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From: Ross, Mike <Mike.Ross@jacobs.com>
Sent: Monday, October 19, 2026 2:08 PM
To: Public Comment
Cc: Randy Harper (rharper@sautech.edu); Sarah Pierce (adpce.ad)
Subject: Comments for revisions to 8 CAR part 22

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I am a current wastewater operator and have held an Arkansas class IV license since 1991. I am also an adjunct instructor for the Arkansas Environmental Academy for the past 15 years, teaching all four levels of wastewater classes.

I have the following questions, primarily for clarifications.

1. 8 CAR 22-302: Requirements and classifications...
 - Parts (c) (2), (d) (2), and (e) (2): For the Class II, III and IV licenses the new language include "...including Class I, II and III courses" (according to license level sought). My concern is how this affects an operator who was granted reciprocity for a license. For example, if the operator was granted a class II license by reciprocity, this new language seems to imply that they would have to take the Arkansas class I and class II courses in addition to the Class III course to receive a class III license (assuming other requirements are met). Previously I don't think this was required. Is this the intent of the changes, or is there another section where reciprocity waives this requirement?
2. 8 CAR 22-403: Training Requirements
 - Parts (a) (1) (B)(iii) and (iv): the new language limits the number of times lower level courses can be used towards renewal hours. Does this limitation apply only to the two year license renewal interval, or is it for the "lifetime" of the license holder? Also the term "higher license classificaitons" should be distinguished (II, III, and IV)
 - Parts (a) (1) (C): removes language regarding district meetings. Is this removal because the language is redundant or has there been a change in how district meeting hours are considered for training requirements?
 - Parts (b) (1) (A): The removal of "General education classes" and replacement with "Directly applicable..." seems to imply that no other college courses would be eligible for any credit, is this the intent?
3. 8 CAR 22-309: Operator employment reporting...
 - Part (b): The new language requires reporting a change in employment "at a wastewater treatment plant". Some cities have more than one treatment plant. If an operator is assigned to a different plant does this trigger a reporting requirement? Similarly if an operator is transferred to the collection system crew is this also a reporting requirement?

As an instructor I have found that wastewater courses are usually the only time that operators become aware of any requirements other than renewal and permit limits. So I am requesting these clarifications to better educate operators in future classes.

Thanks,

Mike Ross

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