

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

Department of Professional and Occupational Regulation

Response to Economic Impact Analysis

October 15, 2008

The Board for Waterworks and Wastewater Works Operators and Onsite Sewage System Professionals (Board) appointed a nine-member committee to develop the proposed regulation amendments to implement the regulation of onsite sewage system professionals.

The committee members are experts in sewage treatment and the regulation of sewage treatment. The committee is composed of three Board members from the onsite sewage system community, the Board member from the Virginia Department of Health (VDH), the Board member from the Virginia Department of Environmental Quality (DEQ), the Board member holding the highest class of wastewater works operator license, and the Board's Citizen Member. The administrator of the current VDH authorized onsite soil evaluator regulatory program and an Environmental Engineering and Policy Development Manager from the Loudoun County Health Department were also included. The committee has experts from all perspectives of sewage treatment regulation with an emphasis on onsite sewage treatment.

The committee experts examined the current VDH regulatory program for onsite soil evaluators, the professionals who determine a site's suitability for onsite sewage systems, focusing on the experiences of VDH and of localities where onsite sewage systems are common. Based on their examination of the current VDH program, their expertise, and their consideration of the costs, they concluded that to assure public protection, eight years of experience was the minimum necessary to obtain an onsite soil evaluator license for those individuals with no college degree.

The requirement was, therefore, based on the conclusions of subject matter experts rather than VDH tradition (even though the amount of experience required in the proposed regulations is consistent with VDH's current regulations).

The Board will seek public comment on this specific provision.

Otherwise, the Board agrees with the EIA.