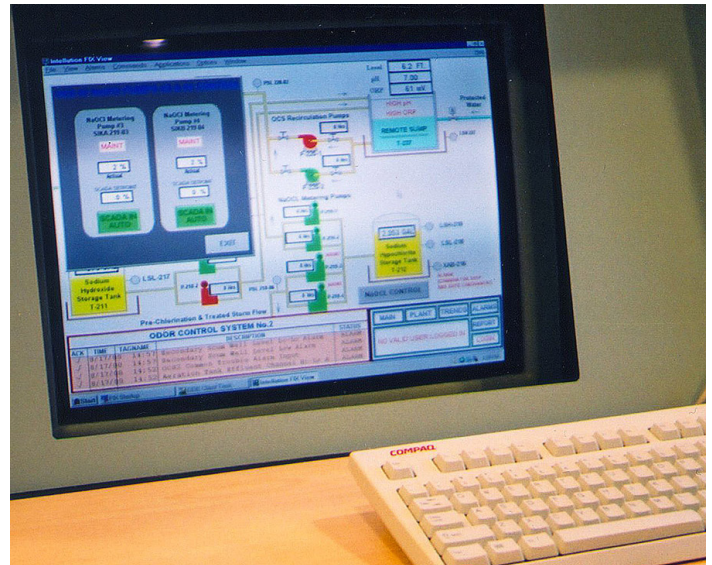
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by the New England Water Environment Association*



A serious threat to our environment is looming. The most vital component of protecting our nation's water quality is the experienced, trained, and certified workforce that operates and maintains the infrastructure that conveys and treats water throughout the United States. However, many of these treatment plant operators entered the wastewater field during the 1970s and 1980s, and are now either retired or preparing to retire from the profession. The impact of this exodus is exacerbated because there are not enough properly educated, trained, and credentialed operators waiting in the wings to replace these seasoned veterans before we lose their historical knowledge and skills. The result will be a void in the environmental industry, and a lack of the talented, promising, and skilled replacement operators needed to effectively protect our nation's waterways. The prospect of a seriously depleted or impaired workforce is real. It is urgent that training programs for replacement personnel be vigorously supported and solidly funded.

In 1982, the Federal government acknowledged the need for training requirements as an integral component to proper operation and maintenance of the United States' vast infrastructure investment by establishing the Section 104(g) Wastewater Treatment Plant Operator On-Site Technical Assistance Training Program in the Clean Water Act. The goal of the 104(g) program is to provide direct on-site assistance to operators at small publicly-owned community wastewater treatment facilities in order to help the facilities achieve and maintain consistent permit compliance. Small wastewater treatment plants face particular challenges because of high operator turnover, low budgets and salaries, and often a lack of community support. The 104(g) program helps to bring these facilities into compliance, improves plant performance, and assists with the training of staff at these facilities. This program protects public health, improves water quality and safeguards capital investments and upgrades at treatment plants.

Unfortunately, the 104(g) program traditionally has not been funded adequately, and since 2007 the program has not



received any monies from EPA. In fact, the Bush administration completely eliminated funding for the 104(g) program, threatening its existence and sending the message that protecting the environment with well-trained operators is not important—when in actuality nothing could be more important. Without a well-trained workforce in our treatment plants, our nation's supply of clean water, so essential to life on this planet, is at risk.

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The impact of the 104(g) program cannot be overestimated. The program assistance focuses on pivotal issues such as wastewater treatment plant capacity, operation training, maintenance, administrative management, financial management, trouble-shooting, and laboratory operations. It promotes collaboration between plant operating staff and local elected officials to solve treatment plant problems and improve water quality by maximizing treatment equipment efficiency. This is achieved by educating local officials about compliance requirements and penalties, and about ways to stay in compliance with the least amount of cost and effort.

Furthermore, the results of the 104(g) program are real and tangible. Through the program, pollutant reduction is tracked by calculating the difference in concentrations of

nitrogen, total suspended solids, and Biochemical Oxygen Demand (BOD) in a wastewater treatment plant's effluent before and after the assistance. For the facilities where assistance was completed in 2007 and the results reported, the 104(g) program helped prevent the discharge of more than four million pounds of pollutants into the waters of the United States. The numbers below summarize the pounds of pollutants prevented from being discharged into surface water by EPA under the 104(g) program in 2007 (EPA 104(g) Accomplishments Report, 2007).

Pounds of TSS Removed	2,055,703
Pounds of BOD Removed	1,484,724
Pounds of Nitrogen Removed	<u>568,896</u>
Total Pounds of Pollutants Removed	4,109,323

It should be added that, as noted by the American Water Works Association (AWWA) and the Water Environment Federation (WEF), the job market for water and wastewater treatment operators is a "buyers' market." Qualified operators are in short supply, and small rural facilities often cannot afford to hire highly trained operators to run their plants smoothly and efficiently. Other issues that need to be resolved include

how to promote professionalism, improve retention, upgrade recruitment, enhance succession planning, lower infrastructure costs, and expand operator certification at small water and wastewater treatment facilities.

We must remain cognizant and ever vigilant of the social, political, and economic benefits resulting from a well operated, solidly maintained infrastructure. A proper level of wastewater treatment, as set forth in the Clean Water Act, promotes the security of our nation by protecting all of us from the inherent biological threats of partially or improperly treated wastewater. A well-trained public workforce is also one of the cornerstones of a sound economic base.

As one of the largest organizations representing the wastewater community in New England, the New England Water Environment Association firmly encourages your consideration and your support of funding for the 104(g) program. Its positive impact and value are indisputable, and it is even more vital now with the aging of the wastewater workforce. The need for training at small wastewater facilities is urgent and compelling, and it is through the 104(g) program that this need can best be met.