

## Paula Wilson

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**From:** Tyler Fortunati  
**Sent:** Wednesday, January 13, 2016 10:11 AM  
**To:** Paula Wilson  
**Subject:** FW: Negotiated Rulemaking: Service Provider

**From:** Steve or PaRee Godsill [<mailto:everlastingcp@hotmail.com>]  
**Sent:** Tuesday, January 12, 2016 12:03 PM  
**To:** Tyler Fortunati  
**Subject:** Negotiated Rulemaking: Service Provider

Hi Tyler,

I have given a lot of thought to the service provider rulemaking and have a few comments and questions. The two things I would like to address is the education and training requirements for Service Providers as well as the increase in expenses for our company.

I view the intended Service Provider as more of an "Operator". I have found the educational opportunities thru DEQ regarding wastewater operations very helpful and an excellent source of education for our specialized industry. The classes I attended were also attended by certified wastewater operators and other individuals interested in providing service to ATU's. I believe the protection of Idaho's groundwater would be better served by a service provider that has attended "Operator" classes. An operator has a better understanding of overall wastewater treatment. It is imperative that a service provider understand wastewater treatment. I agree that a Complex Installer is better than a Basic installer as a service provider, but I do not agree that a Service Provider should also be a Complex Installer.

As the Norweco distributor, we intend to train and certify service providers for our technology. We want our technology to be maintained as required by the manufacturer. The requirement for a service provider to have manufacturer training is necessary especially with the 90% compliance expectation. We have found that many of the complex installers are not interested in becoming certified service providers. This will likely not change with the new rulemaking. I would encourage DEQ to look at expanding the ways to become a service provider. A service provider must know how to evaluate effluent, just knowing how to install is not enough. Service providers must know how to evaluate system use. By removing the requirement to be a complex installer, we could solicit Operators currently licensed in the State. This would give us a larger base to find qualified service providers.

It was suggested by property owners that a plethora of service providers would bring the "cost" of service down. This is not an accurate statement for our company. We are currently \$80 below the national average for our technology. The cost to provide service will go up due to the required permits and bond amount. We are not installers. We do not intend to ever install. We are not required to have a complex installer license or a bond at this time as a service provider. Our company will have new expenses associated with the intended changes. A \$15,000 bond is an unreasonable amount for a service provider. A smaller bond, similar to what plumbers have, is a good alternative that costs less, while providing the property owner the assurances the rulemaking intended. We have General Liability Insurance and other policies as suggested by our agent. Errors and Omissions insurance is imperative for a service provider that monitors and reports to DEQ.

It is my opinion that it would be easier to separate the Service Provider Permit from the Installers altogether. I think this was discussed briefly at a TGC meeting, but haven't went back to review all the meeting minutes. This email is not intended as Public Comment regarding the negotiated rulemaking, just more of an inquiry at the possibility of separating the permits. Please feel free to share my email with whomever you choose for their

thoughts or position. Depending on your response I may choose to make public comment. Thanks for your work to make this program functional; It is appreciated.

Best regards,

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