



MEMORANDUM

To: Permitted Wastewater Treatment Facilities
Permitted Drinking Water Treatment Facilities
Wastewater Treatment Facility Operators
Drinking Water Treatment Facility Operators

From: South Carolina Department of Health and Environmental Control
Bureau of Water

Date: October 26, 2020

Re: Requirements for Facility Operation/Operator of Grade at Wastewater Treatment Facilities
and Drinking Water Treatment Facilities

In recent years, the Bureau of Water ("BOW") has received numerous inquiries regarding the requirements of permitted wastewater treatment facilities and permitted drinking water treatment facilities to have an operator of the appropriate grade on-site at treatment facilities when treatment and/or discharge occurs. The purpose of this memorandum is to clarify the BOW's position regarding this matter.

This issue arises from the interpretation of regulations pertaining to wastewater treatment facility operators and drinking water treatment facility operators. Specifically, many entities have interpreted Department of LLR Regulation 51-5, Operator-in-Training-Licenses, to apply to BOW permitted operation of wastewater treatment facilities and drinking water treatment facilities. This has resulted in the erroneous interpretation that an Operator-in-Training License is sufficient when treatment and/or discharges occur (including treatment and operational adjustments) as long as these actions are under the direct supervision of a legally licensed operator of the appropriate grade. This direct supervision would mean that an operator of appropriate grade may be in contact with an Operator-in-Training Licensee by telephone, radio or other electronic means during treatment activities and/or discharge. The BOW does not endorse this interpretation.

Permitted Wastewater Treatment Facilities

Permitted Wastewater Treatment Facilities are required to operate in accordance with the provisions contained in Water Pollution Control Permits, S.C. Code Ann. Regs. 61-9.122.41(3):

(3)(i) Except as stated in (ii) below, the permittee shall provide for the performance of daily treatment facility inspections by a certified operator of the appropriate grade as defined in the permit for the facility. The inspections shall include, but should not necessarily be limited to, areas which require visual observation to determine efficient operation and for which immediate corrective measures can be taken using the O & M manual as a guide. All inspections shall be recorded and shall include the date, time, and name of the person making the inspection, corrective measures taken, and routine equipment maintenance, repair, or replacement performed. The permittee shall maintain all records of inspections at the permitted facility as required by the permit, and the records shall be made available for on-site review during normal working hours.

(ii) The Department may make exceptions to operating requirements, if stated in the permit, as follows:

(A) Attendance by the certified operator of the appropriate grade ("the operator") is normally required only on days when treatment or discharge occurs.

(B) For performance of daily inspections, permits may allow a reduced grade of operator for limited time periods under specific circumstances when justified by the permittee in a staffing plan and approved by the Department.

(C) Reduced inspection frequency, but in no case less than weekly, may be suitable when specified in the permit, if there is complete telemetry of operating data and there is either a simple treatment system with a low potential for toxicity but requiring pumps or other electrical functions or the ability to stop the discharge for an appropriate period when necessary.

Permitted Drinking Water Treatment Facilities

Permitted Drinking Water Treatment Facilities are required to operate in accordance with the provisions contained in S.C. Code Ann. Regs. 61-58.7.C(1) and D(2).

(C) (1) All surface water treatment plants shall have an operator of the appropriate grade present at the plant and responsible for its operation, when the plant is producing water for public consumption.

(D) (2) All groundwater treatment plants shall be monitored by an operator of the appropriate grade, at a frequency to ensure proper operation, but in no case less than once a day.

Such monitoring may be accomplished through site visits and/or remote monitoring equipment approved by the Department.

Remote monitoring equipment at ground water treatment plants must be approved in writing by the Department if it is used in lieu of daily operator visits.