



April 23, 2012

Charlotte Horn, MC 205  
Office of Legal Services  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Chapter 30 - Occupational Licenses and Registrations **Rule Project No. 2011-044-030-WS**

The Water Environment Association of Texas (WEAT) and the Texas Association of Clean Water Agencies (TACWA) appreciate the opportunity to comment on TCEQ's proposed revisions to the occupational licensing rules. WEAT and TACWA members are responsible for the design, operation, and maintenance of publically owned wastewater collection and treatment systems all across Texas.

WEAT and TACWA support adoption of this rule package, in particular, the amendments to Subchapter A, Section 30.24, implementing HB 965. WEAT and TACWA believe that it is important to allow management level A and B water and wastewater operators the option to use webinars for licensing renewal credit. With the current economic stresses facing Texas municipalities and other water and wastewater treatment providers, licensed water and wastewater operators are facing more and more travel and financial restrictions for training.

Webinars offer a way to get up to the minute training and information on the newest regulations and treatment technologies without the expense of travel or time away from their facilities. Water and wastewater operators today are expected to treat water and reduce pollutants to a level not even considered 25 years ago. The need for the introduction of new treatment techniques and technologies are at an all-time high, and this format of training and introduction to these technologies will prove to be a cost effective and timely way for operators to receive the training they need to keep up with the ever increasing standards.

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We look forward to working with TCEQ staff on the development of guidance to implement this rule.

Thank you for the opportunity to comment. If you need any additional information, feel free to contact me at 512-924-2102 or [carol@weat.org](mailto:carol@weat.org).

Sincerely,

A handwritten signature in cursive script that reads "Carol Batterton".

Carol Batterton  
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