

IDEM Seeks Input on its Professional Licensing Regulations

All Indiana state agencies are required to review all occupational licenses and occupational regulations within their respective jurisdictions. I.C. § [25-1-16.5-8](#). Furthermore, all occupational licenses and regulations “must be limited to those demonstrably necessary and carefully tailored to fulfill legitimate public health, safety, or welfare objectives.” I.C. § [25-1-16.5-7](#). Executive Order [25-18](#) outlines additional priorities all agencies should consider when reviewing and revising their licensing requirements.

As part of this statewide effort to review state licensing requirements, the Indiana Department of Environmental Management (IDEM) is seeking input on the various licenses it regulates. Please provide feedback on the IDEM license programs listed below. Specifically, IDEM seeks input on whether the requirements for each license are too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough, or need any other improvements.

Send any comments to Efficiency@idem.IN.gov by **June 30, 2026**. IDEM will consider this information for potential rule amendments or requests to the General Assembly for statutory changes.

This table lists each license by name, its associated statutory and rules-based requirements, and IDEM webpages with more information.

License	Statutes	Rules	Webpage
Drinking Water Operator	IC 13-18-11	327 IAC 8-12	https://www.in.gov/idem/clean-water/drinking-water/drinking-water-operator-certification/
Wastewater Operator	IC 13-18-11	327 IAC 5-23	https://www.in.gov/idem/clean-water/wastewater-compliance/wastewater-operator-certification-and-continuing-education/
Asbestos Inspector	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
Asbestos Management Planner	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
Asbestos Project Designer	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
Asbestos Project Supervisor	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/

Asbestos Worker	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
Asbestos abatement contractor	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
UST Operator Class A	IC 13-23-1	329 IAC 9	https://www.in.gov/idem/tanks/regulated-storage-tanks/
UST Operator Class B	IC 13-23-1	329 IAC 9	https://www.in.gov/idem/tanks/regulated-storage-tanks/
UST Operator Class C	IC 13-23-1	329 IAC 9	https://www.in.gov/idem/tanks/regulated-storage-tanks/
UST Workers Certification	IC 13-23-3	329 IAC 9-10	https://www.in.gov/idem/tanks/regulated-storage-tanks/
Solid Waste Operator Cat I	IC 13-15-10	329 IAC 12-7	
Solid Waste Operator Cat II	IC 13-15-10	329 IAC 12-7	
Solid Waste Operator Cat III	IC 13-15-10	329 IAC 12-7	

Reference Guide
Public Comments
EO 25-18

Drinking Water Operators

- There are 5 classes of drinking water operators
 - Class WT 1
 - Class WT 2
 - Class WT 3
 - Class WT 4
 - Class WT 5
- Common responses include:
 - Respondents believe current requirements are adequate and could be made more stringent.
 - Several respondents raised concerns about the licensing exam, noting that some questions were ambiguous or obscure and did not reflect practical, real-world knowledge needed by operators. They also emphasized the need to update outdated questions to improve the exam's relevance and clarity.
- Indiana American Water (INAW)
 - Certification: INAW believes the certification process could be modernized, as many parts still rely heavily on physical paper. For example, applications are still submitted by mail.
 - CEUs: INAW supports the current CEU system but believes the process could be made more efficient. Currently, only one state employee manages the licensing process. Given the high volume of applications received, this has resulted in significant backlogs and delays. Additionally, allowing applicants to complete license renewals online could streamline the process and help reduce the employee's workload.
 - Operator-in-training: An applicant becomes an operator-in-training when their application has been approved, and they have passed required exam but have not yet completed the required CEU hours. INAW requests additional clarification and interpretation of the required weekly hours and work activities that qualify toward the required CEU hours.

Wastewater Operators

- There are 10 classes of wastewater operators
 - Municipal
 - Class I-SP
 - Class I
 - Class II
 - Class III
 - Class IV
 - Industrial
 - Class A-SO
 - Class A
 - Class B
 - Class C
 - Class D
- Common responses include:
 - The most common response called for changes to the advancement process for operator certifications. Under the current system, an operator may only test at the certification class that corresponds to the facility where they work. As a result, operators who wish to advance to higher certification class must first obtain employment at a facility of the matching classification. Respondents stated that this structure limits career advancement and mobility, as operators cannot progress to higher class unless they are already employed at high-level facilities.
 - Respondents believe current requirements are adequate and could be made more stringent.
 - Some respondents believe that simple systems requiring only low-level certification should not be subject to strict requirements.
 - One respondent suggested unifying lower-level wastewater and water licenses to reduce unnecessary overlap in licensing.
 - Several respondents questioned the quality of the licensing exam, noting that many questions are outdated, overly hypothetical, and fail to assess practical, real-world operator knowledge.
 - Multiple respondents expressed that hands-on training, or on-the-job training should be recognized and counted toward continuing education units (CEUs).

- Respondents noted that insufficient emphasis is placed on college degrees or higher-education programs that are directly relevant to the licensed fields.

Water Operators

- There are 3 additional classes of water operators
 - DSS
 - DSM
 - DSL
- Common responses include:
 - The respondents believe requirements are adequate and could be made more stringent.
 - The current requirements are overly rigid and stringent.
 - Respondents suggest aligning renewal periods for individuals who held multiple licenses to streamline the process.
 - Educational Requirements:
 - Respondents expressed concern that too much emphasis is placed on college degrees or higher education rather than on practical, hands-on training.

IIOA (Indiana Industrial Operators Association)

- The IIOA serves professionals in wastewater treatment.
- The IIOA Board, led by chairman Al Goodman, drafted a formal response.
- 21 respondents submitted statements expressing their support for the Board's positions.
- The response addresses:
 - The requirements are necessary
 - The IIOA emphasized that wastewater operator certifications are essential and remain the only proven method for protecting Hoosiers and ensuring the cleanliness and safety of Indiana's water resources.
 - The requirements are not too strict
 - The IIOA believes that current licensing requirements are not too strict. The board notes that recent updates to the exams have made them more standardized and focused on essential need-to-know content, improving their relevance and effectiveness.

- The IIOA states that Indiana's requirements are comparatively less strict than those in many other states. They note that only six to eight percent of applications are not approved. Indiana requires just eight CEU hours per renewal period, whereas some states require as many as thirty. Additionally, only seventy percent of Indiana's required CEUs must be technical, further reducing the stringent requirements.
- The requirements are not overly burdensome
 - The IIOA stated that the requirements are not overly burdensome. The board explained that Indiana extended the renewal period from two years to three years and reduced the application fee. Additionally, licensing exams are now offered at regional campuses with same-day scoring, which shortens processing time and reduces delays for operators.
- The requirements are not outdated
 - The IIOA states that the requirements are not outdated, noting that all 50 states require operator certification and that Indiana updated its requirements in 2018.
- The requirements are not duplicative
 - The IIOA declares that licensing requirements are not duplicative. Indiana has ten wastewater license classes (five municipal and five industrial) and while some basic concepts overlap, this reflects fundamental knowledge needed to support more advanced competencies. They further note that operators who achieve higher-level certifications receive increased compensation, reinforcing the value of progressive skill development.
- Other improvements
 - The IIOA noted a recent decline in licensed wastewater operators due to retirements. To attract younger generations, the Board proposes expanding online courses and training opportunities prior to certification. They also suggest increasing certification fees to help fund the development of these programs.

Asbestos

- Common responses include:
 - The current requirements are adequate and could be made more stringent.
 - One respondent suggested emailing an electronic copy of the license to the operator upon approval to reduce delays associated with receiving the physical license.

UST Operators

- Common responses include:
 - The current requirements are adequate and could be made more stringent.
 - When a UST license is revoked, the reasons should be documented and made publicly available so other licensed operators can learn from the violations.
- Keramida Inc.
 - Keramida would like to shift the scope of the question. It is not so much about reducing regulations as it is about making the regulations easier to comply with.
 - Keramida would like to see stronger training programs so that operators are better equipped to comply with 40 CFR part 280 subsection J. Strengthening these programs would reduce the number of operators who need to rely on consultants for outsources work.
 - Keramida requested revisions to the program to clarify the different UST license categories and their associated training requirements. The company representative noted that some operators were unsure whether certain processes required a license due to the lack of clarity in the current requirements.

Continuing Education Units (CEUs)

- **Drinking Water**
 - Respondents expressed concern that completing CEUs is both costly and time-consuming.
 - Respondents noted that many CEU courses are vendor specific and do not provide meaningful or broadly applicable education, reducing their overall value for career development.
- **Wastewater**
 - Several respondents recommended eliminating the separate general and technical CEU requirements.

- Other respondents stated that the overall number of required CEUs is too high, difficult for full-time workers to complete, and often costly.
- Respondents expressed that CEUs should be allowed to count toward multiple licenses or include a carryover option, noting that operators with several licenses often work in overlapping fields and find the separate CEU requirements burdensome.
- **Water**
 - One respondent suggested offering online CEU options to provide greater convenience for full-time workers.
- **Asbestos**
 - One respondent suggested improving the renewal process by revising training requirements for individuals who hold multiple asbestos licenses. They noted that courses for inspectors and supervisors largely duplicate the same material, resulting in unnecessary repetition, increased costs, reduced productivity, and added administrative burden.
- **Unspecified**
 - One respondent requested clearer guidance on which educational books qualify for CEUs.
 - Other respondents suggested aligning renewal dates for operators who hold multiple licenses to simplify compliance.
 - One respondent asked that CEUs accepted in other states be recognized in Indiana and count toward Indiana's licensing requirements.

Solid Waste Operators

- There were no comments directed specifically at solid waste operators.

Email Responses to Professional Licensing Regulations				
License	Date Received	Sent by Whom	Affiliated Company	Summary of Comment
Drinking Water Operators	6/2/2026	John Solenberg	N/A	Solenberg is a former utility superintendent and a current licensed water operator. He believes that operator certification is necessary for maintaining safe and reliable drinking water. But he believes there is a difference between ensuring competency and creating barriers that discourage qualified individuals from entering the profession. He is concerned about if the examinations are measuring practical competency or testing knowledge that extends beyond what most operators encounter in day-to-day operations. He is concerned that the certification process was becoming so difficult that it contribute to a shortage of licensed operators. Public utility work is demanding but is not among the highest-paid career field. Years of experience and then facing an examination with a low pass rate can cause less people to pursue licensure. Thus, causing less qualified operators to manage critical infrastructure.
Drinking Water Operators	6/2/2026	Mary Cripe	Town of Middlebury	Cripe supports keeping the higher standards for licensing of water operators because it keeps the drinking water safe and preserves human health.
Drinking Water Operators	6/3/2026	John Trout III	N/A	Trout explains his frustration with the WT3 drinking water license test. Trout explains the test contained some obscure questions. Trout wished the test focused more on fundamental questions and basic math which would illustrate a solid understanding of the material.
Drinking Water Operators	6/4/2026	Ken Parcels	Hand Industries Inc.	Parcells finds CEU classes to very informative and helpful. Parcells suggest keeping the requirements.
Drinking Water Operators	6/4/2026	John Rumble	Marion Utilities	Rumble recommends bringing back open-book testing as removing it has not improved the industry. Rumble questions why operators are restricted to obtaining licenses only for the class of plant they currently work at. Rumble suggests expanding / improving the 12-week operator school. Rumble also expresses concern that many CEU opportunities consist mostly of vendor presentations rather than meaningful instruction, resulting in training that is convenient but low in educational value.
Drinking Water Operators	6/5/2026	lhacth7@aol.com	N/A	Respondent believes CEUs have become increasingly expensive and difficult to obtain. Respondent has also observed too many systems that are not meeting the required visits from certified operators, as the responsibility and required visits are passed on to uncertified operators.
Drinking Water Operators	6/10/2026	Shawna Taylor	N/A	Taylor supports maintaining high standards for advanced water treatment operators, but believes IDEM should reassess whether the exam effectively measures the knowledge and skills required for modern facility operations. Taylor recommends providing unsuccessful candidates with more detailed feedback to help target study efforts.
Drinking Water Operators	6/18/2026	Drake Abramson	Indiana American Water	(1) INAW believes that the certification process could be modernized. There are many parts to the process that still heavily rely on physical paper. For example, applications are still mailed in. (2) INAW supports the current CEU system but believes the process could be made more efficient. Currently, only one state employee manages the licensing process. Given the high volume of applications received, this has resulted in significant backlogs and delays. Additionally, allowing applicants to complete license renewals online could streamline the process and help reduce the employee's workload. (3) An applicant becomes an operator-in-training when their application has been approved, and they have passed required exam but have not yet completed the required CEU hours. INAW requests additional clarification and interpretation of the required weekly hours and work activities that qualify toward the required CEU hours.
Drinking Water Operators	6/30/2026	Wes Weimer	North Webster School	Weimer has several comments about specific certifications and tests. (1) whether obtaining an FSO certification is necessary when the individual already holds a DS certification, as both are classified as DSS credentials, with the FSO being site-specific; (2) the WT3 exam is particularly difficult and contains ambiguous questions; and (3) should a non-transient, non-community water system that only filters and softens waste be required to have a WT3-certified operator, when the WT2 certification appears sufficient for such system requirements.
Wastewater Operators	6/2/2026	Tim Brill	N/A	Brill would like to suggest a change to the classifications of CEUs. Brill does not see the utility to have general and technical divisions if the presentation or course has value as education to advancing knowledge of an operator.
Wastewater Operators	6/2/2026	Tim Dodt	N/A	Dodt would like the licensing requirements to be updated so operators working at lower-class facilities can still qualify for a higher license. For example, Dodt would like to obtain a Class IV wastewater operator license but is unable to do so because Dodt works at a Class II facility.
Wastewater Operators	6/2/2026	Wenona Fosselman	Mulzer Family of Companies	Fosselman is a sustainability manager and a certified wastewater operator. It is Fosselman's opinion that the wastewater operator licenses for their type of operations should pertain more to their purposes and not the same as that of an operator working at a municipal wastewater facility. Some of their wastewater could be treated with flocculant and they do manage water pumps (not sludge) and sediment ponds (not sludge, just TSS from limestone). It does not make sense that the education and testing for operator licenses addresses so much regarding traditional wastewater facilities and not much regarding the wastewater at a limestone mine or ready mix concrete plant.
Wastewater Operators	6/2/2026	Micheal Dauterman	Cleveland-Cliffs Inc.	Dauterman believes the requirements for wastewater operators are currently sufficient.
Wastewater Operators	6/3/2026	Robert Lindley	City of Monticello, Wastewater Utility	Lindley believes the current examinations are appropriate for each level of certification and adequately reflect the knowledge and skills required. Lindley believes the Alliance Apprenticeship Program is a successful pathway for preparing individuals for certification and long-term career growth. It is important to encourage participation and workforce development, but it is also important to maintain rigorous certification standards. He fears lowering the standards too much may diminish the professionalism, credibility, and competence of the industry.
Wastewater Operators	6/3/2026	Skylar Hall	Louis Dreyfus Company Services, LLC	Hall is a utilities supervisor and holds a Class A Wastewater certification. In 2024, his site was reclassified to a Class C facility due to changes to the statutes and classifications. Class C requirements are significantly more than Class A requirements. He is not eligible for a Class C certification until June 17, 2026. His biggest gripe with the classification is the responsible charge experience required. Most of their wastewater operators are not considered responsible charge operators but are responsible for the site when normal operators are not onsite. He thinks it is vague and unclear to many operators how they are supposed to gain responsible charge operator experience when the site is required to have an RC operator with the required certification.
Wastewater Operators	6/3/2026	Matthew Chandler	Astbury Water Technology, Inc.	Chandler holds a Class II Wastewater certification and oversees the operation of over 12 wastewater and/or industrial treatment facilities. Chandler must obtain 15 CEU's to keep his Class II license and 15 more CEU's to keep his Class B license. He is very opposed to this requirement. He thinks that it makes it mandatory for a licensed individual to take time away from their responsibilities to go to a class that covers what they do daily or to attend a conference and listen to lectures or sales pitches that focus on what they do daily. He does not understand why a working licensed operator has to pay to attend these when they already have the products the equipment representatives are selling. He feels it seems that once a wastewater operator is certified on the job training is no longer accepted to maintain their certification. Now they have to pay for conferences/classes that educate them on topics they already know. He feels operators should be treated similarly to employees in other industries where it is required to take some form of training similar to the concept of safety training and then quarterly see an online lecture or demonstration.
Wastewater Operators	6/3/2026	Terry Barnett	N/A	Barnett would like for training credits to apply for multiple licenses to limit the redundancy.
Wastewater Operators	6/3/2026	Daniel Wooten	N/A	Wooten believes IDEM has become too lenient with licensing standards for water and wastewater operators. Allowing exams to be taken at home or through Ivy Tech enables cheating and lowers professional standards. Additionally, operators should not be allowed to retake exams weekly until passing. As for CEUs, full-time operators often struggle to attend classes during workdays and hinders compliance.
Wastewater Operators	6/3/2026	David Turner	Turner Tech, LLC	Turner is a long-time wastewater treatment plant operator and trainer who participated in creating Indiana's current operator certification rules around 2018. He believes the existing requirements effectively protect public health, safety, and water quality. He supports shifting from a two-year to a three-year renewal cycle as it reduces paperwork. He emphasizes the important of separate municipal and industrial certification categories due to the diversity of facility types.
Wastewater Operators	6/3/2026	Brian Myers	N/A	Myers believes that the educational requirements to renew the wastewater license are excessive and burdensome. He does not believe that wastewater technology and processes have changed drastically in the past 20 years. He wants to know why the CEU requirements are excessive.

Wastewater Operators	6/4/2026	Joshua Walker	Patoka Lake Regional Water and Sewer District	Walker believes current wastewater operator licensing standard are appropriate but raises concerns about portions of the examination content. Walker reports encountering test questions referencing outdated equipment and technologies no longer common in the industry and notes mathematical formulas are presented in a confusing manner. Walker supports maintaining strong licensing requirements but recommends updating exam content to reflect modern wastewater practices and ensuring accuracy of all formulas to improve the overall testing process.
Wastewater Operators	6/4/2026	Steve Jacobson	South Bend Ethanol, LLC	Jacobson would like for IDEM to consider shortening the path to obtaining certifications. Jacobson takes issue with the time-length of experience needed for some of the certifications. Jacobson believes if you can pass the test, you should be able to obtain the license. Passing the test indicates you have either gained the knowledge through years of practice or you have studied enough that you can find the information when it is needed.
Wastewater Operators	6/4/2026	Kevin Brown	Gary Sanitary District	Brown thinks it is a good idea to allow the test to be taken more than once or twice a year. Brown feels the Class I, II, III, and IV classifications are fine. However, Brown has a problem with the number of questions and the questions themselves. He feels the test questions should reflect actual experiences that occur in a wastewater plant instead of hypothetical questions that one may never experience during their wastewater career. He believes the questions should be more relevant.
Wastewater Operators	6/5/2026	DuWayne Johnson	Wastewater Operations, LLC	Johnson believes the current certification process is generally adequate but is concerned that the shortened experience requirements (adopted to address workforce shortages) are insufficient given the complexity of treatment systems, reporting obligations, and cybersecurity risks. He notes that operators today often lack on-the-job training and may advance too quickly without fully understanding operations and procedures. While certification exams test for knowledge, practical experience is necessary to apply such knowledge effectively. Johnson also stresses the importance of understanding permit requirements and maintaining high professional standard to ensure competent future operators and strong relationship with inspectors of which can only be learned from practical skills.
Wastewater Operators	6/7/2026	Jason Lenz	Creek Run, LLC	Lenz suggested stricter protocols for obtaining and maintaining a license. Relevant and applicable continuing education requirements problematic. Lenz questions if there is a way IDEM can help establish reliable, relevant, and applicable continuing education requirements.
Wastewater Operators	6/8/2026	Bruce Wilson	Monticello Wastewater Utility	Wilson supports the licensing requirements as they are. Wilson believes if the requirements become too lax, then operators may not be able to provide proper services.
Wastewater Operators	6/9/2026	Thomas Druar	Martin Marietta	Druar believes certification for managing settling ponds at rock quarries and construction sites is unnecessary. Druar works in many other states where there are no requirements for certification to oversee or sample stormwater, sedimentation ponds, or mine dewatering effluent. While certifications for more complex wastewater operations may be justified, Druar believes settling basin management is simple and does not warrant such requirements.
Wastewater Operators	6/14/2026	Jeanne Fleischhacker	N/A	Fleischhacker recommends creating a more unified water and wastewater operator license, as the fields are closely overlap and reduce administrative burden. Fleischhacker also calls for stronger oversight of continuing education to ensure training is meaningful, up-to-date, and often delivered in person. Hands-on operational experience should never be replaced by college education when assessing operator competency.
Wastewater Operators	6/22/2026	Aaron Popplewell	N/A	Popplewell has several comments: (1) The current Indiana regulations for wastewater and water operator experience are too rigid, especially for individuals coming from related technical fields or from out of state. This creates unnecessary barriers during a nationwide workforce shortage; (2) Operators who hold both water and wastewater licenses face duplicative CUE units. Thus relevant coursework should be able to count towards both licenses; (3) IDEM's exam application, approval, and verification processes lack digital efficiency causing administrative delays for operators and utilities; and (4) The satanized testing format overemphasizes theoretical memorization rather than practical, hands-on skills needed in modern plant operations.
Wastewater Operators	6/30/2026	Aaron Tolliver	Aqua Utility Services, LLC	Tolliver supports keeping Indiana's current industrial and municipal wastewater operator certification requirements, emphasizing that modern treatment facilities are far more complex than in the past and require operators with solid technical competency to safely manage advanced processes. Tolliver cautions in reducing certification standards would not lessen the complexity of operations, only the assurance that qualified individuals are managing them. Tolliver supports improving administrative efficiency, expanding workforce development, increasing training access, and modernizing testing but competency standards must remain strong to protect Indiana's waters.
Wastewater Operators	6/11/2026	Al Goodman	IIOA Chairman	Chairman Goodman submitted a formal response. A summary of the report can be found in the separate reference guide.
Wastewater Operators	6/1/2026	John Myers	N/A	Myers supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/1/2026	Erika Foo	Whitestown Government	Foo supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors. Foo also believes standards should not be lowered, even with the operator shortages because reduced experience requirements could result in individuals gaining certifications without the background needed to responsibly manage facilities. Foo worries this could lead to operators motivated only by higher pay, people lacking interest in water and wastewater processes.
Wastewater Operators	6/11/2026	Jeffery Graham	Delta Chemical & Equipment, Inc.	Graham supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/11/2026	Chadwick Cutliff	N/A	Cutliff supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/11/2026	Thomas Martin	Delta Chemicals & Equipment Inc.	Martin supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/11/2026	Justin Maxwell	Delta Chemicals & Equipment Inc.	Maxwell supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/12/2026	Casey Decaro	N/A	Decaro supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/12/2026	Russ Eiler	Schlage Lock Company LLC (Allegion PLC)	Eiler supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/12/2026	Rick Studebaker	Dormakaba	Studebaker supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/12/2026	Nick McClain	MW Components Company	McClain supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/12/2026	Tyler Reece	IFT Worldwide	Reece supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/15/2026	Mark Reece	Nestle USA	Reece supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/17/2026	Cortnee Hyser	Winona Powder Coating, Inc.	Hyser supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/18/2026	John Wheatley	Harwell Farms, LLC	Wheatley supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/30/2026	Timothy Guedel	Midwest Environmental Services	Guedel supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/30/2026	Phillip Gover	Midwest Environmental Services	Gover supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/30/2026	Eric Wolter	N/A	Wolter supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/30/2026	Patti Greer	Fogg (PROMACH)	Greer supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/30/2026	John Fujawa	N/A	Fujawa supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Wastewater Operators	6/30/2026	Scott Hiner	N/A	Hiner supports the document drafted by the Indiana Industrial Operators Association (IIOA) Board of Directors.
Drinking Water & Wastewater Operators	6/3/2026	Johnathon Horton	N/A	Horton suggest to ease up on the requirements to test out of Water Treatment. Horton is currently licensed in WT2, but can't test any higher than that since you can only test as high as what your place of work is classified at.
Drinking Water & Wastewater Operators	6/4/2026	Mary Armacost	IDEM OWQ	Armacost believes that lowering the licensing requirements for drinking water and wastewater operators would harm both local communities and the State of Indiana. He notes that an operator who lacks the necessary knowledge and skills can cause significant harm to the community they serve. Armacost also emphasizes that utility operator are not only an essential public service but also critical component of economic development. Without safe drinking water and effective wastewater treatment, businesses are unlikely to locate in a community.
Drinking Water & Wastewater Operators	6/17/2026	Paul Scott	Valparaiso City Services	Scott has no comments at this time.

Drinking Water & Wastewater Operators	6/24/2026	Justin Parsons	N/A	Parson encouraged IDEM to grant additional experience credit for relevant bachelor's and master's degree programs. Degrees in higher education can provide training directly related drinking water and wastewater operations. Allowing credit from such degrees to count towards certification would encourage professional development and attract qualified individuals to the industry. Additionally, Parson encourages IDEM to change the requirement that operators obtain experience at a specific classification of facility before becoming eligible for higher-level certifications. Many capable operators working at WT2 and WT3 facilities have a desire to advance professionally and pursue higher-level certifications. However, because they do not currently work at a WT4 or WT5 facility, they may never have the opportunity to meet the eligibility requirements despite possessing the knowledge, motivation, and aptitude necessary to succeed. This creates barriers to professional growth.
Drinking Water & Wastewater Operators	6/30/2026	Jerry Stowers	N/A	Stowers asserts that the current operator testing process fails to incorporate modern technology and does not adequately prepare candidates. Although the operators must learn math for the exam, they rarely use it in practice due to readily available technological tools. Additionally, with the present system being able to test at any time of the year and only a self-imposed testing deadline, many operators struggle to prepare for the exam. Stowers suggest that a state-sponsored study program with required classroom hours and a fixed testing deadline would likely improve pass rates. Stowers maintains that the test themselves are not overly burdensome and argues that the state is better served by ensuring operators are properly prepared rather than by making the exams easier.
Drinking Water & Wastewater Operators	6/30/2026	Eric Smith	N/A	Smith suggests several improvements to the licensing process: (1) Hands-on experience in operating, maintaining, and managing water and wastewater facilities should count more toward educational requirements. Real-world work builds practical knowledge and judgment essential to protecting public health and the environment; (2) Expanding educational equivalency options would help reduce barriers for experienced operators who have long demonstrated competency. Allowing additional years of documented responsible-charge experience to substitute for college coursework would better reflect the practical expertise gained through daily operations; (3) Experienced gained in the responsible charge of both drinking water and wastewater system should be recognized as complementary when evaluating educational equivalency, as both field require many of the same core technical skills; (4) The CEU program is an effective way to ensure operators remain current on changing regulations, treatment technologies, and industry best practices. The continuing education provides ongoing competency without unnecessarily preventing experiences operators from advancing; (5) The certification examinations appropriately verify technical knowledge and should remain an important component of operator certification. Public health depend on competent operators, and rigorous testing helps ensure that competency; and (6) Indiana should continue supporting operator career advancement by recognizing both education and progressively responsible work experience. This approach would help retain skilled professionals, strengthen the operator workforce, and protect Indiana's water resources without compromising certification standards.
Water Operators	6/2/2026	Robert Jessie	N/A	Jessie has been an operator for 35 years and believes when it comes to our environment, it deserves quality operators protecting the waterway. Thus the license process should remain the same.
Water Operators	6/2/2026	Tracy White	Indiana American Water	White is concerned that licenses renew in different years. If there were a way to adjust the renew so both licenses expired at the same time, it would make CEUs and deadlines much easier. Having staggered renewals creates unnecessary complexity, so aligning expiration date would simplify the process for many operators.
Water Operators	6/2/2026	Cindy Lindberg	N/A	Lindberg believes that for transferring water and wastewater certifications, Indiana is outdated. She believes that with a valid ID, signature, and a phone call to Colorado to verify no suspensions, she should have been able to transfer her licenses to Indiana. Lindberg feels that the form, supervisor signature, input of experience, and mailing it is a pain. Lindberg believes that having a license and ensuring trainings are completed should be enough. Further, she believes that her licenses should have been higher up in Indiana because of her training and college degree in chemistry.
Water Operators	6/3/2026	Fredrick Hedges	Citizens Energy Group	Hedges feels like IDEM has gone out of their way to make testing as easy as possible. Being able to take the test at remote locations is helpful. The training classes being available at different locations and the exam prep courses being able to be taken during conferences is helpful. Hedges believes IDEM is doing what they should to attract people to these trades. Hedges does not think making the test easier to pass is what is needed. He believes more people need to have the ability to learn and face challenges and assist in improving water and wastewater industries. The testing needs to be as stringent as before. He does not want IDEM to go easier on the testing or requirements to take the test. He believes that retaining the employees is the issue because the pay is not great when starting out. IDEM cannot control what towns/districts pay people but the pay is the real issue. Too much emphasis being placed on having a 2 or 4 year degree in order to climb the career ladder is also an issue.
Water Operators	6/7/2026	Tammy Chiefs	Scenic View Mobile Home Community	Chiefs believes the continuing education requirements for waster certification are overly strict and suggests they could be significantly reduced.
Water Operators	6/11/2026	Lane C. Freiburger	N/A	Freiburger supports the IIOA's position on licensing for water and wastewater operators in Indiana. Freiburger believes that Indiana's requirements are similar or better than those of other states. Freiburger would add that they believe that attention needs to be put on making apprenticeships appealing to younger generations because Indiana needs more water and wastewater operators. That needs is only going to increase as skilled operators retire. Freiburger thinks that the proposed advisory board is a good start but that the board will need members from the younger generations to make recommendations to the state that are meaningful to the youth.
Water Operators	6/14/2026	Rick Tilley	Tipton Municipal Utilities	Tilley believes the tests should only have questions pertaining to the classification they are taking it for. He feels the tests set them up for failure. Further, Tilley thinks there should be hands on training.
Water Operators	6/17/226	Monte Anderson	N/A	Anderson believes operators should not be allowed to complete 100% of their CEUs online. A balance between online and in-person training is important because fully online learning can lead to poor retention, especially for newer operators who need hands-on understanding to become fully competent. Additionally, operators should have the opportunity to advance to higher certification levels after a set number of year in the field, similar to other certification types. This would support career growth and create opportunities for promotions and pay increases.
Water Operators	6/18/2026	Denny Merritt	AquaMark, LLC	Merritt explains Michigan's environmental agency, EGLE, eliminated the use of FSO site operators after initially allowing them on a site-specific basis and believes Indiana should do the same. Merritt asserts that FSO operator are neither trained nor treated to the same standard as qualified operators. FSO operators often fail to maintain required log books and do not make necessary site visits.
Water Operators	6/29/2026	Nick Ferguson	Aqua Water	Ferguson believes reducing professional licensing requirements to quickly increase the operator workforce does not seem like the right solution, as the issue is not the ability of trainees to pass the exams but rather their willingness to take them. Improvements could be made by updating the certification exam to remove outdated topics. Overall, the existing mix of experience requirements, CEUs, and exams seems reasonable and does not appear to hinder employee advancement or harm the industry.
Asbestos	6/2/2026	pmclary@hotmail.com	N/A	They believe that there needs to be more investigation into who can receive asbestos professional licensing certifications.
Asbestos	6/7/2026	Jason Lenz	Creek Run, LLC	Lenz suggested increasing the deadline for the renewal process. Additionally, Lenz requests more robust licensing requirement and continuing education.
Asbestos	6/25/2026	Christiana Spaulding	Dore & Associates Contracting, Inc.	Spaulding notes that the only improvement needed in the licensing process would be allowing electronic copies of the licenses to be emailed once all documentation and fees are submitted. Spaulding explains her physical license was not delivered for several months, and when she requested an electronic copy, she was told it was not permitted. Although she eventually was able to obtain a copy, the delay caused significant inconvenience for ongoing projects.

Asbestos	6/28/2026	Bruce Bultman	Aegis Environmental, Inc.	Bultman believes the licensing program could be made more efficient by revising the annual refresher training requirements for individuals with multiple asbestos credentials. The courses for inspector and supervisor cover largely identical material, resulting in unnecessary duplication, added costs, lost productivity, and administrative burden. Bultman suggests a common core curriculum supplemented by license-specific modules, which would lower costs, reduce redundancy, etc..
Asbestos	6/30/2026	Bill Purves	Purves Environmental, Inc.	Purves supports the recommendations proposed by the report.
UST	6/7/2026	Jason Lenz	Creek Run, LLC	Lenz suggested stricter requirements to achieve all licenses and to keep said licenses. Ohio used to have 8 hours of annual continuing education, not it is every two years and requires the instructor to be licensed by the state. Consider a license that encapsulates all disciplines for UST. If a license is revoked, the reasons should be documented and made publicly available so that other licensed operators can learn from the infraction.
UST	6/30/2026	Lauren Nielsen	Keramida	Keramida would like to shift the scope of the question. It is not so much about reducing regulations as it is about making the regulations easier to comply with. Keramida would like to see stronger training programs so that operators are better equipped to comply with 40 CFR part 280 subsection J. Strengthening these programs would reduce the number of operators who need to rely on consultants for outsourced work. Keramida requested revisions to the program to clarify the different UST license categories and their associated training requirements. The company representative noted that some operators were unsure whether certain processes required a license due to the lack of clarity in the current requirements.
Continuing Education Units (CEU)	6/2/2026	Justen Baker	N/A	Baker would like more clarification on which chapters of the Sacramento University books qualify as general or technical continuing education units and how many hours are in each unit.
Continuing Education Units (CEU)	6/2/2026	Shawn Marshall	Patriot Municipal Utilities	Marshall believes that when an operator carries two or more licenses with different expiration dates, the continuing education units obtained after the required amount needed for one license should go to the other licenses.
Continuing Education Units (CEU)	6/15/2026	Darren Sluder	N/A	Sluder suggest reducing the technical hours needed as they are harder to achieve than general hours.
Continuing Education Units (CEU)	6/20/2026	Paul Burris	N/A	Burris requests that Indiana accept CEU from classes already approved by other states without requiring operators to resubmit detailed course information, noting that collecting instructor and presentation data multiple times is burdensome because states and organizations do not coordinate on certifications. Burris explains that maintaining multiple licenses becomes costly and time-consuming, sometimes requiring days of paperwork or forcing operators to retake similar courses in Indiana. Burris believes it would be beneficial to align all license renewal dates to prevent missed deadlines and make CEU planning easier. Burris expressed appreciation for Indiana's existing structure of initial requirements and CEU expectations, including the 70 percent technical requirement.
Unspecified	6/2/2026	Tom Knapke	N/A	Knapke believes the requirements are accurate.
Deficient	6/30/2026	Jack Buckley	Marion Stamping	No Email Contents.

License Key
Drinking Water Operator
Wastewater Operator
Asbestos Inspector
Asbestos Management Planner
Asbestos Project Designer
Asbestos Project Supervisor
Asbestos Worker
Asbestos Abatement Contractor
UST Operator Class A
UST Operator Class B
UST Operator Class C
UST Workers Certification
Solid Waste Operator Cat I
Solid Waste Operator Cat II
Solid Waste Operator Cat III
Continuing Education Unit (CEU)
Unspecified / Deficient

From: [Robert jessie](#)
To: [IDEM Efficiency](#)
Subject: Efficiency
Date: Tuesday, June 2, 2026 3:35:50 PM

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I feel anything worth having should take a fare amount of effort being an operator for 35 years I have seen IDEM simplify the process a lot and when it comes to our environment it deserves quality operators protecting the waterways for our future so with that being said I would keep on as is.

Thanks

From: [Dauterman, Michael T](#)
To: [IDEM Efficiency](#)
Subject: FW: [EXTERNAL] This is an important message from the Indiana Department of Environmental Management (IDEM)
Date: Tuesday, June 2, 2026 3:36:39 PM
Attachments: [Licensing+notice 05.29.26.pdf](#)

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

I believe the requirements for certified wastewater treatment operators are sufficient currently.

Regards,

MICHAEL DAUTERMAN, P.E.
Manager, Business and Technology
P 219.399.4996 M 219.310.0831
Michael.Dauterman@clevelandcliffs.com

CLEVELAND-CLIFFS INC.
Indiana Harbor Utilities Department, MS 2-324
3210 Watling Street, East Chicago, IN 46312
clevelandcliffs.com

From: dwbmgr@idem.in.gov <noreply@everbridge.net>
Sent: Tuesday, June 2, 2026 2:31 PM
To: Dauterman, Michael T <michael.dauterman@clevelandcliffs.com>
Subject: [EXTERNAL] This is an important message from the Indiana Department of Environmental Management (IDEM)

You don't often get email from noreply@everbridge.net. [Learn why this is important](#)

This Message Is from an External Sender

This message came from outside your organization. Stop, think, and use caution before clicking links or opening attachments.

This is an important message from the Indiana Department of Environmental Management.

This is an important message from the Indiana Department of Environmental Management (IDEM). As part of this statewide effort to review state licensing requirements under Executive Order [25-18](#), IDEM is seeking input on the various licenses it regulates.

Please consider providing feedback on the drinking water and wastewater operator requirements. Specifically, IDEM seeks input on whether the requirements for each license are too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough, or

need any other improvements. Please send any comments to Efficiency@idem.IN.gov by June 30, 2026. IDEM will consider this information for potential rule amendments or requests to the General Assembly for statutory changes.

Additional details are included in the attached notice.

If you have any questions, you can contact us at 317-234-7430 or DWBMGR@idem.in.gov.

IDEM Seeks Input on its Professional Licensing Regulations

All Indiana state agencies are required to review all occupational licenses and occupational regulations within their respective jurisdictions. I.C. § [25-1-16.5-8](#). Furthermore, all occupational licenses and regulations “must be limited to those demonstrably necessary and carefully tailored to fulfill legitimate public health, safety, or welfare objectives.” I.C. § [25-1-16.5-7](#). Executive Order [25-18](#) outlines additional priorities all agencies should consider when reviewing and revising their licensing requirements.

As part of this statewide effort to review state licensing requirements, the Indiana Department of Environmental Management (IDEM) is seeking input on the various licenses it regulates. Please provide feedback on the IDEM license programs listed below. Specifically, IDEM seeks input on whether the requirements for each license are too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough, or need any other improvements.

Send any comments to Efficiency@idem.IN.gov by **June 30, 2026**. IDEM will consider this information for potential rule amendments or requests to the General Assembly for statutory changes.

This table lists each license by name, its associated statutory and rules-based requirements, and IDEM webpages with more information.

License	Statutes	Rules	Webpage
Drinking Water Operator	IC 13-18-11	327 IAC 8-12	https://www.in.gov/idem/clean-water/drinking-water/drinking-water-operator-certification/
Wastewater Operator	IC 13-18-11	327 IAC 5-23	https://www.in.gov/idem/clean-water/wastewater-compliance/wastewater-operator-certification-and-continuing-education/
Asbestos Inspector	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
Asbestos Management Planner	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
Asbestos Project Designer	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
Asbestos Project Supervisor	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/

Asbestos Worker	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
Asbestos abatement contractor	IC 13-17-6	326 IAC 18-2.1	https://www.in.gov/idem/asbestos/training-and-licensing/
UST Operator Class A	IC 13-23-1	329 IAC 9	https://www.in.gov/idem/tanks/regulated-storage-tanks/
UST Operator Class B	IC 13-23-1	329 IAC 9	https://www.in.gov/idem/tanks/regulated-storage-tanks/
UST Operator Class C	IC 13-23-1	329 IAC 9	https://www.in.gov/idem/tanks/regulated-storage-tanks/
UST Workers Certification	IC 13-23-3	329 IAC 9-10	https://www.in.gov/idem/tanks/regulated-storage-tanks/
Solid Waste Operator Cat I	IC 13-15-10	329 IAC 12-7	
Solid Waste Operator Cat II	IC 13-15-10	329 IAC 12-7	
Solid Waste Operator Cat III	IC 13-15-10	329 IAC 12-7	

From: [Shawn Marshall](#)
To: [IDEM Efficiency](#)
Subject: CEU"s
Date: Tuesday, June 2, 2026 3:45:36 PM

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When an operator carries 2 license with 2 different expiration dates any ceu's obtained after the required amount needed for one license should go the other. Not just the one with the earliest expiration.

From: [Fosselman, Wenona \(Mulzer Crushed Stone\)](#)
To: [IDEM Efficiency](#)
Subject: Wastewater Operator Requirements
Date: Tuesday, June 2, 2026 3:45:52 PM

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To Whom It May Concern,

Thank you for the opportunity to provide feedback regarding wastewater operator license requirements. I have been a certified wastewater operator for many years as is required for aggregate mining wastewater permitting. It has always been my opinion and that of many aggregate operators I know that wastewater operator licenses for our type of operations should pertain more to our purposes rather than getting the same licenses as an operator working at a municipal wastewater facility. While some of our wastewater could be treated with flocculant and we do manage water pumps (not sludge) and sediment ponds (again, not sludge, just TSS from limestone), it has never made sense that the education and testing for operator licenses addresses so much in regards to traditional wastewater facilities and very little in regards to the wastewater at a limestone mine or ready mix concrete plant.

Wenona Fosselman

Sustainability Manager

Mulzer Family of Companies

A CRH COMPANY

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E wenona.fosselman@mulzer.com

www.mulzer.com

“Culture eats strategy for breakfast.” Peter Drucker

From: [Cindy](#)
To: [IDEM Efficiency](#)
Subject: Wastewater & Water survey
Date: Tuesday, June 2, 2026 3:49:38 PM

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Hello. I got an email about input for transferring my water & wastewater certifications. I do think Indiana's is outdated. I should have been able to submit both online. With a valid ID, signature and a phone call to Colorado to verify there has been no suspensions and its valid should have been enough to transfer my licenses to Indiana. The form itself and having a supervisor sign and having to put in our experience then mailing it all in was a pain. Just having a license and making sure the trainings are done should be enough. I feel like my licenses should have been higher up in Indiana (level 3 in wastewater and level 4 in water) since I had alot of training and a college degree in Chemistry.

Cindy Lindberg

From: [Justen Baker](#)
To: [IDEM Efficiency](#)
Subject: CEU's
Date: Tuesday, June 2, 2026 3:55:14 PM

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Since the books from Sacramento University allow partial chapters now, it would be nice if we knew what chapters qualified as general or technical and for how many hours.

[Sent from Yahoo Mail for iPhone](#)

From: [John Solenberg](#)
To: [IDEM Efficiency](#)
Subject: WT3 & DSL Licenses
Date: Tuesday, June 2, 2026 3:58:34 PM

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In my opinion, operator certification is essential to maintaining safe and reliable drinking water systems. However, there is a difference between ensuring competency and creating barriers that discourage qualified individuals from entering the profession.

When I took my licensing examinations, I recall the pass rate being approximately 3%. If that figure is accurate, it raises an important question: Are the examinations measuring practical competency, or are they testing knowledge that extends beyond what most operators encounter in day-to-day operations?

As a former utility superintendent, I was concerned that the certification process was becoming so difficult that it could eventually contribute to a shortage of licensed operators. Public utility work is a demanding profession, yet it is generally not among the highest-paying career fields. When candidates are required to accumulate years of experience and then face an examination with an extremely low pass rate, the result can be fewer people pursuing licensure and fewer qualified operators available to manage critical infrastructure.

I strongly support professional certification and rigorous standards. The public deserves competent, well-trained operators responsible for protecting our drinking water systems. However, certification programs should focus on validating the knowledge and skills required for real-world operation and regulatory compliance rather than creating unnecessary obstacles to entry.

As both a former utility superintendent and a current private utility operator, I hope this perspective helps shed light on the challenges facing the profession. Maintaining high standards is important, but those standards must also be practical, relevant, and sustainable if we expect to attract and retain the next generation of water operators.

John Solenberg
Former Utility Superintendent
Licensed Water Operator

From: [pmclary](#)
To: [IDEM Efficiency](#)
Subject: They need more investigation as to who can receive them.
Date: Tuesday, June 2, 2026 4:15:42 PM

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Sent from my Galaxy

From: [Tom Knapke](#)
To: [IDEM Efficiency](#)
Subject: License requirements are accurate.
Date: Tuesday, June 2, 2026 4:16:45 PM

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From: [Tracy S White](#)
To: [IDEM Efficiency](#)
Subject: IDEM water treatment licenses
Date: Tuesday, June 2, 2026 4:18:43 PM

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Good afternoon,

I got an email from INAWWA asking for input on the licenses IDEM regulates.

I currently hold a DSL and a WT3. My only issue with the license is the renewal on separate years.

If there was a way to renew one of my licenses a year early so that they would both expire at the same time it would be more efficient. Having them on different years creates issues with ensuring I have enough CEU's for expirations is different years. Maybe change the rule that if you already hold one treatment license, the new license will expire on the same year as the current license. That would simplify things for a lot of people.

Thanks for the opportunity to provide feedback.

Thank you,

Tracy S. White
Sr. Developer Services Specialist
Indiana American Water
153 N. Emerson Ave.
Greenwood, IN 46143
317-885-2426
Tracy.S.White@amwater.com

Submit all plans to Developer Services
inaw.developerservices@amwater.com

Developer Website

<https://www.amwater.com/inaw/customer-service-billing/For-New-Customers/Developers-Contractors/>

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https://protect.checkpoint.com/v2/r01/___www.amwater.com___.YzJ1OnN0YXRlb2ZpbmRpYW5hOmM6bzpiYWEzY2FkZjEzMmU4MjFhMDBkNDYzNjAzNDI0NjEyNT03OmExMGU6NWVlMDFiZTViMTMxNzYyN2NmNGExNTVmMjllMTQyMjg2YzA3ODZkYWU5YzIzMDc1NzA3ZTU2MzY2MzQ1ZWVmODp0O1Q6Tg

From: [Town Manager](#)
To: [IDEM Efficiency](#)
Subject: Professional Licensing Regulations
Date: Tuesday, June 2, 2026 4:51:48 PM

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To Whom It May Concern,

Thank you for this opportunity to submit feedback about the professional licensing regulations. While I know that the passing rate for Certified Water Operators is a low percentage, I believe that IDEM has made modifications to the tests to make it pertinent to the operations in Indiana. When it comes to drinking water and human health, it is important to have those with the ability and knowledge to properly run the water treatment plants and the water systems. Please keep the higher standards for licensing for water operators, so that communities continue to produce safe drinking water for their residents. You are doing a great job.

Thank you!!

Mary Cripe, P.E.
Town of Middlebury
418 North Main Street
Middlebury, IN 46540
Phone: 574-825-1499

***Please note the new email
address: townmanager@townofmiddlebury.in.gov***

From: [Tim Brill](#)
To: [IDEM Efficiency](#)
Subject: Operator certification regulation review
Date: Tuesday, June 2, 2026 5:35:59 PM

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Thank you for the opportunity to provide input to Wastewater Certification regulations and requirements. I can't provide valuable feedback on the certification process or the test itself, as mine was issued in the late 80's.

However, I would like to suggest a change to the classification of certification continuing education. It makes no sense to me have General and Technical divisions. If a presentation or course has value as education to advancing knowledge of an operator, it shouldn't matter. During the IWEA conferences, I always found myself choosing presentations based on needing technical CEUs.

Thank you for your consideration

Tim Brill
2213 Treys Trail
Mishawaka, IN 46545

(Class IV & D)

Sent from my iPad

From: [tim.dodt](#)
To: [IDEM Efficiency](#)
Subject: license requirements
Date: Tuesday, June 2, 2026 6:57:37 PM

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I would like to get my class four wastewater licenses, but I can't because I only work at a class two wastewater plant. I want to get into an upper management position but I can't because they're saying that they want a class four. I currently have a class three wastewater licenses. I have worked for this wastewater company for 12 years. I would like to see that changed as one of the requirements to be able to get a class four wastewater license.

Get [Outlook for iOS](#)

From: [Terry Barnett](#)
To: [IDEM Efficiency](#)
Subject: IDEM Wastewater Licensing
Date: Wednesday, June 3, 2026 6:43:20 AM

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As to Wastewater licensing, as I recall, years ago a holder of an industrial WW license keeping up with training credits could apply for a municipal license of the same class without more redundant testing. This seems reasonable, please consider.

Thanks.

See ya,

Terry

Isaiah 40:31

From: brian.myers.bristol@gmail.com
To: [IDEM Efficiency](#)
Subject: Wastewater License
Date: Wednesday, June 3, 2026 7:29:39 AM
Attachments: [Licensing+notice_05.29.26.pdf](#)

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I feel the educational requirements to renew the wastewater license is excessive and burdensome. Wastewater technology and processes have not changed dramatically in the past 20 years. Why require the excessive CEU requirements?

Brian Myers

From: dwbmgr@idem.in.gov <noreply@everbridge.net>
Sent: Tuesday, June 2, 2026 3:30 PM
To: Brian.Myers.Bristol@gmail.com
Subject: This is an important message from the Indiana Department of Environmental Management (IDEM)

This is an important message from the Indiana Department of Environmental Management.

This is an important message from the Indiana Department of Environmental Management (IDEM). As part of this statewide effort to review state licensing requirements under Executive Order [25-18](#), IDEM is seeking input on the various licenses it regulates.

Please consider providing feedback on the drinking water and wastewater operator requirements. Specifically, IDEM seeks input on whether the requirements for each license are too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough, or need any other improvements. Please send any comments to Efficiency@idem.IN.gov by June 30, 2026. IDEM will consider this information for potential rule amendments or requests to the General Assembly for statutory changes.

Additional details are included in the attached notice.

If you have any questions, you can contact us at 317-234-7430 or DWBMGR@idem.in.gov.

From: [Skyler Hall](#)
To: [IDEM Efficiency](#)
Subject: Wastewater Operator Certification Comments
Date: Wednesday, June 3, 2026 7:44:16 AM
Attachments: [image001.png](#)

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Hello all, I am the Utilities Supervisor at Louis Dreyfus Company in Claypool, IN. I currently hold a Class A Wastewater certification. Our facility was a Class A facility for 17 years. In 2024 when the statues and classifications were reconfigured our site was reclassified to a Class C facility, not due to any changes at our facility, but because of the changes to the classifications. The requirements for Class C compared to Class A are significant. Upon the change I was not and am not eligible for a Class C certification until June 17, 2026. Our normal responsible charge operator was a Class A and was given a provisional class C that lasted 1 year. This operator is the only person eligible onsite for a Class C due to his 15+ years of experience at our wastewater plant. This was very burdensome on our site as our RC operator was overly stressed about the exam for class C. Luckily, he was able to pass the exam, but now his contact hours have TRIPLED with no change to our facility, just the requirements by IDEM. My biggest gripe with the classification is the responsible charge experience required, when most of our wastewater operators are not considered responsible charge operators, but are responsible for the site at times when our normal operator is not onsite. This is vague and unclear to many operators as to how they are supposed to gain responsible charge operator experience while the site is required to have an RC operator with the required certification. And just to note our site is < 0.200 MGD, VERY SMALL facility yet 2nd highest classification.



Skyler Hall
Utilities Supervisor
Phone: +1 574 566 2195
Mobile: +1 260 330 4485
Email : skyler.hall@ldc.com
Louis Dreyfus Company Services LLC
7344 SR 15 South Claypool, IN 46510 / USA

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This is an environment friendly email. Please do not print it unless it is really necessary.

From: [Bob Lindley](#)
To: [IDEM Efficiency](#)
Cc: [Bruce Wilson](#); [Bobby Neal](#); [Gabrielle Leonard](#); [Diane Schroeder](#)
Subject: Wastewater Certification Test Opinion
Date: Wednesday, June 3, 2026 8:05:59 AM

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I believe the current certification examinations are appropriate for each level of certification and adequately reflect the knowledge and skills required for the profession.

I have utilized the Alliance Apprenticeship Program to train and develop employees, and it has proven to be a successful pathway for preparing individuals for certification and long-term career growth.

While it is important to encourage participation and workforce development, maintaining rigorous certification standards is essential. Lowering those standards too much could ultimately diminish the professionalism, credibility, and competence that the industry depends upon.

Thank you for your time and consideration.

Robert Lindley Superintendent
Class III Municipal, Class A Industrial
City of Monticello, Wastewater Utility
705 East St.,
Monticello, IN., 47960
Phone (574)-583-7847
Fax (574-583-9244)
<https://www.monticelloin.gov/>

From: [John F Trout III](#)
To: [IDEM Efficiency](#)
Subject: Operator License Requirements
Date: Wednesday, June 3, 2026 9:11:12 AM

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I was frustrated with the WT3 drinking water license test. I took the test two times, scoring below 75 the first time, then I paid for a training course and studied a great deal more only to pass slightly over the 75 score required. I felt that this test contained some very obscure questions. My opinion is that the test should focus mostly on the basic questions and basic math to illustrate a solid understanding of the material-- not to show the knowledge of a 30-year plant operator.

My co-worker has applied for the wastewater class D license and has not been allowed to sit for the test. I do not understand this. Her application clearly illustrates her competency and familiarity with the process. If she can pass the test, she is qualified, no? The requirements to sit for the test need to be adjusted, in my opinion.

Thanks for the opportunity to comment!
John

From: [Hedges, Fred](#)
To: [IDEM Efficiency](#)
Subject: Survey Response
Date: Wednesday, June 3, 2026 9:27:00 AM
Attachments: Outlook-https__ww.png

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Good morning and I'm happy to share my response to your questions about my opinion on certification and everything that goes along with maintaining my Class 4 license. I honestly think that IDEM has gone out of their way to make testing as easy as possible on a lot of fronts. The fact that you can take the test at remote locations really helped. All of the different training classes available in a ton of different locations and the fact that you can even take exam prep courses during conferences you attend is really helpful. I'm assuming a big part of the reason you're sending out this survey is to figure out how to get more people interested in both water and wastewater careers, and I believe IDEM is doing what they should be doing to attract people to these trades. Making the test easier to pass is not what is needed in my opinion; we need people that have the ability to learn and take challenges head on and help constantly improve the water and wastewater industries. I've seen too many people come in and not take the job seriously and want to learn and think for themselves. The testing honestly needs to be just as stringent as before because what we deal with on a daily basis can be very difficult and challenging, We need people that can handle that responsibility and know their trade. I've personally been in charge of basically running a Class 4 plant in the most challenging city in the whole state of Indiana for over 13 years and have a strong background in the trades (20 years in skilled trades) before I came to wastewater . DO NOT go easier on the testing or requirements to take the test; you're doing a great job IDEM. I believe that retaining the employees is your real issue, and everyone knows that the pay is not the greatest when you first start into this type of work and that's usually what runs people away from these jobs. I know that IDEM cannot control what these towns and districts pay their people, but that's the real issue, and too much emphasis placed on having a 2- or 4-year degree in order to climb the ladder. As "Operator of the year for the state of Indiana 2025" for Citizens Energy Group of Westfield and over 35 years in the industries and utility work I've seen a few things and faced many challenges in this field and I'm aware of what challenge you are facing and wish you good luck. If I can help in any other ways I'd be glad to talk further on the subject. Have a nice day.

Fredrick Hedges
Lead Treatment Operator
Citizens Westfield Utilities
(317) 517-5664 cell



*2150 Dr. Martin Luther King Jr. Street
Indianapolis, IN 46202*

From: [Daniel Wooten](#)
To: [IDEM Efficiency](#)
Subject: Licensing Requirements
Date: Wednesday, June 3, 2026 10:28:10 AM

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I believe IDEM has been a little lax on the requirements and testing for Water and Wastewater licensing. In my opinion, you should not be able to go to Ivy Tech or take a state exam at home. It promotes cheating and people getting an unfair advantage. Also, you should not be able to take a test weekly until you pass it. The standards should be higher for someone operating a water plant or wastewater treatment facility.

Concerning the CEUs, I believe that most full-time operators have difficulty attending classes on days that they are working. The requirements should be lowered.

From: [Matt Chandler](#)
To: [IDEM Efficiency](#)
Subject: Wastewater Certification
Date: Wednesday, June 3, 2026 10:39:11 AM
Attachments: [Outlook-c4qh550v.png](#)

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In response to your request for feedback concerning the requirements for taking and maintaining a current Wastewater certification:

I currently hold a Class II Wastewater certification; I oversee the operation of over 12 wastewater and/or industrial treatment facilities.

I am required to obtain 15 CEU's to keep my Class II license and an additional 15 CEU's to keep my Class B License.

I will openly state that I am very opposed to this requirement.

It is mandatory for a licensed individual to take time away from their pressing responsibilities to attend a class that covers basically what they do

Every working day on the job. The other option is to attend a conference where if they want the required CEU's they must listen to lectures or

Sales pitches, these again are focused on what a working operator sees or already uses on a daily basis.

I find it difficult to understand that a working licensed operator would need to pay \$300.00 for a lunch and an all-day walk from booth to booth

To listen to equipment reps giving sales pitches for products that if you needed you already have or for products you have no need of at all.

All for 5 CEU's.

In order for an individual to be qualified to take any wastewater exam they are required to work for a specific time in this field of work or at an

Acceptable facility, once certified it seems on the job training is no longer accepted in maintaining your certification. Individuals are now required

To pay to attend a conference or pay for some class that is offered, or pay for an accepted on-Line course all to learn something that they already know

Or they would not have been able to pass the exam in the first place. I think operators should be treated like the employees at every industry I have worked in

You would be required to take some form of training similar to individuals required to attend safety training. Quarterly you would be required to see on-line a

Lecture or demonstration no different than Lock out-Tag out or Blood-borne pathogen training.



Matthew Chandler
General Manager / Southern Region
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E-Mail: mchandler@astburygroup.com

From: [David Turner](#)
To: [IDEM Efficiency](#)
Subject: 327 IAC 5-23 Wastewater Operators
Date: Wednesday, June 3, 2026 11:47:55 AM
Attachments: [David Turner.vcf](#)

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Comments on Professional Licensing Regulations

I have been a long-term Class D and Class II Industrial wastewater treatment plant certified operator and operator training teacher.

In about 2018 I was active in the IDEM workgroup developing the current wastewater treatment certified operator rule.

The current license requirements are adequate to protect public health, safety, and welfare objectives. Protection of the Water Quality of our rivers, streams and lakes is also of prime importance.

The changes from two-year to three-year renewal period was a good step to relieve the paperwork burden of the certification process both for the operator and IDEM.

Having separate Municipal and Industrial Wastewater Certified Operator Certification categories and four levels within both categories is needed due to the many different types and processes within those facilities.

Having been part of the certification process for many years, I think the current rule, while complex, well serves the public needs.

David M Turner

Class D and Class II Certified Wastewater Treatment Plant Operator



David Turner

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dturner@turnertech.net

From: [Johnny Horton](#)
To: [IDEM Efficiency](#)
Subject: License Request
Date: Wednesday, June 3, 2026 12:50:12 PM

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Hey there, my name is Johnathon Horton. I've been in the Wastewater/Drinking Water field of work for about 17 years. I currently hold four licenses through IDEM. My suggestion would be to ease up on the requirements to test out of Water Treatment. I am currently licensed in WT2. I can't test any higher than that since you can only test as high as what your place of work is classified at.

Johnathon W. WW022287 Class IV Municipal

Johnathon W. WW022192 Class D Industrial

Johnathon W. DS240125 Class DSL

Johnathon W. WT120182 Class WT2

From: [Kevin Brown](#)
To: [IDEM Efficiency](#)
Subject: Wastewater certification process
Date: Wednesday, June 3, 2026 8:03:27 PM

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Dear IDEM:

First let me start with positive. I think it was a good idea to allow the test to be taken more than once or twice a year. I think the Class I, II, III , IV

Classification are fine. My problem is with the number of questions on the test and the questions themselves. The test questions should be actual experiences that happen in a wastewater plant and not the hypothetical questions that an operator or lab person may never experience in their entire wastewater career. Make the questions more relevant and not probale. Thanks for the opportunity to comment.

Kevin Brown- Chemist Supervisor
Gary Sanitary District

From: [John Rumble](#)
To: [IDEM Efficiency](#)
Subject: Licensing requirements feedback
Date: Thursday, June 4, 2026 7:06:07 AM
Attachments: [image002.png](#)

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I have held an Indiana WT3 Drinking Water Operator license since around 2012. I have been critical of the entire training/licensing system since learning how it all works. I will list my criticisms in no particular order.

- Bring back open book testing. How has our industry improved by removing open book testing?
- Why limit the license you can acquire, to the type of plant an operator works at? The tests have questions that cover every class of water treatment, but you can only receive a license for the class designation of your specific plant, and there are even saltwater treatment questions on our tests in Indiana. None of these things make sense. Either tailor testing to be WT class specific, or grant licenses to the level of questions asked on the test. I was hired at our wastewater facility in 2005, without a license or any training/education in this industry. I moved to our drinking water facility in 2009, and didn't obtain a license for a couple of years. In my experience, it is pretty common for operators to come into this industry, with little to no experience, or specific knowledge of wastewater or water treatment, and they have learned everything on the job, hands on, as it relates to their specific system. Why are you requiring operators to know answers to questions about systems they don't work with every day, but can only obtain a license relative to their particular plant class designation?
- Can the 12 week operator school be expanded/improved, or develop an actual course offered through IVY Tech (community college) for water and wastewater operations? Ivy Tech seems like the perfect place to implement affordable, specific, workforce training for our industry. Is there any effort being made to develop degree/certification programs, similar to Nursing, in our community college system?
- To keep our licenses active we have CEU requirements that are primarily met through things like Operator Boot Camp, or Operator Expos. These are full day, 30-60 min sessions, that give operators an opportunity to get 6-8 CEU's in 1 day. 99% of the time, the entire days "instruction" are salesmen from every corner of our industry, talking about the products or services they offer. Of course a person can learn something from this environment, but it's a stretch to call them educational. Aside from these training opportunities being very convenient and in a relaxed environment, they are high on networking, and low on education.



John Rumble • Lead Operations Specialist

Marion Utilities O&M, Water Division

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From: [Armacost, Mary](#)
To: [IDEM Efficiency](#)
Cc: [Dryden, Andrew](#)
Subject: Drinking Water & Wastewater Operator Licensing Requirements
Date: Thursday, June 4, 2026 7:46:45 AM

I have been a certified operator since getting my first license in 2000, I currently hold 5 licenses (both drinking water and wastewater), I am required to continually update my education in both fields in order to maintain my licenses. The Drinking Water & Wastewater Operator Licensing Requirements are a vital part of ensuring the safety of our communities. An operator that does not know what they are doing can cause significant harm to their community. In addition, utility work is not just providing a service to the community; it is also a part of economic development. Without safe drinking water and effective wastewater treatment, businesses are not going to local in a community. Weakening the requirements would hurt both our local communities and our state.

Thanks,
Mary

Mary Armacost
PreTreatment Coordinator
Office of Water Quality
Compliance and Enforcement Branch
Indiana Department of Environment Management
marmacos@idem.in.gov
317-234-4816

From: [Steve Jacobson](#)
To: [IDEM Efficiency](#)
Subject: Input on Professional Licensing Regulations - Wastewater Operator - IC 13-18-11 / 327 IAC 5-23
Date: Thursday, June 4, 2026 8:56:59 AM

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RE: IC 13-18-11 / 327 IAC 5-23

I am currently an "Industrial A" Certified Wastewater Operator in Indiana. I need to be "Industrial D" to support my current facility.

Education

BS – Chemistry

MS – Engineering Management

Experience

15 Years – Significant Industrial User (without pretreatment) – Sampling and submitting reports

4 Years – Industrial D facilities (2) – Running the pretreatment plant, sampling and submitting reports

Why am I only Industrial A? Because I don't qualify with enough education and experience to get the "D" certification. It took me less time to get a master's degree than it will take to get my Industrial D. I need 2.3 more years as a "Responsible Charge" before I can test for the Industrial D. For now, we're paying an outside party to show up once a month and to sign off on reports. I'm literally spinning my wheels for 2-plus years.....

In my honest opinion, anything more than one year of experience running a pretreatment system is excessive. One year gets someone through all four seasons and any typical seasonal business variations. I think if you can pass the test, you should be able to obtain the license. Passing the test indicates you have either gained the knowledge through years of practice or you have studied enough that you can find the information when it is needed.

Please consider shortening the path to obtaining these certifications.

Steve Jacobson
EHS Manager

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Part of the Verbio group
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M: (269) 436 0331
steve.jacobson@verbio.us
www.verbio.us

From: [Ken Parcels](#)
To: [IDEM Efficiency](#)
Subject: input requested
Date: Thursday, June 4, 2026 9:56:24 AM

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Good Morning! You requested some input on some licensing requirements. The only one on the list you supplied that I have knowledge of, is the "Drinking Water Operator."

I have taken classes on this topic for several years. I find the classes I have taken, are very informative and very helpful. I look forward to taking the classes to be able to learn some new and interesting facts.

Keep up the good work. And keep the requirements.

Ken Parcels
Warsaw, Indiana

From: [Josh Walker](#)
To: [IDEM Efficiency](#)
Subject: feedback
Date: Thursday, June 4, 2026 2:28:15 PM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Dear Indiana Section American Water Works Association,

Thank you for the opportunity to provide feedback regarding Indiana's wastewater operator licensing requirements and examination process.

In my opinion, the wastewater licensing requirements themselves are not too strict. The standards help ensure that operators possess the knowledge and skills necessary to safely and effectively manage wastewater treatment systems.

However, I do have concerns regarding portions of the examination content. Specifically, I have encountered questions that appear to reference equipment and technologies that are outdated and no longer commonly used in today's wastewater industry. As treatment processes and equipment continue to evolve, I believe the examination would benefit from periodic review and updates to better reflect current industry practices and technologies.

Additionally, I have noticed what appears to be one or two mathematical formulas presented in an incorrect or confusing format. Accurate formula representation is important to ensure operators are being tested on their understanding rather than their ability to interpret potentially flawed equations.

Overall, I support maintaining the current licensing standards, but I believe updating examination content to reflect modern wastewater operations and verifying the accuracy of all mathematical formulas would improve the testing process and better serve both operators and industry.

Thank you for considering this feedback.

Sincerely,

Joshua Walker
Patoka Lake Regional Water and Sewer District

Joshua Walker
Wastewater Superintendent

P: 812-678-5171
C: 812-653-2022



From: [DuWayne Johnson](#)
To: [IDEM Efficiency](#)
Subject: Executive order 25-18 input Wastewater input
Date: Friday, June 5, 2026 9:32:41 AM

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Dear IDEM,

As a wastewater operator since 1990, I have the following inputs. I believe the certification process is adequate for the most part. I also realize that in the 1970s there were no operators and those that obtained certifications at that time are now retiring from the field which has most likely created a bit of a shortage. I'm concerned that the time requirements have been shortened to accommodate new operators, which is good to fill the vacancies, but concerning as the complexity of treatment systems and reporting requirements has increased and limits have become more stringent and nutrient removal has become more important. SCADA systems seem to be more prevalent, and it seems I get weekly notices about cyber security, however, there seems to be a lack of resources for small towns with no IT departments or staff.

On the job training is good as operators advance and some of that has been lost with the new folks coming on board and moving up quicker without on-the-job experience. The apprentice program has helped folks with on boarding, but as the field grows more complex, I believe that time on the job is becoming more important than simply passing the exams. I've personally seen operators that are certified but do not understand how a plant works or how to properly fill out a report which is concerning. I believe standards should be held high if we want professional skilled operators and have found that you never stop learning in this field. The system is adequate, but as I mentioned I do not think shortening the time of experience should be any less than the current level. The exams test your knowledge, but on the job, experience is where the knowledge hits the road. A good operator has to take that book knowledge and apply it to the facility and reports to really make the facility a treatment plant! Also, too many operators do not read and pay close enough attention to the permits that IDEM issues them, I preach that the permit is your bible and should be read and understood so that we can satisfy what IDEM wants and expects! I believe we want better operators in the future which takes knowledge and experience and a good relationship with the inspectors. I appreciate the opportunity to comment on this and for IDEM allowing our input.

Respectfully,

DuWayne Johnson
Wastewater Operations, LLC

DuWayne A. Johnson Wastewater Operations, LLC 7366 Outer Lincoln Avenue Newburgh, IN 47630
duwaynej@att.net Mobile 812-598-6818 Home Office 812-853-5006

From: thacth7@aol.com
To: [IDEM Efficiency](#)
Subject: IDEM
Date: Friday, June 5, 2026 9:46:10 AM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

This email is in response to IDEM on drinking water licensing. We currently have way too many systems that either have a certified operator listed or no certified operator. Too many systems aren't meeting the required visits from certified operators, as they are passing the responsibility and required visit on to uncertified operators! I, myself have been in the water industry for 40 years and have been certified for 37 of those years.

I currently see people running systems that haven't any clue or that don't know the rules and regulations. I'm currently helping a system to get an individual certified which has to be met by IDEM... With that being said, I assure you my visits are as IDEM required although the system struggles financially.

Also, the CEU'S are rather extensive and expensive to obtain.

From: [Phil and Tammy Chiafos](#)
To: [IDEM Efficiency](#)
Subject: License requirements
Date: Sunday, June 7, 2026 8:58:14 AM

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Hello,

Yes, i feel the reauirements are too strict for the water certification license. I am a respiratory care practitioner and my license is with the state of Indiana. I had to go to college for 3 years for my degree and ha e to submit 30 CEU'S every 5 years to keep my license. I went to a 3 hour class for my water certification, license and you guys are requiring the same amount of credits as the license I went to college for 3 years to obtain. 10 every 2 years is 25 CEU's in 5 years. Collecting the water samples doesn't even compare to my full time job and the skillet I am required.

I hope this input helps and you dramatically lessen the required CEU's.

Sincerely,

Tammy Chiafos

PW

IN5291020

Scenic View Mobile Home Community

From: [Bruce Wilson](#)
To: [IDEM Efficiency](#)
Subject: Questionnaire
Date: Monday, June 8, 2026 7:17:05 AM

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Greetings,

Sorry, my input on this matter is late.

I understand the need to have operators in the state of Indiana but if the requirements for getting a license are too lax then what kind of operators are we really getting? The state licensing process is there for a reason. Getting a license shouldn't be taken lightly, and the municipalities should be confident that they are receiving proper, knowledgeable personnel in their workforce. We shouldn't be giving participation trophies in this industry!

With Respect,

Bruce Wilson

**Asst. Superintendent
Monticello Wastewater Utility
705 East Street
Monticello, IN 47960
O: 574.583.7847
C: 574.870.9585**

From: [doug whitman](#)
To: [IDEM Efficiency](#)
Subject: Certification renewal
Date: Tuesday, June 9, 2026 4:03:40 PM

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Although wastewater certification renewal requirements has changed to every 3 years, it is much better. However, personally I'm not sure if the credit hour portion is really needed. I understand the renewal fee is necessary but for me the hassle of taking classes or course material tends to be a struggle at times.

Sent from my iPhone

From: [Tom Draur](#)
To: [IDEM Efficiency](#)
Subject: EO 25-18: wastewater operator comments
Date: Tuesday, June 9, 2026 6:57:02 PM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

I am certified as a wastewater operator A-SO. My opinion is that certification for settling ponds used for rock quarries and construction sites should not be necessary. I work in 11 other states in the quarry and mining industry, and no other state requires certification to oversee or sample a stormwater or sedimentation pond for construction or quarry runoff water, or mine dewatering effluent. Certifications for other types of wastewater operations make sense to me, but management of settling basins is extremely rudimentary. The experience component can make it complicated to hire replacement people, and the refresher training requirement is substantial considering the lack of complexity for simple settling applications encountered under the A-SO criteria.

Thomas E. Draur, PE

Senior Manager, Environmental Services – Central Division

Martin Marietta

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e. tom.draur@martinmarietta.com

www.martinmarietta.com

From: [Shawna Taylor](#)
To: [IDEM Efficiency](#)
Subject: Feedback on drinking water requirements
Date: Wednesday, June 10, 2026 6:07:27 AM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

I have taken the WT4 examination five times and have not yet achieved a passing score. While I support maintaining high standards for advanced water treatment operators, I believe IDEM should evaluate whether the examination process effectively measures the knowledge and skills required for successful operation of modern treatment facilities.

One area for improvement would be providing more detailed feedback to unsuccessful candidates. Currently, operators may know they did not pass but receive limited information about specific subject areas requiring additional study. More detailed score reporting could help candidates focus their preparation and improve their chances of success.

IDEM should also evaluate whether exam content accurately reflects current treatment technologies, operational responsibilities, and regulatory requirements encountered by WT4 operators. Ensuring alignment between examination content and real-world job duties would help maintain high standards while improving the effectiveness of the licensing process.

I support strong operator qualifications and public health protections, but I believe additional study resources, clearer exam guidance, and more detailed performance feedback would benefit operators pursuing WT4 certification.

From: [Al Goodman](#)
To: [IDEM Efficiency](#)
Subject: Response for IDEM Certification Notice
Date: Thursday, June 11, 2026 10:08:51 AM
Attachments: [IDEM CERTIFICATION-LICENSING RESPONSE .pdf](#)

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Please find a response to IDEM's request for relative information on the importance of water and wastewater operator certification in Indiana.

Let me know if there's any questions.

Thanks,
Albert Goodman, P.E.
Class IV & D Certified Operator
Past IWEA & WEF President
Chairman of the Board of IIOA
Cell/text: 502 888-5950
Email: goodmanaw4738@outlook.com

RESPONSE TO INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
REQUEST
FOR POTENTIAL REGULATION REFORM
June 10, 2026

This is a formal response to the request of the Indiana Department of Environmental Management (IDEM) request for information related to Governor Braun's Executive Order 25-18 (Amended) for potential professional regulation reform. It specifically responds to IDEM's Licensing Notice 05.29.26 outlining IDEMS review per I.C. 25-1-16.5-8. IDEM has requested responses for 15 types of licensing. These comments relate to licensing of drinking water and wastewater treatment operators only.

IDEM has outlined input desired relative licenses that are: too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough or need other improvements. Comments are offered on each of these.

BACKGROUND

These comments are drafted by a 77-year Indiana resident and IN business owner, certified industrial and municipal wastewater operator at highest levels for over 55 years in IN and KY and as Past president of the Indiana Water Environment Association (IWEA) and past president of the international Water Environment Federation (WEF). Currently serving as Chairman of the Board of the Indiana Industrial Operators Association (IIOA). Also, as a licensed Professional Engineer in Indiana and two other states and a IN licensed plumber. Additional related experience includes serving on 5 separate IDEM internal certification review panels, providing over 50 years of operator training courses in multiple states, and providing certification exam technical questions to IDEM for licensing tests.

Currently in Indiana there are approximately 2,863 wastewater (industrial and municipal) certified operators. There are more drinking water operators than wastewater. According to the U.S. Bureau of Labor Statistics, wastewater treatment operators earned a median annual salary of \$49,090 in 2022. The lowest 10 percent earned less than \$31,440, while the highest 10 percent earned more than \$79,620. Higher positions earn significantly more.

RELATED REGULATIONS

As researched by the American Water Works Association(AWWA), in February 1999 Environmental Protection Agency (EPA) published *Final Guidelines for the Certification and Recertification of Operators of Community and Non-Transient Non-Community Public Water* systems which provided nine baseline standards for state operator programs. These included: passing an exam, having a high school diploma or general equivalency diploma (GED), having defined minimum on-the-job experience or training, and establishing training requirements for renewal of certification. EPA left it to each state to develop its own programs.

IDEM is authorized by the Indiana Code to write rules for treatment operators and plants in accordance with IC 13-19-11. The Wastewater Treatment Plants and Operators rule currently defines IDEM's program.

Facility classification

In the majority of cases, the level or grades for operator certification are tied to classification of the system. Below are the AWWA/EPA findings regarding system classification:

Water Treatment

- The majority of classification systems are based on a point scale, with points awarded for size of system, water source, and treatment process types. The amount of points awarded, and the components of the scales vary substantially between states.
- Classification in a few states is based on size alone, or on size and water source (i.e., surface or groundwater).
- Most states have a small or very small system classifications.

Distribution System

- Classification of distribution systems is typically based on the population served.
- A few states classified distribution systems based on complexity (number of pressure zones, etc.).
- The vast majority of states (46 of 50) have separate operator certification requirements for distribution systems.

Wastewater Treatment

- There is much greater variation in how wastewater treatment systems are classified as opposed to water treatment.
- While the majority of system classifications are varied based on complexity of wastewater treatment (e.g., primary, secondary, tertiary levels, and specific unit processes), the rating criteria and point scales varied significantly between states.

RESPONSES TO IDEM'S REQUEST

These specific topics that follow are individually presented as IDEM requested related to operator certification in Indiana:

Unnecessary

In the mid 1970's there was much debate in Indiana about requirements for certification of operators. There were "grandfather" rules incorporated by the State Board of Health (IDEM predecessor) to allow experienced (non-tested) operators to remain at their facilities. If they transferred to a new facility they would need to pass an exam. Most didn't transfer and most all have since retired or passed believing certification was unnecessary.

However, times have changed significantly with current technologies pushing water and wastewater treatment into water recycling, water reuse, water resource recovery, groundwater

recharge, direct potable water reuse, nutrient recovery, etc. “Water” now is much more inclusive of drinking water, wastewater, industrial discharges and includes the current “Circular Water Economy” by shifting from the take-use-dispose to a more sustainable approach that maximizes the value of water. Additional emphasis is on stormwater, wetlands, irrigation efficiencies, agricultural runoff and all water-related issues. Federal and state agencies are implementing new regulations for reuse requirements based on new advanced “water” treatment technologies.

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Respectfully submitted by:

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REFERENCES:

1. Operator Licensing Requirements Across the United States, American Water Works Association 2018,
<https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fefcnetwork.org%2Fwp-content%2Fuploads%2F2022%2F05%2FAWWA-Operator-Licensing-Requirements-Across-the-United-States.pdf>
2. How to Become a Wastewater Treatment Plant Operator; January 6, 2026;
<https://www.environmentalscience.org/career/wastewater-treatment-operator>
3. Water Quality in Indiana: Wastewater Operator Certification Information, 6-6-2026;
<https://www.in.gov/idem/cleanwater/wastewater-operator-ertification-and-continuing-education/wastewater-certification-information/>
4. Center for Disease Control (CDC) *Waterborne Disease in the United States/Waterborne Disease and Outbreak Surveillance Reporting* (May 29, 2025) <https://www.cdc.gov/healthy-water-data/watervoreune-disease-in-us/index.html>
5. Great Lakes Water Workforce Workgroup, Final Recommendations, 2026.
<https://www.glc.org/wp-content/uploads/GLC-GL-WWF-Recs-2026.pdf>

From: [Al Goodman](#)
To: [IDEM Efficiency](#)
Cc: [Martin, Martha](#); [Eiler, Russell](#); [Martin, Tom](#)
Subject: IDEM Certification response from Indiana Industrial Operators Association
Date: Thursday, June 11, 2026 11:19:03 AM
Attachments: [IDEM CERTIFICATION-Licensing response from IIOA.pdf](#)

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Attached, please find the Indiana Industrial Operator's Association, Inc. formal response to IDEM's request for information supporting the water and wastewater certification in Indiana. Please contact any of the signatories if there are any questions. We gratefully acknowledge IDEM's request for this information and its contacting individual Indiana operators for response.

Respectfully,

Al Goodman, P.E.

Chairman of the Board of the Indiana Industrial Operators Association, Inc.

Class IV/D Certified Operator



Indiana Industrial Operators Association, Inc., www.iioa.net

RESPONSE TO INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT REQUEST FOR POTENTIAL REGULATION REFORM June 10, 2026

This is a formal response to the request of the Indiana Department of Environmental Management (IDEM) request for information related to Governor Braun's Executive Order 25-18 (Amended) for potential professional regulation reform. It specifically responds to IDEM's Licensing Notice 05.29.26 outlining IDEMS review per I.C. 25-1-16.5-8. IDEM has requested responses for 15 types of licensing. These comments relate to licensing of drinking water and wastewater treatment operators only.

IDEM has outlined input desired relative licenses that are: too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough or need other improvements. Comments are offered on each of these.

BACKGROUND

These comments are drafted by a 77-year Indiana resident and IN business owner, certified industrial and municipal wastewater operator at highest levels for over 55 years in IN and KY and as Past president of the Indiana Water Environment Association (IWEA) and past president of the international Water Environment Federation (WEF). Currently serving as Chairman of the Board of the Indiana Industrial Operators Association (IIOA). Also, as a licensed Professional Engineer in Indiana and two other states and a IN licensed plumber. Additional related experience includes serving on 5 separate IDEM internal certification review panels, providing over 50 years of operator training courses in multiple states, and providing certification exam technical questions to IDEM for licensing tests.

Currently in Indiana there are approximately 2,863 wastewater (industrial and municipal) certified operators. There are more drinking water operators than wastewater. According to the U.S. Bureau of Labor Statistics, wastewater treatment operators earned a median annual salary of \$49,090 in 2022. The lowest 10 percent earned less than \$31,440, while the highest 10 percent earned more than \$79,620. Higher positions earn significantly more.

RELATED REGULATIONS

As researched by the American Water Works Association (AWWA), in February 1999 Environmental Protection Agency (EPA) published *Final Guidelines for the Certification and Recertification of Operators of Community and Non-Transient Non-Community Public Water* systems which provided nine baseline standards for state operator programs. These included: passing an exam, having a high school diploma or general equivalency diploma (GED), having defined minimum on-the-job experience or training, and establishing training requirements for renewal of certification. EPA left it to each state to develop its own programs.

Response to IDEM request

IDEM is authorized by the Indiana Code to write rules for treatment operators and plants in accordance with IC 13-19-11. The Wastewater Treatment Plants and Operators rule currently defines IDEM's program.

Facility classification

In the majority of cases, the level or grades for operator certification are tied to classification of the system. Below are the AWWA/EPA findings regarding system classification:

Water Treatment

- The majority of classification systems are based on a point scale, with points awarded for size of system, water source, and treatment process types. The amount of points awarded, and the components of the scales vary substantially between states.
- Classification in a few states is based on size alone, or on size and water source (i.e., surface or groundwater).
- Most states have a small or very small system classifications.

Distribution System

- Classification of distribution systems is typically based on the population served.
- A few states classified distribution systems based on complexity (number of pressure zones, etc.).
- The vast majority of states (46 of 50) have separate operator certification requirements for distribution systems.

Wastewater Treatment

- There is much greater variation in how wastewater treatment systems are classified as opposed to water treatment.
- While the majority of system classifications are varied based on complexity of wastewater treatment (e.g., primary, secondary, tertiary levels, and specific unit processes), the rating criteria and point scales varied significantly between states.

RESPONSES TO IDEM'S REQUEST

These specific topics that follow are individually presented as IDEM requested related to operator certification in Indiana:

Unnecessary

In the mid 1970's there was much debate in Indiana about requirements for certification of operators. There were "grandfather" rules incorporated by the State Board of Health (IDEM predecessor) to allow experienced (non-tested) operators to remain at their facilities. If they transferred to a new facility they would need to pass an exam. Most didn't transfer and most all have since retired or passed believing certification was unnecessary.

However, times have changed significantly with current technologies pushing water and wastewater treatment into water recycling, water reuse, water resource recovery, groundwater recharge, direct potable water reuse, nutrient recovery, etc. "Water" now is much more inclusive of drinking water, wastewater, industrial discharges and includes the current "Circular Water Economy" by shifting from the take-use-dispose to a more sustainable approach that maximizes the value of water. Additional emphasis is on stormwater, wetlands, irrigation efficiencies, agricultural runoff and all water-related issues. Federal and state agencies are implementing new regulations for reuse requirements based on new advanced "water" treatment technologies.

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REFERENCES:

1. Operator Licensing Requirements Across the United States, American Water Works Association 2018,
<https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fefcnetwork.org%2Fwp-content%2Fuploads%2F2022%2F05%2FAWWA-Operator-Licensing-Requirements-Across-the-United-States.pdf>
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5. Great Lakes Water Workforce Workgroup, Final Recommendations, 2026.
<https://www.glc.olrg/wp-content/uploads/GLC-GL-WWF-Recs-2026.pdf>

From: [Comcast](#)
To: [IDEM Efficiency](#)
Subject: Response to IDEM request
Date: Thursday, June 11, 2026 3:46:09 PM
Attachments: [image.png](#)
[IDEM CERTIFICATION-LICENSING+RESPONSE.pdf](#)

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I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

Justin Maxwell | D-IV, RIWPhD

Vice President

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From: [Thomas H. Martin](#)
To: [KIMM Efficiency](#)
Subject: Response to Request Licensing Certification
Date: Thursday, June 11, 2026 3:48:53 PM
Attachments: [JOHN CERTIFICATION LICENSING RESPONSE\(AWG\).pdf](#)
Importance: High

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Thomas H. Martin
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https://protect.checkpoint.com/v2/d0/____www.avast.com____YzJlOnN0YXRibS7ZghmRyYWhOmM6bzodYVWQfOWFsNjZmVmJmFhODYtYmE3NGQlZDp2MmJlNTto3OmU1Mxc6Yj45ZDY5ZmFpYjYlOjRlMTA0MWRmZDhMTE3NTBhZmRzZGVySnpqSjA1YTlsMDU1OWV3MzZmZGVmYTg3ZDZmMjpsOjQ6Tg

From: [Thomas H. Martin](#)
To: [IDPH Efficiency](#)
Subject: Request for Response Licensing
Date: Thursday, June 11, 2026 3:55:49 PM
Attachments: [IDPH CERTIFICATION LICENSING RESPONSE\(AWS\).pdf](#)

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"I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and HOA Board of Directors."

Jeffery D. Graham, Class D Operator
Chetgraham214@yahoo.com

Delta Compliance Consultants Div.
Delta Chemicals & Equipment, Inc.
5439 N. Acorn Ct.
Greenfield, IN 46140
317-439-8350 Cell

https://protect.checkpoint.com/v2/d01/____YzJ1OnN0YXRibS7ghmRgYWShOmM6bz0YQyMzIkZmUsNjEwNjEzZmRlNTI1YQyNGQ0ZTc3OmNmMDU6NkksNjY0YUdmc0ZlNmVhNWU4OTI1YzAAMTZzZDUuNDk6NmYANGQ3TVkZGMzJzAAhNmRlN2I1ZDk6M2IyYVZlZTpsOIQ6Tg

Jeffery Graham
5432 N. Acorn Ct.
Greenfield, IN 46140

https://protect.checkpoint.com/v2/d01/____YzJ1OnN0YXRibS7ghmRgYWShOmM6bz0YQyMzIkZmUsNjEwNjEzZmRlNTI1YQyNGQ0ZTc3OmNmMDU6NkksNjY0YUdmc0ZlNmVhNWU4OTI1YzAAMTZzZDUuNDk6NmYANGQ3TVkZGMzJzAAhNmRlN2I1ZDk6M2IyYVZlZTpsOIQ6Tg

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From: [Rick Tilley](#)
To: [IDEM Efficiency](#)
Date: Sunday, June 14, 2026 6:44:20 AM

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I think tests should only have questions that pertain to the classification they are taking it for. Seems like tests are set up for failure. Also think there should be hands on training.

Rick Tilley
Tipton Municipal Utilities
317-385-5847

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: [Lane Freiberger](#)
To: [IDEM Efficiency](#)
Subject: Wastewater license review
Date: Thursday, June 11, 2026 5:24:16 PM
Attachments: [IDEM CERTIFICATION-LICENSING RESPONSE \(AWG\).pdf](#)

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IDEM,

I support the IIOA position on licensing for water and wastewater operators in Indiana.

Indiana generally has similar or better requirements when compared to other states.

The only thing I would add above what Chairman Goodman's memo stated, is that I think a lot of attention needs to be paid to making apprenticeships appealing to younger generations. Indiana needs more water and wastewater operators and that need is only going to increase as retirements take skilled operators out of the system. The proposed advisory board would be a good start, but that board will need members from the younger generations to make recommendations to the state that will truly be meaningful to youth.

Best Regards,

Lane C. Freiberger
6303 Maple Rd.
Greenville, IN 47124
502-295-3367
laneproton.me@proton.me

From: [Casey Decaro](#)
To: [IDEM Efficiency](#)
Subject: Order 25-18: Wastewater & Drinking Water Operators license requirements
Date: Thursday, June 11, 2026 9:45:52 PM
Attachments: [IDEM+CERTIFICATION-LICENSING+RESPONSE.pdf](#)

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Hello,

I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

I feel that based on the grounds that these requirements are "essential to public safety" like it states in section 14 of the order they should not be streamlined.

Furthermore, I believe that these requirements make companies run more efficiently not less because everyone benefits from better skilled labor from people in these positions.

Finally, you want people treating public water supplies to have a good knowledge base of what they are doing and access to good information such as our certification training programs.

--

Casey Decaro
219 362 0104

From: [Rick Studebaker](#)
To: [IDEM Efficiency](#)
Subject: Licensing programs under review
Date: Friday, June 12, 2026 5:46:37 AM
Attachments: [image001.png](#)
[image002.png](#)
[23633_comm_center_quh1sdnsoso_1781205497874-IDEM+CERTIFICATION-LICENSING+RESPONSE++\(AWG\).pdf](#)

This is the first time you received an email from this sender (rick.studebaker@dormakaba.com). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

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I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

Rick Studebaker

Plating Lab Technician / Wastewater Operator - Class B

dormakaba USA Inc.
6161 E. 75th Street
Indianapolis, IN 46250

t 317 386-2243
rick.studebaker@dormakaba.com
www.dormakaba.us



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From: [Chadwick Cutliff](#)
To: [IDEM Efficiency](#)
Subject: FW: Response to IDEM Licence Request
Date: Friday, June 12, 2026 6:35:24 AM

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Hello,

I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

Thanks,

Chadwick L.Cutliff

WT2
DSS
Class D Operator

From: Martha Martin, IIOA <IndianIndustrialOperatorsAssociation@wbxmail.net>
Sent: Thursday, June 11, 2026 3:31 PM
To: Chadwick Cutliff <ccutliff@camsops.com>
Subject: Response to IDEM Licence Request

You don't often get email from indianaindustrialoperatorsassociation@wbxmail.net. [Learn why this is important](#)

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Members and Operators:

IIOA has responded to IDEM's request about the licensing programs under review as requested by Gov. Braun including wastewater and water operators. In order to have a voice and protect our programs, **attached please find the IIOA response that operators are welcome to use to respond to the IDEM request.** Attached hereto is the response letter to IDEM on IIOA letterhead with our contact information at the end.

Feel free to generate your own response or you may email this response document to Efficiency@idem.IN.gov with your email saying something like "I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors." Include in your

email: Your Name and Contact Information.

We are concerned that the mass notice from IDEM went to spam as several of us found it there. **Time is of the essence and the final date to submit is June 30.**

Your action counts on this important response.

[IDEM CERTIFICATION-LICENSING RESPONSE \(AWG\).pdf](#)

Send your IDEM response to: Efficiency@idem.IN.gov

www.iioa.net

Martha Martin, Business Manager
Indiana Industrial Operators Association, Inc.
Water Quality Protectors
317-502-1380 Cell

martin2076@comcast.net

Don't want to receive further communication? [Click here](#) to unsubscribe.

From: [Nick McClain](#)
To: [IDEM Efficiency](#)
Subject: IIOA Letter
Date: Friday, June 12, 2026 8:14:47 AM
Attachments: [image001.png](#)
[image002.png](#)
[IIOA response letter.pdf](#)

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I support the attache letter from IIOA.

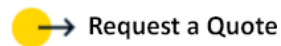
Nick McClain | Water Treatment Operator

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From: [Randy Tarrance](#)
To: [IDEM Efficiency](#)
Subject: licensing programs
Date: Friday, June 12, 2026 9:16:13 AM
Attachments: [image.png](#)
[IDEM+CERTIFICATION-LICENSING+RESPONSE++\(AWG\) \(1\).pdf](#)

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I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

Randy Tarrance

Class C wastewater Operator

2009 individual operator of the year
2013 operator of the Industrial plant of the year
2016 Industrial operator of the year
2020 operator of the Industrial plant of the year
IEM-M

dormakaba USA Inc.
6161 E. 75th Street
Indianapolis, IN 46250
t 317.386.2239

Randy.Tarrance@dormakaba.com
www.dormakaba.us



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From: [Tyler Reece](#)
To: [IDEM Efficiency](#)
Subject: Support the Response from IIOA
Date: Friday, June 12, 2026 9:48:27 AM
Attachments: [image001.png](#)

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Good Morning,

I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

[IDEM CERTIFICATION-LICENSING RESPONSE \(AWG\).pdf](#)

Thanks,



Tyler Reece
Wastewater Operator
3722 Foundation Ct
South Bend, IN 46628
Ph: 574-514-8621
[IFT Worldwide | Stronger As One](#)

From: [Eiler, Russ](#)
To: [IDEM Efficiency](#)
Subject: Response to IDEM's request for feedback on water and wastewater operator requirements
Date: Friday, June 12, 2026 3:09:29 PM
Attachments: [image002.png](#)
[IDEM Licensing Response.pdf](#)

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I fully support the attached document drafted by Chairman Goodman and endorsed by the President (me) and Business Manager and IIOA Board of Directors.

As a global compliance leader for a multinational corporation dealing with compliance issues daily, I wish all US states and other countries had a robust operator certification program like that of the State of Indiana.

Russell E. Eiler

Licensed Indiana Wastewater Operator

WW019487 Class IV

WW019339 Class D

Russ

Russell E. Eiler, MS, CEF, RIWPhD, CHMM, CSP
Director, Global EHS Compliance, Remediation, and M&A integration

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Allegion plc
c/o Schlage Lock Company LLC
11819 N. Pennsylvania Street
Carmel, Indiana 46032 USA
Office +1.317.810.3874
Cell +1.317.414.4070
Email: Russ.Eiler@Allegion.com
allegion.com



From: [Jeanne Fleischhacker](#)
To: [IDEM Efficiency](#)
Subject: Recommendations Regarding Water and Wastewater Operator Licensing Requirements
Date: Sunday, June 14, 2026 10:13:22 PM

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Jeanne Fleischhacker
319 Ironwood St NW
Demotte, IN 46310
jfleischhacker@valpo.us

14 June 2026

Indiana Department of Environmental Management (IDEM)
Subject: Recommendations Regarding Water and Wastewater Operator Licensing Requirements

Dear IDEM Representatives,

I am writing to share my concerns and recommendations regarding Indiana's water and wastewater operator licensing programs. As someone who recognizes the importance of protecting public health and the environment, I believe there are several areas where the current licensing framework could be improved.

First, I believe Indiana should consider combining water and wastewater operator licenses into a single, unified operator certification. The knowledge and responsibilities associated with both disciplines are closely related, and many operators work across both systems throughout their careers. A combined license would create a more versatile workforce, reduce administrative burdens, and encourage a broader understanding of the complete water cycle from treatment to discharge and environmental protection and in a sense hold operators accountable.

Second, I believe the current requirements for obtaining and maintaining operator licenses are not stringent enough. The operation of water and wastewater facilities directly impacts public health, environmental quality, and regulatory compliance. Given the significance of these responsibilities, licensing standards should reflect the high level of expertise and accountability required.

Additionally, I am concerned that too many facilities may not be utilizing licensed operators to the extent intended by regulatory requirements. Licensed operators provide critical oversight

and technical knowledge that help ensure compliance and environmental stewardship. Greater enforcement of operator staffing requirements would help ensure that facilities are being managed by qualified professionals.

I also believe that college education should never be considered a substitute for meaningful real-world operating experience when it comes to environmental protection and utility operations. While formal education can provide valuable theoretical knowledge, hands-on experience is essential for understanding the practical challenges, decision-making, troubleshooting, and accountability required to operate water and wastewater systems safely and effectively. Experience gained through direct facility operations should remain a cornerstone of the licensing process.

Furthermore, I encourage IDEM to establish stricter requirements and accountability measures for Responsible In Charge (RIC) operators. Individuals who sign permits, certify compliance documents, and submit regulatory reports should be held to the highest professional standards. Their signatures represent the accuracy of information submitted to regulatory agencies and should carry clear responsibility for ensuring compliance and operational integrity, not through political favors.

Finally, I would like to see increased oversight of continuing education requirements used to maintain operator licenses and assist operators in training. Complacency kills as I am sure many of you are aware. Continuing education should provide meaningful and relevant training that enhances operator competency rather than serving as a routine administrative requirement. Stronger review and verification of continuing education programs would help ensure that licensed operators remain knowledgeable about evolving regulations, technologies, and best practices, preferably in person and meetings, not through zoom. Indiana's water and wastewater operators play a vital role in protecting public health and preserving our natural resources. By strengthening licensing requirements, increasing accountability, emphasizing practical experience, and improving oversight, IDEM can further enhance the professionalism and effectiveness of the operator community.

Thank you for your consideration of these comments and recommendations. I appreciate the opportunity to provide input on this important matter and hope these suggestions will be considered in future discussions regarding operator certification and regulatory oversight.

Sincerely,

Jeanne Fleischhacker

Class III WWTO License #WW022469

From: [Darren Sluder](#)
To: [IDEM Efficiency](#)
Subject: Message regarding Op Lic
Date: Monday, June 15, 2026 11:59:24 AM
Attachments: [image.png](#)

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Sometime Technical Hours are difficult to come by or classes are General and not Technical. Lowering the technical would work.

Best:

Darren Sluder



From: [Reece, Mark, US-Anderson](#)
To: [IDEM Efficiency](#)
Subject: IDEM Licensing Requirements
Date: Monday, June 15, 2026 1:48:28 PM
Attachments: [23633_comm_center_quh1sdnsoso_1781205497874-IDEM+CERTIFICATION-LICENSING+RESPONSE++\(AWG\).pdf](#)

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To Whom It May Concern,

I fully support the attached document drafted by Chairman Goodman.

Mark D Reece

Lead Wastewater Operator

Nestle USA

4301 W 73rd St.

Anderson, IN 46013

Mobile (765) 571-9706

Office (765) 778-6046



From: [Cortnee Hyser](#)
To: [IDEM Efficiency](#)
Subject: IDEM CERTIFICATION LICENSING RESPONSE
Date: Wednesday, June 17, 2026 4:38:17 AM
Attachments: [image001.png](#)
[IDEM+CERTIFICATION-LICENSING+RESPONSE++\(AWG\).pdf](#)

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To whom it may concern:

I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

Sincerely,
Cortnee Hyser
Wastewater Operator Class C
WW022163



Cortnee Hyser

Lab Manager and Wastewater Operator

Work: 574-858-6082 ext.*364

Direct: 574-354-3569

Mobile: 574-551-8392

cortneehyser@winonapowder.com

www.winonapowder.com

Plant Locations

9876 W. Old Road 30

Etna Green, IN 46524

574-858-6082

800 Summa Drive

Elkhart, IN 46516

574-294-6662



From: [monte anderson](#)
To: [IDEM Efficiency](#)
Subject: Input
Date: Wednesday, June 17, 2026 1:16:56 PM

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Number 1: Operators shouldn't have the ability to fulfill 100% of their CEU's online. Maybe 60/40 or 50/50, doesn't matter, but we're losing a lot of detail knowledge by eliminating the need for in person training. I see people that are new and don't yet have a feel and complete understanding of the needed ownership and education to continue to grow as the fully competent operator that will be needed long term, by just looking for the simplest thing they can find online and blowing thru it without actually listening or trying to retain anything. Participation in the running and overseeing of this industry in the future by fully competent operators is paramount to the success and protection of the industry as a whole.

Number 2: Start letting Water Treatment operators advance up the scale after a period of years of service like all the other certifications can. Example WT2 after 5 years could test for WT3 or something. This could possibly open some individuals up for pay raises or other possible promotions that would keep them involved in the industry.

Number 3: I want to Thank You for always continuing to simply ask and seek out opinions of Operators and show a willingness to change and adapt where needed.

From: [Paul Scott](#)
To: [IDEM Efficiency](#)
Subject: Certification Comments
Date: Wednesday, June 17, 2026 1:18:07 PM
Attachments: [image001.png](#)
[image002.png](#)

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Although I do not have any comments at this time, I do appreciate being asked for input. Please continue to send these kinds of requests.

Sincerely,



Paul Scott
Superintendent -WRD
Email: psscott@valpo.us
Phone: (219) 462-6174 x1352
1251 Joliet Road, Valparaiso, IN 46385
Valpo.us

From: [Prater, Matthew](#)
To: [IDEM Efficiency](#)
Subject: FW:
Date: Thursday, June 18, 2026 6:58:38 AM

We received the comment below regarding our operator certification rule language.

From: Doug Merritt <permit1975@gmail.com>
Sent: Wednesday, June 17, 2026 6:51 PM
To: Prater, Matthew <MPrater@idem.IN.gov>
Subject:

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Dear Matt:

In response to your email, No, EGLE (Michigan) does not allow for FSO operators. They only provided for FSO site operators the first year but it had to be site specific and they did away with it. Indiana should do the same. Here is why, FSO operators are not educated or treated the same as qualified operators. In my experience, FSO operators do not maintain log books and make required visits.

--

Denny
AquaMark, LLC.
2319 Lincolnway East
Mishawaka, IN 46544
574-286-8749

From: [Drake M Abramson](#)
To: [IDEM Efficiency](#)
Cc: [Woods, Clint \(IDEM Commissioner\)](#)
Subject: RE: IDEM Seeks Input on Professional Licensing Regulations
Date: Thursday, June 18, 2026 9:43:33 AM
Attachments: [INAW IDEM license program feedback June 2026 final .pdf](#)

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Good morning,

I hope this email finds you well!

Attached you will find comments and feedback from Indiana American Water (INAW) pertaining to the requirements for state licenses in which IDEM regulates. On behalf of INAW, we appreciate the opportunity to provide input and feedback which we believe will improve the process for all.

Should there be any comments, questions, or concerns pertaining to INAW's feedback, please do not hesitate to contact me at 219-895-6796 or at drake.abramson@amwater.com. Thanks!

Sincerely,

Drake

Drake Abramson
Indiana American Water
153 N Emerson Ave
Greenwood, Indiana 46143

O:317-885-2416
C: 463-313-3477
drake.abramson@amwater.com

From: Woods, Clint (IDEM Commissioner) <ClintWoods@idem.IN.gov>
Sent: Tuesday, June 2, 2026 12:33 PM
To: Woods, Clint (IDEM Commissioner) <ClintWoods@idem.IN.gov>
Subject: IDEM Seeks Input on Professional Licensing Regulations

The Indiana Department of Environmental Management (IDEM) is [seeking public input](#) on the requirements for the state licenses it regulates, including: drinking water operators; wastewater operators; asbestos inspectors, management planners, project designers/supervisors, workers, and asbestos abatement contractors; underground storage tank (UST) operators (Class A/B/C); UST workers; and solid waste operators (Categories I/II/III). In accordance with [Executive Order 25-18](#), all Indiana state agencies must review the occupational licenses and regulations within their respective jurisdictions.

[Additional information and a list of relevant licenses by name is available \[PDF\].](#)

Please submit any comments to Efficiency@idem.IN.gov by June 30, 2026. IDEM will review all feedback for potential rule amendments or recommendations to the General Assembly for statutory changes.

Thanks!



Clint Woods

Commissioner

www.idem.IN.gov

100 North Senate Ave.

Indianapolis, IN 46204

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Indiana American Water appreciates the opportunity to provide comment during the statewide review of licensing requirements under Executive Order 25-18. 327 IAC 8-12 sets the rules within the Indiana Administrative Code that govern the examination and certification of drinking water operators. Indiana American Water has broken our comments out into three components of the rule, Operator Certification Exam, Continuing Education/License Renewal, and Operator-in-Training requirements.

The Operator Certification Exam process presents an opportunity for modernization and improved efficiency. This opportunity begins with the application process, which continues to primarily rely on paper forms that applicants must complete and mail to the state. The mail-in application process can take up to five weeks for the applicant to receive a response from the regulating agency. While an online portal is available for applicants to apply for the exam, increased awareness and clearer guidance could improve the applicant experience. In addition, the payment portal could be enhanced to provide a more direct and user-friendly solution for applicants applying for the exam. Once an applicant has been approved to take the exam, the preparation and testing process could also be improved. Updating formula sheets on the State website and ensuring testing partners distribute current formula sheets and question pools would help provide greater consistency for testers.

Once a drinking water treatment or distribution system license is issued, it must be renewed every three years. The licensee must have a set number of continuing education units (CEUs) corresponding with the level of certification. Indiana American Water supports the current continuing education requirements and sees an opportunity to improve the CEU approval, submittal, and tracking processes through greater automation. Currently, one state employee manages the CEU approval process, and additional support or backup could help improve processing timelines. This could reduce delays in CEU applications and approvals, as well as improve the timeliness of logging training hours for license renewals. Operator CEU submittal forms continue to be in paper format, and additional visibility into the specific courses credited by the state would help licensees better track their renewal status. If a paper CEU form is misplaced, a more transparent tracking process could help identify the issue more quickly and avoid restarting the paper submittal process. The state provides an operator certification list showing the amount of earned CEUs by licensee/license, and more frequent updates could further improve visibility for licensees. Finally, when the licensee has accumulated the required number of CEUs for license renewal, improving the reliability of the online renewal process would help reduce delays and support a smoother renewal experience.

If an applicant passes the certification exam but does not have the required amount of education and/or hands-on experience, they will be granted an Operator-in-Training (OIT) certification. The OIT certification requirements include a specific number of years for the licensee to obtain a specific amount of experience based on the certification level. The Professional Licensing Database (PLD) tracks drinking water licenses, and additional visibility into OIT status and current qualifying hours toward full licensure would be beneficial for licensees and the public. In addition, aligning the PLD certification date with the state certification date could improve clarity, as the current system may indicate the exam pass date as the license issuance date once the license is issued. The required amount of experience, number of hours per week, and specific duties that qualify toward the OIT certification can involve some interpretation, and additional guidance could help ensure consistent evaluation. We would like to see flexibility in the number of hours per week required under the OIT rules to allow operators to account for time off for vacation, illness, bereavement, or other common life occurrences. The OIT rules and overall licensing program could be improved through greater transparency and automation, including an up-to-date online time log or similar tracking tool. Prior written clarification of approval dates and requirements for meeting the number of CEUs required for certification renewal would also be helpful. If a licensee obtains the required CEUs within the required time frame and is granted their license in the same year that it expires, clearer guidance could help avoid situations where they must obtain a significant number of CEUs within a short timeframe to maintain certification.

From: [JW Wheatley](#)
To: [IDEM Efficiency](#)
Subject: response to Executive order 25 - 18 from IIOA board members
Date: Thursday, June 18, 2026 3:09:17 PM
Attachments: [wheatley response exe order 25-18 \(1\).docx](#)
[IDEM CERTIFICATION-LICENSING RESPONSE IIOA Member.docx](#)

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June 17, 2026

John D Wheatley, Class D – IV, RIWPhD, MSF
harwellfarms2@gmail.com

Response to

I'm writing in response to the above order regarding the review of State licensing requirements for certain professions. I am specifically interested in possible changes to Industrial and Municipal Wastewater licenses. I have been a licensed operator for 51 years holding both an Industrial Class D and a Municipal Class IV.

I've watched this profession grow from the "Old Guard" who did the best they could to meet the goals of the regulatory requirements to a group of seasoned professionals that know the law, the chemistry, and the operation of complex treatment systems. Getting to where we are today from where we started over 50 years ago with the passage of the Clean Water Act was not easy. But through regulation, companies were forced to commit resources to build treatment facilities and hire people to operate them. Granted, this cost companies money to build and operate these systems. It also cost them more to hire and retain qualified personnel to operate these systems and meet the regulatory reporting requirements.

What did we get for all this? We got clean water.

No one could argue that the water quality in the State of Indiana and the entire Country hasn't improved in the past 50 years. I've worked in this profession all that time and I'm amazed at how fast we've cleaned up the streams and rivers. We have a three-legged stool, so to speak, that caused this to occur: government regulation, companies' financial commitment, and trained professionals to operate treatment systems. If you were to take away any of those legs, the system that has cleaned up the water would collapse.

Let's suppose for the sake of discussion that Wastewater Operators no longer needed to be licensed. Company management would be pleased. Generally, company management doesn't like wastewater treatment; they see it as a necessary expense they wish they didn't have, calling it "non-productive labor". They have to follow the regulations and operate the process, so where do they save money? If a licensed operator in Responsible Charge is no longer needed, they won't hire the skilled professional who understands the process and the law because, due to his or her training and experience, they'll command a higher salary. Instead, the companies will hire a "warm body" off the street and pay them a base wage. You get what you pay for. I've worked in industry as an employee and consultant for almost 60 years. Following this approach will result in our industrial water discharges being controlled by low-wage workers with on-the-job training. I don't think that benefits the State or the environment.

There may be some professions where licensing may not be necessary. I can't speak to those

professions. What I can speak to is that licensing wastewater operators is absolutely necessary to ensure we don't backslide and lose the great gains we've made over the years.

I'm attaching Al Goodman's comments on behalf of the IIOA, which I am in complete agreement with.

Respectfully submitted,
John D Wheatley Class D – IV, RIWPhD, MSF
harwellfarms2@gmail.com

From: paulburris13@gmail.com
To: [IDEM Efficiency](#)
Subject: FW: This is an important message from the Indiana Department of Environmental Management (IDEM) - Idea?
Date: Saturday, June 20, 2026 5:29:16 PM
Attachments: [Licensing+notice_05.29.26.pdf](#)

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Comments:

As an operator who is licensed in multiple states. It would be nice to have a rule or acceptance that allows classes to carry over from other states without having to try and gather all the information as if it was a new class. It has already been approved by another state that has collected speakers name, address, and presentation. To have to provide this information to Indiana staff is a challenge since states and organizations in this industry do not work together for certifications.

I spend days gathering data for classes taken out of state or spend more money taking classes in Indiana for the same thing. It costly to us to maintain licenses when paperwork to submit for a CEU takes hours to gather the data the state requires to basically approve a class already approved by another EPA (DEP).

Just asking for help here. This is for water and wastewater operator specifically.

#2 – would be nice to have all licenses be renewed at the same time. This would help with CEUs and not missing due to overlapping deadlines.

#3 – I think you have a great scale for what is needed for initial requirements and CEU's required to renew. The 70% technical is a good number.

From: dwbmgr@idem.in.gov <noreply@everbridge.net>
Sent: Tuesday, June 2, 2026 2:30 PM
To: paulburris13@gmail.com
Subject: This is an important message from the Indiana Department of Environmental Management (IDEM)

This is an important message from the Indiana Department of Environmental Management.

This is an important message from the Indiana Department of Environmental Management (IDEM). As part of this statewide effort to review state licensing requirements under Executive Order [25-18](#), IDEM is seeking input on the various licenses it regulates.

Please consider providing feedback on the drinking water and wastewater operator requirements. Specifically, IDEM seeks input on whether the requirements for each license are too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough, or need any other improvements. Please send any comments to Efficiency@idem.IN.gov by June 30, 2026. IDEM will consider this information for potential rule amendments or requests to the General Assembly for statutory changes.

Additional details are included in the attached notice.

If you have any questions, you can contact us at 317-234-7430 or DWBMGR@idem.in.gov.

From: [Aaron Popplewell](#)
To: [IDEM Efficiency](#)
Subject: Licensing Regulation Input
Date: Monday, June 22, 2026 11:02:58 AM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

1. Outdated and Restrictive Experience Reciprocity / Pathways

The Issue: The current rules (327 IAC 8-12 and 327 IAC 5-23) are overly rigid regarding how hands-on experience is counted, particularly for individuals transitioning from related technical fields (e.g., engineering, industrial mechanics, or military utility operations) or those moving from out-of-state.

The Complaint: This creates an overly burdensome barrier to entry during a critical nationwide workforce shortage in the water/wastewater sector.

Proposed Improvement: IDEM should modernize reciprocity and create accelerated experience pathways or substitute educational/alternative technical experience to fulfill the carefully tailored mandate of I.C. § 25-1-16.5-7, without compromising safety objectives.

2. Continuing Education Unit (CEU) Tracking and Redundancy

The Issue: Operators holding dual licenses (e.g., both a higher-level Water Treatment and a Wastewater license) frequently navigate cumbersome, separate tracking or disjointed approval processes for Continuing Education Units (CEUs).

The Complaint: The separate management of CEUs for overlapping technical competencies can be duplicative and unnecessary. It places an administrative strain on municipal utilities and operators who must track distinct requirements across two programs overseen by the exact same state agency.

Proposed Improvement: Streamline and integrate the CEU approval process. Introduce a unified digital dashboard where general safety, management, or foundational utility courses automatically apply to both certifications simultaneously.

3. Lack of Digital Modernization in Exam and Application Processes

The Issue: Despite modern technological capabilities, parts of the application, scheduling, and historical verification processes for IDEM utility exams can experience significant administrative lags.

The Complaint: Long wait times for application approvals to sit for an exam, or delays in updating license statuses post-examination, are overly burdensome to municipal staffing and career progression.

Proposed Improvement: In alignment with Executive Order 25-18's efficiency priorities, IDEM should fully transition to an on-demand, instant-result digital testing framework and automated portal

verification to eliminate unnecessary operational friction for local communities.

4. Misalignment of Practical Skills vs. Standardized Testing

The Issue: The standardized testing format sometimes heavily favors rote memorization of theoretical formulas over the modern, practical troubleshooting skills required in day-to-day plant operations (such as advanced SCADA navigation or hands-on plant upset remediation).

The Complaint: The testing mechanism is outdated and not perfectly carefully tailored to evaluate modern operational competence, potentially holding back highly capable field operators who struggle with rigid standardized testing formats.

Proposed Improvement: Incorporate practical, scenario-based evaluations or offer modular testing options to better reflect true operational proficiency.

From: [Justin Parsons](#)
To: [IDEM Efficiency](#)
Subject: Comments on Drinking Water and Wastewater Operator Certification Requirements
Date: Wednesday, June 24, 2026 1:53:44 PM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Dear IDEM Licensing Review Team,

Thank you for the opportunity to provide feedback regarding Indiana's drinking water and wastewater operator certification requirements.

As a certified water and wastewater operator, I appreciate the importance of maintaining high professional standards to protect public health and the environment. However, I would like to offer two suggestions that I believe would strengthen operator development and help address future workforce needs without lowering those standards.

First, I encourage IDEM to consider granting additional experience credit for relevant bachelor's and master's degree programs. Higher education provides substantial training in subjects directly related to water and wastewater operations, including chemistry, biology, environmental science, engineering principles, regulations, management, and leadership. While practical operating experience remains essential, the current requirements may not fully recognize the value of advanced education. Providing additional credit toward certification eligibility would encourage professional development and help attract qualified individuals into the industry.

Second, I encourage IDEM to review the requirement that operators obtain experience at a specific classification of facility before becoming eligible for higher-level certifications. Many capable operators working at WT2 and WT3 facilities have a desire to advance professionally and pursue higher-level certifications. However, because they do not currently work at a WT4 or WT5 facility, they may never have the opportunity to meet the eligibility requirements despite possessing the knowledge, motivation, and aptitude necessary to succeed.

This creates a barrier to professional growth and may unintentionally limit the pool of qualified operators available for larger and more complex systems. Allowing operators to sit for higher-level certification

examinations based on education and overall operating experience, rather than strictly the classification of their current facility, would help develop future operators and support workforce succession planning throughout Indiana.

An operator who passes a WT4 or WT5 examination has demonstrated the required technical knowledge. IDEM could still require a specified amount of higher-level operating experience before issuing the full certification, but allowing operators to complete the examination process earlier would provide a clearer pathway for career advancement and professional development.

Thank you for considering these comments and for seeking input from operators across Indiana. I appreciate IDEM's willingness to review these requirements and look for ways to improve the certification process while maintaining the high standards expected of Indiana operators.

Sincerely,

Justin Parsons

Indiana Certified Water and Wastewater Operator

From: [Christina](#)
To: [IDEM Efficiency](#)
Subject: FW: Input on Asbestos Professional Licensing Regulations
Date: Thursday, June 25, 2026 3:45:59 PM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

In response to the email below, the only thing that could make this a little easier is if an electronic copy of the license can be emailed after all documents are provided and fees are paid. Last year, we had an issue where ours was not received to our PO Box or our physical address for several months. When I asked to have it emailed, I was informed that was not allowed. I was finally able to obtain a copy online but it was quite inconvenient for projects at the time without a copy.

Besides that, the process is fairly easy to complete and understand.

Thank you,

Christina Spaulding
Executive Assistant



PO Box 338, Bay City, MI 48707-0338
Office: 989-684-8411
Fax: 989-684-6663
christina@doreassoc.com

From: IDEM Asbestos Demo Reno [<mailto:AsbestosDemoReno@idem.IN.gov>]
Sent: Thursday, June 25, 2026 1:43 PM
Subject: Input on Asbestos Professional Licensing Regulations

The Indiana Department of Environmental Management (IDEM) is seeking public input on the requirements for the state licenses it regulates. In accordance with [Executive Order 25-18](#), all Indiana state agencies must review the occupational licenses and regulations within their respective jurisdictions.

[A list of relevant licenses by name is available \[PDF\].](#)

We are asking that you take a few minutes to provide any comments you may have regarding the asbestos licensing program that IDEM manages. Please feel free to send this message out to anyone you believe may have comments or suggestions for IDEM to consider as we review these programs.

Please submit any comments to Efficiency@idem.IN.gov by June 30, 2026. IDEM will review all feedback for potential rule amendments or recommendations to the

General Assembly for statutory changes.
Thank you in advance for your consideration.

From: [Bruce Bultman](#)
To: [IDEM Efficiency](#)
Subject: FW: Input on Asbestos Professional Licensing Regulations
Date: Saturday, June 27, 2026 8:35:45 PM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Dear IDEM Licensing Review Committee,

Thank you for the opportunity to provide comments regarding Indiana's asbestos professional licensing requirements as part of the Executive Order 25-18 review.

I currently hold both Indiana Asbestos Inspector and Indiana Asbestos Supervisor licenses and have maintained these credentials for many years while conducting asbestos inspections, renovation and demolition surveys, and asbestos consulting throughout Indiana.

One area where I believe the licensing program could be significantly more efficient is the annual refresher training requirement for individuals holding multiple asbestos licenses.

The yearly refresher courses for the Asbestos Inspector and Asbestos Supervisor licenses are substantially similar in content. Both courses review current federal and state regulations, health effects, work practices, personal protective equipment, sampling considerations, and regulatory updates. Although I do not currently hold an Asbestos Management Planner license, it is my understanding that its annual refresher training also covers many of the same topics.

As a result, professionals holding multiple asbestos licenses are often required to attend multiple refresher courses each year that provide nearly identical instruction. This creates unnecessary costs, lost productivity, and administrative burden for license holders, training providers, and IDEM without providing a meaningful increase in competency or public health protection.

I encourage IDEM to consider allowing a single annual asbestos refresher course to satisfy the continuing education requirement for all asbestos professional licenses held by an individual, provided the course includes the regulatory updates and any license-specific material necessary to maintain competency. Alternatively, IDEM could establish a common core refresher curriculum that satisfies all license renewals, with brief supplemental modules only where genuinely license-specific training is required.

This approach would:

- Reduce unnecessary duplication in training requirements.
- Lower costs for licensed professionals and employers.
- Reduce time away from field work while maintaining professional competency.
- Simplify license administration for both IDEM and accredited training providers.
- Maintain the existing health and safety objectives of the asbestos licensing program.

Indiana already requires extensive initial training and examination before an individual may obtain an asbestos license. Once licensed, experienced professionals benefit most from meaningful updates on regulatory changes, industry best practices, and significant technical developments rather than repeated instruction covering largely identical material.

I appreciate IDEM's willingness to review these regulations and welcome the opportunity to discuss these comments or provide additional input based on my experience as an environmental consultant and licensed asbestos professional.

Thank you for your consideration.

Sincerely,
Bruce Bultman, LPG
Principal Geologist
Aegis Environmental, Inc.
1013 North Bluff Road
Greenwood, Indiana 46142
(317) 833-9000 ext. 1001 (Office)
(317) 797-4064 (Cell)
Visit our website: www.aegisenvironmentalinc.com



From: IDEM Asbestos Demo Reno <AsbestosDemoReno@idem.IN.gov>

Sent: Thursday, June 25, 2026 1:43 PM

Subject: Input on Asbestos Professional Licensing Regulations

The Indiana Department of Environmental Management (IDEM) is seeking public input on the requirements for the state licenses it regulates. In accordance with [Executive Order 25-18](#), all Indiana state agencies must review the occupational licenses and regulations within their respective jurisdictions.

[A list of relevant licenses by name is available \[PDF\].](#)

We are asking that you take a few minutes to provide any comments you may have regarding the asbestos licensing program that IDEM manages. Please feel free to send this message out to anyone you believe may have comments or suggestions for IDEM to consider as we review these programs.

Please submit any comments to Efficiency@idem.IN.gov by June 30, 2026. IDEM will review all feedback for potential rule amendments or recommendations to the General Assembly for statutory changes.

Thank you in advance for your consideration.

From: [Ferguson, Nick](#)
To: [IDEM Efficiency](#)
Cc: [Oliva, Sadzi Martha](#); [Williams, Craig](#)
Subject: Response to Professional Licensing Regulations
Date: Monday, June 29, 2026 9:38:38 AM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Good Morning,

From the standpoint of staffing, reducing professional licensing regulations to get our operator trainees licensed and the hope of increasing licensed individuals in the workforce, thus increasing Aqua's chances of hiring qualified operators, does not seem to me to be the answer.

As for our operator trainees, it comes down to simply taking the test to pass rather than the inability to pass. I have no doubt that our operations staff could get certified under current rules and regulations.

The argument that there would be more certified operators in the workforce to fill key positions when unable to promote from within is plausible, but I am cautious about making certification "easier" in that we want candidates to be truly capable of running the plants, and the current requirements do not seem to be that cumbersome.

Some possible improvements to the overall certification path could be to modernize the certification test to exclude questions regarding trickling filters, rotating biological contactors, etc. as these are antiquated systems rarely seen (if at all) anymore. Also, expanding reciprocity of out-of-state licenses so that it is not a barrier of employment may be beneficial to some amount, but I am skeptical of that being a huge success.

However, the current education perk of having a bachelor's degree in lieu of 1 year experience (i.e. a class 4 only requires 3 years experience rather than 4), the current experience required to test for a license, continuing education units to maintain a license, and the certification test do not seem to me to be so over burdensome that it is keeping our employees from improving their career or hurting the industry as a whole.

Thank you.

Nick Ferguson
Environmental Compliance Specialist
Aqua Indiana, Inc.
14421 Illinois Rd
Fort Wayne, IN 46814
M: 260.494.6773 O: 260.625.4700 x 55223

AQUASM

An  Essential Utilities Company

From: [Wes Weimer](#)
To: [IDEM Efficiency](#)
Subject: Drinking water
Date: Tuesday, June 30, 2026 8:43:53 AM

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

To whom it may concern,

Here are a few suggestions or comments on drinking water.

Is it necessary to have a FSO certification if you already have a DSS certification? Both certifications state that they are DSS certifications, but one is site specific.

The WT3 test is difficult and has several questions that are ambiguous. I cannot speak for the other levels because I have only taken the WT3. I have taken other state exams and this by far is the most difficult one.

Should a non-transient non-community water system filtering water require a WT3 certification that is only filtering and softening water? Looking at the WT2 certification it appears that would cover the requirements

Thank you

--

Wes Weimer
North Webster School

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Please accept these two attached documents as my official response to IDEM's request for comments about the licensing program for wastewater and water operators.

Thank you for taking the time to evaluate these critical programs.

Thomas H. Martin
thomashmartin@comcast.net

Delta Compliance Consultants Div.
Delta Chemicals & Equipment, Inc.
5439 N. Acorn Ct.
Greenfield, IN 46140
317-439-8350 Cell
<https://protect.checkpoint.com/v2/0>

This email has been checked for viruses by Avast antivirus software.
<https://protect.checkpoint.com/y2/0f1- www.avast.com- YzJlOnN0YXRibzZelmRgYw5hOnM6b2toIDk5ZjlyYWZmZ3M4a2MlODBiYmlFMQ2NDZMT0c3Qm9GUyZyZmRlNmMmYzZlImlyZjcxMzQ5MTNlNTM5E0NGUyZ000GNk0dG5lOTI0ImJkMjE5ZDE5MGNWMlMlRlNjE0OjE5>

**Response to Indiana Department of Environmental Management
Request for Potential Regulation Reform
June 30, 2026**

My wastewater career began in 1965 at a General Motors factory located in Elyria, Ohio. This plant had many large metal finishing processes which included electroplating, anodizing and painting. Wastewater from these processes was discharged into the Black River and the plant was fined \$1.00 for every fish that was killed. Even though this was long before the EPA and "clean water act," the plant had extensive wastewater treatment, including chroming reduction, cyanide oxidation and dissolved metal removal processes.

In 1967 I moved to Indiana and continued to work in the metal finishing industry. To my surprise, unlike Ohio and most other states, Indiana has an Industrial Wastewater licensing program as well as municipal licenses. My first wastewater license was a Class "C" which I earned in 1972 followed by my Class "D" license in 1977. This advanced licensed help me move forward in my career and in 1985 my wife and I started our own company. The primary business of our company is industrial wastewater treatment and we now employ several Class D-IV operators. However, we soon recognized the difference between industrial metal finishing using chemical-physical treatment and food processing which uses chemical-physical and biological (municipal) treatment processes. Therefore, in 1990, I earned a Class "IV" municipal license. Having both licenses enabled us to further our careers and our firm built several industrial wastewater treatment systems in Indiana. Also, we were active members of the Indiana Water Pollution Control Association (IWPCA), which is now called the Water Environment Federation (WEF). We served on the "industrial" committee which was not very active. Therefore, my wife and five (5) other industrial leaders formed the Indiana Industrial Operators Association (IIOA) in 1995. We also were instructors in the wastewater and regulatory compliance courses at Ivy Tech and IUPUI.

Today, we are still on the IIOA Board of Directors and busy writing new courses and teaching for the IIOA, which now has 10 courses and over 1,000 members. Also, a "Regional" tri state annual conference is held in April, which over 200 operators attend to earn continuing education units (CEUs) for license renewal. Much of our progress has been made possible by building on the basic foundation of wastewater education here in Indiana. Specifically, the Indiana Department of Environmental Management (IDEM) industrial and municipal licensing programs. In fact, 54 IIOA members have earned industrial and or municipal licenses by taking the IIOA exam prep courses.

Response to IDEM request

I was honored to receive the Distinguished Hoosier recognition in 2019 from the former Governor Eric J. Holcomb for my lifetime of work mentoring and teaching wastewater operators in Indiana.

In summary, the IDEM wastewater licensing programs do much more than just protect our water and keep it clean. These programs provide a foundation for young people to advance in their careers and even build new companies. This means that more Hoosiers will be employed, raise families and continue to work here in Indiana. In fact, thousands of workers are employed either directly (operators) or indirectly (suppliers) in the wastewater profession! As you can see, not having these critical IDEM programs would not only adversely affect our environment, it would decrease the job opportunities for thousands of Hoosiers.

I am also attaching the comments drafted by the Indiana Industrial Operators Association, Inc. that I fully support and agree with.

Respectfully,

Thomas H. Martin, RIWPhD, Class D and Class IV Licensed Wastewater Operator

thomashmartin@comcast.net

Cell: 317.439-8350

Attachments:

IDEM Certification-Licensing Response(AWG).pdf

Martin_Thomas_My_Wastewater_Career_2026_06.pdf



Indiana Industrial Operators Association, Inc., www.iioa.net

RESPONSE TO INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT REQUEST FOR POTENTIAL REGULATION REFORM June 10, 2026

This is a formal response to the request of the Indiana Department of Environmental Management (IDEM) request for information related to Governor Braun's Executive Order 25-18 (Amended) for potential professional regulation reform. It specifically responds to IDEM's Licensing Notice 05.29.26 outlining IDEMS review per I.C. 25-1-16.5-8. IDEM has requested responses for 15 types of licensing. These comments relate to licensing of drinking water and wastewater treatment operators only.

IDEM has outlined input desired relative licenses that are: too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough or need other improvements. Comments are offered on each of these.

BACKGROUND

These comments are drafted by a 77-year Indiana resident and IN business owner, certified industrial and municipal wastewater operator at highest levels for over 55 years in IN and KY and as Past president of the Indiana Water Environment Association (IWEA) and past president of the international Water Environment Federation (WEF). Currently serving as Chairman of the Board of the Indiana Industrial Operators Association (IIOA). Also, as a licensed Professional Engineer in Indiana and two other states and a IN licensed plumber. Additional related experience includes serving on 5 separate IDEM internal certification review panels, providing over 50 years of operator training courses in multiple states, and providing certification exam technical questions to IDEM for licensing tests.

Currently in Indiana there are approximately 2,863 wastewater (industrial and municipal) certified operators. There are more drinking water operators than wastewater. According to the U.S. Bureau of Labor Statistics, wastewater treatment operators earned a median annual salary of \$49,090 in 2022. The lowest 10 percent earned less than \$31,440, while the highest 10 percent earned more than \$79,620. Higher positions earn significantly more.

RELATED REGULATIONS

As researched by the American Water Works Association (AWWA), in February 1999 Environmental Protection Agency (EPA) published *Final Guidelines for the Certification and Recertification of Operators of Community and Non-Transient Non-Community Public Water* systems which provided nine baseline standards for state operator programs. These included: passing an exam, having a high school diploma or general equivalency diploma (GED), having defined minimum on-the-job experience or training, and establishing training requirements for renewal of certification. EPA left it to each state to develop its own programs.

IDEM is authorized by the Indiana Code to write rules for treatment operators and plants in accordance with IC 13-19-11. The Wastewater Treatment Plants and Operators rule currently defines IDEM's program.

Facility classification

In the majority of cases, the level or grades for operator certification are tied to classification of the system. Below are the AWWA/EPA findings regarding system classification:

Water Treatment

- The majority of classification systems are based on a point scale, with points awarded for size of system, water source, and treatment process types. The amount of points awarded, and the components of the scales vary substantially between states.
- Classification in a few states is based on size alone, or on size and water source (i.e., surface or groundwater).
- Most states have a small or very small system classifications.

Distribution System

- Classification of distribution systems is typically based on the population served.
- A few states classified distribution systems based on complexity (number of pressure zones, etc.).
- The vast majority of states (46 of 50) have separate operator certification requirements for distribution systems.

Wastewater Treatment

- There is much greater variation in how wastewater treatment systems are classified as opposed to water treatment.
- While the majority of system classifications are varied based on complexity of wastewater treatment (e.g., primary, secondary, tertiary levels, and specific unit processes), the rating criteria and point scales varied significantly between states.

RESPONSES TO IDEM'S REQUEST

These specific topics that follow are individually presented as IDEM requested related to operator certification in Indiana:

Unnecessary

In the mid 1970's there was much debate in Indiana about requirements for certification of operators. There were "grandfather" rules incorporated by the State Board of Health (IDEM predecessor) to allow experienced (non-tested) operators to remain at their facilities. If they transferred to a new facility they would need to pass an exam. Most didn't transfer and most all have since retired or passed believing certification was unnecessary.

However, times have changed significantly with current technologies pushing water and wastewater treatment into water recycling, water reuse, water resource recovery, groundwater recharge, direct potable water reuse, nutrient recovery, etc. “Water” now is much more inclusive of drinking water, wastewater, industrial discharges and includes the current “Circular Water Economy” by shifting from the take-use-dispose to a more sustainable approach that maximizes the value of water. Additional emphasis is on stormwater, wetlands, irrigation efficiencies, agricultural runoff and all water-related issues. Federal and state agencies are implementing new regulations for reuse requirements based on new advanced “water” treatment technologies.

All of these systems require technical competence for the operators and especially so in Indiana where we have had significant fish kills (White River) and very large industries that have the potential discharges to upset or pass through the Public Owned Treatment Works (POTW’s). The certified operator in responsible charge of a municipality or industry, as defined by IDEM and the Clean Water Act, is legally responsible for compliance oversight with discharge permits and environmental regulations. Indiana needs and has dedicated professional operators who daily 24-7 take their jobs and protect their certification seriously.

It’s been acknowledged by health professionals and the American Medical Society that advancements in drinking water treatment provided significant reduction in water-related diseases such as typhoid, cholera, cryptosporidiosis, e. coli infections and other diseases. Improper operation of water treatment facilities was recently evident in the Flint, Michigan water crisis.

According to the Center for Disease Control (CDC) *Waterborne Disease in the United States* (May 29, 2025), waterborne diseases affect over 7 million people in the U.S. every year and cost our healthcare system over \$3 billion. It states there are waterborne diseases caused by 17 pathogens. Adequately trained operators are required to protect Hoosiers from these pathogens.

Most all Hoosiers take their drinking water quality for granted. The professional certified operator that makes Indiana water quality “happen” is one of the critical services provided just as important as fire and police protection. However, this unseen protection is not recognized by the general public.

Likewise, the professional certified wastewater operator that protects Indiana water environment that ultimately cleans water for drinking downstream, is as important and necessary as the drinking water operator. The certified industrial operator in Indiana helps protect the downstream POTW from upset or pass-through of metals, chemicals, and other pollutants. Pre-treatment coordinators for municipalities work with the industrial dischargers to enhance overall water quality for discharge to the environment. All of these require talented, qualified, dedicated, experienced and knowledgeable operators. To ensure these requirements are met, certification is the only proven method used by all 50 states. Indiana legislators and policymakers and IDEM should remain committed to supporting certification and advancement of its water professionals.

These are NOT unnecessary programs and requirements. Rather, they are critical professions to protect Hoosiers and our Indiana water environment.

Too strict:

Currently all 50 states require water and wastewater certification for different levels and in some cases different technologies used. Indiana is one of approximately 18 states that require separate industrial wastewater certification from municipal certification. The Indiana certification requirements are not as strict as some states, within other states there are quite a variety of certification levels and categories, however, all have minimum experience and education requirements. Indiana requires, for example, only one certified operator in responsible charge of the entire treatment plant or distribution network, while other states require certification for each of the major unit treatment processes. All states require various education and experience prior to achieving higher levels of certification. Education and experience required by IDEM is not more strict than other states, and less strict than some.

The requirements for certification testing are not restrictive for individuals in Indiana. Indiana uses and informs test applicants of specific reference study materials prior to taking an exam. The exam questions are usually multiple choice and the Associated similar format as the Board of Certification (ABC) exam questions.

ABC is an organization that is attempting to standardize Need-To-Know Criteria (NTKC) and examinations. ABC is a voluntary program. In 2012, ABC published revised NTKC (2017) for water treatment, distribution system, wastewater treatment, and collection system operators. To develop these criteria, ABC went through an extensive process that included a job analysis of more than 1,192 individuals. Job tasks and capabilities needed were identified and ranked based on frequency of performance and seriousness of inadequate or incorrect performance. Results were analyzed by a committee using weighting criteria to determine appropriate material for examination. For essential tasks and required capabilities the knowledge needed and ability to conduct were identified. The level of knowledge (i.e., comprehension, application, analysis) required for each task was also identified. Indiana uses certification exam questions based on the ABC format and questions are varied from a pool of questions to make each exam non-repetitive and tailored to the specific knowledge and expertise required for that certification level. This approach is not more restrictive than other states which also use the ABC format, and in some cases, they only use ABC-based questions. IDEM has had peer review of most all of the questions used on their exams.

Currently Indiana does not require certification for collection system (sewer system) operators/maintenance personnel, nor is certification required for water or wastewater on-site laboratories. There are voluntary certifications available and these are utilized as advancement steps for treatment plant personnel.

Overly Burdensome

As stated above, Indiana does not impose more burdens on either a certification applicant or a renewal applicant than other states. Recently IDEM has moved to using a 3-year renewal cycle for certified operators instead of a 2-year renewal cycle previously used. This allows fewer burdens on training required for renewal of certifications since the longer period of another year allows individuals and/or companies paying for employee training to spread the costs. Effectively, this reduced the cost of the license from \$15/year to \$10/year. The cost of drinking and wastewater license fees in Indiana are much lower than other license fees. The legislature

should be encouraged to adopt a more realistic fee structure that would ensure a fully funded continuance of these critical programs.

In addition, IDEM has partnered with Indiana Vocational Technical College (IVTC) to administer certification exams at their regional campuses on a much more frequent and less costly burden on the operators rather than the previous twice per year exams only being offered in Indianapolis. Exams are digital and graded on-site before the operator leaves allowing for significantly reduced time awaiting the results of the test score.

IDEM has on their website the Operator Certification Rule at 327 IAC 5-23-9 that defines education and experience requirements. This is cited so applicants can understand the various levels required. Also, on IDEM's website is a detailed list and source of 14 study guides and books for the exams including several developed by IDEM staff. A study guide identifies specific sections for various exam levels.

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The basic four wastewater certification levels of municipal (Class I-IV) and industrial (Class A-D) are categorically recognized by employers as a means of advancement within employee compensation. Often not only is certification at a specific level required, but employers offer increased salary or a bonus if additional certification is achieved. These Indiana companies do not believe that there is duplication within IDEM's certification process.

The water and wastewater certification programs are not duplicative within other Indiana licensing programs. For example, neither the Indiana Professional Engineers nor the Indiana Plumber licenses evaluate an operator's knowledge of treatment technologies, techniques, understanding of chemical dosages, bacteriological disinfection procedures, biological treatment processes, etc.

While there are some overlaps of need-to-know within the higher levels of certification about a few lower levels of certification, this is not considered duplicative. It is necessary for the highest level of certification to know smaller systems as well as the more advanced technologies. Another example of non-duplicative programs is the knowledge level for analytical data used on various exams. The lower-level small treatment systems (and often industrial wastewater

plants) frequently do not perform their own laboratory tests, or use less accurate indicative instruments, while the larger systems frequently have their own laboratories and chemists. The levels of knowledge required are tested relative the specific level of certification.

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In addition, to renew their certification, an operator must attend from a minimum of 8 hours up to 30 hours of continuing education at high level certification, within the 3-year renewable period. This is a strict requirement, made more so by the requirement that 70% of the continuing education be obtained from the technical category of IDEM pre-approved continuing education courses. Kentucky for example has 24 hours of continuing education for upper-level certification.

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Respectfully submitted by:

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REFERENCES:

1. Operator Licensing Requirements Across the United States, American Water Works Association 2018,
<https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fefcnetwork.org%2Fwp-content%2Fuploads%2F2022%2F05%2FAWWA-Operator-Licensing-Requirements-Across-the-United-States.pdf>
2. How to Become a Wastewater Treatment Plant Operator; January 6, 2026;
<https://www.environmentalscience.org/career/wastewater-treatment-operator>
3. Water Quality in Indiana: Wastewater Operator Certification Information, 6-6-2026;
<https://www.in.gov/idem/cleanwater/wastewater-operator-ertification-and-continuing-education/wastewater-certification-information/>
4. Center for Disease Control (CDC) *Waterborne Disease in the United States/Waterborne Disease and Outbreak Surveillance Reporting* (May 29, 2025)
<https://www.cdc.gov/healthy-water-data/watervoreune-disease-in-us/index.html>
5. Great Lakes Water Workforce Workgroup, Final Recommendations, 2026.
<https://www.glc.olrg/wp-content/uploads/GLC-GL-WWF-Recs-2026.pdf>

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To: [IDEM Efficiency](#)
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Indiana Industrial Operators Association, Inc., www.iioa.net

RESPONSE TO INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT REQUEST FOR POTENTIAL REGULATION REFORM June 10, 2026

This is a formal response to the request of the Indiana Department of Environmental Management (IDEM) request for information related to Governor Braun's Executive Order 25-18 (Amended) for potential professional regulation reform. It specifically responds to IDEM's Licensing Notice 05.29.26 outlining IDEMS review per I.C. 25-1-16.5-8. IDEM has requested responses for 15 types of licensing. These comments relate to licensing of drinking water and wastewater treatment operators only.

IDEM has outlined input desired relative licenses that are: too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough or need other improvements. Comments are offered on each of these.

BACKGROUND

These comments are drafted by a 77-year Indiana resident and IN business owner, certified industrial and municipal wastewater operator at highest levels for over 55 years in IN and KY and as Past president of the Indiana Water Environment Association (IWEA) and past president of the international Water Environment Federation (WEF). Currently serving as Chairman of the Board of the Indiana Industrial Operators Association (IIOA). Also, as a licensed Professional Engineer in Indiana and two other states and a IN licensed plumber. Additional related experience includes serving on 5 separate IDEM internal certification review panels, providing over 50 years of operator training courses in multiple states, and providing certification exam technical questions to IDEM for licensing tests.

Currently in Indiana there are approximately 2,863 wastewater (industrial and municipal) certified operators. There are more drinking water operators than wastewater. According to the U.S. Bureau of Labor Statistics, wastewater treatment operators earned a median annual salary of \$49,090 in 2022. The lowest 10 percent earned less than \$31,440, while the highest 10 percent earned more than \$79,620. Higher positions earn significantly more.

RELATED REGULATIONS

As researched by the American Water Works Association (AWWA), in February 1999 Environmental Protection Agency (EPA) published *Final Guidelines for the Certification and Recertification of Operators of Community and Non-Transient Non-Community Public Water* systems which provided nine baseline standards for state operator programs. These included: passing an exam, having a high school diploma or general equivalency diploma (GED), having defined minimum on-the-job experience or training, and establishing training requirements for renewal of certification. EPA left it to each state to develop its own programs.

Response to IDEM request

IDEM is authorized by the Indiana Code to write rules for treatment operators and plants in accordance with IC 13-19-11. The Wastewater Treatment Plants and Operators rule currently defines IDEM's program.

Facility classification

In the majority of cases, the level or grades for operator certification are tied to classification of the system. Below are the AWWA/EPA findings regarding system classification:

Water Treatment

- The majority of classification systems are based on a point scale, with points awarded for size of system, water source, and treatment process types. The amount of points awarded, and the components of the scales vary substantially between states.
- Classification in a few states is based on size alone, or on size and water source (i.e., surface or groundwater).
- Most states have a small or very small system classifications.

Distribution System

- Classification of distribution systems is typically based on the population served.
- A few states classified distribution systems based on complexity (number of pressure zones, etc.).
- The vast majority of states (46 of 50) have separate operator certification requirements for distribution systems.

Wastewater Treatment

- There is much greater variation in how wastewater treatment systems are classified as opposed to water treatment.
- While the majority of system classifications are varied based on complexity of wastewater treatment (e.g., primary, secondary, tertiary levels, and specific unit processes), the rating criteria and point scales varied significantly between states.

RESPONSES TO IDEM'S REQUEST

These specific topics that follow are individually presented as IDEM requested related to operator certification in Indiana:

Unnecessary

In the mid 1970's there was much debate in Indiana about requirements for certification of operators. There were "grandfather" rules incorporated by the State Board of Health (IDEM predecessor) to allow experienced (non-tested) operators to remain at their facilities. If they transferred to a new facility they would need to pass an exam. Most didn't transfer and most all have since retired or passed believing certification was unnecessary.

However, times have changed significantly with current technologies pushing water and wastewater treatment into water recycling, water reuse, water resource recovery, groundwater recharge, direct potable water reuse, nutrient recovery, etc. “Water” now is much more inclusive of drinking water, wastewater, industrial discharges and includes the current “Circular Water Economy” by shifting from the take-use-dispose to a more sustainable approach that maximizes the value of water. Additional emphasis is on stormwater, wetlands, irrigation efficiencies, agricultural runoff and all water-related issues. Federal and state agencies are implementing new regulations for reuse requirements based on new advanced “water” treatment technologies.

All of these systems require technical competence for the operators and especially so in Indiana where we have had significant fish kills (White River) and very large industries that have the potential discharges to upset or pass through the Public Owned Treatment Works (POTW’s). The certified operator in responsible charge of a municipality or industry, as defined by IDEM and the Clean Water Act, is legally responsible for compliance oversight with discharge permits and environmental regulations. Indiana needs and has dedicated professional operators who daily 24-7 take their jobs and protect their certification seriously.

It’s been acknowledged by health professionals and the American Medical Society that advancements in drinking water treatment provided significant reduction in water-related diseases such as typhoid, cholera, cryptosporidiosis, e. coli infections and other diseases. Improper operation of water treatment facilities was recently evident in the Flint, Michigan water crisis.

According to the Center for Disease Control (CDC) *Waterborne Disease in the United States* (May 29, 2025), waterborne diseases affect over 7 million people in the U.S. every year and cost our healthcare system over \$3 billion. It states there are waterborne diseases caused by 17 pathogens. Adequately trained operators are required to protect Hoosiers from these pathogens.

Most all Hoosiers take their drinking water quality for granted. The professional certified operator that makes Indiana water quality “happen” is one of the critical services provided just as important as fire and police protection. However, this unseen protection is not recognized by the general public.

Likewise, the professional certified wastewater operator that protects Indiana water environment that ultimately cleans water for drinking downstream, is as important and necessary as the drinking water operator. The certified industrial operator in Indiana helps protect the downstream POTW from upset or pass-through of metals, chemicals, and other pollutants. Pre-treatment coordinators for municipalities work with the industrial dischargers to enhance overall water quality for discharge to the environment. All of these require talented, qualified, dedicated, experienced and knowledgeable operators. To ensure these requirements are met, certification is the only proven method used by all 50 states. Indiana legislators and policymakers and IDEM should remain committed to supporting certification and advancement of its water professionals.

These are NOT unnecessary programs and requirements. Rather, they are critical professions to protect Hoosiers and our Indiana water environment.

Too strict:

Currently all 50 states require water and wastewater certification for different levels and in some cases different technologies used. Indiana is one of approximately 18 states that require separate industrial wastewater certification from municipal certification. The Indiana certification requirements are not as strict as some states, within other states there are quite a variety of certification levels and categories, however, all have minimum experience and education requirements. Indiana requires, for example, only one certified operator in responsible charge of the entire treatment plant or distribution network, while other states require certification for each of the major unit treatment processes. All states require various education and experience prior to achieving higher levels of certification. Education and experience required by IDEM is not more strict than other states, and less strict than some.

The requirements for certification testing are not restrictive for individuals in Indiana. Indiana uses and informs test applicants of specific reference study materials prior to taking an exam. The exam questions are usually multiple choice and the Associated similar format as the Board of Certification (ABC) exam questions.

ABC is an organization that is attempting to standardize Need-To-Know Criteria (NTKC) and examinations. ABC is a voluntary program. In 2012, ABC published revised NTKC (2017) for water treatment, distribution system, wastewater treatment, and collection system operators. To develop these criteria, ABC went through an extensive process that included a job analysis of more than 1,192 individuals. Job tasks and capabilities needed were identified and ranked based on frequency of performance and seriousness of inadequate or incorrect performance. Results were analyzed by a committee using weighting criteria to determine appropriate material for examination. For essential tasks and required capabilities the knowledge needed and ability to conduct were identified. The level of knowledge (i.e., comprehension, application, analysis) required for each task was also identified. Indiana uses certification exam questions based on the ABC format and questions are varied from a pool of questions to make each exam non-repetitive and tailored to the specific knowledge and expertise required for that certification level. This approach is not more restrictive than other states which also use the ABC format, and in some cases, they only use ABC-based questions. IDEM has had peer review of most all of the questions used on their exams.

Currently Indiana does not require certification for collection system (sewer system) operators/maintenance personnel, nor is certification required for water or wastewater on-site laboratories. There are voluntary certifications available and these are utilized as advancement steps for treatment plant personnel.

Overly Burdensome

As stated above, Indiana does not impose more burdens on either a certification applicant or a renewal applicant than other states. Recently IDEM has moved to using a 3-year renewal cycle for certified operators instead of a 2-year renewal cycle previously used. This allows fewer burdens on training required for renewal of certifications since the longer period of another year allows individuals and/or companies paying for employee training to spread the costs. Effectively, this reduced the cost of the license from \$15/year to \$10/year. The cost of drinking and wastewater license fees in Indiana are much lower than other license fees. The legislature

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REFERENCES:

1. Operator Licensing Requirements Across the United States, American Water Works Association 2018,
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<https://www.in.gov/idem/cleanwater/wastewater-operator-ertification-and-continuing-education/wastewater-certification-information/>
4. Center for Disease Control (CDC) *Waterborne Disease in the United States/Waterborne Disease and Outbreak Surveillance Reporting* (May 29, 2025)
<https://www.cdc.gov/healthy-water-data/watervoreune-disease-in-us/index.html>
5. Great Lakes Water Workforce Workgroup, Final Recommendations, 2026.
<https://www.glc.olrg/wp-content/uploads/GLC-GL-WWF-Recs-2026.pdf>

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To: [IDEM Efficiency](#)
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I support the recommendations proposed by the report.

Bill Purves
Purves Environmental, Inc.

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From: [Aaron Tolliver](#)
To: [IDEM Efficiency](#)
Subject: RESPONSE TO INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT REQUEST FOR POTENTIAL REGULATION REFORM
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Indiana Department of Environmental Management

To Whom It May Concern,

This is a formal response to the request of the Indiana Department of Environmental Management (IDEM) request for information related to Governor Braun's Executive Order 25-18 (Amended) for potential professional regulation reform. It specifically responds to IDEM's licensing notice 05.29.26 outlining IDEMS review per I.C. 25-1-16.5-8. IDEM has requested responses for 15 types of licensing. These comments relate to licensing of Industrial and Municipal Wastewater Treatment Operators only.

My name is Aaron Tolliver. I am an Indiana resident, a certified wastewater operator, and one of the owners of Aqua Utility Services, LLC, an Indiana-based company that provides contract operations for municipal and industrial water and wastewater facilities throughout Indiana and Kentucky.

I strongly support maintaining Indiana's current Industrial and Municipal wastewater operator certification requirements.

As someone who works in treatment plants every day, I can confidently say that today's wastewater systems bear little resemblance to those of decades past. Modern treatment facilities rely on increasingly sophisticated biological, chemical, mechanical, and computerized treatment processes. Industrial pretreatment facilities routinely manage complex waste streams containing heavy metals, cyanide, solvents, high-strength organics, ammonia, nutrients, and other pollutants that require knowledgeable operators to safely and consistently achieve permit compliance.

Certification is not simply a credential—it establishes a minimum standard of competency for the individuals entrusted with protecting Indiana's waters.

Unlike many professions, wastewater operators make operational decisions every day that can have immediate environmental consequences. Incorrect chemical dosing, equipment operation, biological process management, or emergency response decisions can result in permit violations, fish kills, damage to publicly owned treatment works, groundwater contamination, and significant economic impacts to industries and municipalities alike.

As both an operator and an employer, certification also serves another important purpose.

When I hire operators, certification provides confidence that an individual has demonstrated a baseline understanding of treatment principles, regulations, laboratory interpretation, safety, and process control. While every facility requires additional site-specific training, certification provides a common professional standard across our industry.

Removing or significantly reducing certification requirements would not reduce the complexity of

operating treatment facilities. It would simply reduce the assurance that qualified individuals are responsible for operating them.

Indiana has worked for decades to improve its rivers, lakes, and streams. Those improvements are the result of investments in infrastructure, regulation, and perhaps most importantly, qualified operators who are responsible for protecting public health and the environment twenty-four hours a day, seven days a week.

As a business owner, I certainly understand the importance of reducing unnecessary government regulation. Regulations should always be reviewed to ensure they remain efficient and practical.

However, wastewater Industrial and Municipal operator certification is not unnecessary regulation.

It is a public health and environmental safeguard.

If anything, I believe Indiana should continue looking for ways to strengthen the profession by:

- expanding workforce development and apprenticeship opportunities,
- increasing awareness of wastewater operations as a skilled technical career,
- improving access to training throughout the state,
- streamlining administrative processes where appropriate, while maintaining technical standards,
- and continuing to support continuing education requirements that keep operators current with evolving treatment technologies.

Reducing administrative burden is worthwhile. Reducing professional competency standards is not.

Finally, I offer one additional perspective beyond my professional experience.

I am also the father of young children who will grow up drinking Indiana's water, fishing in Indiana's rivers, and enjoying Indiana's lakes. Like every Hoosier, I depend on qualified professionals to protect those resources every day.

The people operating our treatment facilities are often invisible to the public because success means nothing happens—no contamination events, no fish kills, no unsafe drinking water, and no permit violations. That success is built upon education, experience, accountability, and professional certification.

For these reasons, I respectfully encourage IDEM to maintain Indiana's Industrial and Municipal wastewater operator certification requirements while continuing to improve administrative efficiency and workforce development.

Thank you for considering my comments and for your continued commitment to protecting Indiana's environment.

Respectfully,

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812-284-9243 Office
502-645-0987 Cell*



From: dwbmgr@idem.in.gov <noreply@everbridge.net>

Sent: Tuesday, June 2, 2026 3:30 PM

To: Aaron Tolliver <aaron.tolliver@ausllc.com>

Subject: This is an important message from the Indiana Department of Environmental Management (IDEM)

This is an important message from the Indiana Department of Environmental Management.

This is an important message from the Indiana Department of Environmental Management (IDEM). As part of this statewide effort to review state licensing requirements under Executive Order [25-18](#), IDEM is seeking input on the various licenses it regulates.

Please consider providing feedback on the drinking water and wastewater operator requirements. Specifically, IDEM seeks input on whether the requirements for each license are too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough, or need any other improvements. Please send any comments to Efficiency@idem.IN.gov by June 30, 2026. IDEM will consider this information for potential rule amendments or requests to the General Assembly for statutory changes.

Additional details are included in the attached notice.

If you have any questions, you can contact us at 317-234-7430 or DWBMGR@idem.in.gov.



RESPONSE TO INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT REQUEST FOR POTENTIAL REGULATION REFORM

June 30, 2026

Indiana Department of Environmental Management

To Whom It May Concern,

This is a formal response to the request of the Indiana Department of Environmental Management (IDEM) request for information related to Governor Braun's Executive Order 25-18 (Amended) for potential professional regulation reform. It specifically responds to IDEM's licensing notice 05.29.26 outlining IDEMS review per I.C. 25-1-16.5-8. IDEM has requested responses for 15 types of licensing. These comments relate to licensing of Industrial and Municipal Wastewater Treatment Operators only.

My name is Aaron Tolliver. I am an Indiana resident, a certified wastewater operator, and one of the owners of Aqua Utility Services, LLC, an Indiana-based company that provides contract operations for municipal and industrial water and wastewater facilities throughout Indiana and Kentucky.

I strongly support maintaining Indiana's current Industrial and Municipal wastewater operator certification requirements.

As someone who works in treatment plants every day, I can confidently say that today's wastewater systems bear little resemblance to those of decades past. Modern treatment facilities rely on increasingly sophisticated biological, chemical, mechanical, and computerized treatment processes. Industrial pretreatment facilities routinely manage complex waste streams containing heavy metals, cyanide, solvents, high-strength organics, ammonia, nutrients, and other pollutants that require knowledgeable operators to safely and consistently achieve permit compliance.

Certification is not simply a credential—it establishes a minimum standard of competency for the individuals entrusted with protecting Indiana's waters.

Unlike many professions, wastewater operators make operational decisions every day that can have immediate environmental consequences. Incorrect chemical dosing, equipment operation, biological process management, or emergency response decisions can result in permit violations, fish kills, damage to publicly owned treatment works, groundwater contamination, and significant economic impacts to industries and municipalities alike.

As both an operator and an employer, certification also serves another important purpose.

When I hire operators, certification provides confidence that an individual has demonstrated a baseline understanding of treatment principles, regulations, laboratory interpretation, safety, and

process control. While every facility requires additional site-specific training, certification provides a common professional standard across our industry.

Removing or significantly reducing certification requirements would not reduce the complexity of operating treatment facilities. It would simply reduce the assurance that qualified individuals are responsible for operating them.

Indiana has worked for decades to improve its rivers, lakes, and streams. Those improvements are the result of investments in infrastructure, regulation, and perhaps most importantly, qualified operators who are responsible for protecting public health and the environment twenty-four hours a day, seven days a week.

As a business owner, I certainly understand the importance of reducing unnecessary government regulation. Regulations should always be reviewed to ensure they remain efficient and practical.

However, wastewater Industrial and Municipal operator certification is not unnecessary regulation.

It is a public health and environmental safeguard.

If anything, I believe Indiana should continue looking for ways to strengthen the profession by:

- expanding workforce development and apprenticeship opportunities,
- increasing awareness of wastewater operations as a skilled technical career,
- improving access to training throughout the state,
- streamlining administrative processes where appropriate, while maintaining technical standards,
- and continuing to support continuing education requirements that keep operators current with evolving treatment technologies.

Reducing administrative burden is worthwhile. Reducing professional competency standards is not.

Finally, I offer one additional perspective beyond my professional experience.

I am also the father of young children who will grow up drinking Indiana's water, fishing in Indiana's rivers, and enjoying Indiana's lakes. Like every Hoosier, I depend on qualified professionals to protect those resources every day.

The people operating our treatment facilities are often invisible to the public because success means nothing happens—no contamination events, no fish kills, no unsafe drinking water, and no permit violations. That success is built upon education, experience, accountability, and professional certification.

For these reasons, I respectfully encourage IDEM to maintain Indiana's Industrial and Municipal wastewater operator certification requirements while continuing to improve administrative efficiency and workforce development.

Thank you for considering my comments and for your continued commitment to protecting Indiana's environment.

Respectfully,

Aaron Tolliver

Certified Wastewater Operator

President & Co-Owner

Aqua Utility Services, LLC

Indiana Resident

From: [jerry stowers](#)
To: [IDEM Efficiency](#)
Subject: Drinking Water Operator & Wastewater Operator Licensing Requirements
Date: Tuesday, June 30, 2026 11:18:17 AM

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To Whom It May Concern:

I am responding to an email I received concerning licensing requirements for IDEM licenses. I am dual licensed, Drinking Water and Wastewater. Therefore, my comments will apply to both, unless otherwise noted.

I sat for the exams many years ago, a paper exam offered twice a year. I have been involved with other younger people who are attempting to pass the exams at the present time.

I also am in a unique situation in that I have never worked in a municipality, I work in industry with our own wells on site and a discharge permit. I am speaking from that perspective as I write this today.

I recall there being approximately 10% of the questions being math related when I tested, and believe it probably remains somewhat the same today. I saw people struggle with the math portion then and now. Whether that would be a reflection on our educational system is a debate for a different day, and department. But I do think what is pertinent to the testing is it is not embracing technology. The reality of the day is that an operator has to know the math for the testing. But then will not use it after that because today's operator carries a computer in pocket and will ask it for the answer to his or her question.

I also see potential operators struggle with self-study to prepare for the exam. Whether they lack self-discipline or do not have the tools to understand how to self-study, the result is the same. With the present system being able to test at any time of the year, and only a self-imposed testing deadline, I see potential operators pushing back their own deadline rather setting a personal goal. They are under prepared when they take the test. Frankly, I have never really quite understood why to maintain a license you are required x number of hours of continuing education yet are only required time on the job as a requirement to testing. I suspect a state sponsored formal study program being offered and required classroom hours before testing along with a deadline for testing after classroom completion would increase the pass rate on the testing.

I do not believe the testing for the licenses is overly burdensome, an operator of our state water treatment needs to be knowledgeable and competent. Therefore, I believe rather than trying to make the tests easier to pass, the people of our state would be better served if the potential operators were better prepared for examination.

Thank you,

Jerry L. Stowers

From: [Scott Hiner](#)
To: [IDEM Efficiency](#)
Cc: scott_hiner@yahoo.com
Subject: I support IIOA
Date: Tuesday, June 30, 2026 11:48:42 AM
Attachments: [IDEM CERTIFICATION LICENSING RESPONSE \(AWG\).pdf](#)

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I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

Scott Hiner (317)627-0667 scott_hiner@yahoo.com

From: [Jack Buckley](#)
To: [IDEM Efficiency](#)
Date: Tuesday, June 30, 2026 12:13:20 PM
Attachments: [image001.png](#)

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Jack E Buckley

Site Utilitys Manager – Marion Stamping

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From: [Eric Smith](#)
To: [IDEM Efficiency](#)
Subject: IDEM - Feedback on the drinking water and wastewater operator requirements.
Date: Tuesday, June 30, 2026 12:22:22 PM

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Dear Review Committee,

Thank you for the opportunity to provide comments regarding Indiana's Drinking Water and Wastewater Operator licensing requirements.

As someone with many years of experience in both public drinking water operations and industrial wastewater operations, I support maintaining high standards that protect public health and the environment. However, I believe several improvements could make the licensing process more practical while still ensuring qualified operators.

1. Greater Recognition of Responsible Operator Experience

Hands-on experience operating, maintaining, and managing water and wastewater facilities should receive greater consideration toward educational requirements. Many experienced operators perform complex technical work every day involving regulatory compliance, SCADA systems, laboratory sampling, distribution systems, treatment processes, emergency response, reporting, inspections, supervisory responsibilities, and direct interaction with regulatory agencies. This real-world experience develops knowledge and judgment that are directly applicable to protecting public health and the environment.

2. Expand Educational Equivalency Options

Current educational requirements can create barriers for experienced operators who have successfully demonstrated competency over many years. Allowing additional years of documented responsible charge experience to fully substitute for college coursework would recognize the practical knowledge gained through actual facility operation.

I personally believe this is an area worthy of review. Although I have accumulated many years of responsible operational experience in both public drinking water and industrial wastewater, successfully passed Indiana's certification examinations, completed the required continuing education, and maintained compliance with regulatory requirements, I am still required to satisfy additional educational equivalency requirements before reaching full certification eligibility. My experience demonstrates that a knowledgeable operator can gain extensive technical expertise through years of responsible field experience. I respectfully encourage IDEM to consider allowing substantial, documented responsible charge experience, combined with successful examination performance and continuing education, to satisfy educational equivalency requirements for experienced operators.

3. Recognize Complementary Drinking Water and Wastewater Experience

Experience gained while serving in responsible charge of both drinking water and wastewater facilities should be recognized as complementary when evaluating educational equivalency. Although each discipline has its own regulatory requirements, both require operators to demonstrate competency in chemistry, biology, hydraulics, treatment processes, instrumentation and controls, SCADA systems, mechanical and electrical equipment, laboratory sampling, regulatory compliance, emergency response, troubleshooting, and sound operational decision-making.

Operators who have successfully managed responsibilities in both fields develop a broad technical foundation through practical application in two closely related environmental professions. Indiana should consider allowing documented responsible charge experience across both drinking water and wastewater operations to contribute toward satisfying educational equivalency requirements, recognizing that this combined experience often provides knowledge, judgment, and technical competency comparable to formal coursework.

Additionally, operators who have served as Operators in Responsible Charge under Indiana's Distribution System License (DSL) program have demonstrated the ability to safely manage public drinking water systems, supervise system operations, ensure regulatory compliance, oversee infrastructure maintenance, respond to emergencies, and protect public health. These responsibilities require significant technical expertise and accountability and should be recognized as meaningful evidence of competency when evaluating educational equivalency for advanced wastewater certification.

4. Continue Strong Continuing Education Requirements

The continuing education (CEU) program is an effective way to ensure operators remain current on changing regulations, treatment technologies, and industry best practices. Continuing education provides ongoing competency without unnecessarily preventing experienced operators from advancing.

5. Maintain Examination Standards

The certification examinations appropriately verify technical knowledge and should remain an important component of operator certification. Public health depends on competent operators, and rigorous testing helps ensure that competency.

6. Encourage Career Advancement

Indiana should continue encouraging operators to pursue higher certification levels by recognizing both education and progressively responsible work experience. This would help address workforce shortages while maintaining qualified operators throughout the state.

In closing, I believe Indiana should continue protecting public health through strong certification standards while providing greater flexibility for experienced operators who have demonstrated years of successful responsible charge experience. Recognizing documented responsible charge experience in both drinking water and wastewater operations, together with successful examination performance, professional licensure, and continuing education, would acknowledge the substantial technical competency developed through practical application while maintaining the high standards expected of Indiana's certified operators.

This approach would help retain experienced professionals, strengthen Indiana's operator workforce, encourage career advancement, and continue protecting Indiana's drinking water and water resources without compromising the integrity of the certification program.

Thank you for considering these comments and for seeking input from licensed operators throughout Indiana. I appreciate the opportunity to provide feedback and respectfully encourage IDEM to consider these recommendations during its review of the operator certification program.

Sincerely,

Eric Smith

812-639-1676
emmdks5@gmail.com

From: [Eric Diana Wolter](#)
To: [IDEM Efficiency](#)
Subject: Licensing Programs Response
Date: Tuesday, June 30, 2026 1:32:01 PM
Attachments: [IDEM+CERTIFICATION-LICENSING+RESPONSE++\(AWG\).pdf](#)

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I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

Eric Wolter
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ericwolter1@outlook.com
Class IV WW019563
Class D WW019562

From: [Timothy Guedel](#)
To: [IDEM Efficiency](#)
Subject: Cert and Licensing Response
Date: Tuesday, June 30, 2026 1:36:26 PM
Attachments: [image001.png](#)

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[IDEM CERTIFICATION-LICENSING RESPONSE \(AWG\).pdf](#)

I fully support the attached document drafted by Chairman Goodman, and endorsed by the President and Business Manager and IIOA Board of Directors.

Timothy Guedel

Timothy Guedel RIWPhD
Project Manager
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Midwest Environmental Services
Office: (317) 894-8373 | Mobile: (317) 243-1819



From: [Phillip Gover](#)
To: [IDEM Efficiency](#)
Subject: Cert and licensing Response
Date: Tuesday, June 30, 2026 1:38:10 PM
Attachments: [Cert and Licensing response.pdf](#)

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Thank you,

Phillip Gover
Wastewater operator
Midwest Environmental services

From: [John Fujawa](#)
To: [IDEM Efficiency](#)
Subject: Response
Date: Tuesday, June 30, 2026 3:15:42 PM

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I fully support my IIOA Association views in response to IDEMs request.

Thanks,

John Fujawa
574-876-7701

From: [Lauren Nielsen](#)
To: [IDEM Efficiency](#)
Cc: [Brian Harrington](#)
Subject: KERAMIDA Comments on IDEM Professional Licensing
Date: Tuesday, June 30, 2026 7:27:14 PM
Attachments: [keramida-logo-email_5f5d681f-0f6b-4be6-9419-457d16f9e5e7.png](#)
[linkedincopy_1e5652d6-c3a0-4600-90f8-42ce3e0e158e.png](#)
[youtubecopy-transparent_98da15f2-2650-4d90-b0a5-972935898af0.png](#)
[KERAMIDA Comments RE Professional Licensing.pdf](#)

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Please find attached KERAMIDA's response to IDEM's memorandum [seeking input on its professional licensing regulations](#).

Thank you,

Lauren Nielsen, PE
Senior Engineer, Land Services



Global Strategic Advisors
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June 30, 2026

Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204
Attn: Professional Licensing Review
Email: Efficiency@idem.IN.gov

Re: Input on IDEM Professional Licensing Regulations (Executive Order 25-18)
UST Operator (Class A, B, and C) Training and UST Workers Certification Programs

Dear IDEM Professional Licensing Review Team:

KERAMIDA Inc. (KERAMIDA) appreciates the opportunity to respond to the Indiana Department of Environmental Management's (IDEM) request for input on its professional licensing programs under Executive Order 25-18. As an Indianapolis-based environmental consulting firm that works alongside Indiana's regulated community every day, we offer these comments in a spirit of partnership. Our focus is the Underground Storage Tank (UST) Operator certification programs (Class A, Class B, and Class C; IC 13-23-1, 329 IAC 9) and the UST Workers Certification program (IC 13-23-3, 329 IAC 9-10), where we see a meaningful opportunity for IDEM to advance its public health and environmental mission while reducing burden on both the Agency and the businesses it serves.

OVERVIEW

The current statewide licensing review is often framed around removing requirements. We respectfully offer a complementary lens: the most valuable improvements are not always those that make it easier to do business by reducing oversight, but those that make it easier to comply. The operators who run underground storage tank systems, and the workers who service them, want to do the right thing; when training and certification programs equip them to do so, compliance becomes the path of least resistance. In our experience, strengthening and reimagining the UST Operator training and UST Workers Certification programs would produce fewer violations, less extraneous records and paperwork to navigate, smoother and more defensible IDEM inspections, less strain on the Agency's enforcement resources, and greater confidence across the regulated community. We see this review as a timely opportunity to direct attention to two programs that are well positioned for renewal.

DISCUSSION

The Business Case for Investment

Investing in stronger operator and worker training is, at its core, an investment in outcomes that serve IDEM and the regulated community alike. Better-prepared operators and contractors commit fewer violations and arrive at inspections better organized, which allows IDEM's inspections to proceed more quickly, more smoothly, and on a more defensible footing, easing the load on the Agency's enforcement staff. Properly informed owners and operators also save money, because they can request the correct services from their contractors rather than paying for work that is unnecessary or misdirected. Contractors, in turn, expose themselves to less liability and fewer payment disputes over services that were unnecessary or performed by individuals who were not certified to perform them. The benefits even reach beyond the tanks program: for instance, operators who understand their obligations will be less susceptible to solid and hazardous-waste

mismanagement, supporting the work of other IDEM divisions. In short, the most useful question may be less whether these requirements are too strict or not strict enough, and more whether they are doing the work they were designed to do.

Strengthening UST Operator Training (Class A, B, and C)

The Class A and Class B operator training programs and, by extension, the Class C program, represent IDEM's best opportunity in this area. In their current form, they do not yet fully meet the requirements of 40 CFR Part 280, Subpart J, or achieve the federal objective of ensuring that "properly trained individuals operate all regulated UST systems." In practice, the training has come to function largely as a formality: it does not consistently impart current, relevant knowledge, and in places it still references repealed rules and the former role of the Indiana Department of Homeland Security (IDHS).

As described in EPA's 2015 final rule (80 FR 41566; 2015-15914), Class A operator training is intended to teach and evaluate an operator's knowledge and skills to make informed decisions regarding compliance and to determine whether the appropriate individuals are fulfilling the operation, maintenance, and recordkeeping requirements for UST systems. Today, Class A operators frequently defer to maintenance and testing contractors, who are themselves often only modestly better informed on compliance matters. And when systems are found to be out of compliance, the retraining contemplated by 40 CFR 280.244 is not consistently applied; it appears that retraining is waived under the discretion afforded by 40 CFR 280.244(b), though these apparent waivers are not documented in writing. Refreshing the curriculum, aligning it with Subpart J, and ensuring that retraining decisions are recorded would close these gaps and give IDEM a training program it can confidently stand behind.

Modernizing the UST Workers Certification Program

The UST Workers Certification program presents a parallel opportunity. The current requirements are not always clear, and that lack of clarity has real consequences: improperly trained individuals end up providing services to owners and operators who are not themselves well positioned to evaluate that work. The confusion has been significant enough that, until only a few years ago, many workers did not realize certification was required at all, or that different types of work call for different certifications, prompting IDEM to issue Fact Sheet UN0223L to address the widespread uncertainty it had recognized. Even now, many workers do not fully understand the regulations and are not well equipped to advise or support owners and operators on their recordkeeping obligations. Clarifying the certification categories and strengthening the underlying training would directly address the confusion IDEM has already worked to alleviate.

A Clear Path Forward—With Authority and Funding Already in Place

Encouragingly, IDEM already has both the statutory authority and a funding mechanism to act. Indiana Code 13-23-1-3 directs the Department to establish an internet-based operator training program that complies with the federal Energy Policy Act of 2005, and it expressly authorizes the use of the Excess Liability Trust Fund to pay for that program:

IC 13-23-1-3 Operator training program; Internet website

Sec. 3. (a) The department shall establish a training program: (1) on an Internet website; and (2) that complies with the requirements of the federal Energy Policy Act of 2005 (P.L. 109-58).

(b) The department may use the excess liability trust fund to pay expenses related to the training program established under subsection (a).

Because this authority is already in place, modernizing the operator training program need not wait on new legislation or a new appropriation. The statute contemplates precisely the kind of investment described above, and the federal framework offers a ready blueprint for the curriculum. We would be glad to help IDEM think through how the Excess Liability Trust Fund could be applied to a refreshed, web-based program.

KERAMIDA appreciates IDEM's work in undertaking this review and would welcome the opportunity to support the Agency as it considers improvements to these programs. We would be glad to share additional detail, examples from the field, or assistance in developing updated training and certification content. Should you have any questions regarding these comments, please contact us at (317) 685-6600. Thank you for the opportunity to provide input, and for IDEM's continued commitment to the goal at the heart of this program, ensuring that, by having UST owners and operators operate and maintain their systems and have them periodically tested by properly trained and certified people, releases can be prevented to protect human health and the environment.

Sincerely,



Lauren Nielsen, P.E.
Senior Engineer, Land Services
lnielsen@keramida.com

From: [john myers](#)
To: [IDEM Efficiency](#)
Subject: IDEM,s request for licensing programs
Date: Tuesday, June 30, 2026 8:16:31 PM

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I fully support Chairman Goodman and the document drafted and endorsed by the President and Business manager and the IIOA Board of Directors.

My contact information.

John Myers 135 W Dudley Ave Indianapolis In 46217

Phone 317-491-5250

Wastewater operator Certification WW018285

From: [Erika Foo](#)
To: [IDEM Efficiency](#)
Subject: Operator Certification Rule
Date: Tuesday, June 30, 2026 11:02:04 PM
Attachments: [1781205497874-IDEM+CERTIFICATION-LICENSING+RESPONSE++\(AWG\).pdf](#)

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To whom it may concern,

I agree with all the points in this letter, aside from one. I think IDEM should go back to the experience requirements from years past (I'm currently looking at the 2008 manual). I don't and did not agree with IDEM making the experience requirements for Class A-SO, I-SP, I, A, 2, and B easier to achieve a year or two ago. While I understand we have a shortage of operators in this State, certified or not, and it will get worse as time goes on, we can't lower standards to obtain those certifications. This will lead to more individuals in charge of operations that do not have the background to sustain plants, more individuals with certifications that are solely interested in getting paid more, more individuals with very little interest in water or wastewater science, more individuals without the responsible nature to document plant issues and exceedances, and excess pollution.

I do want to double down on the IIOA's comment IDEM could raise their price on certification. When I applied for reciprocity in California, it costs my company \$150 per application. With everything else costing more, I would think IDEM could justify a \$10-20 increase to help the State keep positions funded and/or provide higher salaries/give raises. Maybe it's my ignorance on the subject. I don't know exactly where those certification application funds are funneled to after processing.

Thank you,
Erika Foo



Indiana Industrial Operators Association, Inc., www.iioa.net

RESPONSE TO INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT REQUEST FOR POTENTIAL REGULATION REFORM June 10, 2026

This is a formal response to the request of the Indiana Department of Environmental Management (IDEM) request for information related to Governor Braun's Executive Order 25-18 (Amended) for potential professional regulation reform. It specifically responds to IDEM's Licensing Notice 05.29.26 outlining IDEMS review per I.C. 25-1-16.5-8. IDEM has requested responses for 15 types of licensing. These comments relate to licensing of drinking water and wastewater treatment operators only.

IDEM has outlined input desired relative licenses that are: too strict, overly burdensome, outdated, duplicative, unnecessary, not strict enough or need other improvements. Comments are offered on each of these.

BACKGROUND

These comments are drafted by a 77-year Indiana resident and IN business owner, certified industrial and municipal wastewater operator at highest levels for over 55 years in IN and KY and as Past president of the Indiana Water Environment Association (IWEA) and past president of the international Water Environment Federation (WEF). Currently serving as Chairman of the Board of the Indiana Industrial Operators Association (IIOA). Also, as a licensed Professional Engineer in Indiana and two other states and a IN licensed plumber. Additional related experience includes serving on 5 separate IDEM internal certification review panels, providing over 50 years of operator training courses in multiple states, and providing certification exam technical questions to IDEM for licensing tests.

Currently in Indiana there are approximately 2,863 wastewater (industrial and municipal) certified operators. There are more drinking water operators than wastewater. According to the U.S. Bureau of Labor Statistics, wastewater treatment operators earned a median annual salary of \$49,090 in 2022. The lowest 10 percent earned less than \$31,440, while the highest 10 percent earned more than \$79,620. Higher positions earn significantly more.

RELATED REGULATIONS

As researched by the American Water Works Association (AWWA), in February 1999 Environmental Protection Agency (EPA) published *Final Guidelines for the Certification and Recertification of Operators of Community and Non-Transient Non-Community Public Water* systems which provided nine baseline standards for state operator programs. These included: passing an exam, having a high school diploma or general equivalency diploma (GED), having defined minimum on-the-job experience or training, and establishing training requirements for renewal of certification. EPA left it to each state to develop its own programs.

Response to IDEM request

IDEM is authorized by the Indiana Code to write rules for treatment operators and plants in accordance with IC 13-19-11. The Wastewater Treatment Plants and Operators rule currently defines IDEM's program.

Facility classification

In the majority of cases, the level or grades for operator certification are tied to classification of the system. Below are the AWWA/EPA findings regarding system classification:

Water Treatment

- The majority of classification systems are based on a point scale, with points awarded for size of system, water source, and treatment process types. The amount of points awarded, and the components of the scales vary substantially between states.
- Classification in a few states is based on size alone, or on size and water source (i.e., surface or groundwater).
- Most states have a small or very small system classifications.

Distribution System

- Classification of distribution systems is typically based on the population served.
- A few states classified distribution systems based on complexity (number of pressure zones, etc.).
- The vast majority of states (46 of 50) have separate operator certification requirements for distribution systems.

Wastewater Treatment

- There is much greater variation in how wastewater treatment systems are classified as opposed to water treatment.
- While the majority of system classifications are varied based on complexity of wastewater treatment (e.g., primary, secondary, tertiary levels, and specific unit processes), the rating criteria and point scales varied significantly between states.

RESPONSES TO IDEM'S REQUEST

These specific topics that follow are individually presented as IDEM requested related to operator certification in Indiana:

Unnecessary

In the mid 1970's there was much debate in Indiana about requirements for certification of operators. There were "grandfather" rules incorporated by the State Board of Health (IDEM predecessor) to allow experienced (non-tested) operators to remain at their facilities. If they transferred to a new facility they would need to pass an exam. Most didn't transfer and most all have since retired or passed believing certification was unnecessary.

However, times have changed significantly with current technologies pushing water and wastewater treatment into water recycling, water reuse, water resource recovery, groundwater recharge, direct potable water reuse, nutrient recovery, etc. “Water” now is much more inclusive of drinking water, wastewater, industrial discharges and includes the current “Circular Water Economy” by shifting from the take-use-dispose to a more sustainable approach that maximizes the value of water. Additional emphasis is on stormwater, wetlands, irrigation efficiencies, agricultural runoff and all water-related issues. Federal and state agencies are implementing new regulations for reuse requirements based on new advanced “water” treatment technologies.

All of these systems require technical competence for the operators and especially so in Indiana where we have had significant fish kills (White River) and very large industries that have the potential discharges to upset or pass through the Public Owned Treatment Works (POTW’s). The certified operator in responsible charge of a municipality or industry, as defined by IDEM and the Clean Water Act, is legally responsible for compliance oversight with discharge permits and environmental regulations. Indiana needs and has dedicated professional operators who daily 24-7 take their jobs and protect their certification seriously.

It’s been acknowledged by health professionals and the American Medical Society that advancements in drinking water treatment provided significant reduction in water-related diseases such as typhoid, cholera, cryptosporidiosis, e. coli infections and other diseases. Improper operation of water treatment facilities was recently evident in the Flint, Michigan water crisis.

According to the Center for Disease Control (CDC) *Waterborne Disease in the United States* (May 29, 2025), waterborne diseases affect over 7 million people in the U.S. every year and cost our healthcare system over \$3 billion. It states there are waterborne diseases caused by 17 pathogens. Adequately trained operators are required to protect Hoosiers from these pathogens.

Most all Hoosiers take their drinking water quality for granted. The professional certified operator that makes Indiana water quality “happen” is one of the critical services provided just as important as fire and police protection. However, this unseen protection is not recognized by the general public.

Likewise, the professional certified wastewater operator that protects Indiana water environment that ultimately cleans water for drinking downstream, is as important and necessary as the drinking water operator. The certified industrial operator in Indiana helps protect the downstream POTW from upset or pass-through of metals, chemicals, and other pollutants. Pre-treatment coordinators for municipalities work with the industrial dischargers to enhance overall water quality for discharge to the environment. All of these require talented, qualified, dedicated, experienced and knowledgeable operators. To ensure these requirements are met, certification is the only proven method used by all 50 states. Indiana legislators and policymakers and IDEM should remain committed to supporting certification and advancement of its water professionals.

These are NOT unnecessary programs and requirements. Rather, they are critical professions to protect Hoosiers and our Indiana water environment.

Too strict:

Currently all 50 states require water and wastewater certification for different levels and in some cases different technologies used. Indiana is one of approximately 18 states that require separate industrial wastewater certification from municipal certification. The Indiana certification requirements are not as strict as some states, within other states there are quite a variety of certification levels and categories, however, all have minimum experience and education requirements. Indiana requires, for example, only one certified operator in responsible charge of the entire treatment plant or distribution network, while other states require certification for each of the major unit treatment processes. All states require various education and experience prior to achieving higher levels of certification. Education and experience required by IDEM is not more strict than other states, and less strict than some.

The requirements for certification testing are not restrictive for individuals in Indiana. Indiana uses and informs test applicants of specific reference study materials prior to taking an exam. The exam questions are usually multiple choice and the Associated similar format as the Board of Certification (ABC) exam questions.

ABC is an organization that is attempting to standardize Need-To-Know Criteria (NTKC) and examinations. ABC is a voluntary program. In 2012, ABC published revised NTKC (2017) for water treatment, distribution system, wastewater treatment, and collection system operators. To develop these criteria, ABC went through an extensive process that included a job analysis of more than 1,192 individuals. Job tasks and capabilities needed were identified and ranked based on frequency of performance and seriousness of inadequate or incorrect performance. Results were analyzed by a committee using weighting criteria to determine appropriate material for examination. For essential tasks and required capabilities the knowledge needed and ability to conduct were identified. The level of knowledge (i.e., comprehension, application, analysis) required for each task was also identified. Indiana uses certification exam questions based on the ABC format and questions are varied from a pool of questions to make each exam non-repetitive and tailored to the specific knowledge and expertise required for that certification level. This approach is not more restrictive than other states which also use the ABC format, and in some cases, they only use ABC-based questions. IDEM has had peer review of most all of the questions used on their exams.

Currently Indiana does not require certification for collection system (sewer system) operators/maintenance personnel, nor is certification required for water or wastewater on-site laboratories. There are voluntary certifications available and these are utilized as advancement steps for treatment plant personnel.

Overly Burdensome

As stated above, Indiana does not impose more burdens on either a certification applicant or a renewal applicant than other states. Recently IDEM has moved to using a 3-year renewal cycle for certified operators instead of a 2-year renewal cycle previously used. This allows fewer burdens on training required for renewal of certifications since the longer period of another year allows individuals and/or companies paying for employee training to spread the costs. Effectively, this reduced the cost of the license from \$15/year to \$10/year. The cost of drinking and wastewater license fees in Indiana are much lower than other license fees. The legislature

should be encouraged to adopt a more realistic fee structure that would ensure a fully funded continuance of these critical programs.

In addition, IDEM has partnered with Indiana Vocational Technical College (IVTC) to administer certification exams at their regional campuses on a much more frequent and less costly burden on the operators rather than the previous twice per year exams only being offered in Indianapolis. Exams are digital and graded on-site before the operator leaves allowing for significantly reduced time awaiting the results of the test score.

IDEM has on their website the Operator Certification Rule at 327 IAC 5-23-9 that defines education and experience requirements. This is cited so applicants can understand the various levels required. Also, on IDEM's website is a detailed list and source of 14 study guides and books for the exams including several developed by IDEM staff. A study guide identifies specific sections for various exam levels.

Outdated

Since all 50 states require certification, Indiana is not outdated in this requirement. Also, since exams are prepared specifically for different NTKC and levels of certification, this allows for current technologies to be examined or training for certification renewal to be continuously updated.

IDEM has revised the wastewater rules in 2018 including extending renewal periods to 3 years and allowing for implemented computerized exams at 25 IVTC locations. This methodology is not outdated and actually better than some states still using paper-based exams. This saves the applicants and certified operators, and IDEM costs to administer the previous methodology.

Duplicative

Indiana has 10 wastewater levels of certification and 8 levels of water certification (3 in distribution piping systems and 5 in drinking water treatment plants. As noted previously, these various levels are based on the size of the systems served, capacity of the treatment facilities, technologies used, and type of industries (Ex: gravel pits versus chemical plants).

The basic four wastewater certification levels of municipal (Class I-IV) and industrial (Class A-D) are categorically recognized by employers as a means of advancement within employee compensation. Often not only is certification at a specific level required, but employers offer increased salary or a bonus if additional certification is achieved. These Indiana companies do not believe that there is duplication within IDEM's certification process.

The water and wastewater certification programs are not duplicative within other Indiana licensing programs. For example, neither the Indiana Professional Engineers nor the Indiana Plumber licenses evaluate an operator's knowledge of treatment technologies, techniques, understanding of chemical dosages, bacteriological disinfection procedures, biological treatment processes, etc.

While there are some overlaps of need-to-know within the higher levels of certification about a few lower levels of certification, this is not considered duplicative. It is necessary for the highest level of certification to know smaller systems as well as the more advanced technologies. Another example of non-duplicative programs is the knowledge level for analytical data used on various exams. The lower-level small treatment systems (and often industrial wastewater

plants) frequently do not perform their own laboratory tests, or use less accurate indicative instruments, while the larger systems frequently have their own laboratories and chemists. The levels of knowledge required are tested relative the specific level of certification.

Not strict enough

The IDEM water and wastewater certification and renewal process continues to evolve for the better. Currently the exams and requirements are not too strict for entry or advancement within the Indiana programs. Per IDEM's website, approximately 6-8% of applicants are not approved by IDEM to take the exam. This indicates there is vigorous review of applications by IDEM for the education and experience required. Also, whether an applicant passes or fails is public information.

In addition, to renew their certification, an operator must attend from a minimum of 8 hours up to 30 hours of continuing education at high level certification, within the 3-year renewable period. This is a strict requirement, made more so by the requirement that 70% of the continuing education be obtained from the technical category of IDEM pre-approved continuing education courses. Kentucky for example has 24 hours of continuing education for upper-level certification.

IDEM determinations over the years is that reciprocity with other state operator certificates sometimes does not meet Indiana requirements for the same education and experience. This is not to say that Indiana requirements are too strict, but to indicate other states may not meet the applicable similar certification requirements. Some states only teach training-to-pass-the exam, rather than Indiana's training developed for specific need-to-know for job requirements.

Need other improvements

The Environmental Science reference in January 26, 2026, identified a projected decline of 6% of operators through 2035 with approximately 10,500 openings per year in the U.S. mainly due to retirement and transfers. This places a demand on IDEM to evaluate applicants and develop appropriate level examinations.

In July 2025, the Great Lakes Commission convened over 80 participants from 64 state agencies (including several IDEM managers and certification directors), water/wastewater utilities, trade/professional organizations (Indiana Industrial Operator's Association sponsored two representatives) and educational institutions for a Water Workforce Roundtable workshop in Michigan. Eight states surrounding the Great Lakes were present (IN, IL, OH, WI, MN, PA, MI, NY). The Great Lakes Water Workforce Recommendations were developed for Federal, state and local agencies as well as water-related utilities and professional organizations. The 2-day workshop and subsequent conference calls all predicated on trained operators and current certification requirements in each 8 state. The primary topic was how to engage and train new certified and qualified operators for those retiring and identify current successes or the many organizations participating. The "Gray Tsunami" of older operators facing retirement is concern for training replacements. There are over 50 training options for operators considering on-line, in-class, video conferencing, site conferences and specific training centers. For example: the Indiana Industrial Operators Association offers 8 training courses. IWEA offers many annual seminars and conferences as well.

Response to IDEM request

One of the many recommendations that should be implemented in Indiana is an Advisory Board or Council to assist IDEM in developing Need-to-Know criteria pertinent to specific certification levels. There have been previous intermittent voluntary boards in Indiana, but suggestion of a standing Advisory Council or Board is recommended.

Current IDEM regulation requires a \$30 application fee for examinations and a \$30 certification renewal fee for a 3-year period. IVTC adds a \$45 fee to take the exam at one of their sites. The \$30 fee has not been changed for over 20 years. IDEM should be allowed to increase the application and renewal fee to pay for the program.

Respectfully submitted by:

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REFERENCES:

1. Operator Licensing Requirements Across the United States, American Water Works Association 2018,
<https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fefcnetwork.org%2Fwp-content%2Fuploads%2F2022%2F05%2FAWWA-Operator-Licensing-Requirements-Across-the-United-States.pdf>
2. How to Become a Wastewater Treatment Plant Operator; January 6, 2026;
<https://www.environmentalscience.org/career/wastewater-treatment-operator>
3. Water Quality in Indiana: Wastewater Operator Certification Information, 6-6-2026;
<https://www.in.gov/idem/cleanwater/wastewater-operator-ertification-and-continuing-education/wastewater-certification-information/>
4. Center for Disease Control (CDC) *Waterborne Disease in the United States/Waterborne Disease and Outbreak Surveillance Reporting* (May 29, 2025)
<https://www.cdc.gov/healthy-water-data/watervoreune-disease-in-us/index.html>
5. Great Lakes Water Workforce Workgroup, Final Recommendations, 2026.
<https://www.glc.olrg/wp-content/uploads/GLC-GL-WWF-Recs-2026.pdf>

From: [Woods, Clint \(IDEM Commissioner\)](#)
To: [IDEM Efficiency](#)
Cc: [Anthony, William H](#); [Stuckey, Matt \(IDEM\)](#); [Mettler, Martha Clark](#); [Higginbotham, Paul](#)
Subject: Fwd: Licensing Requirements
Date: Tuesday, July 7, 2026 12:38:38 PM
Attachments: [image001.png](#)

Clint
IDEM

Begin forwarded message:

From: Jason Lenz <jlenz@creekrun.com>
Date: July 7, 2026 at 12:17:31 PM EDT
To: "Woods, Clint (IDEM Commissioner)" <ClintWoods@idem.in.gov>
Cc: "Rennaker, Colleen" <CoRennak@idem.in.gov>, "Tomes, Tracy" <TTomes@idem.in.gov>
Subject: Licensing Requirements

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Commissioner,

I wanted to respond to your request regarding the licensing requirements. I am only commenting on licenses that individuals within are company hold, including me. I will state that I do not think in most cases the testing requirements are adequate nor do I believe the continuing education requirements are adequate. They need to be intensified to keep the industry as professional as possible.

UST(s) – Stricter requirements to achieve all licenses and to keep the licenses. Ohio used to have 8 hours of annual continuing education, now it is every two years and requires the instructor to be licensed by the state. Consider a license that encapsulates all disciplines for UST. If and when a license is pulled document the reason and publicize it so that others with a license can learn from the infraction.

Wastewater – Stricter protocols for obtaining and maintaining a license. We have found relevant and applicable continuing education requirements problematic.

Water Well – Stricter protocols for obtaining and maintaining a license. Again – is there a way IDEM can help establish relatable, relevant, and applicable continuing education requirements?

Asbestos – We have a request from one of our team members to increase the deadline for the renewal process. And we wish to continue the argument for a more robust licensing requirement and continuing education.

I hope this helps. I would be glad to sit down with you and discuss and/or help with a protocol on continuing education requirements. Anything I can do to help – just let me know.

Jason



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Site Closures/NFAs = 367

“Many times I’ve often prayed – in the darkness of my night – in the brightness of my day.”

Bob Dylan