

From: [Dustin R. Miller](#)
To: [Porter, Marcia \(ECY\)](#)
Subject: RE: Staffing
Date: Wednesday, November 1, 2023 3:09:23 PM
Attachments: [image001.png](#)

Marcia,

Thank you for taking my call earlier and the quick response. This clarifies things for us as we look to schedule and fulfill proper staffing.

Regards,

Dustin Miller

Sewer Operations Supervisor

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dmiller@westrichland.org



From: Porter, Marcia (ECY) <mpor461@ECY.WA.GOV>
Sent: Wednesday, November 01, 2023 2:38 PM
To: Dustin R. Miller <dmiller@westrichland.org>
Subject: Staffing
Importance: High

Hi Dustin:

I managed to spend some time on teams with Erik today and the state is not that prescriptive. You can use other staff that hold certifications at the proper level as back-up from the public works shop. They need to be familiar with your treatment operations though. So flex around your schedules as needed, but be aware of the following issue(s) or potential issue(s):

- The facility has an Ecology approved O & M manual that includes sections on staffing and certification levels for general operations. Over the coming weeks you would need to make sure that whatever you have in the approved O & M manual for those sections is updated if what you propose changes those sections in a substantial manner. You would need to submit just that part, if changed, for approval. (I will shoot from the hip here and say get any changes to us for approval by 120 days which will get you over the 'holiday hump.' I will post this email in the communication log of your permit electronic file so it is available as a record).
- Be aware of the risk. You may or may not have a level two or three staff physically on-site,

but they should be on call and readily available (i.e. not out of state somewhere) in the event of some major occurrence that would require their input.

- All remaining staff that is physically on-site should be well trained in the operations of your facility, which in this case includes the pre-treatment unit not located within the footprint of the wastewater plant.
- There should be clear communications between all staff on who is available for on-call and who is in responsible charge. i.e. the level three operator is out of state, but a level two operator is available somewhere, communication with that level two operator should make s/he clearly aware that they are in responsible charge.

So basically if you and the management are comfortable with the training level of all operators who could be on-site without a two or three, then you have flexibility with all two and three staff whether they are on-site or just readily available. Make sure you check that O & M for potential updates.

Hope this helps. Call if it is at all confusing.

Kind Regards,

Marcia Porter (*she/her*)
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Water Quality Program, Central Regional Office
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<https://ecology.wa.gov/FRUITPACKPERMIT>

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