

Large Subsurface Sewage Treatment System Operator Certification

As you may be aware, the last few years have shown a steady increase in the number of Large Subsurface Sewage Treatment Systems (LSTS) being permitted by the Minnesota Pollution Control Agency (MPCA).

The LSTS permittees are required, via their permit, to employ an operator in charge possessing a certification equal to or greater than the class level of the facility. Generally, certified wastewater operators attend training and are tested on conventional wastewater treatment systems, i.e. ponds and mechanical systems. The actual LSTS systems that are being operated by these professionals are by and large a combination of conventional wastewater treatment systems *with discharge into soil treatment systems*. Since the wastewater operators typically have little or no experience operating soil treatment systems, a significant gap in certification and training for LSTS Operators has been identified.

Proposal

As Minn. R. 9400.1200 gives the MPCA the authority to establish and require additional training for LSTS Operators, we recommend a policy that will require all LSTS Operators to become additionally trained and certified as Subsurface Sewage Treatment System (SSTS) Service Providers. This new Service Provider certification is established by the February 2008 Minn. R. ch. 7083. The requirements of becoming certified as a SSTS Service Provider include successfully completing the “Introduction to Onsite Systems” and “Service Provider” courses provided by the University of Minnesota Onsite Sewage Treatment Program and maintaining SSTS continuing education credits.

To earn a Wastewater Certification, as is also currently required by the permit of each LSTS, each operator must have a combination of education, experience and a passing examination at each class level. An entry-level Class D Certification requires a passing exam, high school diploma and either completion of a postsecondary Wastewater program or one year of experience in the operation of a Class A, B, C, or D system or facility, *or in a related field*. Midsize Subsurface Sewage Treatment System (MSTS) or Individual Subsurface Sewage Treatment System (ISTS) operation may qualify as experience under the discretion of the Wastewater Certification Specialist, Dianne Navratil. The LSTS operation does qualify as experience, as they are permitted systems. As the operator progresses to higher classes, the additional experience that is required must be in the operation of Class A, B, C, or D system or facility, or similar industrial facility. In this case, MSTS or ISTS operation will not qualify. The LSTS operation will continue to qualify.

Both Wastewater and SSTS programs require a minimum amount of continuing education hours to maintain certification over a three-year period: Wastewater Certification Class B requires 24 hours, Wastewater Certification Class C requires 16 hours, Wastewater Certification Class D requires 8 hours, and SSTS Service Provider Certification requires 12 hours. The LSTS Operator will be required to attend the number of continuing education hours which is greatest between the two certification programs. At least half of the total hours must be directly related to SSTS and at least half of the total hours must be directly related to Wastewater. The LSTS Operators should be aware that the three-year SSTS certification period begins the date that they pass the “Introduction to Onsite Systems” examination.

- LSTS Operator of Class B System – requires 24 Hours every 3 years, at least 12 SSTS, at least 12 Wastewater
- LSTS Operator of Class C System – requires 16 Hours every 3 years, at least 8 SSTS, at least 8 Wastewater
- LSTS Operator of Class D System – requires 12 Hours every 3 years, at least 6 SSTS, at least 6 Wastewater

Implementation

In March of 2007, the proposal was presented to operators at the MPCA’s Annual Wastewater Conference. In early June of 2007, the MPCA sent a letter to all LSTS permittees informing them of the upcoming changes to their next National Pollutant Discharge Elimination System Permit (NPDES).

All new and re-issued LSTS permits between **September 1, 2007, and March 3, 2008**, included a requirement that the LSTS Operator must successfully complete the “Introduction to Onsite Systems” course within two years of permit issuance. To meet the terms, the operator must submit certificate of attendance and passing exam results to the MPCA within two and a half years. Upon their five year re-issuance, these permits will include a requirement that the LSTS Operator must also complete the “Service Provider” course and become certified as a Service Provider within a time period determined by the permit writer. To meet the terms, the operator must submit a copy of the SSTS Individual Certification Card displaying the Certification Number to the MPCA within a time period determined by the permit writer.

All new and re-issued LSTS permits after **March 3, 2008**, will include a requirement that the LSTS Operator must become certified as a SSTS Service Provider within two years of permit issuance. To meet the terms, the operator must submit a copy of the SSTS Individual Certification Card displaying the Certification Number to the MPCA within two and a half years. The operator will be required to maintain certification and report their certification number as part of their NPDES report.

All new and re-issued permits will continue to require the LSTS Operator to maintain Wastewater certification at a class level equal to or greater than that of the facility.

Follow-Up

The long-term solution to the problem is rule revision to Minn. R. ch. 9400. It is our recommendation that when this rule is open for the revisions, this policy should be re-evaluated and if determined necessary, a new LSTS Operator certification class should be established.

If you have questions concerning this matter, please contact Wastewater Certification Specialist, Dianne Navratil, or SSTS Certification Specialist, Jimmy Lipps at 651-296-6300 or 800-657-3864.