STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

BOARD OF CERTIFICATION OF OPERATORS OF WASTEWATER TREATMENT FACILITIES

TRAINING EVENT APPROVAL GUIDANCE

BOARD APPROVED: MAY 7, 2014

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http://www.dem.ri.gov/programs/benviron/water/licenses/wwoper/index.htm
From the Board’s enabling legislation:

§ 42-17.4-5 Powers and duties of board. Subsection (9)  
“Encourage all operators to attend classes, seminars, and/or other educational programs periodically to keep abreast of changes and advances in the fields of wastewater treatment and management.”

From Rule 13(B) of the Board’s regulations:

(4) At the time of License renewal, a Licensee may choose to renew their License in either one or the other of two licensure tiers: Tier One is reserved for renewals without participation in optional training protocols; Tier Two renewal will include documentation that the Licensee has, at their own discretion, met particular training requirements, enumerated below.

(a) Renewal in Tier One will result in standard Grade 1, Grade 2, Grade 3, or Grade 4 licensure levels; Tier Two renewals will result in a Grade 1T, Grade 2T, Grade 3T, or Grade 4T. No matter what Tier the Licensee holds, the Licensee can then choose during that renewal period to participate in the requisite training so that subsequent renewal may be achieved at the Tier Two level.

(b) For the purposes of these regulations, participation in the Tier Two level is optional.

(c) Both Tiers will meet the intent of statutory and regulatory Wastewater Operator licensure requirements.

(d) To participate in Tier Two licensure renewal, the Licensee must submit adequate documentation at the time of renewal of the successful completion of training per the following:

(i) Operators seeking to participate in the Tier Two licensure renewal status must attain 20 (twenty) training hours during the prior renewal period.

(ii) To be credited toward the required amount of 20 (twenty) hours, a training event/program must be approved by the Board.

(iii) Approved training may include professional conferences, classroom training, and in-house training programs or active participation in the Narragansett Water Pollution Control Association’s Operator Challenge Team.

(iv) Applicable training will be in topics that are not required for the performance of an Operator’s required duties. Training required by the licensee’s employer as a condition of employment will not be applicable to meet the intent of this provision.

(v) Unless otherwise requested at the time of renewal application, Licenses will be renewed at the Tier One level.

(vi) Random audits will examine the validity of submitted information for Tier Two renewal; a determination that false or misleading information has been submitted regarding training contact hours may result in the revocation of the License.

(vii) The Board reserves the right to rescind a prior approval of a training course and remove any hours from an operator’s total training hours that were gained through that course.

The History and Intent of Tier Two Renewals

In light of mandatory training requirements required by other state and commonwealth licensure programs, various interests sought similar provisions for Rhode Island wastewater operator license renewal. Consensus was difficult to achieve on the value of this new requirement, especially in difficult economic times.

The Board then proposed and, after gathering feedback, adopted a voluntary renewal “level” that indicates that the licensee took a minimum of twenty hours of approved and appropriate training during the previous two-year renewal cycle.

This approach was taken because the Board nevertheless seeks to encourage training and professional development—especially that which goes beyond required training for an individual’s position. The exact regulatory language is that “[a]pplicable training will be in topics that are not required for the performance of an Operator’s required duties. Training required by the licensee’s employer as a condition of employment will not be applicable to meet the intent of this provision.”

As such, when approving training events, the Board must consider the necessity of specific training for varying levels of licensure and specific operator positions.
Training providers must submit the following for approval of a training event:

1. Provider contact information (name, address, phone, email)
2. A course proposal, which must include, at a minimum and where applicable:
   a. Training title
   b. Training dates/times/total training contact hours
   c. Training outline, which must include:
      i. A syllabus
      ii. Intended outcomes for training or other form of information transfer.
      iii. Specific methods of training, etc (such as classroom, experiential, online, lecture, seminar)
      iv. If applicable, specific means to determine the successful completion of each participant, such as pre- and post- quizzes. (Please note that the Board will look positively on such information-transfer assessment.)
      v. For one or more levels of licensure, an explanation of how training goals may exceed information needed for the performance of an operator’s current duties.
   d. Procedures for roster monitoring, verifying, and maintain appropriate records of attendance and participation.
   e. Training programs must provide participants who have successfully completed a program with a notice of passing that includes the title of the course, the dates/times held, an instructor’s name and signature, the name of the participant, notice of the Board’s pre-approval status, if applicable, and the number of delivered contact hours. Such notices of passing must be issued after—and only after—a participant has successfully attended the entirety of the training. (The Board will post a course approval certificate example/template on its website.)

Other program approval guidance:

- Approval of proposals will generally be made during Board meetings.
- The Board will give special consideration to formal structures (that meet the criteria in 1 and 2 above) that either involve shadowing or working at a wastewater treatment facility other than a participant’s own, which may include training for new plant systems/upgrades (Note: the Board encourages new-plant/upgrade trainings to be open to all interested licenses from other Rhode Island facilities, while being capped at a certain number for space considerations.)
- Consideration for approvals may be made at the following levels: Programs approved at a “beginning” level will be approved for Grade 1 and 2 certification levels; an “intermediate” level for Grade levels 1, 2, and 3; and an “advanced” level for all Grades levels. The Board may also consider training approvals for specific positions (management, operations, maintenance, laboratory, etc).
- While the Board will have final decision-making authority for training approvals, it nonetheless seeks the participation, advice, and counsel from the operator profession. As such, the Board encourages the regulated community to attend Board meetings at which training program proposals will be evaluated.
- Pre-approvals may be issued to training providers for advertising purposes. Such approval requests should be made in a timely manner.
**Suggested “above and beyond” course categories by professional focus**

From the Board’s enabling legislation, § 42-17.4-5  Powers and duties of board. Subsection (9) “Encourage all operators to attend classes, seminars, and/or other educational programs periodically to keep abreast of changes and advances in the fields of wastewater treatment and management.”

While the Board will consider all courses submitted to it by an operator, the following guidance is meant to assist individuals in considering training activities based on their current career employment. This listing is not exhaustive nor is meant to imply automatic approvals for any individual person or course.

**Suggested courses for operations staff:**
- Maintenance and laboratory testing, QA/QC
- Collection system
- Laboratory QA/QC
- Engineering/design
- Facilities planning
- Operations of systems not at the licensee’s facility(ies)
- Energy Efficiency

**Suggested courses for maintenance staff:**
- Process control—theory
- Process control—case studies
- Microscopic observation
- Laboratory techniques
- Laboratory QA/QC
- Engineering/design
- Facilities Planning

**Suggested courses for laboratory staff:**
- Maintenance
- Collection system
- Engineering/design
- Facilities planning
- Operations of systems not at the licensee’s facility(ies)
- Energy Efficiency
- Process control—theory
- Process control—case studies

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**Fast-Track Consideration Criteria:**

While most approvals will be made at Board meetings (per § 42-17.4-5(9) of the Board’s enabling legislation), administrative approvals may be offered to training events in certain situations. Such training, etc, must take place during the appropriate two-year renewal cycle. Fast-track administrative approval may be offered in the following cases:

- A training program that the Board has already approved in the past and that has no changes to the proposed submission.
- Training offered by the RI DEM, the RI EMA, the RI DOH, or the Board itself.
- Training offered by the New England Interstate Water Pollution Control Commission or the Atlantic States Water Pollution Control Association.
- A licensee’s time as a member of the NWPCA Operator Challenge Team.
- Superintendents or other positions in Direct Responsible Charge may attain training hours in certain cases for their delivery of training in which they were required to assemble material, perform research, and develop a program that translates general theory and/or best management practices into plant-specific training for operators or other licensed positions. (Such training may or may not also be approved for the participants being trained.) Examples of applicable training topics are theoretical process control workshops, treatment technologies that are not used at the facility, water quality impacts of effluent discharge.