



Please Support HB3655: Lagoon Wastewater System Certification

The members of the Small Municipalities Advocacy Coalition (SMAC) are seeking to **A**) require the Oregon Department of Environmental Quality to develop and administer a certification process specific to lagoon system operators, and **B**) reduce the current experience requirement (and related costs) for 'certification pre-qualification' to one year of employment within a lagoon wastewater treatment facility.

After connecting with municipalities with similar issues and outcomes, the challenges identified by lagoon system operators include:

- **Poor Testing Criteria and High Failure Rates**
- **Experience/Education Requirements and Certification Oversight Expense**
- **Employee Retention – Revolving Door Affect**

Poor Testing Criteria and High Failure Rates:

This relates directly to the specific questions ASKED of the test takers and related materials used to prepare for the certification of lagoon system operators. A significant percentage of the questions on the exams are wholly unrelated to the operation of a lagoon system. Those same unrelated questions have a direct impact on the pass/fail requirement score of 70%.

We believe that if an individual has chosen to work in the lagoon environment, their certification should be specific to the work environment they have chosen, and not technologies and processes they do not use. Learning a new process should be at the discretion of the individual when they are ready to do so and should never be a disincentive to furtherance of career objectives.

Work Experience, Education and Oversight Costs:

Currently the DEQ requires that an “uncertified employee” must have two years of work experience and/or a two-year Associate’s degree in a related field + one year of work experience, *before being eligible to test* for a Level 1 Wastewater Distribution Certificate. SMAC believes that lagoon-specific system operations and management can be learned with one year of hands-on experience at the facility. To remain in compliance a city is forced to hire someone who is certified to provide supervisory oversight for their facility until an employee meets the testing requirements and becomes certified. Currently “supervisory oversight” is costing one small city (Scio - population 961) \$12,000.00 annually, a significant expense.

Employee Retention – Revolving Door Effect:

Small cities, unlike larger Oregon cities face a “revolving door syndrome” due to the testing requirements associated with Level 1 Wastewater Distribution Certifications.

SMAC stands with DEQ on the need for testing and certification to ensure public safety when it comes to the delivery of water and wastewater services. However, when testing criteria fails to match the reality of the work environment, employees leave agencies and seek employment elsewhere.

Small cities have a hard time recruiting and competing with larger cities that offer bigger salaries and more comprehensive benefit packages; adding the testing criteria associated with the current certification process simply exacerbates the issue. Keeping workers in rural areas becomes very difficult, and the expense of turnover very likely outpaces supervisory oversight costs.

The Small Municipalities Advocacy Coalition respects the idea of certification testing. We understand that this Profession is responsible for the safe and efficient delivery of wastewater treatment, collections and distribution. This legislation will help to level the playing field for Oregon's small cities, and eliminate unnecessary hurdles potentially faced by dozens of small cities and private businesses with a lagoon wastewater systems.

Please join us in support of HB3655:

