



Board for Waterworks and Wastewater Works Operators and
Onsite Sewage System Professionals

Guidance Document

**Requirement for Dual Licensure for
Alternative Onsite Sewage System
Operators**

Adopted April 21, 2016

I. Background

Board staff has received a number of inquiries from individuals, specifically from engineers and alternative onsite sewage system operators, in reference to the Board's requirement of holding both an alternative onsite sewage system operator license and a wastewater works operator license in order to operate certain alternative onsite sewage systems. The Board determined that dual licensure in certain cases was required and the regulation became effective July 1, 2009.

II. Applicable Regulation and Policy

18 VAC 160-20-74. D of the Board's Regulations states:

D. No individual shall act as an alternative onsite sewage system operator of an alternative onsite sewage system that exceeds 10,000 gallons per day design flow without possessing the appropriate class of wastewater works operator license in addition to an alternative onsite sewage system operator license.

18 VAC 160-20-130. A of the Board's Regulations states:

A. A Class 4 wastewater works licensee may operate any wastewater works as follows:

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1. A wastewater works employing natural treatment methods (i.e., those not utilizing aerated or mixed flows and not using electrical or outside energy sources to accomplish treatment) with a design hydraulic capacity greater than *0.04 MGD but equal to or less than 1.0 MGD*; or {Emphasis added]

2. A wastewater works classified by the Virginia Department of Health or the Virginia Department of Environmental Quality as a Class 4 wastewater works.

9 VAC 25-790-300 Table 1 (in part) of the Department of Environmental Quality Regulations

Treatment Works Classification & Treatment Required Classification of the Operator in responsible charge	Treatment Works Capacity (MGD)	Treatment Process Methods
III	Greater than 1.00 MGD	Natural Treatment Methods
III	Greater than 0.001 MGD but equal to or less than 0.1 MGD	Advanced Treatment Methods A) Ammonia Stripping, B) Breakpoint Chlorination, C) Carbon Absorption, D) Chemical Coagulation, Flocculation, Precipitation, E) Filtration, F) Demineralization (Ion Exchange, Reverse Osmosis, Electrodialysis)
IV	Greater than .001 MGD but equal to or less than .04 MGD	Biological Mechanical Methods
IV	Greater than .001 MGD but equal to or less than 1.00 MGD	Natural Treatment Methods

III. Issue

The Board’s regulations state in order to operate an alternative onsite sewage system that exceeds 10,000 gallons per day by design, both an alternative onsite sewage system operator and an *appropriate* wastewater works operator license is required. However, the

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Board's regulations appear to limit or only require a wastewater works operator license when operating systems that are equal to or above 40,000 gallons per day by design or to systems classified by the Virginia Department of Health or the Virginia Department of Environmental Quality.

Concerns have been raised regarding what class of wastewater works operator license is needed when operating systems that fall within the 10,000 to 40,000 gallon per day by design range.

III. Policy

The Board determined that a Class 4 or higher wastewater works operator license is "an appropriate class of license" as outlined in 18 VAC 160-20-74. D, of the Board's regulations.