

COMMONWEALTH OF VIRGINIA

Department of Environmental Quality

Water Division

Larry G. Lawson, P.E., Director

Subject: GUIDANCE MEMORANDUM NO. 03-2014
Reporting of Data Generated During Approved Training Programs

To: Regional Directors

From: Larry G. Lawson, P.E., Director



Date: September 10, 2003

Copies: Regional Deputy Directors, Regional Water Permit Managers, Regional Water Compliance Auditors, Jack Vanderland, John vanSoestbergen, and Al Pollock

Summary:

The purpose of this guidance is to clarify that data generated by training program, workshop and/or seminar participants during scheduled laboratory and/or field exercises of training programs approved by the State Board for Waterworks and Wastewater Works Operators are not considered reliable and should not be included in the facility's monitoring records or used for reporting purposes. However, when this data generated indicates a potential operational or compliance problem program instructors will provide the information to the plant operating staff so that they may investigate.

This determination applies only to data collected by registered workshop participants during scheduled training activities conducted as part of a training program, workshop, or seminar that has been approved the State Board for Waterworks and Wastewater Works Operators in accordance with Part VI of the Board's regulations (18 VAC 160-20-160). It does not apply to any other form of training or training activity.

Electronic Copy:

An electronic copy of this guidance in PDF format is available for staff internally on DEQNET, and for the general public on DEQ's website at: <http://www.deq.state.va.us/water/>.

Contact information:

If you have any questions on this guidance document, please contact Jack Vanderland. Office of Operator Training, at (804) 698 4092, or jwvanderland@deq.state.va.

Disclaimer:

This document is provided as guidance and, as such, sets forth standard operating procedures for the agency. However, it does not mandate any particular method nor does it prohibit any particular method for the analysis of data, establishment of a wasteload allocation, or establishment of a permit limit. If alternative proposals are made, such proposals should be reviewed and accepted or denied based on their technical adequacy and compliance with appropriate laws and regulations.

Discussion

The best way to train an individual to obtain representative samples and to accurately perform analysis methods is through the use of hands on training conducted under circumstances that are as close to the "real world" environment normally encountered at the treatment plant. For this reason many wastewater treatment related training programs include site visits and field exercises to provide the participant with true to life learning experiences. While most treatment systems fully recognize the importance of hands on training there has been some concern expressed by facility managers as to their legal responsibility to collect the data generated by students during these exercises and to use it in completing the facility's permit required reports. In a few situations this has led facility managers to choose not to allow training programs to use their facilities.

This guidance was developed to encourage facility managers to allow training programs to obtain samples and/or conduct field exercises at their plants without requiring inclusion of student generated data in plant records and reporting. The rationale used to determine that the data generated by students under these situations could be excluded is based upon the following:

Training participants are by definition learning the correct methods for collection, preservation and analysis of the subject pollutants. They are prone to making sampling, testing and/or calculation errors. These errors make the data generated during these exercises unreliable.

Standard Methods, 18th Edition (Part 1020 B 1) states that "Before an analyst is permitted to do reportable work, competence in making the analysis is to be demonstrated." The participants have not demonstrated competence in performing the subject analysis and data generated during these exercises should not be considered reliable.

To avoid abuse of this exclusion, it applies only to planned training activities conducted as part of formal training programs, workshops, or seminars that have been reviewed and approved by the State Board for Waterworks and Wastewater Works Operators in accordance with the procedures outlined in the Board's regulation (18 VAC 160-20-160) Part VI. **It does not apply to any other training or training activity.**