



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
WATER

October 15, 2001

**MEMORANDUM**

**SUBJECT:** Annual Submittal Contents for State Operator Certification Programs

**FROM:** William R. Diamond, Director /s/  
Drinking Water Protection Division

**TO:** Drinking Water Program Directors  
Regions I-X

I am writing to forward recommended *Annual Submittal Contents for State Operator Certification Programs*. The recommended submittal contents were developed at the request of states, and are based on input from states and your staff. Submittal contents expand upon the *Final Guidelines for the Certification and Recertification of the Operators of Community and Nontransient Noncommunity Public Water Systems* (Guidelines).

The Guidelines include a provision for states to annually submit “documentation and evaluation of ongoing program implementation.” We will use the submittals to ensure that each state’s program continues to meet the requirements of the Guidelines. Attachment 1 clarifies the types of information that we anticipate receiving in annual state submissions.

If you have questions or comments, please call me or contact Jenny Jacobs of my staff at (202) 260-2939.

Attachment

cc: Operator Certification Coordinators, Regions I-X  
Association of State Drinking Water Administrators

## Recommended Operator Certification Annual Submittal Reporting Requirements

1. **Authorization:** A new Attorney General's certification is not necessary unless a state makes statutory and/or regulatory changes to its program.
2. **Classification of Systems, Facilities, and Operators:** The total number of systems in the state that are required to have a certified operator and the number of systems without an Operator in Responsible Charge (ORC). This could include a brief discussion of how a state is working with those systems to obtain a certified operator. For states that have added systems that are required to have a certified operator because of EPA's Guidelines, this could include a brief discussion of the progress the state has made working with those systems to obtain a certified operator. Information on how the state is implementing its "provisional" or "temporary" certification options could also be included.
3. **Operator Qualifications:** For states are using the grandparenting option, a brief discussion on the progress that is being made. For example, how many systems are eligible for grandparenting and how many of those systems' operators are certified?
4. **Enforcement:** A brief description of any actions taken against system owners and operators.
5. **Certification Renewal:** A brief description of the state's training program, including any suggestions under consideration or changes that will be made based on stakeholder input and program review.
6. **Resources Needed to Implement the Program:** Any major changes in program resources, including an update on development of new databases, etc.
7. **Stakeholder Involvement:** A brief discussion on any type of stakeholder meetings or board meetings that were held during the reporting period.
8. **Program Review:** A brief discussion on any program review that was held during the reporting period and the outcome of the review.
9. **Implementation Schedule Update:** A brief discussion on progress that is being made on newly implemented segments of the program.